Appendix F

Greenhouse Gas Report

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Greenhouse Gas Emissions Assessment

525 South Virgil Avenue Project

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TABLE OF CONTENTS

1.0 INTRODUCTION 1

1.1 Project Location 1
1.2 Project Description 1
1.3 Open Space and Landscaping 2
1.4 Site Security 2
1.5 Sustainability Features 2
1.6 Anticipated Construction Schedule 2

2.0 ENVIRONMENTAL SETTING 7

2.1 Greenhouse Gases and Climate Change 7

3.0 REGULATORY SETTING 10

3.1 Federal 10
3.2 State of California 13
3.3 Regional 23
3.4 Local 24

4.0 SIGNIFICANCE CRITERIA AND METHODOLOGY 27

4.1 Thresholds and Significance Criteria 27
4.2 Methodology 28

5.0 IMPACT ANALYSIS 37

5.1 Greenhouse Gas Emissions 37
5.2 Greenhouse Gas Reduction Plan Compliance 39
5.3 Cumulative Setting and Impacts 48

6.0 REFERENCES 49

Figures

Figure 1: Regional Vicinity 4
Figure 2: Local Vicinity Map 5
Figure 3: Project Site Plan 6

Tables

Table 1: Description of Greenhouse Gases 8
Table 2: Construction-Related Greenhouse Gas Emissions 37
Table 3: Operational Project Greenhouse Gas Emissions 39
Table 4: 2024 Regional Transportation Plan/Sustainable Communities Strategy Consistency 42
Table 5: Green New Deal Consistency 45

Appendices

Appendix A: Greenhouse Gas Emissions Modeling Data

LIST OF ABBREVIATED TERMS

ACC	Advanced Clean Car
ACF	Advanced Clean Fleets
ACT	Advanced Clean Trucks
ADA	Americans with Disabilities Act
AB	Assembly Bill
BTU	British thermal unit
BAU	Business-as-usual
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resource Board
CCR	California Code of Regulations
CalEEMod	California Emissions Estimator Model
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CalGEM	California Geologic Energy Management Division
CALGreen Code	California Green Building Standards Code
CNRA	California Natural Resources Agency
CPUC	California Public Utilities Commission
CRNA	California Natural Resources Agency
CO_2	Carbon dioxide
CO_2e	Carbon dioxide equivalent
CFC	Chlorofluorocarbon
CAA	Clean Air Act
CAP	Climate action plan
CAFE	Corporate average fuel economy
cy	Cubic yard
EV	Electric Vehicle
EDFZ	Electricity Demand Forecast Zone
EMFAC	EMission FACtor
EO	Executive Order
Gt	Gigatonnes
GWP	Global warming potential
LUCI	Governor's Office of Land Use and Climate Innovation
OPR	Governor's Office of Planning and Research
GHG	Greenhouse gas
HVAC	Heating, ventilation, and air conditioning
HCFC	Hydrochlorofluorocarbon
HFC	Hydrofluorocarbon
LADOT	Los Angeles Department of Transportation
LAGBC	Los Angeles Green Building Code
LAMC	Los Angeles Municipal Code
LCFS	Low Carbon Fuel Standard
CH_4	Methane

$MTCO_2e$	Metric tons of carbon dioxide equivalent
mpg	Miles per gallon
$MMTCO_2e$	Million metric tons of carbon dioxide equivalent
NHTSA	National Highway Traffic Safety Administration
NWL	Natural and working lands
NF_3	Nitrogen trifluoride
N_2O	Nitrous oxide
PFC	Perfluorocarbon
RPS	Renewable Portfolio Standard
SAFE	Safer Affordable Fuel-Efficient
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCAG	Southern California Association of Government
Sf	Square feet or foot
SF_6	Sulfur hexafluoride
TAC	Toxic air contaminants
U.S.	United States
U.S. EPA	United States Environmental Protection Agency
VMT	Vehicle miles traveled
VOC	Volatile organic compound
ZEV	Zero-emission vehicle

1.0 INTRODUCTION

This report documents the results of a Greenhouse Gas Emissions Assessment completed for the 525 South Virgil Avenue Project ("Project" or "proposed Project"). This Greenhouse Gas Emissions Assessment evaluates the potential construction and operational emissions of greenhouse gases (GHGs) associated with the Project and determines the level of impact the Project's GHG 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, 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.

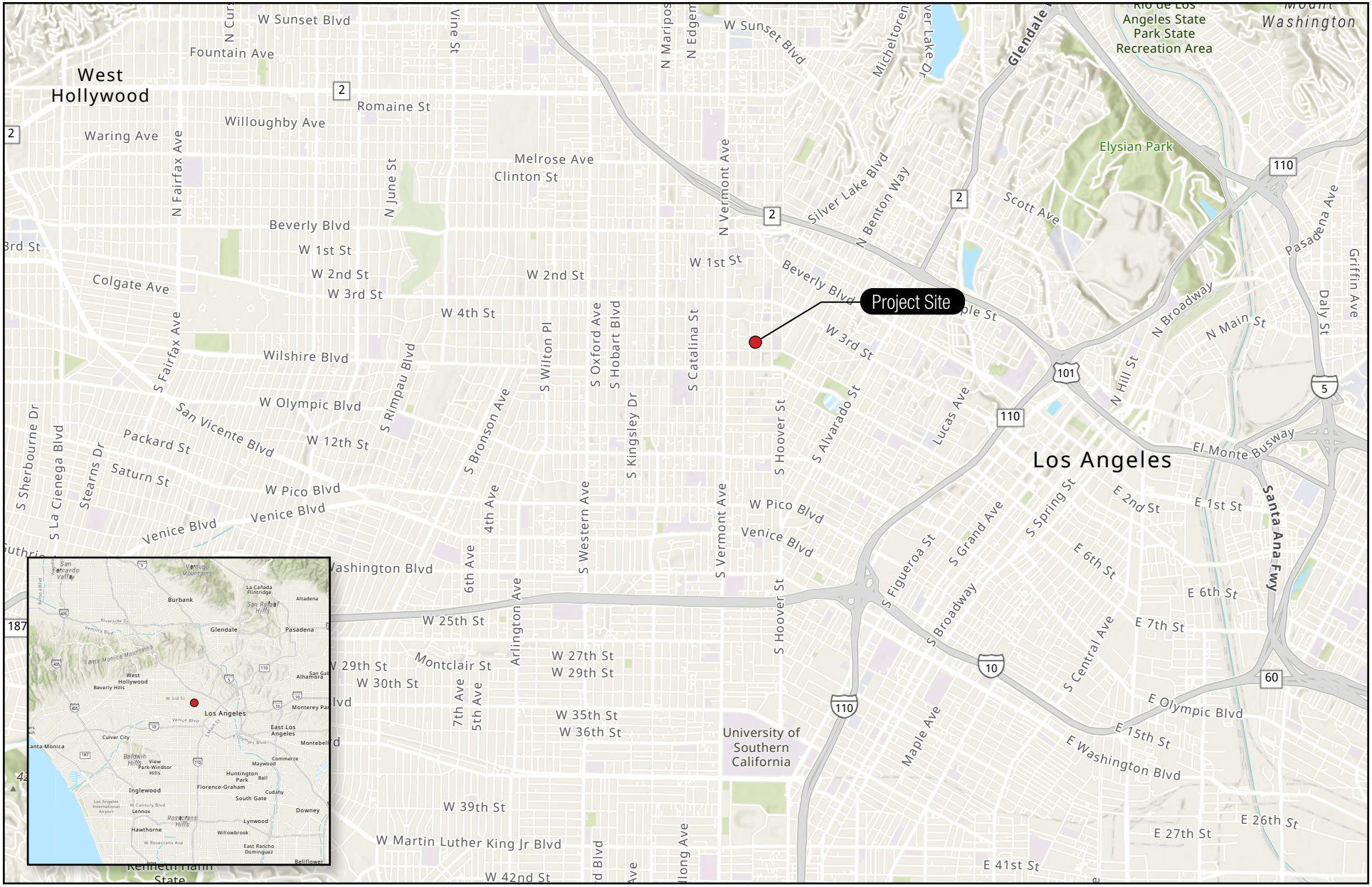
1.5 Sustainability Features

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.

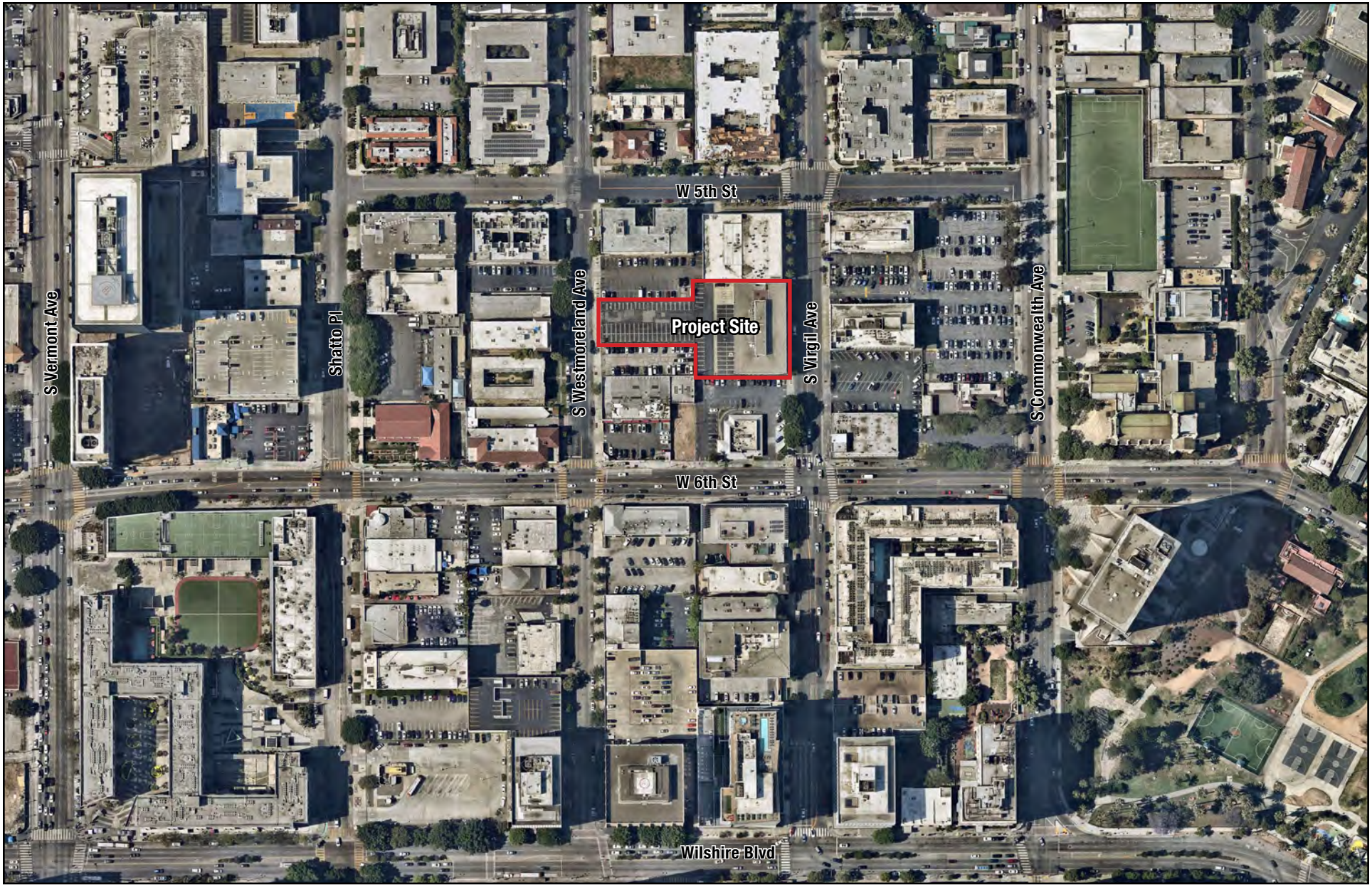


SOURCE: ArcGIS Pro, 2025

FIGURE 1: Regional Vicinity Map

525 SOUTH VIRGIL AVENUE PROJECT

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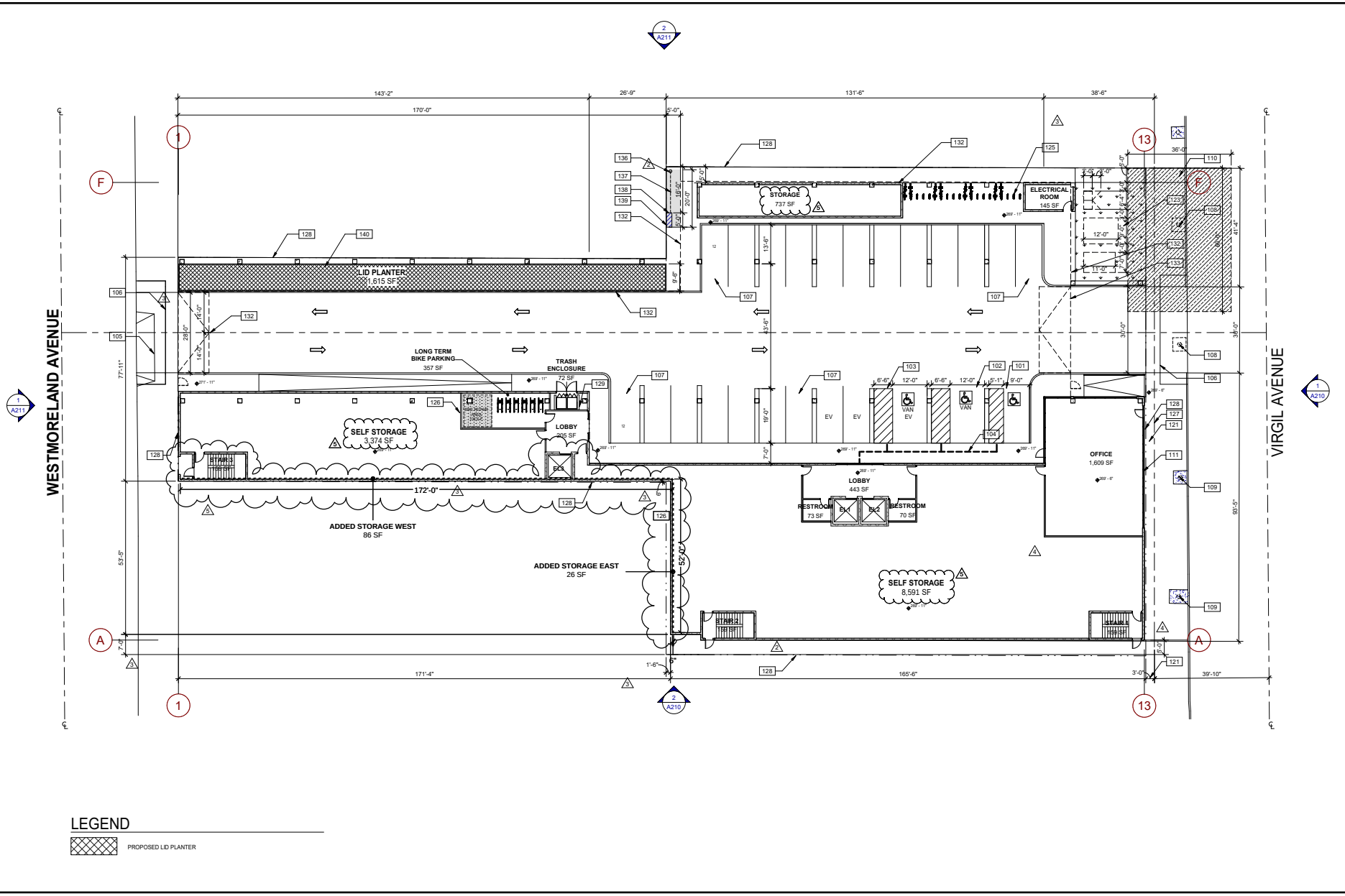


SOURCE: Nearmap, 2025

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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2.0 ENVIRONMENTAL SETTING

2.1 Greenhouse Gases and Climate Change

Certain gases in the Earth's atmosphere classified as GHGs play a critical role in determining the Earth's surface temperature. Solar radiation enters the Earth's atmosphere from space. A portion of the radiation is absorbed by the Earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the Earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as and contribute to the greenhouse effect, which is responsible for maintaining a habitable climate on Earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change.[1] Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3); however, it is noted that these gases are usually associated with refrigerants, aerosol propellants, foam blowing agents, solvents, fire retardants, and a variety of industrial processes such as aluminum and semiconductor manufacturing and not with typical land use development.[2] Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of a GHG molecule is dependent on multiple variables and cannot be pinpointed, consistently since the late 19th century, more CO_2 has been emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms of carbon sequestration. Of the total annual human-caused CO_2 emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO_2 emissions remains stored in the atmosphere.[3]

Table 1: Description of Greenhouse Gases describes the primary GHGs attributed to global climate change.

[1] United States Environmental Protection Agency, Overview of Greenhouse Gases, 2025, https://www.epa.gov/ghgemissions/overview-greenhouse-gases. Accessed November 25, 2025.
[2] United States Environmental Protection Agency, Fluorinated Gas Emissions, https://www.epa.gov/ghgemissions/fluorinated-gas-emissions#sources. Accessed November 25, 2025.
[3] Intergovernmental Panel on Climate Change, Climate Change 2013: The Physical Science Basis, page 467, 2013, https://www.ipcc.ch/site/assets/uploads/2018/02/WG1AR5_all_final.pdf. Accessed October 21, 2025.

Table 1: Description of Greenhouse Gases	
GHG	**Description**
Carbon Dioxide (CO_2)	CO_2 is a colorless, odorless gas that is emitted naturally and through human activities. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood. The largest source of CO_2 emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. The atmospheric lifetime of CO_2 is variable because it is readily exchanged in the atmosphere. CO_2 is the most widely emitted GHG and is the reference gas (GWP of 1) for determining GWPs for other GHGs.
Nitrous Oxide (N_2O)	N_2O is largely attributable to agricultural practices and soil management. Primary human-related sources of N_2O include agricultural soil management, sewage treatment, combustion of fossil fuels, and adipic and nitric acid production. N_2O is produced from biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N_2O is approximately 120 years. The GWP of N_2O is 298 times that of CO_2 (1 ton of N_2O is 298 $MTCO_2e$).
Methane (CH_4)	CH_4, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. CH_4 is the major component of natural gas, about 87 percent by volume. Human-related sources include fossil fuel production, animal husbandry, rice cultivation, biomass burning, and waste management. Natural sources of CH_4 include wetlands, gas hydrates, termites, oceans, freshwater bodies, non-wetland soils, and wildfires. The atmospheric lifetime of CH_4 is about 12 years and the GWP is 25.
Hydrofluorocarbons (HFCs)	HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is increasing, as the continued phase out of CFCs and HCFCs gains momentum. The 100-year GWP of HFCs range from 124 for HFC-152 to 14,800 for HFC-23.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Two main sources of PFCs are primary aluminum production and semiconductor manufacturing. GWPs range from 6,500 to 9,200.
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane with chlorine and/or fluorine atoms. They are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. The Montreal Protocol on Substances that Deplete the Ozone Layer prohibited their production in 1987. GWPs for CFCs range from 3,800 to 14,400.
Sulfur Hexafluoride (SF_6)	SF_6 is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas. The GWP of SF_6 is 23,900.
Hydrochlorofluorocarbons (HCFCs)	HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, HCFCs are subject to a consumption cap and gradual phase

Table 1: Description of Greenhouse Gases	
GHG	**Description**
	out. The United States is scheduled to achieve a 100 percent reduction to the cap by 2030. The 100-year GWPs of HCFCs range from 90 for HCFC-123 to 1,800 for HCFC-142b.
Nitrogen Trifluoride (NF_3)	NF_3 was added to Health and Safety Code § 38505(g)(7) as a GHG of concern. This gas is used in electronics manufacture for semiconductors and liquid crystal displays. It has a high GWP of 17,200.
GHG = greenhouse gas; GWP = global warming potential; $MTCO_2e$ = metric tons of CO_2 equivalents	
Source: Compiled from United States Environmental Protection Agency, Overview of Greenhouse Gases, 2018, https://www.epa.gov/ghgemissions/overview-greenhouse-gases. Accessed October 21, 2025; United States Environmental Protection Agency, Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016, 2018, https://www.epa.gov/sites/default/files/2018-01/documents/2018_complete_report.pdf. Accessed December 1, 2025; Intergovernmental Panel on Climate Change, Climate Change 2007: The Physical Science Basis, 2007, https://www.ipcc.ch/site/assets/uploads/2018/05/ar4_wg1_full_report-1.pdf. Accessed December 1, 2025; National Research Council, Advancing the Science of Climate Change, 2010; United States Environmental Protection Agency, Methane and Nitrous Oxide Emission from Natural Sources, 2010.	

3.0 REGULATORY SETTING

Recent federal actions have introduced uncertainty regarding the future of vehicle emission regulations in California. Historically, California has exercised authority under Clean Air Act (CAA) Section 209(b) waivers to implement more stringent GHG and zero-emission vehicle (ZEV) standards than federal requirements. However, the revocation of California's Federal CAA waivers and the adoption of House Joint Resolutions 87, 88, and 89 – which disapprove key federal rules supporting state-level emission programs – create ambiguity about the enforceability and continuity of these standards.

If these revocations and resolutions remain in effect, California may lose its ability to mandate advanced vehicle technologies and stricter GHG limits, potentially delaying fleet electrification and reducing anticipated emission reductions. Conversely, ongoing litigation and potential regulatory reversals could restore California's authority, but the timing and outcome remain uncertain. This regulatory instability complicates long-term projections of transportation-related GHG emissions and may affect assumptions regarding compliance pathways for projects subject to state and regional climate goals.

In response, CARB adopted the Emergency Vehicle Emissions Regulation to ensure that certain antecedent regulations (displaced by Advanced Clean Cars (ACC) II and Omnibus) remain operative (as previously adopted) with the caveat that CARB may enforce ACC II and Omnibus, to the extent permitted by law, in the event a court of law holds invalid the resolution purporting to disapprove those waivers.

3.1 Federal

To date, national standards have not been established for nationwide GHG reduction targets, nor have any federal regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level. Various efforts have been promulgated at the federal level to improve fuel economy and energy efficiency to address climate change and its associated effects.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, requires the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks (see Federal Vehicle Standards, below for further discussion of NHTSA rule-making).
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy

efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

On April 9, 2025, President Trump signed an executive order (EO) calling for the sunset of various environmental regulations. The order affects pieces of several keystone energy and environmental legislation, including the Energy Independence and Security Ace of 2007.

United States Environmental Protection Agency Endangerment Finding

The United States Environmental Protection Agency's (U.S. EPA) authority to regulate GHG emissions stems from the United States (U.S.) Supreme Court decision in *Massachusetts v. EPA,* 549 U.S. 497 (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Federal CAA and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the U.S. EPA finalized an endangerment finding in December 2009. Based on scientific evidence, it found that six GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing Federal CAA and U.S. EPA's assessment of the scientific evidence that form the basis for the U.S. EPA's regulatory actions.

Federal Vehicle Standards

In response to the U.S. Supreme Court ruling discussed above, EO 13432 was issued in 2007 directing the U.S. EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and in 2010, the U.S. EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012 through 2016.

In 2010, an Executive Memorandum was issued directing the Department of Transportation, Department of Energy, U.S. EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the U.S. EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017 through 2025 light-duty vehicles. The proposed standard is projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 mpg if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017 through 2021.

On January 12, 2017, the U.S. EPA finalized its decision to maintain the current GHG emissions standards for model years 2022 through 2025 cars and light trucks. In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the U.S. EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014 through 2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the U.S. EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by six to 23 percent over the 2010 baselines.

In August 2016, the U.S. EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program

will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program.

In 2018, the President and the U.S. EPA stated their intent to halt various federal regulatory activities to reduce GHG emissions, including the phase two program. California and other states have stated their intent to challenge federal actions that would delay or eliminate GHG reduction measures and have committed to cooperating with other countries to implement global climate change initiatives.

On September 27, 2019, the U.S. EPA and the NHTSA published the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program." (84 Fed. Reg. 51,310 (September 27, 2019).) The Part One Rule revokes California's authority to set its own GHG emissions standards and set ZEV mandates in California.

On March 31, 2020, the U.S. EPA and NHTSA finalized rulemaking for SAFE Part Two which sets CO_2 emissions standards and corporate average fuel economy (CAFE) standards for passenger vehicles and light duty trucks, covering model years 2021 through 2026. The U.S. EPA repealed SAFE Rule Part One, effective January 28, 2022, and is reconsidering Part Two.

In December 2021, the U.S. EPA finalized federal GHG emissions standards for passenger cars and light trucks for model years 2023 through 2026. These standards are the strongest vehicle emissions standards ever established for the light-duty vehicle sector and are based on an assessment of current and future technologies. The updated standards will result in avoiding more than 3 billion tons of GHG emissions through 2050[4] and are on track for the launch of U.S. EPA's next phase of standards for model years 2027 and beyond.

As of April 1, 2022, the CAFE standards require an industry-wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026. The new CAFE standards for model year 2024 through 2026 reduces fuel use by more than 200 billion gallons through 2050, as compared to continuing under the old standards.[5]

On June 7, 2024, the NHTSA announced the final rule for passenger cars and light trucks for model years 2027 through 2031, which strengthened previous emission standards and proposed an industry-wide fleet average of approximately 50.4 mpg in model year 2031. The new CAFE standards for model years 2027 through 2031 would reduce fuel use by 70 billion gallons through 2050.[6]

In response to President Trump's "Unleashing American Energy" EO, published on January 20, 2025, the U.S. EPA announced its intention to reconsider regulations and actions that rely on the

[4] United States Environmental Protection Agency, Final Rule to Revise Existing National GHG Emissions Standards for Passenger Cars and Light Trucks Through Model Year 2026, 2021, https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-revise-existing-national-ghg-emissions. Accessed October 21, 2025.

[5] National Highway Traffic Safety Administration, USDOT Announces New Vehicle Fuel Economy Standards for Model Year 2024-2026. 2022, https://www.nhtsa.gov/press-releases/usdot-announces-new-vehicle-fuel-economy-standards-model-year-2024-2026. Accessed October 21, 2025.

[6] National Highway Traffic Safety Administration, Corporate Average Fuel Economy, https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy. Accessed October 21, 2025.

Endangerment Finding on March 12, 2025. This includes the CAFE standards. On June 6, 2025, the NHTSA published an interpretive rule that establishes the NHTSA's authority to revise the CAFE standards without consideration of electrical vehicles. Therefore, implementation of these standards remains uncertain.

3.2 State of California

California Air Resources Board

The California Air Resources Board (CARB) is responsible for the coordination and oversight of State and local air pollution control programs in California. Various statewide and local initiatives to reduce California's contribution to GHG emissions have raised awareness about climate change and its potential for severe long-term adverse environmental, social, and economic effects. California is a significant emitter of carbon dioxide equivalents (CO_2e) in the world and produced 360.4 gross million metric tons of CO_2e ($MMTCO_2e$) in 2023.[7] In the State, the transportation sector is the largest emitter of GHGs, followed by industrial operations such as manufacturing and oil and gas extraction.[8]

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation, such as the landmark Assembly Bill (AB) 32, *California Global Warming Solutions Act of 2006*, was specifically enacted to address GHG emissions. Other legislation, such as Title 24 Building Efficiency Standards and Title 20 Appliance Energy Standards, were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions. This section describes the major provisions of the legislation.

CARB Scoping Plan

Overview. CARB adopted the Scoping Plan to achieve AB 32 goals. The Scoping Plan and its updates establish an overall framework for the measures that would be adopted to reduce California's GHG emissions. CARB determined that achieving the 1990 emissions level would require a reduction of GHG emissions of approximately 29 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as "business-as-usual" [BAU]).[9] The Scoping Plan and its updates evaluate opportunities for sector-specific reductions, including the transportation sector, integrates early actions and additional GHG reduction measures by both CARB and the State's Climate Action Team, identifies additional measures to be pursued as regulations, and outlines the adopted role of a cap-and-trade program, which is discussed below.[10] Additional development of these measures and adoption of the appropriate regulations occurred through the

[7] California Air Resources Board, Current California GHG Emissions Inventory Data, 2025, https://ww2.arb.ca.gov/ghg-inventory-data. Accessed December 1, 2025.

[8] California Air Resources Board, Current California GHG Emissions Inventory Data, 2025, https://ww2.arb.ca.gov/ghg-inventory-data. Accessed December 1, 2025.

[9] CARB defines BAU in its Scoping Plan as emissions levels that would occur if California continued to grow and add new GHG emissions but did not adopt any measures to reduce emissions. Projections for each emission-generating sector were compiled and used to estimate emissions for 2020 based on 2002–2004 emissions intensities. Under CARB's definition of BAU, new growth is assumed to have the same carbon intensities as was typical from 2002 through 2004.

[10] The Climate Action Team, led by the secretary of the California Environmental Protection Agency, is a group of State agency secretaries and heads of agencies, boards, and departments. Team members work to coordinate statewide efforts to implement global warming emissions reduction programs and the State's Climate Adaptation Strategy.

end of 2013. The following includes an overview of key Scoping Plan elements, including the latest 2022 Scoping Plan.

Key Scoping Plan elements and its updates include:

- Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards.
- Achieving a statewide renewables energy mix of 33 percent by 2020.
- Developing a California cap-and-trade program that links with other programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions (adopted in 2011).
- Establishing targets for transportation-related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets (several sustainable community strategies have been adopted).
- Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, heavy-duty truck measures (amendments to the Pavley Standard adopted 2009; ACC standard adopted 2012), goods movement measures, and the Low Carbon Fuel Standard (LCFS) adopted 2009.
- Creating targeted fees, including a public goods charge on water use, fees on gases with high global warming potential, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.
- The California Sustainable Freight Action Plan was developed in 2016 and provides a vision for California's transition to a more efficient, more economically competitive, and less polluting freight transport system. This transition of California's freight transport system is essential to supporting the State's economic development in coming decades while reducing pollution.
- CARB's Mobile Source Strategy demonstrates how the State can simultaneously meet air quality standards, achieve GHG emission reduction targets, decrease health risk from transportation emissions, and reduce petroleum consumption over the next fifteen years. The Mobile Source Strategy includes increasing ZEV buses and trucks.

The following revisions to the CARB Scoping Plan are provided chronologically.

Updated BAU Estimates and Inventory Forecasts. In 2012, CARB released revised estimates of the expected 2020 emissions reductions.[11] The revised analysis relied on emissions projections updated in light of current economic forecasts that accounted for the economic downturn since 2008, reduction measures already approved and put in place relating to future fuel and energy demand, and other factors. This update reduced the projected 2020 emissions from 596 $MMTCO_2e$ to 545 $MMTCO_2e$. The reduction in forecasted 2020 emissions means that the revised BAU reduction necessary to achieve AB 32's goal of reaching 1990 levels by 2020 was adjusted to 21.7 percent, down from 29 percent. CARB also provided a lower 2020 inventory forecast that incorporated State-

[11] California Air Resources Board, Status of Scoping Plan Recommended Measures, page 1, https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/sp_measures_implementation_timeline.pdf. Accessed December 1, 2025.

led GHG emissions reduction measures already in place. When this lower forecast is considered, the necessary reduction from business-as-usual needed to achieve the goals of AB 32 is approximately 16 percent.

2014 Scoping Plan Update**.** In 2014, CARB adopted the first major update to the Scoping Plan.[12] The updated Scoping Plan summarizes the most recent science related to climate change, including anticipated impacts to California and the levels of GHG emissions reductions necessary to likely avoid risking irreparable damage. It identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32.

Senate Bill 32. In 2016, the Legislature passed Senate Bill (SB) 32, which codifies a 2030 GHG emissions reduction target of 40 percent below 1990 levels and is discussed further below. With SB 32, the Legislature passed companion legislation, AB 197, which provides additional direction for developing the Scoping Plan. Two major updates to the Scoping Plan have occurred since the passing of SB 32 and AB 197 and are discussed further below.

CARB 2017 Scoping Plan. On December 14, 2017, CARB adopted a second update to the Scoping Plan.[13] The 2017 Scoping Plan details how the State will reduce GHG emissions to meet the 2030 target set by EO B-30-15 and codified by SB 32; EO B-30-15 is discussed further below. Other objectives listed in the 2017 Scoping Plan are to provide direct GHG emissions reductions; support climate investment in disadvantaged communities; and support other federal actions. Key elements from the 2017 Scoping Plan update include:

- The California Sustainable Freight Action Plan aims to have 25 percent improvement of freight system efficiency by 2030 through the deployment of over 100,000 freight vehicles and equipment capable of zero-emission operation and maximizing near-zero-emission freight vehicles and equipment powered by renewable energy.
- The Cleaner Technology and Fuels Scenario of CARB's ongoing Mobile Source Strategy includes GHG regulations for medium-duty trucks and heavy-duty trucks, periodic assessment, and promotion of cleaner fleet standards, and increasing ZEV across all vehicle classes, including rail vehicles, along with charging infrastructure.

CARB 2022 Scoping Plan. On December 15, 2022, CARB adopted the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan).[14] The 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high global warming potential (GWP); providing communities with sustainable

[12] California Air Resources Board, AB 32 Global Warming Solutions Act of 2006, https://ww2.arb.ca.gov/resources/fact-sheets/ab-32-global-warming-solutions-act-2006. Accessed December 1, 2025.

[13] California Air Resources Board, California's 2017 Climate Change Scoping Plan, 2017, https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf. Accessed December 1, 2025.

[14] California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, 2022, https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf. Accessed December 1, 2025.

options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., climate action plan [CAP]) consistent with California Environmental Quality Act (CEQA) Statute and Guidelines §15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission transportation (i.e., electrifying cars, buses, trains, and trucks), since transportation constitutes California's single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place. The 2022 Scoping Plan also presents the following relevant strategies for transitioning the transportation sector:

- Transitioning vehicles to zero-emission technology by achieving 100 percent ZEV sales of light-duty vehicles (light trucks) by 2040.
- Promote private investment in the transition to ZEV technology, bolstered by regulatory certainty such as infrastructure credits in the LCFS for hydrogen and electricity and hydrogen station grants from the California Energy Commission's (CEC) Clean Transportation Program.
- Evaluate and align relevant CARB policies such as Advanced Clean Trucks (ACT), Advanced Clean Fleets (ACF), Zero-Emissions Forklifts, In-use Locomotives, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the LCFS.[15, 16, 17]

The 2022 Scoping Plan includes a set of Local Actions (2022 Scoping Plan Appendix D) aimed at providing local jurisdictions with tools to reduce GHG emissions and assist the State in meeting the 2022 Scoping Plan's ambitious targets. 2022 Scoping Plan Appendix D Section 3.2 includes approaches that lead agencies can consider when evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development to determine consistency with the 2022 Scoping Plan. Notably, this section focuses on the alignment of proposed

[15] On January 13, 2025, CARB withdrew their requests for Federal CAA waivers from the U.S. EPA needed to support four recently adopted vehicle emissions regulations: (1) the ACF Regulations; (2) the In-Use Locomotive Regulations; (3) part of the Commercial Harbor Craft and Ocean-Going Vessels At-Berth Regulations; and (4) part of the Transport Refrigeration Unit Engine Standards Regulations. Therefore, implementation of these regulations is currently unknown.

[16] The ACT Regulation, which requires manufacturers to sell increasing percentages of ZEVs, was granted a separate waiver in 2023. On May 22, 2025, the U.S. Senate voted to revoke the waiver granted by the Biden administration for California's ACT Regulation. On June 12, 2025, President Trump formally nullified the California's ACT Regulation (Congressional Resolutions H.J. Res 87 and H.J. Res 88, respectively).

[17] As part of a legal settlement, CARB has agreed to repeal the High Priority Fleet and Drayage Fleet requirements of the ACF regulation. Final action on the repeal is required by August 31, 2026.

plans and residential and mixed-use project types.[18] CARB specifically states that the 2022 Scoping Plan Appendix D is not exhaustive and does not address industrial development.[19] However, CARB plans to continue to explore new approaches for other development types in the future.[20]

ACT Regulation

CARB adopted the ACT Regulation in June 2020 requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024.[21] By 2045, every new truck sold in California is required to be zero-emission. This rule directly addresses disproportionate risks and health and pollution burdens and puts California on the path to an all zero-emission short-haul drayage fleet in ports and railyards by 2035, and zero-emission "last-mile" delivery trucks and vans by 2040. The ACT Regulation accelerates the transition of zero-emission medium- and heavy-duty vehicles from Class 2b to Class 8. The regulation has two components, a manufacturer sales requirement and a reporting requirement:

- Zero-Emission Truck Sales: Manufacturers who certify Class 2b through 8 chassis or complete vehicles with combustion engines are required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales need to be 55 percent of Class 2b – 3 truck sales, 75 percent of Class 4 – 8 straight truck sales, and 40 percent of truck tractor sales.
- Company and Fleet Reporting: Large employers including retailers, manufacturers, brokers and others would be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations. This information would help identify future strategies to ensure that fleets purchase available zero-emission trucks and place them in service where suitable to meet their needs.

The ACT Regulation was granted a separate waiver in 2023 by the Biden administration. On May 22, 2025, the U.S. Senate voted to revoke the waiver granted by the Biden administration for California's ACT Regulation (as well as the ACC II program and Heavy-Duty Omnibus regulation). On June 12, 2025, President Trump formally nullified California's ACT Regulation (Congressional Resolutions H.J. Res 87 and H.J. Res 88, respectively). Implementation is currently unknown.

SB 32 (California Global Warming Solutions Act of 2006: Emissions Limit)

Signed into law in September 2016, SB 32 codifies the 2030 GHG reduction target in EO B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

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[18] California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions, page 10, 2022, https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp-appendix-d-local-actions_0.pdf. Accessed December 1, 2025.

[19] California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions, page 1, 2022, https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp-appendix-d-local-actions_0.pdf. Accessed December 1, 2025.

[20] California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions, page 10, 2022, https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp-appendix-d-local-actions_0.pdf. Accessed December 1, 2025.

[21] California Air Resources Board, Path to Zero Emission Trucks FAQ, 2022, https://ww2.arb.ca.gov/resources/fact-sheets/path-zero-emission-trucks-faq#:~:text=Advanced%20Clean%20Trucks:%20Regulation%20and,that%20need%20it%20the%20most. Accessed December 1, 2025.

SB 375 (The Sustainable Communities and Climate Protection Act of 2008)

Signed into law on September 30, 2008, SB 375 provides a process to coordinate land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction goals established by AB 32. SB 375 requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, aligns planning for transportation and housing, and creates specified incentives for the implementation of the strategies.

AB 1493 (Pavley Regulations and Fuel Efficiency Standards)

AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the U.S. EPA's denial of an implementation waiver. The U.S. EPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011. The regulations establish one set of emission standards for model years 2009 through 2016 and a second set of emissions standards for model years 2017 through 2025. By 2025, when all rules will be fully implemented, new automobiles will emit 34 percent fewer CO_2e emissions and 75 percent fewer smog-forming emissions. In 2018, the U.S. EPA proposed the SAFE Vehicles Rule, which would roll back fuel economy standards and revoke California's waiver. However, in December 2021, the NHTSA repealed the SAFE Vehicle Rule Part One.

SB 1368 (Emission Performance Standards)

SB 1368 is the companion bill of AB 32, which directs the California Public Utilities Commission (CPUC) to adopt a performance standard for GHG emissions for the future power purchases of California utilities. SB 1368 limits carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than 5 years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. The new law effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. The CPUC adopted the regulations required by SB 1368 on August 29, 2007. The regulations implementing SB 1368 establish a standard for baseload generation owned by, or under long-term contract to publicly owned utilities, for 1,100 pounds of CO_2 per megawatt-hour.

SB 1078, SB 107, and SBX1-2 (Renewable Electricity Standards)

SB 1078 (2002) required California to generate 20 percent of its electricity from renewable energy by 2017. SB 107 (2006) changed the due date to 2010 instead of 2017. On November 17, 2008, Governor Arnold Schwarzenegger signed EO S-14-08, which established a Renewable Portfolio Standard (RPS) target for California requiring that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. EO S-21-09 also directed CARB to adopt a regulation by July 31, 2010, requiring the State's load serving entities to meet a 33 percent renewable energy target by 2020. CARB approved the Renewable Electricity Standard on September 23, 2010, by Resolution 10-23. SBX1-2 (2011) codified the 33 percent by 2020 goal.

SB 350 (Clean Energy and Pollution Reduction Act of 2015)

Signed into law on October 7, 2015, SB 350 implements the goals of EO B-30-15. The objectives of SB 350 are to increase the procurement of electricity from renewable sources from 33 percent to 50 percent (with interim targets of 40 percent by 2024, and 25 percent by 2027) and to double the energy efficiency savings in electricity and natural gas end uses of retail customers through energy efficiency and conservation. SB 350 also reorganizes the Independent System Operator to develop more regional electricity transmission markets and improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western U.S.

AB 398 (Market-Based Compliance Mechanisms)

Signed on July 25, 2017, AB 398 extended the duration of the Cap-and-Trade program from 2020 to 2030. AB 398 requires CARB to update the Scoping Plan and for all GHG rules and regulations adopted by the State. It also designated CARB as the statewide regulatory body responsible for ensuring that California meets its statewide carbon pollution reduction targets, while retaining local air districts' responsibility and authority to curb TACs and criteria pollutants from local sources that severely impact public health. AB 398 also decreases free carbon allowances over 40 percent by 2030 and prioritized Cap-and-Trade spending to various programs including reducing diesel emissions in impacted communities.

SB 150 (Regional Transportation Plans)

Signed on October 10, 2017, SB 150 aligns local and regional GHG reduction targets with State targets (i.e., 40 percent below their 1990 levels by 2030). SB 150 creates a process to include communities in discussions on how to monitor their regions' progress on meeting these goals. The bill also requires CARB to regularly report on that progress, as well as on the successes and the challenges regions experience associated with achieving their targets. SB 150 provides for accounting of climate change efforts and GHG reductions and identified effective reduction strategies.

SB 100 (California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases)

Signed into law in September 2018, SB 100 increased California's renewable electricity portfolio requirement from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

AB 1346 (Air Pollution: Small Off-Road Engines)

Signed into law in October 2021, AB 1346 requires CARB, to adopt cost-effective and technologically feasible regulations to prohibit engine exhaust and evaporative emissions from new small off-road engines, consistent with federal law, by July 1, 2022. The bill requires CARB to identify and, to the extent feasible, make available funding for commercial rebates or similar incentive funding as part of any updates to existing applicable funding program guidelines to local air pollution control districts and air quality management districts to implement to support the transition to zero-emission small off-road equipment operations.

AB 1279 (The California Climate Crisis Act)

AB 1279 establishes the policy of the State to achieve carbon neutrality as soon as possible, but no

later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that, by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies.

SB 1020 (100 Percent Clean Electric Grid)

Signed on September 16, 2022, SB 1020 provides additional goals for the path to the 2045 goal of 100 percent clean electricity retail sales. It creates a target of 90 percent clean electricity retail sales by 2035 and 95 percent clean electricity retail sales by 2040.

SB 905 (Carbon Sequestration Program)

Signed on September 16, 2022, SB 905 establishes regulatory framework and policies that involve carbon removal, carbon capture, utilization, and sequestration. It also prohibits the injecting of concentrated carbon dioxide fluid into a Class II injection well for the purpose of enhanced oil recovery.

AB 1757 (Nature-Based Solutions)

Signed on September 16, 2022, AB 1757 requires State agencies to develop a range of targets for natural carbon sequestration and nature-based climate solutions that reduce GHG emissions to meet the 2030, 2038, and 2045 goals which would be integrated into a scoping plan addressing natural and working lands (NWL).

EOs Related to GHG Emissions

California's Executive Branch has taken several actions to reduce GHGs using EOs. Although not regulatory, they set the tone for the State and guide the actions of state agencies.

EO S-3-05. EO S-3-05 was issued on June 1, 2005, which established the following GHG emissions reduction targets:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an EO, the goals are not legally enforceable for local governments or the private sector.

EO S-01-07. Issued on January 18, 2007, EO S-01-07 mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. The EO established the LCFS and directed the Secretary for Environmental Protection to coordinate the actions of the CEC, CARB, the University of California, and other agencies to develop and propose protocols for measuring the "life-cycle carbon intensity" of transportation fuels. CARB adopted the LCFS on April 23, 2009.

EO S-13-08. Issued on November 14, 2008, EO S-13-08 facilitated the California Natural Resources Agency (CRNA) development of the 2009 California Climate Adaptation Strategy. Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

EO S-14-08. Issued on November 17, 2008, EO S-14-08 expands the State's Renewable Energy Standard to 33 percent renewable power by 2020. Additionally, EO S-21-09 (signed on September 15, 2009) directs CARB to adopt regulations requiring 33 percent of electricity sold in the State come from renewable energy by 2020. CARB adopted the Renewable Electricity Standard on September 23, 2010, which requires 33 percent renewable energy by 2020 for most publicly owned electricity retailers.

EO S-21-09. Issued on July 17, 2009, EO S-21-09 directs CARB to adopt regulations to increase California's RPS to 33 percent by 2020. This builds upon SB 1078 (2002), which established the California RPS program, requiring 20 percent renewable energy by 2017, and SB 107 (2006), which advanced the 20 percent deadline to 2010, a goal which was expanded to 33 percent by 2020 in the 2005 Energy Action Plan II.

EO B-30-15. Issued on April 29, 2015, EO B-30-15 established a California GHG reduction target of 40 percent below 1990 levels by 2030 and directs CARB to update the Scoping Plan to express the 2030 target in terms of $MMTCO_2e$. The 2030 target acts as an interim goal on the way to achieving reductions of 80 percent below 1990 levels by 2050, a goal set by EO S-3-05. The EO also requires the State's climate adaptation plan to be updated every three years and for the State to continue its climate change research program, among other provisions. With the enactment of SB 32 in 2016, the Legislature codified the goal of reducing GHG emissions by 2030 to 40 percent below 1990 levels.

EO B-55-18. Issued on September 10, 2018, EO B-55-18 establishes a goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. This goal is in addition to the existing statewide targets of reducing GHG emissions. The EO requires CARB to work with relevant state agencies to develop a framework for implementing this goal. It also requires CARB to update the Scoping Plan to identify and recommend measures to achieve carbon neutrality. The EO also requires state agencies to develop sequestration targets in the Natural and Working Lands Climate Change Implementation Plan.

EO N-79-20. Signed in September 2020, EO N-79-20 establishes as a goal that where feasible, all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, will be zero-emission by 2035. The EO sets a similar goal requiring that all medium and heavy-duty vehicles will be zero-emission by 2045 where feasible. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment "requiring increasing volumes" of new ZEVs "towards the target of 100 percent." The EO directs the California Environmental Protection Agency, the California Geologic Energy Management Division (CalGEM), and the CRNA to transition and repurpose oil production facilities with a goal toward meeting carbon

neutrality by 2045. EO N-79-20 builds upon the CARB ACT Regulation, which was adopted by CARB in July 2020.[22]

California Regulations and Building Codes

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California's energy consumption relatively flat even with rapid population growth.

Title 20 Appliance Efficiency Regulations

The appliance efficiency regulations (California Code of Regulations [CCR] Title 20, §§1601-1608) include standards for new appliances. Twenty-three categories of appliances are included in the scope of these regulations. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Title 24 Building Energy Efficiency Standards

California's Energy Efficiency Standards for Residential and Non-residential Buildings (CCR Title 24, Part 6) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. In December 2024, the 2025 Energy Code was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2025 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2026, must comply with the 2025 Energy Code.[23]

Title 24 California Green Building Standards Code

The California Green Building Standards Code (CCR Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. The CALGreen Code requires new residential and commercial buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in the five green building topics: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary tiers and measures that local

[22] The ACT Regulation, which requires manufacturers to sell increasing percentages of ZEVs, was granted a separate waiver in 2023. On May 22, 2025, the U.S. Senate voted to revoke the waiver granted by the Biden administration for California's ACT Regulation. On June 12, 2025, President Trump formally nullified the California's ACT Regulation (Congressional Resolutions H.J. Res 87 and H.J. Res 88, respectively).

[23] California Energy Commission, 2025 Building Energy Efficiency Standards, 2025, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-building-energy-efficiency. Accessed October 21, 2025.

governments may adopt that encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in December 2024 (2025 CALGreen Code) and continues to improve upon the existing standards for new construction of, and additions and alterations to, residential and non-residential buildings. Buildings whose permit applications are applied for on or after January 1, 2026, must comply with the 2025 CALGreen Code.[24]

3.3 Regional

South Coast Air Quality Management District Thresholds

The South Coast Air Quality Management District (SCAQMD) formed a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. As of the last Working Group meeting (Meeting #15) held in September 2010, SCAQMD proposed adopting a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency. With the tiered approach, a project is compared with the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. SCAQMD adopted a threshold of 10,000 metric tons of CO_2e ($MTCO_2e$) per year for industrial projects. SCAQMD proposed a 3,000 $MTCO_2e$ threshold for non-industrial projects, but it did not adopt the non-industrial threshold. SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant GHG emissions impact.

All projects are subject to applicable SCAQMD rules and regulations in effect at the time of construction and operation. The following is the SCAQMD rule relevant to GHG:

- **Rule 1415 (Reduction of Refrigerant Emissions from Stationary Air Conditioning Systems)** – 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.

Southern California Association of Governments

On April 4, 2024, SCAG's Regional Council adopted Connect SoCal (*2024 - 2050 Regional Transportation Plan/Sustainable Communities Strategy* [2024 RTP/SCS]). The RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The strategy was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The RTP/SCS is a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals. The SCAG region strives toward sustainability through integrated land use and

[24] California Energy Commission, 2025 California Green Building Standards Code (CALGreen), 2025, https://www.energy.ca.gov/proceeding/2025-california-green-building-standards-code-calgreen. Accessed October 21, 2025.

transportation planning. The SCAG region must achieve specific federal air quality standards and is required by state law to lower regional GHG emissions. Per SB 375, CARB has set GHG reduction targets at 8 percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035.

3.4 Local

City of Los Angeles General Plan

The City does not have a General Plan Element specific to climate change and GHG emissions, but several stated goals, objectives, or policies in the City's General Plan Air Quality Element (Air Quality Element) and Mobility Plan 2035 (Mobility Plan) encourage the reduction of GHG emissions.

Air Quality Element

The following Air Quality Element goals and objectives would serve to reduce GHG emissions:

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

- Objective 2.1: Reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.
- Objective 2.2: Increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles, and incentives for high occupancy vehicles.

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 4.2: Reduce vehicle trips and vehicle miles traveled associated with land use patterns.

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 methods such as site orientation and tree planting.

- Objective 5.1: Increase energy efficiency of City facilities and private developments.

Mobility Plan 2035

In August 2015, the City Council adopted the Mobility Plan, which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016. The Mobility Plan incorporates "complete street" principles and lays the policy foundation for how the City's residents interact with their street. Components of the Mobility Plan would serve to reduce VMT and mobile source GHG emissions. One component of the Mobility Plan is a GHG emissions tracking program to establish compliance with SB 375, AB 32, and the region's Sustainable Community Strategy.

City of Los Angeles Sustainable City pLAn (2015)

In 2015, the City released the Sustainable City pLAn, which covers various issues related to GHG reduction either specifically or by association. Actionable goals were set that include but are not limited to increasing green building standards for new construction, developing blue, green, and

black waste bin infrastructure, and reducing water use by 20 percent. In 2019, the plan was updated with new goals through the Green New Deal.

L.A.'s Green New Deal

In April 2019, the Sustainable City pLAn was updated and renamed as *L.A.'s Green New Deal* (Green New Deal), which consists of a program of actions designed to create sustainability-based performance targets through 2050 to advance economic, environmental, and equity objectives.[25] The Green New Deal augments, expands, and elaborates on the City's vision for a sustainable future and tackles the climate emergency with accelerated targets and new aggressive goals.

Although reducing GHG emissions is not the main purpose of the Green New Deal, "Climate Mitigation," is one of eight explicit benefits that defines the strategies and goals. These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5 percent by 2025, 25 percent by 2035, and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per sf for all building types 22 percent by 2025, 34 percent by 2035, and 44 percent by 2050 (from a baseline of 68 thousand British thermal unit (BTU) per sf in 2015).
- All new buildings will be net zero carbon by 2030, and 100 percent of buildings will be net zero carbon by 2050.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides, or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025, 39 percent by 2035, and 45 percent by 2050.
- Increase the percentage of electric and ZEV in the city to 25 percent by 2025, 80 percent by 2035, and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025, 95 percent by 2035, and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025 and 3 degrees by 2035.

[25] City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn 2019, 2019, https://ladot.lacity.gov/sites/default/files/documents/green-new-deal_plan.pdf. Accessed December 1, 2025.

Los Angeles Green Building Code

In 2019, the Los Angeles Green Building Code (LAGBC; Article 9 of Chapter IX of the LAMC) was amended to incorporate portions of the CALGreen Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to non-residential and high-rise residential buildings. The LAGBC requires projects to incorporate infrastructure to support future EV supply equipment, reduce the overall use of potable water by 20 percent, and meet the applicable Energy Code provisions.[26]

City of Los Angeles Solid Waste Programs and Ordinances

The recycling of solid waste materials also contributes to reduced energy consumption. Specifically, when products are manufactured using recycled materials, the amount of energy that would have otherwise been consumed to extract and process virgin source materials is reduced as well as disposal energy averted. In 1989, California enacted AB 939, the California Integrated Waste Management Act, which establishes a hierarchy for waste management practices such as source reduction, recycling, and environmentally safe land disposal.

The City has developed and is in the process of implementing the Solid Waste Integrated Resources Plan, also referred to as the Zero Waste Plan, whose goal is to lead the City towards being a "zero waste" city by 2030. In addition, the City adopted the Recovering Energy, Natural Resources, and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan in 2006, which aims to achieve a zero waste goal through reducing, reusing, recycling, or converting the resources not going to disposal and achieving a diversion rate of 90 percent or more by 2025.[27] The City also approved the Waste Hauler Permit Program (Ordinance No. 181,519, LAMC Chapter VI, Article 6, Section 66.32), which requires private waste haulers to obtain AB 939 Compliance Permits to transport construction and demolition waste to City-certified construction and demolition waste processors. The City's Exclusive Franchise System Ordinance (Ordinance No. 182,986), among other requirements, sets a maximum annual disposal level and diversion requirements for franchised waste haulers to promote waste diversion from landfills and support the City's zero waste goals. These programs reduce the number of trips to haul solid waste and therefore reduce the amount of petroleum-based fuels and energy used to process solid waste.

[26] City of Los Angeles, City of Los Angeles Municipal Code, Article 9: Green Building Code, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-214608. Accessed December 1, 2025.

[27] City of Los Angeles, RENEW LA, Five-Year Milestone Report, page 3, 2011, https://cityclerk.lacity.org/onlinedocs/2011/11-0973_MISC_06-07-11.pdf. Accessed December 1, 2025.

4.0 SIGNIFICANCE CRITERIA AND METHODOLOGY

4.1 Thresholds and Significance Criteria

Based upon the criteria derived from Appendix G of the State CEQA Guidelines, a project normally would have a significant effect on the environment if it would:

(a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Addressing GHG emissions generation impacts under CEQA requires an agency to determine what constitutes a significant impact. The amendments to the State CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of the potential impact, which in turn provides the basis to assess and, if required to address significant impacts, to apply mitigation measures.[28] This means that each agency is left to determine whether a project's GHG emissions will have a "significant" impact on the environment and to support that determination with substantial evidence in the record. Regardless of the manner in which an agency determines the significance of GHG emissions impacts in accordance with CEQA, the State CEQA Guidelines direct that agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissions.[29]

Lead agencies quantify GHG emissions of projects and consider several factors when determining the significance of GHG emissions from a project: the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional or local plan for the reduction or mitigation of GHG emissions. CCR Section 15064.4 does not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions and for individual projects, including by using thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see State CEQA Guidelines Section 15064.7(c)). The State CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see State CEQA Guidelines Section 15064.4). As a note, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.[30]

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[28] California Governor's Office of Planning and Research, Proposed Updates to the CEQA Guidelines – Final, page 84, 2017, https://lci.ca.gov/ceqa/docs/20171127_Comprehensive_CEQA_Guidelines_Package_Nov_2017.pdf. Accessed December 1, 2025.

[29] 14 California Code of Regulations, § 15064.4a

[30] California Governor's Office of Planning and Research, Proposed Updates to the CEQA Guidelines – Final, page 84, 2017, https://lci.ca.gov/ceqa/docs/20171127_Comprehensive_CEQA_Guidelines_Package_Nov_2017.pdf. Accessed December 1, 2025.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project.[31] To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.[32] Examples of such programs include "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of [GHG] emissions."[33]

The City has not adopted a numeric threshold for the analysis of GHG impacts. The 2008 SCAQMD working group proposed a 3,000 $MTCO_2e$ threshold of significance for new, non-industrial development. Though not formally adopted by SCAQMD, the numeric target is supported by expert opinion and the evidence in the record of the proceedings of the SCAQMD GHG CEQA Significance Threshold Working Group, and therefore provides a valid, objective basis upon which to assess the significance of the Project's potential contribution of GHG emissions to global climate change.

State CEQA Guidelines Section 15064.4(b)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions. Accordingly, the threshold of significance applied here is whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. This analysis considers qualitative consistency with State GHG reduction goals as articulated in the 2022 Scoping Plan, SCAG's 2024-2050 RTP/SCS, the Green New Deal, and Los Angeles Green Building Code.

4.2 Methodology

Amendments to State CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Consistent with existing CEQA practice, Section 15064.4 gives lead agencies the discretion to determine whether to quantify GHGs resulting from a project and/or rely on a qualitative analysis. The amendments to State CEQA Guidelines Section 15064.4 do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, as long as any threshold chosen is supported by substantial evidence (see State CEQA Guidelines Section 15064.7(c)). The CRNA has also clarified that the State CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see State CEQA Guidelines Section 15064(h)(3)).

[31] 14 California Code of Regulations, § 15064(h)(3)
[32] 14 California Code of Regulations, § 15064(h)(3)
[33] 14 California Code of Regulations, § 15064(h)(3)

The City, which is the lead agency for the Project, has not formally adopted a uniform numerical significance threshold for assessing impacts related to GHG emissions or a local climate action plan for reducing GHG emissions. Similarly, neither SCAQMD, the Governor's Office of Land Use and Climate Innovation (LUCI) (formerly the Governor's Office of Planning and Research (OPR)), CARB, CAPCOA, nor any other state or regional agency have adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment. Based on CEQA case law, when no guidance exists, the lead agency may look to and assess general compliance with comparable regulatory schemes.[34]

In evaluating climate change impacts, the LUCI recommends consideration of the project's consistency with the State's long-term climate goals or strategies to reduce GHG emissions.[35] The lead agency may also use modeling to estimate GHG emissions from a project.[36] This allows a lead agency to quantify GHG emissions resulting from a project. Here, any quantification is for informational purposes and is not used for a comparative analysis or as a threshold of significance.

Consistency with Plans

LUCI encourages lead agencies to analyze and make use of programmatic mitigation plans and programs when conducting individual project consistency analyses. On a Statewide level, the Climate Change Scoping Plan provides measures to achieve AB 32 and SB 32 targets. On a regional level, SCAG's RTP/SCS contains measures to achieve VMT and GHG reductions required under SB 375. The City does not have a programmatic mitigation plan to rely on, such as a Greenhouse Gas Emissions Reduction Plan as recommended in the relevant amendments to the State CEQA Guidelines. The Green New Deal is not an adopted plan or directly applicable to private development projects. However, the Green New Deal, a mayoral initiative, includes short-term and long-term aspirations pertaining to climate change. This analysis addresses consistency with these strategies and goals, as well. If the Project is designed in accordance with these policies and regulations, the Project would result in a less than significant impact because it would be consistent with the overarching State regulations on GHG reduction (e.g., AB 32, SB 32, SB 375).

A consistency analysis is provided below and describes the Project's compliance with, or exceedance of, performance-based standards included in the regulations outlined in the applicable portions of the 2022 Scoping Plan, SCAG's 2024-2050 RTP/SCS, the Green New Deal, and Los Angeles Green Building Code. By being consistent with these plans, as is shown below, the Project

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[34] See *Protect Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1107 ["[A] lead agency's use of existing environmental standards in determining the significance of a project's environmental impacts is an effective means of promoting consistency in significance determinations and integrating CEQA environmental review activities with other environmental program planning and resolution."] Lead agencies can, and often do, use regulatory agencies' performance standards. A project's compliance with these standards usually is presumed to provide an adequate level of protection for environmental resources. See, e.g., *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal. App. 4th 74, 99.

[35] California Governor's Office of Planning and Research, Proposed Updates to the CEQA Guidelines – Final, page 84, 2017, https://lci.ca.gov/ceqa/docs/20171127_Comprehensive_CEQA_Guidelines_Package_Nov_2017.pdf. Accessed December 1, 2025.

[36] CEQA Guidelines Section 15064.4(c).

is in compliance with the applicable state (the 2022 Scoping Plan), regional (SCAG's 2024-2050 RTP/SCS), and local (the Green New Deal and Los Angeles Green Building Code) regulations, which means, pursuant to CEQA Guidelines Section 15064.4(b)(3), the lead agency can find that the Project will have a less than significant impact on GHG emissions.[37]

GHG Emissions

Global climate change is, by definition, a cumulative impact caused and otherwise exacerbated by global GHG emissions. Therefore, there can be no meaningful project-level analysis of GHG-emissions impacts. The baseline against which to compare potential impacts of the project includes the natural and anthropogenic drivers of global climate change, including world-wide GHG emissions from human activities which almost doubled between 1970 and 2010 from approximately 27 gigatonnes (Gt) of CO_2 per year to nearly 49 Gt of CO_2 per year.[38] As also noted above, GHGs tend to evenly mix throughout the Earth's atmosphere. As a result, the geographic extent of climate change and the assessment of GHG emissions' cumulative impacts is worldwide.

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 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.

In line with the State CEQA Guidelines, this analysis quantifies the volume of GHGs the Project would emit using CARB recommended air quality models. The Project's construction and operational GHG emissions are modeled using the CARB-approved California Emissions Estimator Model (CalEEMod) version 2022 (the most recent version). CalEEMod is a Statewide land use emissions computer model designed to quantify potential GHG emissions associated with both construction and operations from a variety of land use projects. Quantifying the Project's GHG emissions is consistent with the requirements of State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The Project's modeled GHG emissions are then compared to SCAQMD's proposed 3,000 $MTCO_2e$ threshold of significance for new, non-industrial development to determine whether the Project's potential impacts are significant.

Construction Emissions

Construction equipment, trucks, worker vehicles, and ground-disturbing activities associated with Project construction would generate GHG emissions. Daily regional construction emissions are estimated by assuming construction occurs at the earliest feasible date (i.e., a conservative

[37] CEQA Guidelines Section 15064.4(b)(3).

[38] Intergovernmental Panel on Climate Change, Climate Change 2014 Mitigation of Climate Change Working Group III Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, page 396, 2014, https://www.ipcc.ch/site/assets/uploads/2018/02/ipcc_wg3_ar5_full.pdf. Accessed December 1, 2025.

estimate of construction activities) and applying off-road, fugitive dust, and on-road emissions factors in CalEEMod. The input values used in this analysis were adjusted to be Project-specific based on anticipated equipment types and the construction schedule. These values were then applied to the construction phasing assumptions used in the analysis to generate GHG emissions values for each construction activity. In accordance with SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project.[39] As impacts from construction activities are short-term, they contribute a relatively small portion of the overall lifetime project GHG emissions. In addition, GHG emission reduction measures for construction equipment are relatively limited. Therefore, SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.[40] Thus, total construction GHG emissions were divided by 30 to determine an estimate of annual construction emissions comparable to operational emissions.

Off-Road Equipment

The emissions calculations associated with construction equipment are from off-road equipment engine use 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 will emit fewer pollutants. As a further conservative assumption, the CalEEMod model uses an emission rate for equipment which represents an average model year for available equipment within the South Coast Air Basin. CalEEMod calculates the exhaust emissions based on CARB OFFROAD methodology using the equation presented below:

$$\text{Emissions Diesel } (MTCO_2e \text{ per year}) = (\Sigma_i (EF_i \times Pop_i \times AvgHP_i \times Load_i \times Activity_i) / 2{,}204.62$$

Where:	EF_i	=	Emission Factor from OFFROAD (pounds per 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)
	2,204.62	=	Conversion factor (pounds per metric ton)
	$_i$	=	Summation index

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

[39] South Coast Air Quality Management District, Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, page 5, 2008, https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf. Accessed December 1, 2025.

[40] South Coast Air Quality Management District, Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, page 5, 2008, https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf. Accessed December 1, 2025.

emissions are based on the number of trips and VMT along with emission factors from the CARB EMission FACtor (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 ($MTCO_2e$ per year) = VMT x EF running, pollutant / 2,204.62

Where: VMT = Vehicle miles traveled (miles)

EF running, pollutant = Emission factor for running emissions (pounds per miles)

2,204.62 = Conversion factor (pounds per metric ton)

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

Architectural Coatings

Volatile organic compound (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:

Architectural Coatings Emissions ($MTCO_2e$ per year) = EF_{AC} x F x A_{paint} / 2,204.62

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

F = Fraction of surface area (%)

A_{paint} = Building Surface Area (sf)

2,204.62 = Conversion factor (pounds per metric ton)

The CalEEMod model assumes the total surface area for painting equals two times that of the non-residential sf. The default values are based on SCAQMD methods used in their coating rules and are 75 percent for the interior surfaces and 25 percent for the exterior shell. Parking areas are based on a six percent coverage.

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

$EF_{AC} = C_{VOC}/453.592 \times 3.785 / 180 / 2{,}204.62$

Where: EF_{AC} = Emission factor (pounds per sf)

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

453.592 = Conversion factor (grams per pound)

3.785 = Conversion factor (liter per gallon)

180 = Area coated (sf per gallon)

2,204.62 = Conversion factor (pounds per metric ton)

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 (Architectural Coatings).

Paving

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

$$Emissions_{AP} (MTCO_2e \text{ per year}) = EF_{AP} \times A_{parking} / 2{,}204.62$$

Where: EF_{AP} = Emission factor (pound per acre)

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

2,204.62 = Conversion factor (pounds per metric ton)

Operational Emissions

Project operations would result in emissions from mobile sources (motor vehicles from Project-generated vehicle trips), area sources (consumer products, architectural coatings, landscape maintenance equipment), electrical generation, natural gas combustion, water supply and wastewater treatment, solid waste generation, and water usage. Project operational GHG emissions were quantified in CalEEMod using CalEEMod default rates and emission factors and GWP values.

Mobile Emissions

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. Mobile source emissions were generally calculated in CalEEMod as follows:

$$\text{Mobile Emissions } (MTCO_2e \text{ per year}) = (\Sigma_i (\text{Units} \times \text{ADT} \times D_{TRIP} \times EF_i) / 2{,}204.62$$

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)

2,204.62 = Conversion factor (pounds per metric ton)

$_i$ = Summation index

Area Source Emissions

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 will be included in each 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, furniture coatings, or architectural coatings. SCAQMD performed an evaluation of consumer product use compared to the total square footage of buildings using data from CARB's consumer product Emission Inventory.[41] To calculate the VOC emissions from consumer product use, the following equation was used in CalEEMod:

Consumer Products Emissions ($MTCO_2e$ per year) = EF_{CP} x Building Area / 2,204.62

Where: EF_{CP} = Emission factor (pounds per sf)

The factor is 1.98×10^{-5} pounds per sf for SCAQMD areas.

Building Area = the total square footage of building

2,204.62 = Conversion factor (pounds per metric ton)

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers. The operational emission methodology from architectural coatings is the same as the construction methodology discussed above. CalEEMod conservatively assumes that all types of buildings are repainted at a rate of 10 percent of area per year. This is 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 ($MTCO_2e$ per year) = $(\Sigma_i (Units \times EF_{LE} \times A_{LE})_i) / 2{,}204.62$

Where: Units = Number of land use units (same land use types) [1,000 sf]

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

A_{LE} = Landscaping equipment operating days per year (days per year)

2,204.62 = Conversion factor (pounds per metric ton)

$_i$ = Summation index

Electricity

Combustion of fossil fuel emits GHGs 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 for the Project were calculated using the CalEEMod emissions inventory model, accounting for energy needed to provide lighting, heating, and cooling and energy consumed

[41] 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.

by sources such as plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (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.

Because power plants are existing stationary sources permitted by air districts and/or the U.S. EPA, criteria pollutant emissions associated with the operation of the power plants themselves, are not attributed to 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 are more appropriately 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.

Emissions associated with electricity demand are based on the size of the proposed land use and the electrical demand factors for the land uses, the emission factors for the electricity utility provider, and the global warming potential values for the GHGs emitted. Annual electricity GHG emissions in units of $MTCO_2e$ are calculated as follows:

Electricity Emissions ($MTCO_2e$ per year) = $(\Sigma_i (Units \times D_E \times EF_E \times GWP)_i) / 2{,}204.62$

Where:

	Units	=	Number of land use units (same and use type) [1,000 sf]
	D_E	=	Electrical demand factor [megawatt-hour per 1,000 sf per year)
	E_{FE}	=	GHG emission factor (pounds per megawatt-hour)
	GWP	=	Global warming potential (CO_2 = 1, CH_4 = 21, N2O = 310)
	2,204.62	=	Conversion factor (pounds per metric ton)
	$_i$	=	Summation index

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. GHG 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 ($MTCO_2e$ per year) = $(\Sigma_i (EF_i \times Energy\ Intensity \times Size) / 2{,}204.62$

Where:

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

Energy Intensity = Natural gas energy intensity for the land use (thousand BTU per sf per year)

Size = building area (sf)

2,204.62 = Conversion factor (pounds per metric ton)

$_i$ = Summation index

The energy intensity in CalEEMod is based on the CEC *2018–2030 Uncalibrated Commercial Sector Forecast* (Commercial Forecast), which provides the 2019 natural gas demand per sf 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.[42]

[42] 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.

5.0 IMPACT ANALYSIS

5.1 Greenhouse Gas Emissions

Threshold (a) Would the Project generate GHG emissions, either directly or indirectly, that could have a significant impact on the environment?

Construction GHG Emissions

Project construction would result in direct emissions of GHGs from construction equipment and the transport of materials and construction workers to and from the Project Site. Construction-related GHG emissions would be temporary and would cease once construction is complete. Construction activities for the Project were conservatively assumed to begin in the second quarter of 2027. Project construction would include demolition, site preparation, 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 is conservatively anticipated to have a maximum of 20 daily worker trips. Based on the *Transportation Assessment* prepared by Gibson Transportation Consulting (2025), 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.[43] Thus, the maximum daily trips during each construction phase was conservatively modeled in CalEEMod to represent the worst-case scenario. Additionally, the construction schedule conservatively assumes that construction will take place six days per week (Monday through Saturday) in accordance with the City's regulations. See Appendix A: Greenhouse Gas Emissions Modeling Data for more information regarding the construction assumptions used in this analysis.

Table 2: Construction-Related Greenhouse Gas Emissions presents the total GHG emissions generated during Project construction.

Table 2: Construction-Related Greenhouse Gas Emissions

Category	$MTCO_2e$
Construction Year 1 (2027)	438
Construction Year 2 (2028)	714
Total Construction Emissions	1,152
30-Year Amortized Annual Construction	38

$MTCO_2e$ = metric tons of carbon dioxide equivalents

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

As shown in Table 2, the Project would result in the generation of approximately 1,152 $MTCO_2e$ over the course of construction. Construction GHG emissions are typically summed and amortized over a 30-year period, then added to the operational emissions in order to determine the Project's annual

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

GHG emissions inventory.[44] As shown in Table 2, the amortized Project construction emissions would be 38 $MTCO_2e$ per year.

Operational GHG Emissions

Operational or long-term emissions would occur over the life of the Project. Operational GHG emissions would result from direct sources, such as Project-generated vehicular traffic, natural gas combustion, and area source usage (consumer products, architectural coatings, and landscape maintenance equipment). Operational GHG emissions would also result from indirect sources, such as electrical power generation, water supply and wastewater treatment, solid waste generation, and fugitive refrigerants from air conditioning or refrigerators. Below is a description of the primary sources of operational GHG emissions:

- Area Sources. Area source emissions occur from consumer products, architectural coatings, and landscape maintenance equipment. Negligible quantities of consumer products (i.e., personal care products, home, lawn, and garden products, disinfectants, sanitizers, polishes, cosmetics, and floor finishes) would be used. Landscaping would be minimal. Additionally, the primary emissions from architectural coatings are VOCs[45], which are relatively insignificant as direct GHG emissions.[46]
- Energy Consumption. Energy source GHG emissions are typically generated from electricity and natural gas consumption, space heating and cooling, water heating, ventilation, lighting, appliances, and electronics.
- Mobile Sources. Mobiles sources from the Project based on the Project-specific trip generation estimates and have been incorporated into CalEEMod. The Project is expected to generate 433 total daily vehicle trips.[47]
- Solid Waste. Solid waste releases GHG emissions in the form of CH_4 when these materials decompose.
- Water and Wastewater. GHG emissions from water demand would occur from electricity consumption associated with water conveyance and treatment.
- Refrigerants. Air conditioning and refrigerator equipment typically generate GHG emissions.

The total GHG emissions associated with the Project are summarized in Table 3: Operational Project Greenhouse Gas Emissions.

[44] The amortization period of 30-years is based on the standard assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13, 2009.).
[45] California Air Pollution Control Officers Association, CalEEMod User Guide, page 18, 2022, https://www.caleemod.com/documents/user-guide/01_User%20Guide.pdf. Accessed December 1, 2025.
[46] Intergovernmental Panel on Climate Change, TAR Climate Change 2001: The Scientific Basis, page 243, 2001, https://www.ipcc.ch/site/assets/uploads/2018/03/TAR-04.pdf. Accessed December 1, 2025.
[47] Gibson Transportation Consulting, Transportation Study Assessment, 2025.

Table 3: Operational Project Greenhouse Gas Emissions	
Emissions Source	**$MTCO_2e$ per Year**
Construction Amortized Over 30 Years	38
Area Source	5
Energy	599
Mobile	349
Waste	74
Water and Wastewater	205
Refrigerants	11
Total Project Emissions	**1,281**
SCAQMD Threshold	*3,000*
Exceeds Threshold?	*No*
$MTCO_2e$ = metric tons of carbon dioxide equivalents; SCAQMD = South Coast Air Quality Management District	
Source: CalEEMod version 2022; South Coast Air Quality Management District, Greenhouse Gases CEQA Significance Thresholds, https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds, Accessed November 25, 2025. Refer to Appendix A for model outputs.	

Table 3 shows that the Project's unmitigated operational and amortized construction emissions would collectively be approximately 1,281 $MTCO_2e$ annually. However, these Project-related GHG emissions are well below SCAQMD's interim threshold of 3,000 $MTCO_2e$ per year.[48] Therefore, Project-related GHG emissions would be less than significant, and no mitigation measures are required.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

5.2 Greenhouse Gas Reduction Plan Compliance

Threshold (b) Would the Project conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions?

As mentioned above, in the absence of any adopted quantitative threshold, the significance of the Project's GHG emissions is evaluated consistent with State CEQA Guidelines Section 15064.4(b)(3) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted for the purpose of reducing the emissions of GHGs. Specifically, this analysis evaluates the Project's compliance with state (the 2022 Scoping Plan), regional (SCAG's 2024-2050 RTP/SCS), and local (the Green New Deal and Los Angeles Green Building Code) plans.

[48] As discussed above, although the 3,000 $MTCO_2e$ per year target was not formally adopted by SCAQMD, the numeric target is supported by expert opinion and the evidence in the record of the proceedings of the SCAQMD GHG CEQA Significance Threshold Working Group, and therefore provides a valid, objective basis upon which to quantitatively assess the significance of the Project's potential contribution of GHG emissions to global climate change.

CARB 2022 Scoping Plan

As previously noted, the 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions to 85 percent below 1990 levels by 2045 in accordance with AB 1279.[49] The State's largest GHG contributors are the transportation, industrial, and electricity sectors.[50] The 2022 Scoping Plan intends to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks). The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan.

Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent ZEV sales in 2035 through ACC II[51]; and implementing the ACF[52] to deploy ZEV buses and trucks. Additional transportation policies include the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The 2022 Scoping Plan would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology.

As indicated in Table 3, approximately 74 percent of the Project's GHG emissions are from energy and mobile sources, which would be reduced by the 2022 Scoping Plan measures described above. The City has no control over vehicle emissions (approximately 27 percent of the Project's total emissions). However, these emissions would decline in the future due to Statewide measures, as well as cleaner technology and fleet turnover. Furthermore, the Project would not obstruct or interfere with efforts to increase ZEVs or State efforts to improve system efficiency. The Project will also provide EV and bicycle parking spaces and it is located in close proximity to numerous public transit options, which would further encourage the reduction of mobile emissions. Compliance with applicable State standards (e.g., continuation of the Cap-and-Trade regulation; CARB's Mobile Source Strategy, and Sustainable Freight Action Plan; EO N-79-20; SB 100 [renewable electricity portfolio improvements that require 60 percent renewable electricity by 2030 and 100 percent renewable by 2045]; etc.) would ensure consistency with State and regional GHG reduction planning efforts. The Project would additionally comply, as applicable, with the Energy Code and CALGreen Code, which require energy conservation features in new construction (e.g., high-efficiency lighting,

49 California Air Resources Board, 2022 Scoping Plan Documents, https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents. Accessed December 1, 2025.

50 California Air Resources Board, Current California GHG Emissions Inventory Data, 2025, https://ww2.arb.ca.gov/ghg-inventory-data. Accessed December 1, 2025.

51 On May 22, 2025, the United States Senate voted to revoke the waiver granted by the Biden administration for the ACC II program. On June 12, 2025, the Trump Administration formally nullified the ACC II program. Pursuant to CARB's Emergency Vehicle Emissions Regulation (adopted October 2, 2025), certain antecedent regulations (displaced by ACC II and Omnibus) remain operative (as previously adopted) with the caveat that CARB may enforce ACC II and Omnibus, to the extent permitted by law, in the event a court of law holds invalid the resolution purporting to disapprove those waivers.

52 On January 13, 2025, CARB withdrew their requests for Federal CAA waivers from the U.S. EPA needed to support the ACF Regulations. As such, implementation of the ACF is currently unknown.

high-efficiency HVAC systems, thermal insulation, double-glazed windows, and water conserving plumbing fixtures). Conserving energy usage would indirectly regulate and reduce GHG emissions.

The Project would not obstruct or interfere with the State's progress towards carbon neutrality under the 2022 Scoping Plan. The Project would not convert any NWL and/or decrease the State's urban forest carbon stock, which are areas of emphasis in the 2022 Scoping Plan. Furthermore, the Project would develop land uses that would potentially reduce VMT and associated GHG emissions.[53] As such, the Project would not conflict with the 2022 Scoping Plan and impacts would be less than significant. No mitigation is required.

SCAG RTP/SCS

Under SB 375, SCAG's 2024 RTP/SCS establishes GHG emissions goals to reduce GHG emissions in the region by eight percent from 2005 levels by 2020 and 19 percent below 2005 levels by 2035.[54] RTP/SCS is a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals.

SCAG plays a critical role in project selection, programming, and administration of federal funds available to the region. The RTP/SCS invests $751.7 billion in the transportation system, primarily in operations and maintenance, to ensure the continued performance of the entire current transportation network.[55] Implementation of the 2024 RTP/SCS would add 181,200 new miles of transit revenue service, 4,000 new miles of bike lanes, and 869 new miles to the Regional Express Lane Network.[56] Strategic investments in infrastructure and transportation would improve access to employment centers and stimulate regional economic growth and opportunity in historically underserved areas. The 2024 RTP/SCS is an important planning document for the region, allowing public agencies to implement transportation projects in a coordinated manner while qualifying for federal and state funding. The 2024 RTP/SCS also supports local jurisdictions in making informed land use planning and housing development decisions that promote the key goals of the plan to reduce VMT and GHG emissions.

The 2024 RTP/SCS accounts for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness of the existing transportation system. The 2024 RTP/SCS is also supported by a combination of transportation and land use strategies that help the region achieve State GHG emissions reduction goals, Federal CAA requirements, increased housing production, improved equity and resilience, the preservation of natural lands, improvement of public health, increased transportation safety, support for the region's vital goods movement industries and more efficient use of resources. The majority of GHG emissions associated with new development consists of

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53 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, page 160, 2010, https://www.aqmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf. Accessed December 1, 2025. The CAPCOA identifies that infill developments, such as the proposed Project, reduce VMT which reduces fuel consumption and associated GHG emissions.

54 Southern California Association of Governments, Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy), page 97, 2024, https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf. Accessed December 1, 2025.

55 Southern California Association of Governments, Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy), page 12, 2024, https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf. Accessed December 1, 2025.

56 Southern California Association of Governments, Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy), page 12, 2024, https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf. Accessed December 1, 2025.

mobile sources[57], and therefore an analysis of the Project's compatibility with the RTP/SCS is an appropriate indicator of whether the Project would inhibit the post-2020 GHG reduction goals promulgated by the State. The Project's consistency with the relevant goals of the 2024 RTP/SCS is analyzed in detail in Table 4: 2024 Regional Transportation Plan/Sustainable Communities Strategy Consistency.

Table 4: 2024 Regional Transportation Plan/Sustainable Communities Strategy Consistency	
SCAG Goals	**Compliance**
2024 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY CONSISTENCY	
Mobility: Build and maintain an integrated multimodal transportation network.	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.	**No Conflict.** While this measure is to be taken at the regional level, Project implementation would not conflict with its implementation. The Project would support improved air quality and would minimize GHG emissions by locating a new self-storage use in an infill location next to existing transit, services, and complimentary land uses. 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 also utilize drought tolerant landscaping and water efficient irrigation.
Ensure that reliable, accessible, affordable, and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.	**No Conflict**. Although this goal applies at a regional level, the Project would support this goal. The Project proposes a self-storage facility on an infill site located in an existing urbanized area within an established network of roads and freeways that provides local and regional access to the Project Site. The Project Site would be located in an existing urban area with an established and extensive transit system. Specifically, the Project Site is located 310 feet to the northeast of the LA Metro Bus Route 18 and 962 feet to the north of LA Metro Bus Route 20. The Project Site is additionally located within a mile of LA Metro Bus Route 204, LADOT Wilshire Center/Koreatown Clockwise and Counterclockwise Bus Route, Wilshire and Vermont Metro Station, and Wilshire and Normandie Station. Thus, the Project Site would be located in proximity to numerous transit options, and the Project would also include bicycle parking to encourage bicycle use.
Support planning for people of all ages, abilities,	**No Conflict.** The Project would be developed on a currently

[57] California Air Resources Board, Current California GHG Emissions Inventory Data, 2025, https://ww2.arb.ca.gov/ghg-inventory-data. Accessed December 1, 2025.

Table 4: 2024 Regional Transportation Plan/Sustainable Communities Strategy Consistency	
SCAG Goals	**Compliance**
and backgrounds.	developed Project Site located within an urbanized area with an established transportation network of roads, freeways, and transit that provides local and regional access to the area, including the Project Site. The Project would provide new self-storage uses that would support the needs of nearby residential and commercial uses. Therefore, the Project would not conflict with this goal.
Communities: Develop, connect, and sustain communities that are livable and thriving	
Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances.	**No Conflict.** Although this goal applies at a regional level, the Project would be developed on a currently developed Project Site located in an existing urbanized environment. As described above, the Project would be located in proximity to several transit options and would provide bicycle parking, which would increase mobility options and reduce travel distances to the Project Site. The Project will also add a valuable community amenity to the neighborhood such that residents will not have to travel as far for their storage needs. Therefore, the Project would not conflict with this goal.
Produce and preserve diverse housing types in an effort to improve affordability, accessibility, and opportunities for all households.	**No Conflict.** The Project does not include new housing, nor would it remove existing housing. However, the Project will add a self-storage use near numerous residential uses, many of which have small units that are lacking in adequate storage space. Thus, the Project will indirectly support the preservation of this existing housing by providing convenient nearby storage. Similarly, the Project may indirectly encourage the production of additional housing that could be drawn to the compatible use and the general revitalization of the neighborhood that comes with new development.
Environment: Create a healthy region for the people of today and tomorrow	
Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change.	**No Conflict.** Although this goal applies at a regional level, the Project would incorporate various sustainability features to improve air quality, reduce greenhouse gas emissions, and enable more sustainable use of energy and water in accordance with current code requirements and City policies. The Project would be designed to meet CalGreen and Title 24 Building Standards Code, as applicable. The Project would include various sustainability features such as EV spaces, bike parking and storage, and low-flow water fixtures. The Project would also utilize drought tolerant landscaping and water efficient irrigation.
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.	**No Conflict.** While the Project is not a transportation improvement project, the location of the Project within a highly developed area and in close proximity to numerous public transit options would reduce trip lengths and VMT,

Table 4: 2024 Regional Transportation Plan/Sustainable Communities Strategy Consistency	
SCAG Goals	**Compliance**
	which would reduce GHG and air quality emissions. Therefore, the Project would not conflict with this goal. The reduction of energy use, improvement of air quality, and promotion of more environmentally sustainable development are encouraged through development of alternative transportation methods, green design techniques for buildings, and other energy-reducing techniques, such as compliance with the applicable provisions of the California Building Energy Efficiency Standards.
Conserve the region's resources.	**No Conflict.** Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project is an infill development, surrounded by urban land uses. It is not located on land designated for agricultural uses, natural resources, or conservation, nor are there any such resources in the vicinity that could be impacted by the Project. Additionally, as mentioned above, the Project would incorporate a variety of sustainability features to help preserve the region's energy and water resources.
Economy: Support a sustainable, efficient, and productive regional economic environment that provides opportunities for all people in the region	
Improve access to jobs and educational resources.	**No Conflict**. The Project would provide new employment opportunities near residential and institutional uses, employment centers, and public transit services. Therefore, the Project would not conflict with this goal.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.	**Not Applicable**. The Project proposes a self-storage facility that would not include logistics or goods movement. Therefore, this measure is not applicable to the Project.
N/A = Not Applicable; GHG = greenhouse gas; VMT = vehicle miles traveled; SCAQMD = South Coast Air Quality Management District; $MTCO_2e$ = metric tons of carbon dioxide equivalents; LADOT = Los Angeles Department of Transportation; LA = Los Angeles; LAGBC = Los Angeles Green Building Code	
Source: Southern California Association of Governments, Connect SoCal (2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy), 2024.	

As shown Table 4, the proposed Project would be consistent with the stated goals of the 2024-2050 RTP/SCS. Therefore, the proposed Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's GHG emission reduction targets. Impacts would be less than significant, and no mitigation is required.

Green New Deal

The Green New Deal establishes both short-term and long-term goals through the year 2050 concerning water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality.[58] Although reducing GHG

[58] City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn 2019, 2019, https://ladot.lacity.gov/sites/default/files/documents/green-new-deal_plan.pdf. Accessed December 1, 2025.

emissions is not the main purpose of the Green New Deal, addressing climate change is one of eight explicit topics that help define strategies and goals. The Green New Deal's specific targets include ensuring 57 percent of new housing units are built within 1,500 feet of transit by 2025 and 75 percent by 2035; reducing VMT per capita by at least 13 percent by 2025, 39 percent by 2035, and 45 percent by 2050; increasing the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 25 percent by 2025 and 50 percent by 2035 and has established targets such as 100 percent renewable energy by 2045, installation of 10,000 publicly-available EV supply equipment by 2022 and 28,000 by 2028, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035.[59] Although the Green New Deal mainly targets GHG emissions related to City-owned buildings and operations, Table 5: Green New Deal Consistency provides a discussion of the Project's consistency with applicable GHG-reducing actions.

Table 5: Green New Deal Consistency

Action	Description	Consistency Analysis
Focus Area: Local Water		
Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain or reduce 2035 per capita water use through 2050.	The City would build upon the success of the Save the Drop program and develop additional water conservation campaigns. In addition, the City would continue to benchmark customer use and improve data gathering to identify effective programs.	**No Conflict.** While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features to reduce water use, including low-flow faucets and drought-tolerant landscaping. Water usage rates were calculated assuming default CalEEMod rates. City Ordinance No. 184,248, the 2019 California Plumbing Code, 2022 CALGreen Code, 2020 LA Plumbing Code, and 2022 LAGBC require approximately a 20-percent reduction in water usage as compared to the CalEEMod default base demand. Therefore, Project water usage would be approximately 20 percent lower than assumed in this analysis.
Focus Area: Clean and Healthy Buildings		
All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050.	The City would perform a complete building electrification study and develop supporting programs. Financing would be expanded and improved to provide electrification, existing energy efficiency, and solar programs.	**No Conflict.** While this action primarily applies to the City, the Project would be designed and operated to meet the applicable requirements of the CALGreen Code and the LAGBC. The Project would be subject to the applicable 2025 Title 24 Standards which represent "challenging but achievable design and construction practices" that represent "a major step towards

[59] City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019 Targets.

Table 5: Green New Deal Consistency		
Action	**Description**	**Consistency Analysis**
		meeting the Zero Net Energy goal".[1]
Reduce building energy use per square feet for all building types 22% by 2025; 34% by 2025; and 44% by 2050	The City would increase awareness of incentives and smart building energy management systems. An energy consumption report will be prepared to assess the energy-water nexus.	**No Conflict.** While this action primarily applies to the City, the Project would be designed and operated to meet or exceed the applicable requirements of the CALGreen Code and the LAGBC.
Focus Area: Mobility and Public Transit		
Reduce VMT per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050	The City would update the TDM ordinance and develop first/last mile infrastructure improvements around transit stations. TDM strategies would also be implemented consistent with the West Wide Mobility Plan to ease congestion.	**No Conflict.** While this action primarily applies to the City, the Project Site is located in an urban and walkable setting surrounded by residential, commercial, and institutional uses with access to extensive public transit and bicycle infrastructure. The Project Site is located 310 feet to the northeast of the LA Metro Bus Route 18 and 962 feet to the north of LA Metro Bus Route 20. Furthermore, the Project Site is located within a mile of LA Metro Bus Route 204, LADOT Wilshire Center/Koreatown Clockwise and Counterclockwise Bus Route, Wilshire and Vermont Metro Station, and Wilshire and Normandie Station. As such, the Project Site location would reduce VMT for some visitors.
Focus Area: Mobility and Public Transit		
Increase the percentage of electric and zero-emission vehicles in the city to 25% by 2025; 80% by 2035; and 100% by 2050.	The City would increase electric vehicle ownership by providing rebates for used EVs and chargers, as well as by promoting trade-in events for electric vehicles. The City would also increase the number of EV charging stations by pursuing public-private partnerships in developing charging stations, streamlining permitting processes for EV charger installations, and updating building codes to simplify EV charging requirements.	**No Conflict.** The Project would support this policy since the Project would comply with City regulations and provide EV charging stations.

LADWP = Los Angeles Department of Water and Power; CalEEMod = California Emissions Estimator Model; EV = electrical vehicle; CALGreen = California Green Building Standards; LADOT = Los Angeles Department of Transportation; LA = Los Angeles; LAGBC = Los Angeles Green Building Code; VMT = vehicle miles traveled; TDM = Transportation Demand Management

Table 5: Green New Deal Consistency		
Action	**Description**	**Consistency Analysis**
1. California Energy Commission, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, page iv, https://www.energy.ca.gov/sites/default/files/2021-06/CEC-400-2018-020-CMF_0.pdf. Accessed December 1, 2025.		

Although the City's Green New Deal is not an adopted plan or directly applicable to private development projects, the Project would not conflict with its goals as it is a commercial use on an infill site in a highly urbanized area in close proximity to transit. Furthermore, the Project would comply with, as applicable, the CALGreen Code, the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Green New Deal with regard to energy-efficient buildings and waste and landfills. The Project would also provide bicycle parking and electrical vehicle charging stations. As the Project's GHG emissions would be generated in connection with a development located and designed to be consistent with the applicable City plan goals and actions for reducing GHG emissions, the Project would be consistent with the New Green Deal and impacts would be less than significant. No mitigation is required.

LAGBC

The LAGBC requires non-residential uses to include short- and long-term bicycle parking, parking areas for low-emitting/fuel efficient and EVs, and energy efficient appliances. The Project would comply with all applicable LAGBC and CALGreen Code requirements as codified by the City, including by providing EV and bicycle parking. Therefore, the Project would minimize operational GHG emissions and would not exceed the SCAQMD's interim significance threshold of 3,000 $MTCO_2e$ per year. As such, the Project would be consistent with the LAGBC and impacts would be less than significant. No mitigation is required.

Conclusion

The consistency analysis above demonstrates that the Project complies with the applicable GHG reduction actions/strategies at the state, regional, and local levels. Thus, pursuant to State CEQA Guidelines Section 15064.4(b)(3)[60], the Project's impacts on GHG emissions are less than significant and no mitigation measures would be required.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

5.3 Cumulative Setting and Impacts

Cumulative Setting

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and TACs, which are pollutants of regional and local concern. Pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), whereas GHGs have much longer

[60] CEQA Guidelines Section 15064.4(b)(3)

atmospheric lifetimes of one year to several thousand years, which allow GHGs to be dispersed fairly evenly in Earth's atmosphere around the globe.

The State CEQA Guidelines clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see State CEQA Guidelines Section 15064.4). As a note, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.[61] Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project.[62]

Cumulative Impacts

As a general matter, an individual project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a cumulatively consideration contribution to the global phenomenon of climate change.[63] As the California Supreme Court explained, "because of the global scale of climate change, any one project's contribution is unlikely to be significant by itself".[64] As such, GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. In other words, the analysis herein is inherently a cumulative impact analysis. The additive effect of Project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. As discussed above, the Project is consistent with and would not interfere with the implementation of the applicable State, regional, and local regulations, plans, and policies and Project-related GHG emissions would not exceed the 3,000 $MTCO_2e$ threshold of significance proposed by SCAQMD for non-industrial development projects. In addition, the Project, as well as the other cumulative Related Projects, would be subject to all applicable regulatory requirements mentioned above that would reduce GHG emissions. As such, the Project would not result in a significant cumulative GHG impact.

Mitigation Measure: No mitigation is required.

Level of Significance: Less than significant.

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61 California Governor's Office of Planning and Research, Proposed Updates to the CEQA Guidelines – Final, page 84, 2017, https://lci.ca.gov/ceqa/docs/20171127_Comprehensive_CEQA_Guidelines_Package_Nov_2017.pdf. Accessed December 1, 2025.

62 14 California Code of Regulations, § 15064(h)(3)

63 California Air Pollution Control Officers Association, CEQA and Climate Change White Paper, page 27, 2008, https://www.ncuaqmd.org/files/1997c676d/CAPCOA-White-Paper_CEQA_Climate_Change.pdf. Accessed December 1, 2025.

64 *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 512.

6.0 REFERENCES

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Appendix A

Greenhouse Gas Emissions 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

Table of Contents

1. Basic Project Information
   1.1. Basic Project Information
   1.2. Land Use Types
   1.3. User-Selected Emission Reduction Measures by Emissions Sector
2. Emissions Summary
   2.1. Construction Emissions Compared Against Thresholds
   2.2. Construction Emissions by Year
      2.2.1. Total Construction Emissions by Year, Unmitigated
      2.2.2. Onsite Construction Emissions by Year, Unmitigated
      2.2.3. Offsite Construction Emissions by Year, Unmitigated
   2.3. Operations Emissions Compared Against Thresholds
   2.4. Operations Emissions by Sector, Unmitigated
3. Construction Emissions Details
   3.1. Demolition (2027)
      3.1.1. Onsite - Unmitigated
      3.1.2. Offsite - Unmitigated
   3.2. Site Preparation (2027)
      3.2.1. Onsite - Unmitigated

3.2.2. Offsite - Unmitigated
3.3. Grading (2027)
3.3.1. Onsite - Unmitigated
3.3.2. Offsite - Unmitigated
3.4. Shoring (2027)
3.4.1. Onsite - Unmitigated
3.4.2. Offsite - Unmitigated
3.5. Building Construction (2027)
3.5.1. Onsite - Unmitigated
3.5.2. Offsite - Unmitigated
3.6. Building Construction (2028)
3.6.1. Onsite - Unmitigated
3.6.2. Offsite - Unmitigated
3.7. Paving (2028)
3.7.1. Onsite - Unmitigated
3.7.2. Offsite - Unmitigated
3.8. Architectural Coating (2028)
3.8.1. Onsite - Unmitigated
3.8.2. Offsite - Unmitigated
3.9. Infrastructure Improvements/Detention System (2027)
3.9.1. Onsite - Unmitigated
3.9.2. Offsite - Unmitigated

4. Operations Emissions Details
4.1. Mobile Emissions by Land Use
4.1.1. Unmitigated
4.2. Energy
4.2.1. Electricity Emissions By Land Use - Unmitigated
4.2.3. Natural Gas Emissions By Land Use - Unmitigated
4.3. Area Emissions by Source
4.3.1. Unmitigated
4.4. Water Emissions by Land Use
4.4.1. Unmitigated
4.5. Waste Emissions by Land Use
4.5.1. Unmitigated
4.6. Refrigerant Emissions by Land Use
4.6.1. Unmitigated
4.7. Offroad Emissions By Equipment Type
4.7.1. Unmitigated
4.8. Stationary Emissions By Equipment Type
4.8.1. Unmitigated
4.9. User Defined Emissions By Equipment Type
4.9.1. Unmitigated
4.10. Soil Carbon Accumulation By Vegetation Type
4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated
4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated
5. Activity Data
5.1. Construction Schedule
5.2. Off-Road Equipment
5.2.1. Unmitigated
5.3. Construction Vehicles
5.3.1. Unmitigated
5.4. Vehicles
5.4.1. Construction Vehicle Control Strategies
5.5. Architectural Coatings
5.6. Dust Mitigation
5.6.1. Construction Earthmoving Activities
5.6.2. Construction Earthmoving Control Strategies
5.7. Construction Paving
5.8. Construction Electricity Consumption and Emissions Factors
5.9. Operational Mobile Sources
5.9.1. Unmitigated
5.10. Operational Area Sources
5.10.1. Hearths
5.10.2. Architectural Coatings
5.10.3. Landscape Equipment

5.11. Operational Energy Consumption
5.11.1. Unmitigated
5.12. Operational Water and Wastewater Consumption
5.12.1. Unmitigated
5.13. Operational Waste Generation
5.13.1. Unmitigated
5.14. Operational Refrigeration and Air Conditioning Equipment
5.14.1. Unmitigated
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
5.18.1. Biomass Cover Type
5.18.1.1. Unmitigated
5.18.2. Sequestration
5.18.2.1. Unmitigated
6. Climate Risk Detailed Report

6.1. Climate Risk Summary
6.2. Initial Climate Risk Scores
6.3. Adjusted Climate Risk Scores
6.4. Climate Risk Reduction Measures
7. Health and Equity Details
7.1. CalEnviroScreen 4.0 Scores
7.2. Healthy Places Index Scores
7.3. Overall Health & Equity Scores
7.4. Health & Equity Measures
7.5. Evaluation Scorecard
7.6. Health & Equity Custom Measures
8. User Changes to Default Data
8.1. Justifications
8.3. Land Use
8.4. Construction
8.4.1. Construction Phases
8.4.2. Off-Road Equipment
8.4.3. Off-Road Equipment EF
8.4.6. Trips and VMT
8.5. Operations
8.5.1. Mobile Sources
8.5.1.1. Vehicle Data

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