10939 SUMMIT AVENUE RESIDENTIAL PROJECT

AIR QUALITY and GREENHOUSE GAS STUDY

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Table of Contents

List of Figures

List of Tables

Appendices

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AIR QUALITY and GREENHOUSE GAS STUDY

This report is an analysis of the potential air quality and greenhouse gas impacts associated with the proposed 10939 Summit Avenue Residential Project, a multi-family residential development in the City of Santee, California. This study analyzes the potential for temporary air quality impacts associated with construction activity and impacts associated with project operation.

PROJECT DESCRIPTION

The proposed project site is 4.65 gross acres. The development footprint is approximately 2.42 acres in size (APN 378-190-01) and zoned Medium Density Residential (R-7). The project would construct a total of 50 multifamily units and related improvements including 100 garage parking spaces and 13 open surface spaces. The site is bordered by single-family residential development to the south and north, a church and vacant land to the west and single-family residences and vacant land to the east. Density would be 20.66 units per acre with a maximum building height of three stories and 35 feet.

Grading would require 17,500 cubic yards of soil export. Construction of the project is expected to begin in late-2024 and completed in early 2026. The project site is shown in Figure 1 - Vicinity Map). The preliminary site plan is shown on Figure 2 – Proposed Site Plan.

As part of the discretionary review process for the project, the applicant is required to prepare an Addendum to the previously certified Environmental Impact Report (EIR) for the City of Santee Housing Element. Information from the Air Quality/Greenhouse Gas Report will be used by a third-party consultant to prepare the Addendum.

The following measures are intended to demonstrate compliance with statewide regulations; and thus, have been incorporated into the air emissions modeling:

- The project will provide recycling bins in the trash enclosure areas;
- The project will install drought-tolerant vegetation and water-efficient irrigation systems;
- The project will install low-water use appliances and fixtures;
- The project will be compliant with SDAPCD Rule 67.0.1 which requires the use of low Volitile Organic Compound (VOC) paint (no greater than 100 grams/Liter) for use on buildng interior and exterior surface as well as traffic marking on paved/concrete surfaces and
- The project will install bicycle parking facilities.

Figure 1—Vicinity Map - **Project Site**

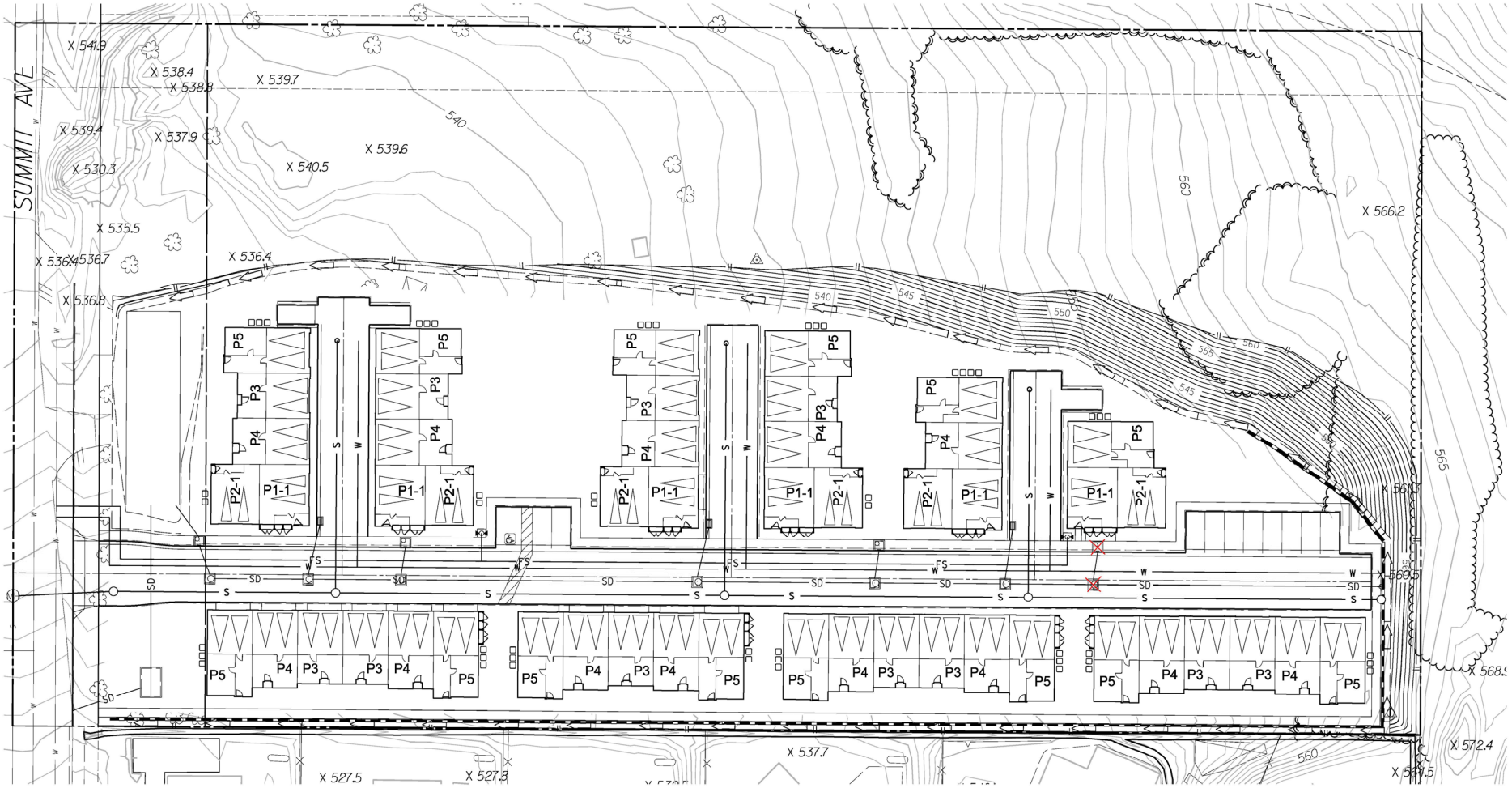

Figure 2— Site Plan

Dust Control Methods

The project would implement various construction dust control strategies as design features to be compliant with SDAPCD Rule 55. Compliance with these dust control measures are listed as follows and would be identified on grading plan approvals:

- During clearing, grading, earth-moving, excavation, or transportation of cut or fill materials, water trucks, sprinkler systems or hand watering shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease;

- During construction, water trucks, sprinkler systems or hand watering shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas later in the morning, after work is completed for the day, and whenever winds exceed 15 mph during active operations. Watering of active disturbance areas, including active grading areas and unpaved roads, would occur approximately every 2 hours of active operations, approximately two times per work day (at a minimum);

- Speeds on unpaved roads shall be reduced to less than 10 miles per hour;

- All grading and excavation operations shall be halted when wind speeds exceed 25 miles per hour;

- Dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways shall be swept, vacuumed, and/or washed at the end of each workday; and

- All trucks hauling dirt, sand, soil, or other loose material to and from the construction site shall be covered and/or a minimum 2 feet of freeboard shall be maintained.

REGULATORY SETTING

Air Pollution Regulation

Air pollutants are regulated at the national, State, and air basin level; each agency has a different degree of control. The United States Environmental Protection Agency (USEPA) regulates at the national level; the California Air Resources Control Board (CARB) regulates at the State level; and the San Diego Air Pollution Control District (SDAPCD) regulates air quality in San Diego County.

The federal and state governments have been empowered by the federal and state Clean Air Acts to regulate the emission of airborne pollutants and have established ambient air quality standards for the protection of public health. The USEPA is the federal agency designated to administer national air quality regulations, while CARB is the state equivalent in the California Environmental Protection Agency. Local control over air quality management is provided by CARB through multi-county and county-level Air Pollution Control Districts (APCDs) (also

referred to as Air Quality Management Districts). CARB establishes statewide air quality standards and is responsible for the control of mobile emission sources, while the local APCDs are responsible for enforcing standards and regulating stationary sources. CARB has established 15 air basins statewide. The City of Santee is located in the San Diego Air Basin (SDAB), which is under the jurisdiction of the SDAPCD.

California Air Resources Board

CARB, which became part of the California EPA (CalEPA) in 1991, is responsible for ensuring implementation of the California Clean Air Act (CCAA), meeting state requirements of the federal Clean Air Act and establishing California Ambient Air Quality Standards (CAAQSs). It is also responsible for setting emission standards for vehicles sold in California and for other emission sources such as consumer products and certain off-road equipment. CARB also established passenger vehicle fuel specifications and oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county level. The CCAA is administered by CARB at the state level and by the Air Quality Management Districts at the regional level. Both state and federal standards are summarized in Table 1. The federal "primary" standards have been established to protect the public health. The federal "secondary" standards are intended to protect the nation's welfare and account for air pollutant effects on soil, water, visibility, materials, vegetation, and other aspects of the general welfare.

Table 1
State and Federal Ambient Air Quality Standards

POLLUTANT	AVERAGE TIME	CALIFORNIA STANDARDS[1]		NATIONAL STANDARDS[2]		
		Concentration[3]	Method[4]	Primary[3, 5]	Secondary[3, 6]	Method[7]
Ozone[8] (O_3)	1 hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 hours	0.070 ppm (137µg/m^3)		0.070 ppm (137 µg/m^3)		
Carbon Monoxide (CO)	8 hours	9.0 ppm (10 mg/m^3)	Non-Dispersive Infrared Spectroscopy (NDIR)	9 ppm (10 mg/m^3)	--	Non-Dispersive Infrared Spectroscopy (NDIR)
	1 hour	20 ppm (23 mg/m^3)		35 ppm (40 mg/m^3)		
Nitrogen Dioxide (NO_2)[10]	Annual Average	0.030 ppm (57 µg/m^3)	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m^3)	Same as Primary Standard	Gas Phase Chemiluminescence
	1 hour	0.18 ppm (339 µg/m^3)		100 ppb (188 µg/m^3)	--	
Sulfur Dioxide (SO_2)[11]	Annual Average	--	Ultraviolet Fluorescence	0.03 ppm (80 µg/m^3)	--	Pararosaniline
	24 hours	0.04 ppm (105 µg/m^3)		0.14 ppm (365 µg/m^3)	--	

POLLUTANT	AVERAGE TIME	CALIFORNIA STANDARDS[1]		NATIONAL STANDARDS[2]		
		Concentration[3]	Method[4]	Primary[3, 5]	Secondary[3, 6]	Method[7]
	3 hours	--		--	0.5 ppm (1300 µg/m³)	
	1 hour	0.25 ppm (655 µg/m³)		75 ppb (196 µg/m³)	--	
Respirable Particulate Matter (PM_{10})[9]	24 hours	50 µg/m³	Gravimetric or Beta Attenuation	150 µg/m³	150 µg/m³	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m³		--	--	
Fine Particulate Matter ($PM_{2.5}$)[9]	Annual Arithmetic Mean	12 µg/m³	Gravimetric or Beta Attenuation	12 µg/m³	15 µg/m³	Inertial Separation and Gravimetric Analysis
	24 hours	--		35 µg/m³	Same as Primary Standard	
Sulfates	24 hours	25 µg/m³	Ion Chromatography	--	--	--
Lead[12, 13] (Pb)	30-day Average	1.5 µg/m³	Atomic Absorption	--	--	High Volume Sampler and Atomic Absorption
	Calendar Quarter	--		1.5 µg/m³	Same as Primary Standard	
	3-month Rolling Average	--		0.15 µg/m³		
Hydrogen Sulfide (H_2S)	1 hour	0.03 ppm (42 µg/m³)	Ultraviolet Fluorescence	--	--	--
Vinyl Chloride[12]	24 hours	0.010 ppm (26 µg/m³)	Gas Chromatography	--	--	--

Notes:

ppm = parts per million
µg/m³ = micrograms per cubic meter
mg/m³ = milligrams per cubic meter
Source: California Air Resources Board 2017

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

2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained

when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

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

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

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

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

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

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

9. On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 μg/ m^3 to 12.0 μg/ m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 μg/ m^3, as was the annual secondary standard of 15 μg/ m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 μg/ m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

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

11. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

    Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

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

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

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

San Diego Air Pollution Control District

The SDAPCD was created to protect the public from the harmful effects of air pollution, achieve and maintain air quality standards, foster community involvement and develop and implement cost-effective programs that meet state and federal mandates while considering environmental and economic impacts.

Specifically, the SDAPCD is responsible for monitoring air quality and planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards in the district. Programs developed include air quality rules and regulations that regulate stationary source emissions, including area sources, point sources, and certain mobile source emissions. The SDAPCD is also responsible for establishing permitting requirements for stationary sources and ensuring that new, modified or relocated stationary sources do not create net emissions increases; and thus, are consistent with the region's air quality goals. The SDAPCD provides significance thresholds in Regulation II, Rule 20.2, Table 20-2-1. "AQIA Trigger Levels." These trigger levels were established for stationary sources of air pollution and are commonly used for environmental evaluations. The SDAPCD enforces air quality rules and regulations through a variety of means, including inspections, educational or training programs, or fines, when necessary. The project site is within the SDAB; and thus, is subject to SDAPCD rules and regulations.

State Implementation Plan/Air Quality Management Plan/Regional Air Quality Strategy

The federal Clean Air Act Amendments (CAAA) mandate that states submit and implement a State Implementation Plan (SIP) for areas not meeting air quality standards. SIPs are comprehensive plans that describe how an area will attain national and state ambient air quality standards. SIPs are a compilation of new and previously submitted plans, programs (i.e., monitoring, modeling and permitting programs), district rules, state regulations and federal controls and include pollution control measures that demonstrate how the standards will be met through those measures.

State law makes CARB the lead agency for all purposes related to the SIP. Local air districts and other agencies prepare SIP elements and submit them to CARB for review and approval. CARB forwards SIP revisions to the USEPA for approval and publication in the Federal Register. Thus, the Regional Air Quality Strategy (RAQS) and Air Quality Management Plan (AQMP) prepared by SDAPCD and referenced herein become part of the SIP as the material relates to efforts ongoing in San Diego County to achieve the national and state ambient air quality standards. The most recent SIP element for San Diego County was submitted in December 2016. The document identifies control measures and associated emission reductions necessary to demonstrate attainment of the 2008 Federal 8-hour ozone standard by July 20, 2018.

The San Diego RAQS was developed pursuant to California Clean Air Act (CCAA) requirements. The RAQS was initially adopted in 1991 and was updated in 1995, 1998, 2001, 2004, 2009 and 2016. The 2022 RAQS update is under development. Until it is adopted, the 2016 is applicable and can be found at the following:

https://www.sdapcd.org/content/dam/sdapcd/documents/grants/planning/2016%20RAQS%20(1).pdf

The RAQS identifies feasible emission control measures to provide progress in San Diego County toward attaining the State ozone standard. The pollutants addressed in the RAQS are volatile organic compounds (VOC) (also referred to as Reactive Organic Gases (ROG)) and oxides of nitrogen (NOx), precursors to the photochemical formation of ozone (the primary component of smog). The RAQS was initially adopted by the SDAPCD on June 30, 1992, and amended on March 2, 1993, in response to ARB comments. At present, no attainment plan for particulate matter less than 10 microns in diameter (PM_{10}) or particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) is required by the state regulations; however, SDAPCD has adopted measures to reduce particulate matter in the SDAB. These measures range from regulation against open burning to incentive programs that introduce cleaner technology. These measures can be found in a report titled "*Measures to Reduce Particulate Matter in San Diego County*" December 2005:
https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/JVR/AdminRecord/IncorporatedByReference/Appendices/Appendix-C---Air-Quality-Report/SDAPCD%202005.pdf

The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County, to estimate future emissions and then determine strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends as well as land use plans developed by the cities and the County as part of the development of the individual General Plans. As such, projects that propose development consistent with the growth anticipated by the general plans would be consistent with the RAQS. In the event that a project would propose development which is less dense than anticipated within the General Plan, the project would likewise be consistent with the RAQS. If a project proposes development that is greater than that anticipated in the General Plan and SANDAG's growth projections, the project might conflict with the RAQS and SIP; and thus, have a potentially significant impact on air quality.

Under state law, the SDAPCD is required to prepare an AQMP for pollutants for which the SDAB is designated non-attainment. Each iteration of the SDAPCD's AQMP is an update of the previous plan and has a 20-year horizon. Currently the SDAPCD has implemented the *2020 Plan for Attaining the National Ambient Air Quality Standard for Ozone in San Diego County* (October 2020) and a 2004 Carbon Monoxide Plan. The 2020 ozone plan was submitted to CARB on October 20, 2020. It was adopted and submitted to the USEPA for review on December 28, 2020. Comments from the USEPA are pending. This plan is available for download on the ARB website located at the following URL:
https://www.sdapcd.org/content/dam/sdapcd/documents/grants/planning/Att%20A%20(Attainment%20Plan)_ws.pdf

SDAPCD Rules and Regulations

As stated above, SDAPCD is responsible for planning, implementing, and enforcing federal and state ambient standards in the SDAB. The following rules and regulations apply to all sources in the jurisdiction of SDAPCD and would apply to the project.

SDAPCD Regulation IV: Prohibitions; Rule 50: Visible Emissions. Prohibits discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than 3 minutes in any period of 60 consecutive minutes that is darker in shade than that designated as Number 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or of such opacity as to obscure an observer's view to a degree greater than does smoke of a shade designated as Number 1 on the Ringelmann Chart (SDAPCD 1997).

SDAPCD Regulation IV: Prohibitions; Rule 51: Nuisance. Prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or have a tendency to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property (SDAPCD 1976).

SDAPCD Regulation IV: Prohibitions; Rule 55: Fugitive Dust. Regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site (SDAPCD 2009b).

SDAPCD Regulation IV: Prohibitions; Rule 67.0.1: Architectural Coatings. Requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (SDAPCD 2015).

SDAPCD Regulation XII: Toxic Air Contaminates; Rule 1200: Toxic Air Contaminants – New Source Review. Requires new or modified stationary source units with the potential to emit TACs above rule threshold levels to either demonstrate that they will not increase the maximum incremental cancer risk above 1 in 1 million at every receptor location, or demonstrate that toxics best available control technology (T-BACT) will be employed if maximum incremental cancer risk is equal to or less than 10 in 1 million, or demonstrate compliance with SDAPCD's protocol for those sources with an increase in maximum incremental cancer risk at any receptor location of greater than 10 in 1 million but less than 100 in 1 million (SDAPCD 2017b).

SDAPCD Regulation XII: Toxic Air Contaminates; Rule 1210: Toxic Air Contaminant Public Health Risks – Public Notification and Risk Reduction. Requires each stationary source that is required to prepare a public risk assessment to provide written public notice of risks at or above the following levels: maximum incremental cancer risks equal to or greater than 10 in 1 million,

or cancer burden equal to or greater than 1.0, or total acute noncancer health hazard index equal to or greater than 1.0, or total chronic non-cancer health hazard index equal to or greater than 1.0.

Regional Climate and Local Air Quality

The weather of San Diego County is profoundly influenced by the Pacific Ocean and its semi-permanent high-pressure systems that result in dry, warm summers and mild, occasionally wet winters. The average minimum temperature for January ranges from the mid-40s to the high-50s degrees Fahrenheit (4 to 15 degrees Celsius) across the county. July maximum temperatures average in the mid-80s to the high-90s degrees Fahrenheit (high-20s to the high-30s degrees Celsius). Most of the county's precipitation falls from November to April, with infrequent (approximately 10 percent) precipitation during the summer. The average seasonal precipitation along the coast is approximately 10 inches (254 millimeters); the amount increases with elevations as moist air is lifted over the mountains.

The interaction of ocean, land, and the Pacific High-Pressure Zone maintains clear skies for much of the year and drives the prevailing winds. Local terrain is often the dominant factor inland and winds in inland mountainous areas tend to blow upwards in the valleys during the day and down the hills and valleys at night.

In conjunction with the onshore/offshore wind patterns, there are two types of temperature inversions (reversals of the normal decrease of temperature with height), which occur within the region that affect atmospheric dispersive capability and that act to degrade local air quality. In the summer, an inversion at about 1,100 to 2,500 feet (335 to 765 meters) is formed over the entire coastal plain when the warm air mass over land is undercut by a shallow layer of cool marine air flowing onshore. The prevailing sunny days in this region further exacerbate the smog problem by inducing additional adverse photochemical reactions. During the winter, a nightly shallow inversion layer (usually at about 800 feet or 243 meters) forms between the cooled air at the ground and the warmer air above, which can trap vehicular pollutants. The days of highest Carbon Monoxide (CO) concentrations occur during the winter months.

The predominant onshore/offshore wind pattern is sometimes interrupted by so-called Santa Ana conditions, when high pressure over the Nevada-Utah region overcomes the prevailing westerly wind direction. This draws strong, steady, hot, and dry winds from the east over the mountains and out to sea. Strong Santa Ana winds tend to blow pollutants out over the ocean, producing clear days. However, at the onset or breakdown of these conditions or if the Santa Ana is weak, prevailing northwesterly winds are reestablished which send polluted air from the Los Angeles basin ashore in the SDAB. "Smog transport from the South Coast Air Basin (the metropolitan areas of Los Angeles, Orange, San Bernardino, and Riverside counties) is a key factor on more than half the days San Diego exceeds clean air standards" (San Diego Air Pollution Control District, 2010).

Pollutants

The SDAPCD is required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in "attainment" or "non-attainment." San Diego County is listed as a federal non-attainment area for ozone (eight hour) and a state non-attainment area for ozone (one hour and eight-hour standards), PM_{10} and $PM_{2.5}$. As shown in Table 2, the SDAB is in attainment for the state and federal standards for nitrogen dioxide, carbon monoxide, sulfur dioxide and lead. Characteristics of ozone, carbon monoxide, nitrogen dioxide, and suspended particulates are described below.

Table 2
San Diego County Attainment Status

Criteria Pollutant	Federal Designation	State Designation
Ozone (one hour)	Attainment*	Non-Attainment
Ozone (eight hour)	Moderate Non-Attainment	Non-Attainment
Carbon Monoxide	Attainment	Attainment
PM_{10}	Unclassifiable**	Non-Attainment
$PM_{2.5}$	Attainment	Non-Attainment
Nitrogen Dioxide	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	No Federal Standard	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Visibility	No Federal Standard	Unclassified

** The federal 1-hour standard of 12 ppm was in effect from 1979 through June 1, 2005. The revoked standard is referenced here because it was used for such a long period and because this benchmark is addressed in State Implementation Plans (SIPs).*

*** At the time of designation, if the available data does not support a designation of attainment or non-attainment, the area is designated as unclassifiable.*

Source: San Diego Air Pollution Control District. June 2016. http://www.sandiegocounty.gov/content/sdc/apcd/en/air-quality-planning/attainment-status.html

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

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

children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

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

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

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

Lead. Lead in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturing of batteries, paints, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phaseout of leaded gasoline reduced the overall inventory of airborne lead by nearly 95%. With the phaseout of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emissions sources of

greater concern. Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and, in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth. Children are highly susceptible to the effects of lead.

Sulfates. Sulfates are the fully oxidized form of sulfur, which typically occur in combination with metals or hydrogen ions. Sulfates are produced from reactions of SO2 in the atmosphere. Sulfates can result in respiratory impairment, as well as reduced visibility.

Vinyl Chloride. Vinyl chloride is a colorless gas with a mild, sweet odor, which has been detected near landfills, sewage plants, and hazardous waste sites, due to the microbial breakdown of chlorinated solvents. Short-term exposure to high levels of vinyl chloride in air can cause nervous system effects, such as dizziness, drowsiness, and headaches. Long-term exposure through inhalation can cause liver damage, including liver cancer.

Hydrogen Sulfide. Hydrogen sulfide is a colorless and flammable gas that has a characteristic odor of rotten eggs. Sources of hydrogen sulfide include geothermal power plants, petroleum refineries, sewers, and sewage treatment plants. Exposure to hydrogen sulfide can result in nuisance odors, as well as headaches and breathing difficulties at higher concentrations.

Visibility-Reducing Particles. Visibility-reducing particles are any particles in the air that obstruct the range of visibility. Effects of reduced visibility can include obscuring the viewshed of natural scenery, reducing airport safety, and discouraging tourism. Sources of visibility-reducing particles are the same as for PM2.5 described above.

Toxic Air Contaminants/Diesel Particulate Matter. Hazardous air pollutants, also known as toxic air pollutants (TACs) or air toxics, are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. Examples of toxic air pollutants include:

1. benzene, which is found in gasoline;
2. perchloroethylene, which is emitted from some dry-cleaning facilities; and
3. methylene chloride, which is used as a solvent.

Transportation related emissions are focused on particulate matter constituents within diesel exhaust and TAC constituents that comprise a portion of total organic gas (TOG) emissions from both diesel and gasoline fueled vehicles. Diesel engine emissions are comprised of exhaust particulate matter and TOGs which are collectively defined as Diesel Particulate Matter (DPM). DPM and TOG emissions from both diesel and gasoline fueled vehicles is typically composed of carbon particles and carcinogenic substances including polycyclic aromatic (i.e., odorous) hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. Diesel

exhaust also contains gaseous pollutants, including volatile organic compounds and oxides of nitrogen (NO_x).

Sensitive Receptors

Land uses considered to be sensitive receptors include residential, school, childcare centers, acute care hospitals, and long-term health care facilities. Sensitive receptors are determined based upon special factors which may include the age of the users or occupants, the frequency and duration of the use or occupancy, continued exposure to hazardous substances as defined by federal and state regulations, and the user's ability to evacuate a specific site in the event of a hazardous incident. Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children; the elderly; persons engaged in strenuous work or exercise and people with cardiovascular and chronic respiratory diseases. Recreational uses can be considered moderately sensitive to air pollution. Exercise can place a high demand on respiratory functions, which can be impaired by air pollution even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial and commercial areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent as the majority of the workers tend to stay indoors most of the time.

Nearby sensitive receptors are single-family residences located adjacent to and south of the site along the north side of Noble Drive and the single-family residence located at 11009 Summit Avenue north of the site Other single residences are located east, southeast and south of the site on the south side of Noble Avenue. The Calvary Chapel of Santee Church is located west of the site at 10920 Summit Avenue.

Monitored Air Quality

The SDAPCD and CARB monitors air quality conditions at locations throughout the SDAB. For this analysis, data from the El Cajon Lexington Elementary School (533 First Street) monitoring station were used to characterize existing pollutant conditions in the vicinity of the project site.

Table 3
Measured Air Quality Data

Averaging Time	Unit	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
				2020	2021	2023	2020	2021	2022
Ozone (O_3) – El Cajon – Lexington Elementary School, 533 First Street									
Maximum 1-hour concentration	ppm	State	0.09	0.094	0.088	0.100	0	0	1

Maximum 8-hour concentration	ppm	State	0.070	0.083	0.076	0.088	14	3	2
		Federal	0.070	0.083	0.076	0.088	14	3	2
Nitrogen Dioxide (NO_2) – El Cajon – Lexington Elementary School, 533 First Street									
Maximum 1-hour concentration	ppm	State	0.18	0.044	0.038	0.036	0	0	0
		Federal	0.100	0.044	0.038	0.036	0	0	0
Coarse Particulate Matter (PM_{10}) – El Cajon – Lexington Elementary School, 533 First Street[2]									
Maximum 24-hour concentration	µg/m^3	State	50	—	—	—	—	—	—
		Federal	150	—	—	—	—	—	—
Annual concentration	µg/m^3	State	20	—	—	—	—	—	—
Fine Particulate Matter ($PM_{2.5}$) – El Cajon – Lexington Elementary School, 533 First Street									
Maximum 24-hour concentration	µg/m^3	Federal	35	38.2	30.2	26.4	2	0	0
Annual concentration	µg/m^3	State	12	11.6	10.4	*	0	0	0
		Federal	12	10.7	9.3	9.4	0	0	0

[1] – *Federal O3 standard reduced from 75 ppm to 70 ppm in October 2015*
[2] – No PM10 data collected by CARB in the San Diego Air Basin
*Insufficient data to determine number of exceedances
Source: California Air Resources Board, 2020, 2021, 2022 Air Quality Data Summaries available at: http://www.arb.ca.gov/adam/topfour/topfourdisplay.php Accessed October 24, 2023.

AIR QUALITY IMPACT ANALYSIS

Methodology and Significance Thresholds

Air quality modeling was performed in general accordance with the methodologies outlined in the SDAPCD 2016 RAQS to identify both construction and operational emissions associated with each phase and the cumulative total of all project phases at build out. All emissions were calculated using the California Emissions Estimator Model (CalEEMod) software version 2022.1 which incorporates current air emission data, planning methods and protocol approved by CARB.

Construction activities would include site preparation, grading, construction of the buildings/utilities and related improvements and painting the interior and exterior building surfaces and paving streets and parking areas. Construction activities would require the use of equipment that would generate criteria air pollutant emissions. For modeling purposes, it was assumed that all construction equipment used would be diesel-powered. Construction emissions associated with development of the proposed project were quantified by estimating the types of equipment, including the number of individual pieces of equipment, that would be used on-site during each of the construction phases as well as off-site haul trips to remove 17,500 cubic yards of excavation spoils. Construction emissions are analyzed using the regional

thresholds established by the SDAPCD and published under Rule 20-2. No fill import would be required.

Operational emissions include mobile source emissions, energy emissions, and area source emissions. Mobile source emissions are generated by motor vehicle trips associated with operation of the project. Emissions attributed to energy use include electricity and natural gas consumption for space and water heating. Area source emissions are generated by landscape maintenance equipment, refrigeration, consumer products and architectural coatings (i.e., paints). To determine whether a regional air quality impact would occur, the increase in emissions are compared with the SDAPCD recommended regional thresholds for operational emissions.

Regional Thresholds. Based on Appendix G of the *CEQA Guidelines (2021)*, a project would have a significant air quality impact if it would:

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

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) indicates that, where available, the significance criteria established by the applicable air quality management district or pollution control district may be relied upon to determine whether the project would have a significant impact on air quality. As part of its air quality permitting process, SDAPCD has established thresholds in Rule 20.2 requiring the preparation of Air Quality Impact Assessments for permitted stationary sources. SDAPCD sets forth quantitative emission thresholds for stationary sources. Although these trigger levels do not generally apply to mobile sources or general land development projects, for comparative purposes these levels may be used to evaluate the increased emissions that would be emitted into the SDAB from proposed land development projects. Project-related air quality impacts estimated in this environmental analysis would be considered significant if any of the applicable significance thresholds presented below in Table 4 are exceeded.

The thresholds listed in Table 4 are screening-level thresholds used to evaluate whether proposed-project-related emissions could cause a significant impact on air quality. Emissions below the screening-level thresholds would not cause a significant impact. The emissions-based thresholds for ozone precursors (ROG and NOx) are intended to serve as the threshold for ozone. This approach is used because ozone is not emitted directly; thus, ozone concentrations associated with individual projects precursors (VOC and NOx) emissions cannot be determined through air quality models or other quantitative methods. For nonattainment pollutants, if emissions exceed the thresholds shown in Table 4, the project has the potential to result in a

cumulatively considerable net increase in these pollutants; and thus, could have a significant impact on the ambient air quality.

Table 4
SDAPCD Air Emission Significance Thresholds

Daily Construction and Operational Emissions	
Pollutant	Total Emissions (pounds per day)
Reactive Organic Gas (ROG)	75
Nitrogen Oxides (NOx)	250
Carbon Monoxide (CO)	550
Sulfur Oxides (SOx)	250
Respirable Particulate Matter (PM_{10})	100
Fine Particulate Matter (PM2.5)	55

With respect to odors, SDAPCD Rule 51 (Public Nuisance) prohibits emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. A project that involves a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors.

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

As stated, under state law, the SDAPCD is required to prepare an AQMP for pollutants for which the SDAB is designated non-attainment. Each iteration of the SDAPCD's AQMP is an update of the previous plan and has a 20-year horizon. A project may be deemed inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. Currently the SDAPCD has implemented the 2*020 Plan for Attaining the National Ambient Air Quality Standard for Ozone in San Diego County* (October 2020) and a 2004 Carbon Monoxide Plan. The AQMP incorporates local city General Plans and the San Diego Association of Governments socioeconomic forecast projections of regional population, housing and employment growth.

The proposed project involves the construction of 50 multi-family residences and 13 open parking spaces. The project site is zoned Residential 7 (R-7). The project would be allowed by right on the project site per Chapter 13.10 of the Santee Municipal Code.

The San Diego APCD and San Diego Association of Governments are responsible for developing and implementing the clean air plans for attainment and maintenance of the ambient air quality standards in the basin—specifically, the SIP and RAQS. The federal O3 maintenance plan, which is part of the SIP, was adopted in 2012. The most recent O3 attainment plan was adopted in 2016. The SIP includes a demonstration that current strategies and tactics will maintain acceptable air quality in the basin based on the NAAQS. The RAQS was initially adopted in 1991 and is updated on a triennial basis (most recently in 2016). The RAQS outlines SDAPCD's plans and control measures designed to attain the state air quality standards for O3. The SIP and RAQS rely on information from CARB and SANDAG, including mobile and area source emissions as well as information regarding projected growth in the County and the cities

in the County, to project future emissions and determine the strategies necessary for the reduction of emissions through regulatory controls.

CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends and land use plans developed by the County and the cities in the County as part of the General Plan development process. If a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the SIP and RAQS and may contribute to a potentially significant cumulative impact on air quality.

As stated, the site is zoned R-7. The zoning designation is intended to support multifamily residential development consistent with what is proposed. The project is consistent with the zoning designation; and thus, was anticipated in the local plan and SANDAG's growth projections. Further, the project will replace an existing single-family residence and out-buildings located on the site. The project would not cause or contribute to population or employment growth beyond what has been considered in SANDAG's Regional Plan population and employee population estimates for the years 2020 and 2035.

The San Diego Association of Governments forecast population and employment through the year 2050 as part of the 2050 Regional Transportation Plan, Regional Growth Forecast.

The population of Santee was projected to be 57,501 in 2025 and 57,773 in 2035, or an increase of 272 residents over the period (SANDAG 2021). The project is anticipated to house 139 residents (CalEEMod 2022.1); therefore, the project would be within SANDAG's population growth forecast, and would not conflict with the SIP and RAQS. The project would be consistent with the AQMP and not cause an adverse impact under threshold (a).

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

Construction Emissions

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction vehicles, work crew vehicle trips in addition to ROG that would be released during the drying phase upon application of paint and other architectural coatings. Construction would generally consist of demolition (debris removal), site preparation (clearing/grubbing), excavation/grading, construction of the proposed buildings, architectural coating (i.e., paint) application and paving.

Emissions from the construction phase of the project were estimated using CalEEMod 2022.1. Construction scenario assumptions, including phasing, equipment mix, and vehicle trips, were based on information provided by the project applicant and CalEEMod default values when project specifics were not known. For purposes of estimating project emissions, and based on

information provided by the project applicant, it is assumed that construction of the project would occur five days per week and commence in October 2024 and would be completed January 2026. The schedule is an estimate calculated by CalEEMod 2022.1. The duration of phases are approximated:

- Demolition: 4 weeks
- Site Preparation: 1 week
- Grading: 22 weeks
- Building Construction: 46 weeks
- Paving: 2 weeks
- Architectural Coating: 8 weeks

Construction-worker and vendor trips estimates by construction phase were based on CalEEMod default data. Mass grading would include the entire project site. Approximately 17,500 cubic yards of debris would be removed during site preparation and grading. Based on a haul truck capacity of 16 cubic yards per truck, demolition and earth-moving activities would result in approximately 1,093 one-way trips (547 round trips) during the site preparation and grading phase. No fill import is anticipated during building construction. CalEEMod default trip length values were used for the distances for all construction-related trips. Defaults for the construction equipment mix and vehicle trips used for estimating the project-generated construction emissions were used and are provided in Appendix A.

As discussed, the project would implement dust control strategies as a project design feature. To reflect implementation of proposed dust control strategies, the following was used in CalEEMod:

- Water exposed area two times per day (55% reduction in PM10 and PM2.5); and

Table 5 summarizes the estimated maximum daily emissions of pollutants occurring during construction. As shown in Table 5, construction of the proposed project would not exceed the SDAPCD daily thresholds. This assumes the architectural coating phase would overlap with the building construction phase by approximately 42 workdays as a design feature to reflect actual construction phasing and reduce daily ROG (VOC) emissions. With SDAPCD Rule 55 compliance, no mitigation measures would be required to meet construction emission thresholds. Construction emissions would be **less than significant** per thresholds (b) and (c) referenced above.

Table 5
Estimated Maximum Daily Construction Emissions with Dust Control Measures

Construction Phase		Maximum Emissions (lbs/day)				
	ROG	NO_x	CO	SOx	PM_{10}	$PM_{2.5}$
2024 Maximum lbs/day	4.0	58.3	41.4	0.15	13.7	6.8
2025 Maximum lbs/day	1.8	17.2	18.9	0.03	3.8	2.1
2026 Maximum lbs/day	0.7	6.2	9.6	0.01	0.4	0.3
SDAPCD Regional Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded 2022	**No**	**No**	**No**	**No**	**No**	**No**

Construction-Related Toxic Air Contaminant Impacts

Potential for toxic air contaminant emissions related to diesel particulate emissions associated with heavy equipment operations during construction. According to South Coast Air Quality Management District (SCAQMD) methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk". A cancer risk greater than 10 cases per 1,000,000 people exposed would be considered a significant impact. The California Office of Environmental Health Hazard Assessment (OEHHA) health risk guidance states that a residential receptor should be evaluated based on a 30-year exposure period. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. The construction schedule duration would be approximately 17 months; however, only a portion of the overall construction work would require the use of diesel-powered equipment. The proposed project would not result in a long-term (i.e., 30 or 70 year) exposure to a substantial source of toxic air contaminant emissions; and thus, would not be exposed to the related individual cancer risk. Therefore, no significant toxic air contaminant impacts would occur during construction of the proposed project**.**

Operational Impacts

Regional Pollutant Emissions

Emissions from the operational phase of the project were estimated using CalEEMod version 2022.1. Operational year 2026 was assumed consistent with completion of project construction.

Area Sources. CalEEMod was used to estimate operational emissions from area sources, including emissions from consumer product use, architectural coatings, and landscape

maintenance equipment. Emissions associated with space heating and water heating are calculated in the building energy use module of CalEEMod.

Consumer products are chemically formulated products used by household and institutional consumers, including detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. Other paint products, furniture coatings, or architectural coatings are not considered consumer products. Consumer product VOC emissions are estimated in CalEEMod based on the floor area of buildings and on the default factor of pounds of VOC per building square foot per day. The CalEEMod default values for consumer products were assumed.

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers used during building maintenance. CalEEMod calculates the VOC evaporative emissions from application of surface coatings based on the VOC emission factor, the building square footage, the assumed fraction of surface area, and the reapplication rate. VOC emissions were estimated based on compliance with SDAPCD Rule 67.0.1, which provides VOC content limits for various coatings. The three general coatings categories are 50 grams per liter (g/L) VOC for flat coatings, 100 g/L VOC for non-flat coatings, and 150 g/L VOC for non-flat high gloss coatings. Consistent with typical construction practices, it is anticipated that interior and exterior paint would not exceed non-flat coating limits, exterior paint would not exceed non-flat coating limits, and a small portion of exterior paint and finishes (trim and other minor finishes) would not exceed non-flat high-gloss coatings limits. It was conservatively assumed that all non-residential (interior and exterior) architectural coating would be 50 g/L VOC and parking lot coating would be 100 g/L.

Energy Sources. Energy sources include emissions associated with building electricity and natural gas use. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for GHGs in CalEEMod, since criteria pollutant emissions occur at the site of the power plant, which is typically off site.

Mobile Sources. To quantify emissions associated with project operational mobile sources, CalEEMod default data, including trip characteristics, trip lengths, variable start information and emissions factors were used for the model inputs. Project-related traffic includes the mixture of vehicles consistent with CalEEMod default vehicle fleet assumptions. Emission factors for 2026 (the first full year of project operation) were used to estimate emissions associated with full buildout of the project.

Table 6 summarizes area, energy and mobile source emissions associated with operation of the proposed project. As shown in Table 6, daily emissions would not exceed the SDAPCD thresholds for ROG, NO_X, CO, SO_X, PM_{10} or $PM_{2.5}$. Therefore, the project's air quality impacts (including impacts related to criteria pollutants, sensitive receptors and violations of air quality standards) would be less than significant per threshold b. Further, the project would not contribute to a cumulatively considerable impact. Impacts relative to threshold b and c would be less than significant.

Table 6
Estimated Operational Emissions

	Estimated Emissions (lbs/day)					
	ROG	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Proposed Project						
Area	1.4	0.02	2.8	0.0001	0.0010	0.0010
Energy	0.01	0.17	0.07	0.001	0.0138	0.0138
Mobile	1.6	1.2	12.5	0.03	2.6	0.6
Maximum lbs/day	**3.1**	**1.4**	**15.5**	**0.03**	**2.7**	**0.7**
SDAPCD Thresholds	**75**	**250**	**550**	**250**	**100**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

See Appendix for CalEEMod version. 2022.1 computer model output - summer emissions shown

c. Expose sensitive receptors to substantial pollutant concentrations;

Carbon Monoxide Hotspots. As discussed, carbon monoxide is a colorless, odorless, poisonous gas that may be found in high concentrations near areas of high traffic volumes. CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. The SDAB is in attainment of state and federal CO standards; thus, CO data is no longer collected and not all monitoring stations have CO data available. The 1110 Beardsley Street monitoring station in the Barrio Logan community is the closest monitoring station to the site that provides CO data. The maximum 8-hour average CO level recorded in 2012 (the last year data were recorded) was 1.81 parts per million (ppm). Concentrations are below the 9-ppm state and federal 8-hour standard.

Numerous factors are related to the formation of CO hotspots. The potential for CO hotspots in the SDAB is steadily decreasing because of the continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion and the already very low ambient CO concentrations. Furthermore, CO transport is extremely limited and disperses rapidly with distance from the source. Under certain extreme meteorological conditions, however, CO concentrations near a congested roadway or intersection may reach unhealthy levels.

Typically, high CO concentrations are associated with roadways or intersections operating under congested conditions. Projects contributing to adverse traffic conditions may contribute to the formation of CO hotspots. Because the City of Santee does not have CO hotspot guidance, the guidance recommended by the County of San Diego was applied to evaluate the potential for CO hotspots to occur as a result of the project. As indicated in the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements Air Quality (County of San Diego 2007), a site-specific CO hotspot analysis should be performed if a proposed development would cause road intersections to operate at or below a LOS E with intersection peak-hour trips exceeding 3,000.

The proposed project was evaluated for CO hotspots under 2026 build out conditions. Trip Generation and Vehicle Miles Traveled Memorandum was prepared for the proposed project (TJW Engineering, Inc. October 2023). The memorandum was prepared consistent with Guidelines for Transportation Impact Studies in the San Diego Region (May 2019). The guidelines state that projects will not require a transportation impact study if they generate less than 1,000 trips and less than 110 peak-hour trips. Further, the County guidelines state that projects consistent with the General Plan and that generate less than 1,000 daily trips are not required to complete a VMT assessment. The proposed project will generate 300 daily trips and 27 peak hour trips. Thus, based on the Guidelines for Transportation Impact Studies in the San Diego Region, the proposed project would not generate enough traffic to require further traffic or VMT analysis.

Because no project specific traffic analysis is required, the project's contribution to baseline traffic conditions would be less than significant and would not contribute to a traffic conditional that could create a CO hotspot. Impacts would be **less than significant** (**threshold c**). No further evaluation with respect to CO hotspots is required.

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

The State of California Health and Safety Code, Division 26, Part 4, Chapter 3, Section 41700, SDAPCD Rule 51 prohibits emissions from any source whatsoever in such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to the public health or damage to property. Projects required to obtain permits from SDAPCD are evaluated by SDAPCD staff for potential odor nuisance, and conditions may be applied (or control equipment required) where necessary to prevent occurrence of public nuisance.

SDAPCD Rule 51 (Public Nuisance) also prohibits emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. A project that involves a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors. Odor issues are very subjective by the nature of odors themselves and due to the fact that their measurements are difficult to quantify. As a result, this guideline is qualitative and will focus on the existing and potential surrounding uses and location of sensitive receptors.

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

impacts associated with other emissions (such as those leading to odors) during construction would be less than significant.

Land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities. The project would construct 50 new multifamily residences with associated parking and infrastructure improvements. These uses are not associated with odors that could rise to the level of significance. Therefore, impacts would be **less than significant** per threshold (d).

GREENHOUSE GAS EMISSION DISCUSSION

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

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

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

California Regulations

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

Assembly Bill 32 and CARB's Scoping Plan

To further the goals established in EO S-3-05, the Legislature passed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. Under AB 32, CARB is responsible for and is recognized as having the expertise to carry out and develop the programs and requirements necessary to achieve the GHG emissions reduction mandate of AB 32. Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions from specified sources. This program is used to monitor and enforce compliance with established standards. CARB also is required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 authorized CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

In 2007, CARB approved a limit on the statewide GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 MMT CO_2E). CARB's adoption of this limit is in accordance with Health and Safety Code, Section 38550.

Further, in 2008, CARB adopted the Scoping Plan in accordance with Health and Safety Code, Section 38561. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions for various emission sources/sectors to 1990 levels by 2020. The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction features by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program. The key elements of the Scoping Plan include the following (CARB 2008):

1. Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards;

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

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

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

In 2014, CARB adopted the First Update to the Climate Change Scoping Plan: Building on the Framework (First Update; CARB 2014). The stated purpose of the First Update is to "highlight California's success to date in reducing its GHG emissions and lay the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80% below 1990 levels by 2050" (CARB 2014). The First Update found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels needed to stay on track to reduce emissions to 80% below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.

In conjunction with the First Update, CARB identified "six key focus areas comprising major components of the state's economy to evaluate and describe the larger transformative actions that will be needed to meet the state's more expansive emission reduction needs by 2050"

(CARB 2014). Those six areas are (1) energy, (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure), (3) agriculture, (4) water, (5) waste management, and (6) natural and working lands. The First Update identifies key recommended actions for each sector that will facilitate achievement of EO S-3-05's 2050 reduction goal (CARB 2014).

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

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

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

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

Assembly Bill 939 and Senate Bill 1374
Assembly Bill 939 (AB 939) requires that each jurisdiction in California to divert at least 50 percent of its waste away from landfills, whether through waste reduction, recycling or other means. Senate Bill 1374 (SB 1374) requires the California Integrated Waste Management Board

to adopt a model ordinance by March 1, 2004 suitable for adoption by any local agency to require 50 to 75 percent diversion of construction and demolition of waste materials from landfills.

Senate Bill 1368

Senate Bill 1368 (SB 1368) is the companion Bill of AB 32 and was adopted September, 2006. SB 1368 required the California Public Utilities Commission (CPUC) to establish a performance standard for baseload generation of GHG emissions by investor-owned utilities by February 1, 2007 and for local publicly owned utilities by June 30, 2007. These standards could not exceed the GHG emissions rate from a baseload combined-cycle, natural gas-fired plant. Furthermore, the legislation states that all electricity provided to the State, including imported electricity, must be generated by plants that meet the standards set by California Public Utilities Commission (CPUC) and California Energy Commission (CEC).

Senate Bill 97

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

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

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

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

4. New amendments include guidelines for determining methods to mitigate the effects of greenhouse gas emissions in Appendix F of the CEQA Guidelines.

5. OPR is clear to state that "to qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project; general compliance with a plan, by itself, is not mitigation."
6. OPR's emphasizes the advantages of analyzing GHG impacts on an institutional, programmatic level. OPR therefore approves tiering of environmental analyses and highlights some benefits of such an approach.

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

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

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

The Energy Commission adopted 2008 Standards on April 23, 2008 and Building Standards Commission approved them for publication on September 11, 2008. These updates became effective on August 1, 2009. All buildings for which an application for a building permit is submitted on or after July 1, 2014 must follow the 2013 standards. The 2013 commercial standards are estimated to be 30 percent more efficient than the 2008 standards; 2013 residential standards are at least 25 percent more efficient. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas emissions.

Senate Bill 375
Senate Bill 375 (SB 375) was adopted in September 2008 and aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPO) to adopt a sustainable

communities strategy (SCS) or alternate planning strategy (APS) that will prescribe land use allocation in that MPOs Regional Transportation Plan (RTP). CARB, in consultation with each MPO, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's sustainable community's strategy or alternate planning strategy for consistency with its assigned targets.

The proposed project is located within the Southern California Association of Governments (SCAG) jurisdiction, which has authority to develop the SCS or APS. For the SCAG region, beginning October 2018, the targets set by CARB are at eight percent below 2005 per capita GHG emissions levels by 2020 and 19 percent below 2005 per capita GHG emissions levels by 2035. On September 3, 2020, SCAG adopted the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), Connect SoCal. which meets the CARB emission reduction requirements. The Housing Element Update is required by the State to be completed within 18 months after RTP/SCS adoption. The Santee Housing Element 2021-2029 (6th Cycle) was adopted July 24, 2021 and includes housing-related goals, policies, and programs to address the existing and projected future housing needs of the City.

City and County land use policies, including General Plans, are not required to be consistent with the RTP and associated SCS or APS. However, CEQA incentivizes, through streamlining and other provisions, qualified projects that are consistent with an approved SCS or APS and categorized as "transit priority projects."

Senate Bill X7-7

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

Title 24 Building Energy Efficiency Standards

California's Energy Efficiency Standards for Residential and Nonresidential 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. On August 11, 2021, the CEC adopted the 2022 Energy Code. In December 2021, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. Among other updates like strengthened ventilation standards for gas cooking appliances, the 2022 Energy Code

includes updated standards such as new electric heat pump requirements for residential uses, schools, offices, banks, libraries, retail, and grocery stores; the promotion of electric-ready requirements for new homes including the addition of circuitry for electric appliances, battery storage panels and dedicated infrastructure to allow for the conversion from natural gas to electricity; and the expansion of solar photovoltaic and battery storage standards to additional land uses including high-rise multi-family residences, hotels and motels, tenant spaces, offices (including medical offices and clinics), retail and grocery stores, restaurants, schools, and civic uses (including theaters auditoriums, and convention centers). Newly constructed commercial buildings would also be required to have a solar photovoltaic (PV) array and an energy storage system (ESS) installed. Projects whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.

Title 24 California Green Building Standards Code

The California Green Building Standards Code (CCR Title 24, Part 11 code) 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 standards require 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. CALGreen 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. The CALGreen Code also provides voluntary measures (CALGreen Tier 1 and Tier 2) that local governments may adopt which encourage or require additional measures in the five green building topics. CALGreen's Tier 1 standards call for a 15% improvement in energy requirements, stricter water conservation, 65% diversion of construction and demolition waste, 10% recycled content in building materials, 20% permeable paving, 20% cement reduction, and cool/solar-reflective roofs. CALGreen's more rigorous Tier 2 standards call for a 30% improvement in energy requirements, stricter water conservation, 75% diversion of construction and demolition waste, 15% recycled content in building materials, 30% permeable paving, 25% cement reduction, and cool/solar-reflective roofs.

The CEC adopted the 2022 CALGreen Code in December 2021, went into effect on January 1, 2023. The 2022 CALGreen code focuses on battery storage system controls, demand management, heat pump space and water heating, and building electrification.

Title 20

Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. Performance of appliances must be certified through the CEC to demonstrate compliance with standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing

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

Executive Order B-30-15

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

Senate Bill 32 and Assembly Bill 197

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

SB 350— Clean Energy and Pollution Reduction Act of 2015

In October 2015, the legislature approved and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Provisions for a 50 percent reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

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

2. Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the California Energy Commission (CEC), and local publicly-owned utilities.

3. Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States (California Leginfo 2015).

SB 100

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

Executive Order B-55-18

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

AB 2127

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

Local Regulations and CEQA Requirements

As referenced, pursuant to the requirements of SB 97, the Resources Agency has adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted CEQA Guidelines provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, but contain no suggested thresholds of significance for GHG emissions. Instead, lead agencies are given the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. The general approach to developing a Threshold of Significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move the state towards climate stabilization. If a project would generate GHG

emissions above the threshold level, its contribution to cumulative impacts would be considered significant.

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

Sustainable Santee Plan

The City of Santee approved a qualified GHG reduction plan under CEQA called the *Sustainable Santee Plan: The City's Roadmap to Greenhouse Gas Reduction*s, in December 2019. The *Sustainable Santee Plan* (Plan) is a long-range plan to reduce GHG emissions from community activities and municipal operations within the City of Santee to support the State's efforts under Executive Order S3-05, SB 32, and AB 32 and to mitigate climate-related impacts. The Sustainable Santee Plan describes the GHG emissions baseline and forecasted emissions for 2020, 2030 and 2035, and identifies the achievable, measurable strategies and actions that the City of Santee will implement to reduce emissions. The City developed an interim goal for 2030 which is to reduce emissions to 40 percent below 2005 levels and a longer-term goal for 2035 which is to reduce emissions to 49 percent below 2005 levels. The interim and longer-term goals would put the City on a path consistent with the State's long-term goal to achieve Statewide carbon neutrality (zero net emissions) by 2045.

The Plan contains implementation strategies that are consistent with the City's goals, values, and priorities and that also support the State's broad climate protection efforts. The Plan also contains local initiatives intended to improve community health and safety, reduce transportation and utility related emissions, facilitate locally beneficial development projects and enhance collaboration on regional planning strategies.

With respect to evaluating project consistency with the Plan, projects that are consistent with the General Plan growth projections and land uses upon which the GHG modeling performed for the Plan was based, and that incorporate applicable GHG reduction measures, can be found consistent with the Plan and related statewide programs to reduce GHG emissions.

CLIMATE CHANGE IMPACT ANALYSIS

Thresholds of Significance

Pursuant to the requirements of SB 97, the Resources Agency adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions in March 2010. These guidelines are used in evaluating the cumulative significance of GHG emissions from the proposed project. According to the adopted CEQA Guidelines, impacts related to GHG emissions from the proposed project would be significant if the project would:

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

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

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

The significance of GHG emissions may be evaluated based on locally adopted quantitative thresholds, or consistency with a regional GHG reduction plan (such as a Climate Action Plan or Sustainable Community Plan).

Neither the City nor the County of San Diego have established a CEQA threshold of significance for GHG emissions. The State CEQA Guidelines Section 15064.4 does not establish a threshold of significance but states that Lead Agencies may appropriately look to thresholds developed by other public agencies or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (State CEQA Guidelines Section 16064.7(c)). Various threshold approaches have been recommended, drafted, or adopted by other public agencies. The County of San Diego uses a screening threshold of 900 metric tons of carbon dioxide (MT CO2e) annually. For the purpose of this evaluation, if the CO2e emissions generated by the proposed project are less than 900 MT CO2e annually, the project would have a less than significant GHG impact.

Methodology

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

Construction Emissions

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

Operational Emissions

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

Emissions associated with area sources (i.e., consumer products, landscape maintenance, and architectural coating) were calculated in CalEEMod based on standard emission rates from CARB, USEPA, and district supplied emission factor values (CalEEMod User Guide, May 2021). Emissions from waste generation were also calculated in CalEEMod and are based on the IPCC's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste (CalEEMod User Guide, May 2021). Waste disposal rates by land use and overall composition of municipal solid waste in California was primarily based on data provided by the California Department of Resources Recycling and Recovery (CalRecycle).

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

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

Estimate of Emissions

Construction Emissions

Construction activity is assumed to occur over a period of approximately 17 months beginning in October 2024 and concluding in March 2026. Based on CalEEMod results, construction activity for the project would generate an estimated 451 metric tons of carbon dioxide equivalent (CO_2E), as shown in Table 7. Amortized over a 30-year period (the assumed life of the project), construction of the proposed project would generate 20 metric tons of CO_2E per year.

Table 7
Estimated Construction Related Greenhouse Gas Emissions

Year	Annual Emissions (metric tons CO_2E)
2024	118
2025	380
2026	87
Total	**585**
Amortized over 30 years	**20**

See Appendix for CalEEMod software program output

Operational Indirect and Stationary Direct Emissions

Long-term emissions relate to energy use, solid waste, water use, and transportation. Each source is discussed below and includes the emissions associated with existing development and the anticipated emissions that would result from the proposed project.

Energy Use. Operation of onsite development would consume both electricity and natural gas (see Appendix for CalEEMod results). The generation of electricity through combustion of fossil fuels typically yields CO_2, and to a smaller extent, N_2O and CH_4. Natural gas emissions can be calculated using default values from the CEC sponsored CEUS and RASS studies which are built into CalEEMod. As shown in Table 8, the overall net increase in energy use at the project site would result in approximately 84 metric tons of CO_2E per year.

Water Use Emissions. The CalEEMod results indicate that the project would use approximately 1,800,000 gallons of water per year. Based on the amount of electricity generated to supply and convey this amount of water, as shown in Table 9, the project would generate approximately 5 metric tons of CO_2E per year. Emissions related to water consumption would be reduced by

20% per Senate Bill X7-7, by implementing measures that include the installation of low flow plumbing fixtures (i.e., faucets, toilets, show heads) and water efficient irrigation systems.

Solid Waste Emissions. Implementation of a municipal recycling program that would achieve a 75% diversion rate statewide is required for residential uses per the California Integrated Waste Management Act of 1989 (AB 939). The CalEEMod results indicate that the project would result in approximately 3 metric tons of CO_2E per year associated with solid waste disposed within landfills provided 75% of solid waste is recycled (Table 9).

Table 8
Estimated Annual Energy-Related Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Proposed Project	
Electricity	48 metric tons
Natural Gas	36 metric tons
Total	**84 metric tons**

See Appendix for CalEEMod software program output.

Table 9
Estimated Annual
Solid Waste and Water Use Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Water	5 metric tons
Solid Waste	3 metric tons
Total Water and Solid Waste	**8 metric tons**

See Appendix for CalEEMod software program output.

Transportation Emissions. Mobile source GHG emissions were estimated using the trip generation rates provided in CalEEMod which utilizes the *Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition.* Table 10 shows the estimated mobile emissions of GHGs for the project based on the estimated annual VMT of 1,233.854. As shown in Table 10, the project would generate approximately 451 metric tons of CO_2E associated with new vehicle trips.

Table 10
Estimated Annual Mobile Emissions of Greenhouse Gases

Emission Source	Annual Emissions (CO_2E)
Proposed Project	
Mobile Emissions (CO_2 & CH_4)	451 metric tons
Total	**451 metric tons**

See Appendix for CalEEMod software program output.

Combined Construction, Stationary and Mobile Source Emissions

Table 11 combines the net new construction, operational, and mobile GHG emissions associated with the proposed project. As discussed above, temporary emissions associated with construction activity (approximately 585 metric tons CO_2E) are amortized over 30 years (the anticipated life of the project).

For the proposed project, the combined annual emissions would total approximately 563 metric tons per year in CO_2E. The proposed project is evaluated based on the threshold of 900 MT CO_2E annually. Project-related annual GHG emissions would not exceed the 900 metric ton screening threshold; thus, annual emissions would be less than significant per threshold a.

Table 11
Combined Annual Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Construction	20 metric tons
Operational Energy Solid Waste Water	 84 metric tons 5 metric tons 3 metric tons
Mobile	451 metric tons
Total	**563 metric tons**

See Appendix for CalEEMod software program output.

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

As discussed above, operation of the proposed project would result in an estimated total of 563 CO2e (MT/year). The GHG emissions from the proposed project would not exceed the County f San Diego screening criteria. Further, the project would be consistent with the following goals of the draft Sustainable Santee Plan approved in December 2019:

- Goal 2: Increase energy efficiency in new residential units; and
- Goal 9: Decrease GHG emissions through reducing solid waste generation.

The project would comply with current Energy Code (California Code of Regulations, Title 24, Part 6) and the 2019 CALGreen standards, which require energy-efficient measures including increased lighting efficiency and the installation of Energy Star® appliances. As required by the 2020 CALGreen standards, the project would reduce indoor water consumption by 20 percent and would implement outdoor water use reduction measures outlined in the Model Water Efficient Landscape Ordinance. The project would also comply with the Santee Water Efficient Landscape Ordinance which promotes water conservation and efficiency by imposing various requirements related to evapotranspiration rates, irrigation efficiency and plant factors. The project would comply with the City's construction and demolition recycling ordinance (Santee Municipal Code Section 13.38.060) and Solid Waste Ordinance, which follow state regulations for solid waste and recycling intended to result in a 75% reduction in the volumes of waste disposed of in landfills.

Therefore, the project would not conflict with the goals and objectives of the Sustainable Santee Plan. Likewise, the proposed project would not conflict with the provisions of AB 32, or any other State or regional plan, policy, or regulation of an agency adopted for the purpose of reducing greenhouse gas emissions. Impacts would be less than significant.

Consistency with EO S-3-05 and SB 32

EO S-3-05. This EO establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050.

SB 32. This bill establishes a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030.

As stated, the Sustainable Santee Plan describes the GHG emissions baseline and forecasted emissions for 2020, 2030 and 2035, and identifies the achievable, measurable strategies and actions that the City of Santee will implement to reduce emissions. The City developed an interim goal for 2030, which was to reduce emissions to 40 percent below 2005 levels and a longer-term goal for 2035, which is to reduce emissions to 49 percent below 2005 levels. The interim and longer-term goals would put the City on a path consistent with SB 32 and the State's long-term goal to achieve Statewide carbon neutrality (zero net emissions) by 2045.

Statewide, CARB has indicated that California is on track to achieve both the 2030 and 2050 goals. This is confirmed in the 2017 Scoping Plan, which states that the Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies to ensure that California meets its GHG reduction targets. Table 12 summarizes the Project's consistency with applicable action elements of the 2017 Scoping Plan.

Table 12
2017 Scoping Plan Consistency Summary

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	California Public Utility Commission (CPUC), California Energy Commission (CEC) and California Air Resources Board (CARB)	No Conflict. The Project would use energy from San Diego Gas and Electric (SDG&E). SDG&E has committed to diversify their portfolio of energy sources by increasing energy from wind and solar sources. The Project would not interfere with or obstruct SDG&E's energy source diversification efforts.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		No Conflict. The Project would be constructed in compliance with current CBC requirements including the 2022 Building and Energy Efficiency Standards and the 2021 California Green Building Standard requirements.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plugin hybrid light-duty EVs by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, Office of Planning and Research (OPR), Local Agencies	No Conflict. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2025 targets. As this is a CARB enforced standard, vehicles that access the Project must comply with the standards as applicable; and thus, would comply with the strategy.
At least 4.2 million zero emission and plugin hybrid light-duty EVs by 2030.		No Conflict. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2030 targets.

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, Office of Planning and Research (OPR), Local Agencies	No Conflict. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.
Medium- and Heavy-Duty GHG Phase 2.		No Conflict. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to implement Medium- and Heavy-Duty GHG Phase 2.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NOX standard.		Not Applicable. This measure is not related to the project scope.
Last Mile Delivery: New regulation that would result in the use of low NOX or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		No Conflict. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve last mile delivery emissions.
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		No Conflict. As stated in the Traffic Study, the Project's VMT impact would be considered less than significant.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	No Conflict. The project would not exceed the City's GHG emission thresholds for retail sources or

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
		otherwise conflict with GHG reduction efforts.
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GOBiz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	No Conflict. The project would not conflict with use of adjacent streets by pedestrians or bicycles. Further, transit service provided by Metropolitan Transit System (MTS) would not be affected by the project.
By 2019, develop pricing policies to support low-GHG transportation (e.g., low emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, California Transportation Commission (CTC), OPR, SGC, CARB	Not Applicable. This measure is not related to the project scope.
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, California Natural Resource Agency (CNRA), CARB, Caltrans, CEC, GO-Biz	No Conflict. This measure would apply to all trucks accessing the project site. It is presumed that these vehicles would primarily be delivery vans and tanker trucks operated as part of the statewide goods movement sector. Access to the Project site would be provided from Summit Avenue.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near zero emission freight vehicles and equipment powered by renewable energy by 2030.		Not applicable. This measure is unrelated to the project scope.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	No Conflict. When adopted, this measure would apply to all fuel sold on-site or purchased for use in vehicles accessing the project site. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, California Department of Food and Agriculture (CDFA), California State Water Resource Control	No Conflict. The Project would be required to comply with this measure and reduce any Project-source SLPS emissions accordingly. The Project would not

ACTION	RESPONSIBLE PARTIES	CONSISTENCY
	Board (SWRCB), Local Air Districts	obstruct or interfere with agency efforts to reduce SLPS emissions.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	No Conflict. The Project would be required to comply with applicable Cap-and-Trade Program provisions. The Project would not obstruct or interfere with agency efforts to implement the post-2020 Cap-and-Trade Program.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink:		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	Not applicable. The Project site is not an identified property that needs to be conserved.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.		Not applicable. The entire site is planned for development.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.		No Conflict. To the extent appropriate for the proposed residences, wood products would be used in construction, including roof structure. Additionally, the Project includes landscaping.
Establish scenario projections to serve as the foundation for the Implementation Plan.		Not applicable. This measure is unrelated to the project scope.
Implement Forest Carbon Plan.	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	Not applicable. This measure is unrelated to the project scope.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	Not applicable. This measure is unrelated to the project scope.

As stated, the project would not generate enough GHG emissions to cumulatively contribute to global climate change; and thus, would not adversely impact the attainment of statewide reductions in GHG emissions referenced above. However, the measures implemented by the project to reduce overall GHG emissions would contribute to GHG reduction goals mandated by AB 32 and further address in EO S-3-05 and SB 32.

2022 Scoping Plan Consistency

CARB's 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil

gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., Climate Action Plan) consistent with CEQA Guidelines Section 15183.5. Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II; and implementing the Advanced Clean Fleets regulation to deploy ZEV buses and trucks. Additional transportation policies include the Off-Road Zero Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel Fueled Fleets Regulation, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation.
The 2022 Scoping Plan would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology. As indicated above, GHG reductions are also achieved as a result of State of California energy and water efficiency requirements for new residential development. These efficiency improvements correspond to reductions in secondary GHG emissions. For example, in California, most of the electricity that powers homes is derived from natural gas combustion. Therefore, energy saving measures, such as Title 24, reduces GHG emissions from the power generation facilities by reducing load demand. The 2022 Scoping Plan Appendix D provides local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. The 2022 Scoping Plan Appendix D focuses on Residential and Mixed-Use Projects. The 2022 Scoping Plan Appendix D lists potential actions that support the State's climate goals. However, the 2022 Scoping Plan notes that the applicability and performance of the actions may vary across the regions. The document is organized into two categories (A) examples of plan-level GHG reduction actions that could be implemented by local governments and (B) examples of on-site project design features, mitigation measures, that could be required of individual projects under CEQA, if feasible, when the local jurisdiction is the lead agency.

The Project would include a number of the Standard Conditions for construction and operation. For example, the 2022 Scoping Plan's construction actions include enforcing idling time restrictions on construction vehicles and requiring construction vehicles to operate highest tier engines commercially available. The Project would include a majority of the feasible operational mitigation measures listed in the 2022 Scoping Plan Appendix D as design features. Some of the recommended operational measures would include providing bicycle parking, creating on- and off-site safety improvements for bike, pedestrian, and transit connections, requiring solar panels, drought-tolerant landscaping, and energy conserving appliances. As discussed above, the Project would be consistent with all applicable plan goals and applicable regulatory programs designed to reduce GHG emissions generated by land use projects. The Project would be subject to compliance with all building codes in effect at the time of construction, which

include energy conservation measures mandated by California Building Standards Code Title 24 – Energy Efficiency Standards. Because Title 24 standards require energy conservation features in new construction (e.g., high- efficiency lighting, high-efficiency heating, ventilating, and air-conditioning (HVAC) systems, thermal insulation, double-glazed windows, water conserving plumbing fixtures), they indirectly regulate and reduce GHG emissions.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. As shown above, the majority of the Project's emissions are from energy and mobile sources, which would be further reduced by the 2022 Scoping Plan actions described above. The City has no control over vehicle emissions; however, these emissions would decline in the future because of Statewide measures as well as cleaner technology and fleet turnover. Many State plans and policies would contribute to a reduction in the Project's mobile source emissions, including the following:

CARB's Advanced Clean Truck Regulation: Adopted in June 2020, CARB's Advanced Clean Truck Regulation requires truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California is required to be zero-emission. The Advanced Clean Truck Regulation accelerates the transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8.

Executive Order N-79-20: Executive Order N-79-20 establishes the goal for all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, to be zero-emission by 2035 and all medium and heavy-duty vehicles to be zero-emission by 2045. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment "requiring increasing volumes" of new ZEVs "towards the target of 100 percent."

CARB's Mobile Source Strategy: CARB's Mobile Source Strategy takes an integrated planning approach to identify the level of transition to cleaner mobile source technologies needed to achieve all of California's targets by increasing the adoption of ZEV buses and trucks.

CARB's Sustainable Freight Action Plan: The Sustainable Freight Action Plan which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks. This Plan applies to all trucks accessing the Project site and may include existing trucks or new trucks that are part of the Statewide goods movement sector.

CARB's Emissions Reduction Plan for Ports and Goods Movement: CARB's Emissions Reduction Plan for Ports and Goods Movement identifies measures to improve goods movement efficiencies such as advanced combustion strategies, friction reduction, waste heat recovery, and electrification of accessories. While these measures are not directly applicable to the Project, any commercial activity associated with goods movement would be required to comply with these measures as adopted.

The Project would not obstruct or interfere with efforts to increase ZEVs or State efforts to improve system efficiency. Compliance with applicable State standards (e.g., continuation of the Cap-and-Trade regulation; CARB's Mobile Source Strategy, Sustainable Freight Action Plan, and Advanced Clean Truck Regulation; Executive Order N-79-20; SB 100/renewable electricity portfolio improvements that require 60 percent renewable electricity by 2030 and 100 percent renewable by 2045, etc.) would ensure consistency with State and regional GHG reduction planning efforts, including the 2022 Scoping Plan. It is also noted that the Project would not convert any Natural and Working Lands (NWL) and/or decrease the State's urban forest carbon stock, which are areas of emphasis in the 2022 Scoping Plan.

Regarding goals for 2050 under Executive Order S-3-05, at this time it is not possible to quantify the emissions savings from future regulatory measures, as they have not yet been developed; nevertheless, it can be anticipated that Project operations would benefit from applicable measures enacted to meet State GHG reduction goals. The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Thus, impacts related to consistency with the 2022 Scoping Plan would be less than significant. The Project would not conflict with the applicable plans and regulatory programs that are discussed above; and therefore, with respect to this particular threshold, the Project does not have a significant impact.

San Diego Association of Governments: San Diego Forward

Regarding consistency with SANDAG's Regional Plan, the project would not conflict with the recently adopted RTP Implementation Actions (December 2021) and objectives of SB 375. Table 13 illustrates the project's consistency with applicable goals of San Diego Forward: The Regional Plan (SANDAG December 2021).

Table 13
San Diego Forward: The Regional Plan Consistency Analysis

Category	Policy Objective or Strategy	Consistency Analysis
The Regional Plan –Implementation Actions		
Land Use and Habitat	The 2021 Regional Plan vision for land use focuses on development and growth in Mobility Hub areas to preserve the region's habitat and open space while supporting transportation investments and reducing vehicle miles traveled (VMT).	Consistent. The project would be consistent with planned land use for the site and would not adversely impact habitat.
Housing	The 2021 Regional Plan addresses the housing crisis through Mobility Hubs, bringing locations where people live and work closer together and	Not applicable. The proposed project would provide housing within an R-7 zone. The site is not within a mobility hub.

	providing more housing options for more San Diegans through increased density.	
Climate Action Planning	To help reach regional and state greenhouse gas (GHG) emission reduction targets, the 2021 Regional Plan focuses heavily on the conversion to clean transportation and a shift from personal vehicle dependency.	Consistent. The project would not impact regional initiatives to reduce GHG emissions. The project would be consistent with the City of Sustainable Santee Plan and screening threshold for GHG emissions.
Climate Adaptation and Resilience	The 2021 Regional Plan aims to better prepare San Diego communities and habitats for climate change impacts by considering evacuation and rapid mobility needs in our transit corridors, evaluating and considering climate vulnerabilities to the region's transportation infrastructure, and using natural lands and conservation to absorb and protect against climate change impacts.	Consistent. The project would not impact regional efforts to implement actions related to climate adaptation.
Electric Vehicles	SANDAG aims to incentivize and encourage the incorporation of all types of EVs into Flexible Fleets, Transit Leap, and goods movement and to support funding programs that increase the number of EVs and charging stations throughout the region and within Mobility Hubs and as part of the Complete Corridor strategy	Consistent. The project would provide EV charging stations.
Parking and Curb Management	The 2021 Regional Plan addresses curb management by proposing strategies to help balance competing and changing travel needs at the curb while remaining flexible to resident, employee, business, and visitor needs.	Not Applicable. The project would provide on-site parking; however, it would not participate in regional parking and curb management strategies.

Transportation Demand Management	SANDAG will continue to administer and monitor the iCommute program by providing regional rideshare, employer outreach, and bike education and secure parking services to help reduce commute-related traffic congestion and vehicle miles traveled.	Not Applicable. The project would not affect implementation of SANDAG's ongoing TDM programs.
Vision Zero	Vision Zero is a national campaign to eliminate all traffic-related deaths and serious injuries by focusing on policies and the redesign of streets to create a transportation system that is safe for everyone.	Not Applicable. The project would not affect SANDAG's initiative to redesign streets and modify the transportation system.
Fix It First	The Fix It First strategy aims to repair existing roads and create a system for sustained maintenance in the future, creating a safe and efficient transportation network for all users.	Not applicable. The project would not affect SANDAG's goal related to the fix it first program.
Transportation System Management and Operations	TSMO includes the establishment of institutional and governance actions to help advance and facilitate cross-agency collaboration to ensure existing and proposed transportation systems are not operated or managed as independent systems but as a multimodal transportation system.	Not Applicable. The project would not affect SANDAGs ability to create and manage a TSMO program.
Value Pricing and User Fees	The 2021 Regional Plan explores a network of Managed Lanes, a mileage-based road usage charge, a fee on the fares charged for rides provided by transportation network companies, and further subsidization of transit fares.	Not Applicable. The project would not affect SANDAGs ability to create and manage a value pricing and user fee program.
Sustainable Communities Strategy (SCS) – Strategies Related to Reimagined Transportation System		
Complete Corridors	Focuses on regional transportation system including managed lanes, rural corridors, regional arterial network and other improvements.	Not applicable. The project would have no effect on the regional transportation system or SANDAGs efforts to improve the system.

Transit Leap	Provide new and expanded transit services including commuter rail, light rail, high speed rail, local buses and micro-transit.	Not applicable. The project would have no effect on the provision of regional transit services.
Mobility Hubs	Invest in a transportation mobility network that focus on micro-mobility, rideshare and micro-transit and other features that promote the development of mobility hubs.	Not Applicable. The project would not impair SANDAG's ability to invest in the development of mobility hubs.
Next OS	Next OS is the digital network that maximizes the efficiency and effectiveness of the other Big Moves—Complete Corridors, Transit Leap, Mobility Hubs, and Flexible Fleets—to make the entire transportation system work at its peak potential.	Not Applicable. The project would not impair SANDAG's ability to develop and/or expand the Next OS infrastructure.
Active Transportation	This strategy would develop a network to make critical connections along Complete Corridors and other streets, providing people with safe and convenient ways to connect to and from Transit Leap services and many other destinations within and between Mobility Hubs.	Not Applicable. The project would not impair the ability of SANDAG to implement the active transportation system.
Climate Strategies	This strategy focuses on measures to mitigate climate change and adapt to inevitable impacts will make our region more resilient. Resilience is defined as "the ability to prepare for changing conditions and withstand, respond to, and recover rapidly from disruptions.	Consistent. The project would not impact regional efforts to implement actions related to climate adaptation.
Innovative Demand and System Management	Innovative demand and system management strategies are programs that encourage and support a choice of alternatives to driving alone. These alternatives include working remotely, carpooling, vanpooling, and choosing transit or active transportation.	Not Applicable. The project would not impair the ability of SANDAG to implement an innovative demand and system management program.

Source: SANDAG 2021.

As shown in Table 13, the project is consistent with applicable Policy Objectives and Strategies from the Regional Plan.

Consistency Analysis with City of Santee General Plan

The project also would be consistent with the goals set forth in the City's General Plan Land Use Element, and Circulation Element that are designed to reduce the emissions of GHGs, reduce energy use in buildings and infrastructure, and promote the use of renewable energy sources, conservation, and other methods of efficiency. Table 14 outlines the project's consistency with applicable General Plan goals.

As shown in Table 14, the project would be consistent with applicable and goals and policies of the City's General Plan to the extent feasible.

Table 14
City of Santee General Plan – Project Consistency Analysis

Goal	Consistency Analysis
Land Use and Urban Design Element	
Objective 2: Allow for the development of a wide range of housing types in the City.	Consistent. The project would meet applicable zoning and design standards as required by the City of Santee.
Policy 2.1 The City should promote the use of innovative site planning techniques that contribute towards provision of a variety of residential product styles and designs.	Consistent. The project incorporates unique design standards and site planning to maximize density while creating a visually compatible project. The project would integrate landscaping to create a visual buffer between the site and residences located to the south.
Policy 2.3 The City should encourage planned residential and/or planned unit developments that provide adequate open space, recreational facilities, off-street parking, interior circulation patterns and other amenities and facilities.	Consistent. The project would provide on-site open space for the community and each unit, garage parking and efficient interior circulation and frontage improvements along Summit Avenue.

Conclusion

The proposed project site is 4.65 gross/2.42 net acres in size (APN 378-190-01) and zoned Medium Density Residential (R-7). The project would construct a total of 50 multifamily units and related improvements including 100 garage parking spaces and 13 open surface spaces.

Air Quality Management Plan Consistency. The project site is zoned R-7. The project is consistent with the R-7 zoning designation and is anticipated in the local plans and SANDAG's

population and employment growth projections. Thus, the project would be within SANDAG's population growth forecast and would not conflict with the SIP and RAQS.

Construction and Operational Emissions. Project construction and operational emissions would not exceed the San Diego APCD thresholds. Thus, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.

Expose Sensitive Receptors to Substantial Pollutant Concentrations. The project would not cause or contribute to CO hot spots or otherwise expose receptors to substantial pollutant concentrations from operation of the adjacent rail corridor.

Odors. The project would provide new residences and related infrastructure improvements. These uses would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Greenhouse Gas Emissions. The proposed project would not generate annual GHG emissions that would exceed the 900 MT CO2e threshold. Further, the project would be consistent with the City of Sustainable Santee Plan, 2017 and 2022 CARB Scoping Plans, the City of Santee General Plan Land Use Element and the SANDAG Regional Plan; San Diego Forward, adopted in December 2021. Impacts related to air quality and greenhouse gas emissions would be less than significant.

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Appendix A

CalEEMod Air Quality and Greenhouse Gas Emissions Model Results – Summer/Annual

10939 Summit Avenue Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	10939 Summit Avenue
Construction Start Date	10/28/2024
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.60
Precipitation (days)	13.8
Location	32.87597002566757, -116.9750646515862
County	San Diego
City	Santee
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6536
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric
App Version	2022.1.1.20

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

Apartments Low Rise	50.0	Dwelling Unit	3.13	53,000	2,000	—	139	—
Parking Lot	13.0	Space	0.12	0.00	100	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads
Construction	C-12	Sweep Paved Roads
Water	W-7	Adopt a Water Conservation Strategy
Waste	S-1/S-2	Implement Waste Reduction Plan

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.20	1.82	17.3	19.0	0.03	0.74	3.08	3.81	0.68	1.42	2.09	—	3,823	3,823	0.17	0.14	2.10	3,872
Mit.	2.20	1.82	17.3	19.0	0.03	0.74	3.08	3.81	0.68	1.42	2.09	—	3,823	3,823	0.17	0.14	2.10	3,872
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	5.63	9.28	58.4	41.5	0.15	1.89	11.9	13.8	1.76	5.09	6.85	—	21,510	21,510	1.09	2.62	0.91	22,319
Mit.	5.63	9.28	58.4	41.5	0.15	1.89	11.9	13.8	1.76	5.09	6.85	—	21,510	21,510	1.09	2.62	0.91	22,319

% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.25	1.14	9.28	11.5	0.02	0.38	0.91	1.29	0.35	0.38	0.74	—	2,275	2,275	0.10	0.06	0.55	2,296
Mit.	1.25	1.14	9.28	11.5	0.02	0.38	0.91	1.29	0.35	0.38	0.74	—	2,275	2,275	0.10	0.06	0.55	2,296
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.23	0.21	1.69	2.10	< 0.005	0.07	0.17	0.24	0.06	0.07	0.13	—	377	377	0.02	0.01	0.09	380
Mit.	0.23	0.21	1.69	2.10	< 0.005	0.07	0.17	0.24	0.06	0.07	0.13	—	377	377	0.02	0.01	0.09	380
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	2.20	1.82	17.3	19.0	0.03	0.74	3.08	3.81	0.68	1.42	2.09	—	3,823	3,823	0.17	0.14	2.10	3,872
2026	0.90	0.79	6.29	9.68	0.01	0.26	0.17	0.43	0.24	0.04	0.28	—	1,536	1,536	0.06	0.02	0.65	1,543
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	5.63	4.05	58.4	41.5	0.15	1.89	11.9	13.8	1.76	5.09	6.85	—	21,510	21,510	1.09	2.62	0.91	22,319
2025	2.19	1.82	17.3	18.9	0.03	0.74	3.08	3.81	0.68	1.42	2.09	—	3,815	3,815	0.17	0.14	0.05	3,862
2026	1.61	9.28	11.0	15.8	0.03	0.40	0.40	0.80	0.37	0.10	0.47	—	3,041	3,041	0.13	0.05	0.04	3,061

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.38	0.31	3.22	2.88	0.01	0.13	0.34	0.47	0.12	0.15	0.27	—	700	700	0.03	0.05	0.27	715
2025	1.25	1.04	9.28	11.5	0.02	0.38	0.91	1.29	0.35	0.38	0.74	—	2,275	2,275	0.10	0.06	0.55	2,296
2026	0.27	1.14	1.90	2.74	< 0.005	0.07	0.07	0.14	0.07	0.02	0.08	—	521	521	0.02	0.01	0.12	525
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.07	0.06	0.59	0.53	< 0.005	0.02	0.06	0.09	0.02	0.03	0.05	—	116	116	0.01	0.01	0.05	118
2025	0.23	0.19	1.69	2.10	< 0.005	0.07	0.17	0.24	0.06	0.07	0.13	—	377	377	0.02	0.01	0.09	380
2026	0.05	0.21	0.35	0.50	< 0.005	0.01	0.01	0.02	0.01	< 0.005	0.01	—	86.3	86.3	< 0.005	< 0.005	0.02	86.9

2.3. Construction Emissions by Year, Mitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	2.20	1.82	17.3	19.0	0.03	0.74	3.08	3.81	0.68	1.42	2.09	—	3,823	3,823	0.17	0.14	2.10	3,872
2026	0.90	0.79	6.29	9.68	0.01	0.26	0.17	0.43	0.24	0.04	0.28	—	1,536	1,536	0.06	0.02	0.65	1,543
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	5.63	4.05	58.4	41.5	0.15	1.89	11.9	13.8	1.76	5.09	6.85	—	21,510	21,510	1.09	2.62	0.91	22,319
2025	2.19	1.82	17.3	18.9	0.03	0.74	3.08	3.81	0.68	1.42	2.09	—	3,815	3,815	0.17	0.14	0.05	3,862
2026	1.61	9.28	11.0	15.8	0.03	0.40	0.40	0.80	0.37	0.10	0.47	—	3,041	3,041	0.13	0.05	0.04	3,061
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.38	0.31	3.22	2.88	0.01	0.13	0.34	0.47	0.12	0.15	0.27	—	700	700	0.03	0.05	0.27	715
2025	1.25	1.04	9.28	11.5	0.02	0.38	0.91	1.29	0.35	0.38	0.74	—	2,275	2,275	0.10	0.06	0.55	2,296
2026	0.27	1.14	1.90	2.74	< 0.005	0.07	0.07	0.14	0.07	0.02	0.08	—	521	521	0.02	0.01	0.12	525

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.07	0.06	0.59	0.53	< 0.005	0.02	0.06	0.09	0.02	0.03	0.05	—	116	116	0.01	0.01	0.05	118
2025	0.23	0.19	1.69	2.10	< 0.005	0.07	0.17	0.24	0.06	0.07	0.13	—	377	377	0.02	0.01	0.09	380
2026	0.05	0.21	0.35	0.50	< 0.005	0.01	0.01	0.02	0.01	< 0.005	0.01	—	86.3	86.3	< 0.005	< 0.005	0.02	86.9

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.11	3.16	1.41	15.5	0.03	0.04	2.67	2.70	0.04	0.68	0.71	23.2	3,651	3,675	2.51	0.13	10.8	3,786
Mit.	2.11	3.16	1.41	15.5	0.03	0.04	2.67	2.70	0.04	0.68	0.71	7.66	3,648	3,655	0.95	0.13	10.8	3,727
% Reduced	—	—	—	—	—	—	—	—	—	—	—	67%	< 0.5%	1%	62%	1%	—	2%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.81	2.87	1.50	11.9	0.03	0.04	2.67	2.70	0.04	0.68	0.71	23.2	3,505	3,528	2.52	0.13	0.65	3,632
Mit.	1.81	2.87	1.50	11.9	0.03	0.04	2.67	2.70	0.04	0.68	0.71	7.66	3,501	3,509	0.96	0.13	0.65	3,573
% Reduced	—	—	—	—	—	—	—	—	—	—	—	67%	< 0.5%	1%	62%	1%	—	2%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.73	2.80	1.36	12.1	0.03	0.04	2.37	2.40	0.03	0.60	0.63	23.2	3,216	3,239	2.50	0.12	4.43	3,342
Mit.	1.73	2.80	1.36	12.1	0.03	0.04	2.37	2.40	0.03	0.60	0.63	7.66	3,212	3,220	0.94	0.12	4.43	3,283
% Reduced	—	—	—	—	—	—	—	—	—	—	—	67%	< 0.5%	1%	62%	1%	—	2%
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	0.32	0.51	0.25	2.20	0.01	0.01	0.43	0.44	0.01	0.11	0.12	3.84	532	536	0.41	0.02	0.73	553
Mit.	0.32	0.51	0.25	2.20	0.01	0.01	0.43	0.44	0.01	0.11	0.12	1.27	532	533	0.16	0.02	0.73	544
% Reduced	—	—	—	—	—	—	—	—	—	—	—	67%	< 0.5%	1%	62%	1%	—	2%

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.82	1.67	1.21	12.6	0.03	0.02	2.67	2.69	0.02	0.68	0.70	—	3,118	3,118	0.14	0.12	10.5	3,167
Area	0.27	1.48	0.03	2.84	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	7.58	7.58	< 0.005	< 0.005	—	7.61
Energy	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	506	506	0.04	< 0.005	—	508
Water	—	—	—	—	—	—	—	—	—	—	—	3.37	19.6	23.0	0.35	0.01	—	34.1
Waste	—	—	—	—	—	—	—	—	—	—	—	19.9	0.00	19.9	1.98	0.00	—	69.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Total	2.11	3.16	1.41	15.5	0.03	0.04	2.67	2.70	0.04	0.68	0.71	23.2	3,651	3,675	2.51	0.13	10.8	3,786
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.79	1.63	1.33	11.8	0.03	0.02	2.67	2.69	0.02	0.68	0.70	—	2,979	2,979	0.15	0.12	0.27	3,020
Area	0.00	1.23	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Energy	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	506	506	0.04	< 0.005	—	508
Water	—	—	—	—	—	—	—	—	—	—	—	3.37	19.6	23.0	0.35	0.01	—	34.1
Waste	—	—	—	—	—	—	—	—	—	—	—	19.9	0.00	19.9	1.98	0.00	—	69.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Total	1.81	2.87	1.50	11.9	0.03	0.04	2.67	2.70	0.04	0.68	0.71	23.2	3,505	3,528	2.52	0.13	0.65	3,632

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.58	1.44	1.17	10.6	0.03	0.02	2.37	2.39	0.02	0.60	0.62	—	2,686	2,686	0.13	0.11	4.05	2,726
Area	0.13	1.35	0.01	1.40	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	3.74	3.74	< 0.005	< 0.005	—	3.75
Energy	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	506	506	0.04	< 0.005	—	508
Water	—	—	—	—	—	—	—	—	—	—	—	3.37	19.6	23.0	0.35	0.01	—	34.1
Waste	—	—	—	—	—	—	—	—	—	—	—	19.9	0.00	19.9	1.98	0.00	—	69.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Total	1.73	2.80	1.36	12.1	0.03	0.04	2.37	2.40	0.03	0.60	0.63	23.2	3,216	3,239	2.50	0.12	4.43	3,342
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.29	0.26	0.21	1.93	< 0.005	< 0.005	0.43	0.44	< 0.005	0.11	0.11	—	445	445	0.02	0.02	0.67	451
Area	0.02	0.25	< 0.005	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	0.62	0.62	< 0.005	< 0.005	—	0.62
Energy	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	83.8	83.8	0.01	< 0.005	—	84.1
Water	—	—	—	—	—	—	—	—	—	—	—	0.56	3.25	3.81	0.06	< 0.005	—	5.65
Waste	—	—	—	—	—	—	—	—	—	—	—	3.29	0.00	3.29	0.33	0.00	—	11.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	0.32	0.51	0.25	2.20	0.01	0.01	0.43	0.44	0.01	0.11	0.12	3.84	532	536	0.41	0.02	0.73	553

2.6. Operations Emissions by Sector, Mitigated

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

Sector	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	1.82	1.67	1.21	12.6	0.03	0.02	2.67	2.69	0.02	0.68	0.70	—	3,118	3,118	0.14	0.12	10.5	3,167
Area	0.27	1.48	0.03	2.84	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	7.58	7.58	< 0.005	< 0.005	—	7.61
Energy	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	506	506	0.04	< 0.005	—	508
Water	—	—	—	—	—	—	—	—	—	—	—	2.69	15.7	18.4	0.28	0.01	—	27.3

Waste	—	—	—	—	—	—	—	—	—	—	—	4.96	0.00	4.96	0.50	0.00	—	17.4
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Total	2.11	3.16	1.41	15.5	0.03	0.04	2.67	2.70	0.04	0.68	0.71	7.66	3,648	3,655	0.95	0.13	10.8	3,727
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.79	1.63	1.33	11.8	0.03	0.02	2.67	2.69	0.02	0.68	0.70	—	2,979	2,979	0.15	0.12	0.27	3,020
Area	0.00	1.23	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Energy	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	506	506	0.04	< 0.005	—	508
Water	—	—	—	—	—	—	—	—	—	—	—	2.69	15.7	18.4	0.28	0.01	—	27.3
Waste	—	—	—	—	—	—	—	—	—	—	—	4.96	0.00	4.96	0.50	0.00	—	17.4
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Total	1.81	2.87	1.50	11.9	0.03	0.04	2.67	2.70	0.04	0.68	0.71	7.66	3,501	3,509	0.96	0.13	0.65	3,573
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.58	1.44	1.17	10.6	0.03	0.02	2.37	2.39	0.02	0.60	0.62	—	2,686	2,686	0.13	0.11	4.05	2,726
Area	0.13	1.35	0.01	1.40	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	3.74	3.74	< 0.005	< 0.005	—	3.75
Energy	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	506	506	0.04	< 0.005	—	508
Water	—	—	—	—	—	—	—	—	—	—	—	2.69	15.7	18.4	0.28	0.01	—	27.3
Waste	—	—	—	—	—	—	—	—	—	—	—	4.96	0.00	4.96	0.50	0.00	—	17.4
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Total	1.73	2.80	1.36	12.1	0.03	0.04	2.37	2.40	0.03	0.60	0.63	7.66	3,212	3,220	0.94	0.12	4.43	3,283
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.29	0.26	0.21	1.93	< 0.005	< 0.005	0.43	0.44	< 0.005	0.11	0.11	—	445	445	0.02	0.02	0.67	451
Area	0.02	0.25	< 0.005	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	0.62	0.62	< 0.005	< 0.005	—	0.62
Energy	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	83.8	83.8	0.01	< 0.005	—	84.1
Water	—	—	—	—	—	—	—	—	—	—	—	0.45	2.60	3.04	0.05	< 0.005	—	4.52
Waste	—	—	—	—	—	—	—	—	—	—	—	0.82	0.00	0.82	0.08	0.00	—	2.88
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06

Total	0.32	0.51	0.25	2.20	0.01	0.01	0.43	0.44	0.01	0.11	0.12	1.27	532	533	0.16	0.02	0.73	544

3. Construction Emissions Details

3.1. Demolition (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.12	2.62	24.9	21.7	0.03	1.06	—	1.06	0.98	—	0.98	—	3,425	3,425	0.14	0.03	—	3,437
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	1.36	1.19	< 0.005	0.06	—	0.06	0.05	—	0.05	—	188	188	0.01	< 0.005	—	188
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.25	0.22	< 0.005	0.01	—	0.01	0.01	—	0.01	—	31.1	31.1	< 0.005	< 0.005	—	31.2

Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.65	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	137	137	0.01	0.01	0.02	139
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.58	7.58	< 0.005	< 0.005	0.01	7.69
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.25	1.25	< 0.005	< 0.005	< 0.005	1.27
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.2. Demolition (2024) - Mitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.12	2.62	24.9	21.7	0.03	1.06	—	1.06	0.98	—	0.98	—	3,425	3,425	0.14	0.03	—	3,437
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	1.36	1.19	< 0.005	0.06	—	0.06	0.05	—	0.05	—	188	188	0.01	< 0.005	—	188
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.25	0.22	< 0.005	0.01	—	0.01	0.01	—	0.01	—	31.1	31.1	< 0.005	< 0.005	—	31.2
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.07	0.06	0.06	0.65	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	137	137	0.01	0.01	0.02	139
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.58	7.58	< 0.005	< 0.005	0.01	7.69
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.25	1.25	< 0.005	< 0.005	< 0.005	1.27
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Site Preparation (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.34	3.65	36.0	32.9	0.05	1.60	—	1.60	1.47	—	1.47	—	5,296	5,296	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	7.70	7.70	—	3.95	3.95	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.49	0.45	< 0.005	0.02	—	0.02	0.02	—	0.02	—	72.5	72.5	< 0.005	< 0.005	—	72.8
Dust From Material Movement	—	—	—	—	—	—	0.11	0.11	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.09	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.0	12.0	< 0.005	< 0.005	—	12.1
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.07	0.76	0.00	0.00	0.15	0.15	0.00	0.03	0.03	—	160	160	0.01	0.01	0.02	162
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	1.21	0.33	22.4	7.78	0.10	0.29	4.06	4.35	0.29	1.11	1.40	—	16,055	16,055	0.87	2.57	0.89	16,843
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.21	2.21	< 0.005	< 0.005	< 0.005	2.24
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.02	< 0.005	0.31	0.11	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	220	220	0.01	0.04	0.20	231
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.37	0.37	< 0.005	< 0.005	< 0.005	0.37
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	36.4	36.4	< 0.005	0.01	0.03	38.2

3.4. Site Preparation (2024) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.34	3.65	36.0	32.9	0.05	1.60	—	1.60	1.47	—	1.47	—	5,296	5,296	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	7.70	7.70	—	3.95	3.95	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.49	0.45	< 0.005	0.02	—	0.02	0.02	—	0.02	—	72.5	72.5	< 0.005	< 0.005	—	72.8
Dust From Material Movement	—	—	—	—	—	—	0.11	0.11	—	0.05	0.05	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.09	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.0	12.0	< 0.005	< 0.005	—	12.1
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.07	0.76	0.00	0.00	0.15	0.15	0.00	0.03	0.03	—	160	160	0.01	0.01	0.02	162
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	1.21	0.33	22.4	7.78	0.10	0.29	4.06	4.35	0.29	1.11	1.40	—	16,055	16,055	0.87	2.57	0.89	16,843
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.21	2.21	< 0.005	< 0.005	< 0.005	2.24
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.02	< 0.005	0.31	0.11	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	220	220	0.01	0.04	0.20	231
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.37	0.37	< 0.005	< 0.005	< 0.005	0.37
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	36.4	36.4	< 0.005	0.01	0.03	38.2

3.5. Grading (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.26	1.90	18.2	18.8	0.03	0.84	—	0.84	0.77	—	0.77	—	2,958	2,958	0.12	0.02	—	2,969
Dust From Material Movement	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	1.00	1.03	< 0.005	0.05	—	0.05	0.04	—	0.04	—	162	162	0.01	< 0.005	—	163
Dust From Material Movement	—	—	—	—	—	—	0.15	0.15	—	0.07	0.07	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.18	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.8	26.8	< 0.005	< 0.005	—	26.9

Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.65	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	137	137	0.01	0.01	0.02	139
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.06	0.02	1.03	0.36	< 0.005	0.01	0.19	0.20	0.01	0.05	0.06	—	736	736	0.04	0.12	0.04	773
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.58	7.58	< 0.005	< 0.005	0.01	7.69
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	40.3	40.3	< 0.005	0.01	0.04	42.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.25	1.25	< 0.005	< 0.005	< 0.005	1.27
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.68	6.68	< 0.005	< 0.005	0.01	7.01

3.6. Grading (2024) - Mitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.26	1.90	18.2	18.8	0.03	0.84	—	0.84	0.77	—	0.77	—	2,958	2,958	0.12	0.02	—	2,969
Dust From Material Movement	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	1.00	1.03	< 0.005	0.05	—	0.05	0.04	—	0.04	—	162	162	0.01	< 0.005	—	163
Dust From Material Movement	—	—	—	—	—	—	0.15	0.15	—	0.07	0.07	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.18	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.8	26.8	< 0.005	< 0.005	—	26.9
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.65	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	137	137	0.01	0.01	0.02	139
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.06	0.02	1.03	0.36	< 0.005	0.01	0.19	0.20	0.01	0.05	0.06	—	736	736	0.04	0.12	0.04	773
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.58	7.58	< 0.005	< 0.005	0.01	7.69
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	40.3	40.3	< 0.005	0.01	0.04	42.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.25	1.25	< 0.005	< 0.005	< 0.005	1.27
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.68	6.68	< 0.005	< 0.005	0.01	7.01

3.7. Grading (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.07	1.74	16.3	17.9	0.03	0.72	—	0.72	0.66	—	0.66	—	2,959	2,959	0.12	0.02	—	2,970

Dust From Material Movement	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.07	1.74	16.3	17.9	0.03	0.72	—	0.72	0.66	—	0.66	—	2,959	2,959	0.12	0.02	—	2,970
Dust From Material Movement	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.51	0.43	3.98	4.38	0.01	0.18	—	0.18	0.16	—	0.16	—	724	724	0.03	0.01	—	726
Dust From Material Movement	—	—	—	—	—	—	0.68	0.68	—	0.33	0.33	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.08	0.73	0.80	< 0.005	0.03	—	0.03	0.03	—	0.03	—	120	120	< 0.005	< 0.005	—	120
Dust From Material Movement	—	—	—	—	—	—	0.12	0.12	—	0.06	0.06	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.05	0.69	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	142	142	0.01	< 0.005	0.53	144
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.06	0.02	0.95	0.35	< 0.005	0.01	0.19	0.20	0.01	0.05	0.06	—	721	721	0.04	0.11	1.57	758
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.05	0.61	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	134	134	0.01	0.01	0.01	136
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.06	0.01	0.98	0.36	< 0.005	0.01	0.19	0.20	0.01	0.05	0.06	—	721	721	0.04	0.11	0.04	756
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.01	0.15	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	33.2	33.2	< 0.005	< 0.005	0.06	33.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.24	0.09	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	176	176	0.01	0.03	0.17	185
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.49	5.49	< 0.005	< 0.005	0.01	5.57
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	29.2	29.2	< 0.005	< 0.005	0.03	30.6

3.8. Grading (2025) - Mitigated

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

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

Off-Road Equipment	2.07	1.74	16.3	17.9	0.03	0.72	—	0.72	0.66	—	0.66	—	2,959	2,959	0.12	0.02	—	2,970
Dust From Material Movement	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.07	1.74	16.3	17.9	0.03	0.72	—	0.72	0.66	—	0.66	—	2,959	2,959	0.12	0.02	—	2,970
Dust From Material Movement	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.51	0.43	3.98	4.38	0.01	0.18	—	0.18	0.16	—	0.16	—	724	724	0.03	0.01	—	726
Dust From Material Movement	—	—	—	—	—	—	0.68	0.68	—	0.33	0.33	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.08	0.73	0.80	< 0.005	0.03	—	0.03	0.03	—	0.03	—	120	120	< 0.005	< 0.005	—	120
Dust From Material Movement	—	—	—	—	—	—	0.12	0.12	—	0.06	0.06	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.05	0.69	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	142	142	0.01	< 0.005	0.53	144
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.06	0.02	0.95	0.35	< 0.005	0.01	0.19	0.20	0.01	0.05	0.06	—	721	721	0.04	0.11	1.57	758
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.05	0.61	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	134	134	0.01	0.01	0.01	136
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.06	0.01	0.98	0.36	< 0.005	0.01	0.19	0.20	0.01	0.05	0.06	—	721	721	0.04	0.11	0.04	756
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.01	0.15	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	33.2	33.2	< 0.005	< 0.005	0.06	33.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.24	0.09	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	176	176	0.01	0.03	0.17	185
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.49	5.49	< 0.005	< 0.005	0.01	5.57
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	29.2	29.2	< 0.005	< 0.005	0.03	30.6

3.9. Building Construction (2025) - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.63	0.53	4.91	6.12	0.01	0.20	—	0.20	0.19	—	0.19	—	1,126	1,126	0.05	0.01	—	1,130
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	0.90	1.12	< 0.005	0.04	—	0.04	0.03	—	0.03	—	186	186	0.01	< 0.005	—	187
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.16	0.15	0.11	1.67	0.00	0.00	0.30	0.30	0.00	0.07	0.07	—	342	342	0.02	0.01	1.28	347
Vendor	0.01	0.01	0.18	0.08	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	134	134	0.01	0.02	0.35	140
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.16	0.14	0.12	1.46	0.00	0.00	0.30	0.30	0.00	0.07	0.07	—	323	323	0.02	0.01	0.03	327
Vendor	0.01	0.01	0.18	0.09	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	134	134	0.01	0.02	0.01	140
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.06	0.70	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	153	153	0.01	0.01	0.26	155
Vendor	0.01	< 0.005	0.09	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	62.8	62.8	< 0.005	0.01	0.07	65.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.13	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	25.3	25.3	< 0.005	< 0.005	0.04	25.7
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	10.4	10.4	< 0.005	< 0.005	0.01	10.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Building Construction (2025) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.35	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.63	0.53	4.91	6.12	0.01	0.20	—	0.20	0.19	—	0.19	—	1,126	1,126	0.05	0.01	—	1,130
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	0.90	1.12	< 0.005	0.04	—	0.04	0.03	—	0.03	—	186	186	0.01	< 0.005	—	187
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.16	0.15	0.11	1.67	0.00	0.00	0.30	0.30	0.00	0.07	0.07	—	342	342	0.02	0.01	1.28	347
Vendor	0.01	0.01	0.18	0.08	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	134	134	0.01	0.02	0.35	140
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.16	0.14	0.12	1.46	0.00	0.00	0.30	0.30	0.00	0.07	0.07	—	323	323	0.02	0.01	0.03	327
Vendor	0.01	0.01	0.18	0.09	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	134	134	0.01	0.02	0.01	140
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.06	0.70	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	153	153	0.01	0.01	0.26	155
Vendor	0.01	< 0.005	0.09	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	62.8	62.8	< 0.005	0.01	0.07	65.6

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.13	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	25.3	25.3	< 0.005	< 0.005	0.04	25.7
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	10.4	10.4	< 0.005	< 0.005	0.01	10.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Building Construction (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	0.17	1.58	2.08	< 0.005	0.06	—	0.06	0.06	—	0.06	—	385	385	0.02	< 0.005	—	386
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.29	0.38	< 0.005	0.01	—	0.01	0.01	—	0.01	—	63.7	63.7	< 0.005	< 0.005	—	63.9
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.13	0.11	1.37	0.00	0.00	0.30	0.30	0.00	0.07	0.07	—	316	316	0.02	0.01	0.03	320
Vendor	0.01	< 0.005	0.18	0.08	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	131	131	0.01	0.02	0.01	137
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.22	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	51.2	51.2	< 0.005	< 0.005	0.08	51.9
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	21.1	21.1	< 0.005	< 0.005	0.02	22.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.47	8.47	< 0.005	< 0.005	0.01	8.60
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.49	3.49	< 0.005	< 0.005	< 0.005	3.65
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.12. Building Construction (2026) - Mitigated

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

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

Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	0.17	1.58	2.08	< 0.005	0.06	—	0.06	0.06	—	0.06	—	385	385	0.02	< 0.005	—	386
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.29	0.38	< 0.005	0.01	—	0.01	0.01	—	0.01	—	63.7	63.7	< 0.005	< 0.005	—	63.9
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.13	0.11	1.37	0.00	0.00	0.30	0.30	0.00	0.07	0.07	—	316	316	0.02	0.01	0.03	320
Vendor	0.01	< 0.005	0.18	0.08	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01	—	131	131	0.01	0.02	0.01	137
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.22	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	51.2	51.2	< 0.005	< 0.005	0.08	51.9
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	21.1	21.1	< 0.005	< 0.005	0.02	22.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.47	8.47	< 0.005	< 0.005	0.01	8.60

Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.49	3.49	< 0.005	< 0.005	< 0.005	3.65
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Paving (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.81	0.68	6.23	8.81	0.01	0.26	—	0.26	0.24	—	0.24	—	1,350	1,350	0.05	0.01	—	1,355
Paving	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.81	0.68	6.23	8.81	0.01	0.26	—	0.26	0.24	—	0.24	—	1,350	1,350	0.05	0.01	—	1,355
Paving	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.17	0.24	< 0.005	0.01	—	0.01	0.01	—	0.01	—	37.0	37.0	< 0.005	< 0.005	—	37.1
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	< 0.005	0.03	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.12	6.12	< 0.005	< 0.005	—	6.14
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.06	0.86	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	186	186	0.01	0.01	0.65	189
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.06	0.76	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	176	176	0.01	0.01	0.02	178
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.85	4.85	< 0.005	< 0.005	0.01	4.92
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.80	0.80	< 0.005	< 0.005	< 0.005	0.82
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.14. Paving (2026) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.81	0.68	6.23	8.81	0.01	0.26	—	0.26	0.24	—	0.24	—	1,350	1,350	0.05	0.01	—	1,355
Paving	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.81	0.68	6.23	8.81	0.01	0.26	—	0.26	0.24	—	0.24	—	1,350	1,350	0.05	0.01	—	1,355
Paving	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.17	0.24	< 0.005	0.01	—	0.01	0.01	—	0.01	—	37.0	37.0	< 0.005	< 0.005	—	37.1
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.12	6.12	< 0.005	< 0.005	—	6.14
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.06	0.86	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	186	186	0.01	0.01	0.65	189
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.06	0.76	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	176	176	0.01	0.01	0.02	178
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.85	4.85	< 0.005	< 0.005	0.01	4.92
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.80	0.80	< 0.005	< 0.005	< 0.005	0.82
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Architectural Coating (2026) - Unmitigated

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

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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	7.93	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.10	0.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.4	15.4	< 0.005	< 0.005	—	15.4
Architectural Coatings	—	0.91	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.54	2.54	< 0.005	< 0.005	—	2.55
Architectural Coatings	—	0.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.27	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	63.2	63.2	< 0.005	< 0.005	0.01	64.0

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.34	7.34	< 0.005	< 0.005	0.01	7.45
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.21	1.21	< 0.005	< 0.005	< 0.005	1.23
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.16. Architectural Coating (2026) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	7.93	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.02	0.01	0.10	0.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.4	15.4	< 0.005	< 0.005	—	15.4
Architectural Coatings	—	0.91	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.54	2.54	< 0.005	< 0.005	—	2.55
Architectural Coatings	—	0.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.27	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	63.2	63.2	< 0.005	< 0.005	0.01	64.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.34	7.34	< 0.005	< 0.005	0.01	7.45
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.21	1.21	< 0.005	< 0.005	< 0.005	1.23

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	1.82	1.67	1.21	12.6	0.03	0.02	2.67	2.69	0.02	0.68	0.70	—	3,118	3,118	0.14	0.12	10.5	3,167
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.82	1.67	1.21	12.6	0.03	0.02	2.67	2.69	0.02	0.68	0.70	—	3,118	3,118	0.14	0.12	10.5	3,167
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	1.79	1.63	1.33	11.8	0.03	0.02	2.67	2.69	0.02	0.68	0.70	—	2,979	2,979	0.15	0.12	0.27	3,020
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.79	1.63	1.33	11.8	0.03	0.02	2.67	2.69	0.02	0.68	0.70	—	2,979	2,979	0.15	0.12	0.27	3,020
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartments Low Rise	0.29	0.26	0.21	1.93	< 0.005	< 0.005	0.43	0.44	< 0.005	0.11	0.11	—	445	445	0.02	0.02	0.67	451
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.29	0.26	0.21	1.93	< 0.005	< 0.005	0.43	0.44	< 0.005	0.11	0.11	—	445	445	0.02	0.02	0.67	451

4.1.2. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	1.82	1.67	1.21	12.6	0.03	0.02	2.67	2.69	0.02	0.68	0.70	—	3,118	3,118	0.14	0.12	10.5	3,167
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.82	1.67	1.21	12.6	0.03	0.02	2.67	2.69	0.02	0.68	0.70	—	3,118	3,118	0.14	0.12	10.5	3,167
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	1.79	1.63	1.33	11.8	0.03	0.02	2.67	2.69	0.02	0.68	0.70	—	2,979	2,979	0.15	0.12	0.27	3,020
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.79	1.63	1.33	11.8	0.03	0.02	2.67	2.69	0.02	0.68	0.70	—	2,979	2,979	0.15	0.12	0.27	3,020
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	0.29	0.26	0.21	1.93	< 0.005	< 0.005	0.43	0.44	< 0.005	0.11	0.11	—	445	445	0.02	0.02	0.67	451

Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.29	0.26	0.21	1.93	< 0.005	< 0.005	0.43	0.44	< 0.005	0.11	0.11	—	445	445	0.02	0.02	0.67	451

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	282	282	0.02	< 0.005	—	283
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	7.20	7.20	< 0.005	< 0.005	—	7.23
Total	—	—	—	—	—	—	—	—	—	—	—	—	289	289	0.02	< 0.005	—	290
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	282	282	0.02	< 0.005	—	283
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	7.20	7.20	< 0.005	< 0.005	—	7.23
Total	—	—	—	—	—	—	—	—	—	—	—	—	289	289	0.02	< 0.005	—	290
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	46.7	46.7	< 0.005	< 0.005	—	46.8

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	1.19	1.19	< 0.005	< 0.005	—	1.20
Total	—	—	—	—	—	—	—	—	—	—	—	—	47.9	47.9	< 0.005	< 0.005	—	48.0

4.2.2. Electricity Emissions By Land Use - Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	282	282	0.02	< 0.005	—	283
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	7.20	7.20	< 0.005	< 0.005	—	7.23
Total	—	—	—	—	—	—	—	—	—	—	—	—	289	289	0.02	< 0.005	—	290
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	282	282	0.02	< 0.005	—	283
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	7.20	7.20	< 0.005	< 0.005	—	7.23
Total	—	—	—	—	—	—	—	—	—	—	—	—	289	289	0.02	< 0.005	—	290
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	46.7	46.7	< 0.005	< 0.005	—	46.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	1.19	1.19	< 0.005	< 0.005	—	1.20
Total	—	—	—	—	—	—	—	—	—	—	—	—	47.9	47.9	< 0.005	< 0.005	—	48.0

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	217	217	0.02	< 0.005	—	218
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	217	217	0.02	< 0.005	—	218
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	217	217	0.02	< 0.005	—	218
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	217	217	0.02	< 0.005	—	218
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	36.0	36.0	< 0.005	< 0.005	—	36.1
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	36.0	36.0	< 0.005	< 0.005	—	36.1

4.2.4. Natural Gas Emissions By Land Use - Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	217	217	0.02	< 0.005	—	218
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	217	217	0.02	< 0.005	—	218
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	217	217	0.02	< 0.005	—	218
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.02	0.01	0.17	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	217	217	0.02	< 0.005	—	218
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	36.0	36.0	< 0.005	< 0.005	—	36.1
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	36.0	36.0	< 0.005	< 0.005	—	36.1

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	—	1.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.27	0.25	0.03	2.84	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.58	7.58	< 0.005	< 0.005	—	7.61
Total	0.27	1.48	0.03	2.84	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	7.58	7.58	< 0.005	< 0.005	—	7.61
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	—	1.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.00	1.23	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	—	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape	0.02	0.02	< 0.005	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.62	0.62	< 0.005	< 0.005	—	0.62
Total	0.02	0.25	< 0.005	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	0.62	0.62	< 0.005	< 0.005	—	0.62

4.3.2. Mitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	—	1.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.27	0.25	0.03	2.84	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.58	7.58	< 0.005	< 0.005	—	7.61
Total	0.27	1.48	0.03	2.84	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	7.58	7.58	< 0.005	< 0.005	—	7.61
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	—	1.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.00	1.23	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	—	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.02	0.02	< 0.005	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.62	0.62	< 0.005	< 0.005	—	0.62
Total	0.02	0.25	< 0.005	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	0.62	0.62	< 0.005	< 0.005	—	0.62

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	3.37	19.6	23.0	0.35	0.01	—	34.1
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.01	0.01	< 0.005	< 0.005	—	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	3.37	19.6	23.0	0.35	0.01	—	34.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartments	—	—	—	—	—	—	—	—	—	—	—	3.37	19.6	23.0	0.35	0.01	—	34.1
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.01	0.01	< 0.005	< 0.005	—	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	3.37	19.6	23.0	0.35	0.01	—	34.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	0.56	3.25	3.80	0.06	< 0.005	—	5.65
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	0.56	3.25	3.81	0.06	< 0.005	—	5.65

4.4.2. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	2.69	15.7	18.4	0.28	0.01	—	27.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.01	0.01	< 0.005	< 0.005	—	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	2.69	15.7	18.4	0.28	0.01	—	27.3
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	2.69	15.7	18.4	0.28	0.01	—	27.3

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.01	0.01	< 0.005	< 0.005	—	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	2.69	15.7	18.4	0.28	0.01	—	27.3
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	0.45	2.60	3.04	0.05	< 0.005	—	4.52
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	0.45	2.60	3.04	0.05	< 0.005	—	4.52

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	19.9	0.00	19.9	1.98	0.00	—	69.5
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	19.9	0.00	19.9	1.98	0.00	—	69.5
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	19.9	0.00	19.9	1.98	0.00	—	69.5

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	19.9	0.00	19.9	1.98	0.00	—	69.5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	3.29	0.00	3.29	0.33	0.00	—	11.5
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	3.29	0.00	3.29	0.33	0.00	—	11.5

4.5.2. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	4.96	0.00	4.96	0.50	0.00	—	17.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.96	0.00	4.96	0.50	0.00	—	17.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	4.96	0.00	4.96	0.50	0.00	—	17.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.96	0.00	4.96	0.50	0.00	—	17.4

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	0.82	0.00	0.82	0.08	0.00	—	2.88
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.82	0.00	0.82	0.08	0.00	—	2.88

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06

4.6.2. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Low Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06

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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

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

Equipment Type	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

4.9.2. Mitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

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

Vegetation	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

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

Land Use	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

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

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

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

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	10/28/2024	11/25/2024	5.00	20.0	—
Site Preparation	Site Preparation	11/26/2024	12/3/2024	5.00	5.00	—
Grading	Grading	12/4/2024	5/5/2025	5.00	109	—
Building Construction	Building Construction	5/6/2025	3/23/2026	5.00	230	—
Paving	Paving	3/24/2026	4/6/2026	5.00	10.0	—
Architectural Coating	Architectural Coating	1/23/2026	3/23/2026	5.00	42.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	2.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	6.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	6.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	2.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	6.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	6.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	12.0	LDA,LDT1,LDT2
Demolition	Vendor	—	7.63	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	12.0	LDA,LDT1,LDT2
Site Preparation	Vendor	—	7.63	HHDT,MHDT
Site Preparation	Hauling	219	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	12.0	LDA,LDT1,LDT2
Grading	Vendor	—	7.63	HHDT,MHDT
Grading	Hauling	10.0	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	36.0	12.0	LDA,LDT1,LDT2
Building Construction	Vendor	5.34	7.63	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	20.0	12.0	LDA,LDT1,LDT2
Paving	Vendor	—	7.63	HHDT,MHDT

Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	7.20	12.0	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	7.63	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	12.0	LDA,LDT1,LDT2
Demolition	Vendor	—	7.63	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	12.0	LDA,LDT1,LDT2
Site Preparation	Vendor	—	7.63	HHDT,MHDT
Site Preparation	Hauling	219	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	12.0	LDA,LDT1,LDT2
Grading	Vendor	—	7.63	HHDT,MHDT
Grading	Hauling	10.0	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	36.0	12.0	LDA,LDT1,LDT2

Building Construction	Vendor	5.34	7.63	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	20.0	12.0	LDA,LDT1,LDT2
Paving	Vendor	—	7.63	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	7.20	12.0	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	7.63	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	107,325	35,775	0.00	0.00	306

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)

Demolition	0.00	0.00	0.00	—	—
Site Preparation	—	8,750	7.50	0.00	—
Grading	—	8,750	109	0.00	—
Paving	0.00	0.00	0.00	0.00	0.12

5.6.2. Construction Earthmoving Control Strategies

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

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Apartments Low Rise	—	0%
Parking Lot	0.12	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	589	0.03	< 0.005
2025	0.00	589	0.03	< 0.005
2026	0.00	589	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year

Apartments Low Rise	366	407	314	133,016	3,395	3,775	2,913	1,233,854
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments Low Rise	366	407	314	133,016	3,395	3,775	2,913	1,233,854
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments Low Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	0
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.1.2. Mitigated

Hearth Type	Unmitigated (number)
Apartments Low Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	0
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	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)
107325	35,775	0.00	0.00	306

5.10.3. Landscape Equipment

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

5.10.4. Landscape Equipment - Mitigated

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

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Low Rise	174,662	589	0.0330	0.0040	678,271
Parking Lot	4,465	589	0.0330	0.0040	0.00

5.11.2. Mitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Low Rise	174,662	589	0.0330	0.0040	678,271
Parking Lot	4,465	589	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Low Rise	1,756,654	36,530
Parking Lot	0.00	1,494

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Low Rise	1,405,323	29,224
Parking Lot	0.00	1,196

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Low Rise	36.8	—
Parking Lot	0.00	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Low Rise	9.21	—
Parking Lot	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Low Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Low Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Low Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0

Apartments Low Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

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

5.15.2. Mitigated

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

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

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

5.16.2. Process Boilers

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

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

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

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

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

5.18.2.2. Mitigated

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

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	18.7	annual days of extreme heat
Extreme Precipitation	4.80	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	30.4	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	N/A	N/A	N/A	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	0	0	0	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

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

6.3. Adjusted Climate Risk Scores

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

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

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	65.7
AQ-PM	41.2
AQ-DPM	11.4
Drinking Water	10.9
Lead Risk Housing	19.9

Pesticides	0.00
Toxic Releases	24.0
Traffic	15.8
Effect Indicators	—
CleanUp Sites	2.59
Groundwater	0.00
Haz Waste Facilities/Generators	3.64
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	35.6
Cardio-vascular	30.2
Low Birth Weights	36.7
Socioeconomic Factor Indicators	—
Education	20.9
Housing	14.7
Linguistic	33.3
Poverty	20.1
Unemployment	17.1

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	77.23598101
Employed	52.68831002
Median HI	74.72090337

Education	—
Bachelor's or higher	44.59129988
High school enrollment	100
Preschool enrollment	75.7602977
Transportation	—
Auto Access	88.68215065
Active commuting	2.194276915
Social	—
2-parent households	23.81624535
Voting	90.17066598
Neighborhood	—
Alcohol availability	97.0101373
Park access	46.54176825
Retail density	9.662517644
Supermarket access	20.89054279
Tree canopy	9.303220839
Housing	—
Homeownership	77.53111767
Housing habitability	89.43924034
Low-inc homeowner severe housing cost burden	48.33825228
Low-inc renter severe housing cost burden	84.83254202
Uncrowded housing	96.93314513
Health Outcomes	—
Insured adults	79.94353907
Arthritis	0.0
Asthma ER Admissions	64.2
High Blood Pressure	0.0

Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	27.9
Cognitively Disabled	54.2
Physically Disabled	49.3
Heart Attack ER Admissions	57.0
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	40.5
SLR Inundation Area	0.0
Children	69.7
Elderly	66.3
English Speaking	85.1
Foreign-born	4.9
Outdoor Workers	52.4

Climate Change Adaptive Capacity	—
Impervious Surface Cover	37.5
Traffic Density	0.0
Traffic Access	23.0
Other Indices	—
Hardship	27.4
Other Decision Support	—
2016 Voting	85.4

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	4.00
Healthy Places Index Score for Project Location (b)	71.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Schedule adjusted to reflect soil export and architectural coating overlap with building construction.
Operations: Hearths	No fireplaces or hearths