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MEMORANDUM

DATE: March 7, 2025

TO: Cherry Miao, Public Storage

FROM: Jessica Coria, Associate
Bianca Martinez, Air Quality Specialist

SUBJECT: Draft Air Quality, Energy, and Greenhouse Gas Technical Memorandum for the Proposed Moreno Valley Public Storage Project in Moreno Valley, California

INTRODUCTION

LSA has prepared this Air Quality, Energy, and Greenhouse Gas Technical Memorandum to evaluate the impacts associated with construction and operation of the proposed Moreno Valley Public Storage Project (project) located in Moreno Valley, Riverside County, California. This analysis was prepared using methods and assumptions recommended in the air quality impact assessment guidelines of the South Coast Air Quality Management District (SCAQMD) in its *CEQA Air Quality Handbook* (1993)[1] and associated updates. This analysis includes an assessment of criteria pollutant emissions, an assessment of carbon monoxide (CO) hot-spot impacts, and an assessment of the project's greenhouse gas (GHG) emissions.

PROJECT LOCATION AND DESCRIPTION

The 3-acre project site (Assessor's Parcel Number [APN] 482-190-022) is located along Indian Street, north of Alessandro Boulevard in the City of Moreno Valley (City). The project site is currently undeveloped and generally flat. Vehicular access to the project site is provided via an existing driveway along Indian Street that is shared with commercial uses to the south of the site. Local access to the project site is provided via Indian Street. The project location is shown on Figure 1 and the project conceptual site plan is shown on Figure 2 (all figures are included in Attachment A).

The proposed project includes development of a 132,003-square-foot, three-story, self-storage building, including a self-storage area, a rental office, and a lobby, with 20,777 square-feet of landscaping. The on-site rental office would be located in the southeastern corner of the building. The proposed project would include a recreational vehicle (RV) parking lot consisting of 52 RV spaces. In addition, 12 passenger vehicle parking spaces, including one Americans with Disabilities Act (ADA) compliant space, and six bicycle parking spaces would be provided adjacent to the east of the proposed self-storage building. The project would also include installation of landscaping and

[1] South Coast Air Quality Management District (SCAQMD). 1993. CEQA Air Quality Handbook (currently under revision). Website: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993) (accessed March 2025).

trees along the project site frontage of Indian Street, as well as landscaping along the project site setbacks to the north, east, and south. Additionally, the building would be all electric and would not include natural gas connections.

According to the City's zoning map and the City's General Plan, the project site is zoned Neighborhood Commercial (NC) and has a land use designation of Commercial. Per City Municipal Code Permitted Uses Table 9.02.020-1 in Section 9.02.020,[2] self-storage facilities are not permitted uses in the NC zone, so the project includes a zone change to change the zoning designation of the project site from NC to Community Commercial (CC) and a Conditional Use Permit (CUP) to allow development of the proposed project within the CC zone.

Once operational the proposed project would generate approximately 216 average daily trips.[3] Operational office hours would be 9:00 a.m. to 6:00 p.m., 7 days a week. Customer access hours would be 6:00 a.m. to 9:00 p.m. The proposed project would include up to two employees per shift to operate the facility.[4]

Construction would occur for approximately 12 months, ending in the second quarter of 2027. Construction activities would include site preparation, grading, building construction, paving, and architectural coating activities. Site preparation, grading, and paving activities would involve the use of standard earthmoving equipment such as large excavators, cranes, and other related equipment. In addition, the proposed project would require approximately 4,210 cubic yards of soil export.[5]

SENSITIVE RECEPTORS IN THE PROJECT AREA

For this analysis, sensitive receptors are considered areas of the population that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include residences, schools, daycare centers, hospitals, parks, and similar uses that are sensitive to air quality. Impacts on sensitive receptors are of particular concern because those receptors are the population that is most vulnerable to the effects of air pollution. The project site is bounded by self-storage uses to the north, residential uses to the east, commercial uses (gasoline station and auto parts store) to the south, and Indian Street and commercial/retail uses to the west. The nearest sensitive receptors are the single-family residences along Pheasant Knoll Lane that are located to

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2 City of Moreno Valley. 2024. Permitted Uses Table 9.02.020-1. Website: https://ecode360.com/attachment/MO4973/MO4973-009a%20Permitted%20Uses%20Table%209.02.020-1.pdf (accessed March 2025).

3 LSA. 2024. Trip Generation and Vehicle Miles Traveled Analysis for the Public Storage Moreno Valley Project (LSA Project No. 20241908). October 16.

4 Assumes up to two shifts per day.

5 The California Emissions Estimator Model version 2022.1 (CalEEMod) model evaluated the project emissions assuming construction would begin in November 2025 and end in November 2026 and require approximately 5,000 cubic yards of soil export. The project schedule and grading plans have since been modified to assume construction would end in the second quarter of 2027 and approximately 4,210 cubic yards of soil export would be required. The 12-month construction duration remained the same. These modifications to the project have been reviewed by LSA and it was determined that the modified construction schedule and soil export quantities would not result in more severe impacts than what is described within.

the east and within 50 feet of the project site (measured from the project site boundary to the center of the nearest residence).

Table A shows the summary of the distances to the nearby sensitive receptors based on the project activity.

Table A: Summary of Analysis Distances by Impact Category

Activity	Nearest Sensitive Receptor	Points of Analysis	Distance (feet)
Construction[1]	Single-family homes on Pheasant Knoll Lane	Perimeter of construction activities to the centroid of the nearest sensitive receptor.	50
Operations	Single-family homes on Pheasant Knoll Lane	Emissions sources on-site are generalized from the centroid of the project site to the centroid of the nearest sensitive receptor.	210

Source: Compiled by LSA (March 2025)

ENVIRONMENTAL SETTING

Air Quality Background

Air quality is primarily a function of local climate, local sources of air pollution, and regional pollution transport. The amount of a given pollutant in the atmosphere is determined by the amount of the pollutant released and the atmosphere's ability to transport and dilute the pollutant. The major determinants of transport and dilution are wind, atmospheric stability, terrain and, for photochemical pollutants, sunshine.

A region's topographic features have a direct correlation with air pollution flow and therefore are used to determine the boundary of air basins. The project site is in Riverside County and is within the jurisdiction of the SCAQMD, which regulates air quality in the South Coast Air Basin (Basin).

The Basin comprises approximately 10,000 square miles and covers all of Orange County and the urban parts of Los Angeles, Riverside, and San Bernardino counties. The Basin is on a coastal plain with connecting broad valleys and low hills to the east. Regionally, the Basin is bounded by the Pacific Ocean to the southwest and high mountains to the east, forming the inland perimeter.

Both State and federal governments have established health-based ambient air quality standards for six criteria air pollutants: CO, ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead (Pb), and suspended particulate matter. In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Two criteria pollutants, O_3 and NO_2, are considered regional pollutants because they (or their precursors) affect air quality on a regional scale. Pollutants such as CO, SO_2, and Pb are considered local pollutants that tend to accumulate in the air locally.

Air quality monitoring stations are located throughout the nation and are maintained by the local air districts and State air quality regulating agencies. Data collected at permanent monitoring stations are used by the United States Environmental Protection Agency (USEPA) to identify regions as "attainment" or "nonattainment" depending on whether the regions meet the requirements stated in the applicable National Ambient Air Quality Standards (NAAQS). Nonattainment areas are imposed with additional restrictions as required by the USEPA. In addition, different classifications of attainment (e.g., marginal, moderate, serious, severe, and extreme) are used to classify each air basin in the State on a pollutant-by-pollutant basis. The classifications are used as a foundation to create air quality management strategies to improve air quality and to comply with the NAAQS. As shown in Table B, the Basin is designated as nonattainment by the federal standards for O_3 and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) and nonattainment by the State standards for O_3, particulate matter less than 10 microns in diameter (PM_{10}), and $PM_{2.5}$.

Table B: Attainment Status of Criteria Pollutants in the South Coast Air Basin

Pollutant	State	Federal
O_3 1-hour	Nonattainment	N/A
O_3 8-hour	Nonattainment	Extreme Nonattainment
PM_{10}	Nonattainment	Attainment/Maintenance
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Attainment/Maintenance
NO_2	Attainment	Unclassified/Attainment (1-hour) Attainment/Maintenance (Annual)
SO_2	Attainment	Unclassified/Attainment
Lead	Attainment[1]	Unclassified/Attainment[1]
All Others	Attainment/Unclassified	Attainment/Unclassified

Source 1: NAAQS and CAAQS Attainment Status for South Coast Air Basin (SCAQMD 2016).
Source 2: Nonattainment Areas for Criteria Pollutants (Green Book) (USEPA 2019).
[1] Only the Los Angeles County portion of the South Coast Air Basin is in nonattainment for lead.

CAAQS = California Ambient Air Quality Standards
CO = carbon monoxide
N/A = not applicable
NAAQS = National Ambient Air Quality Standards
NO_2 = nitrogen dioxide
O_3 = ozone
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
SCAQMD = South Coast Air Quality Management District
SO_2 = sulfur dioxide
USEPA = United States Environmental Protection Agency

O_3 levels, as measured by peak concentrations and the number of days over the State 1-hour standard, have declined substantially as a result of aggressive programs by SCAQMD and other regional, State, and federal agencies. The reduction of peak concentrations represents progress in improving public health; however, the Basin still exceeds the State standard for 1-hour and 8-hour O_3 levels. The USEPA lowered the 1997 0.80 part per million (ppm) national 8-hour O_3 standard to 0.75 ppm in 2008 and then to 0.70 ppm on October 1, 2015. The Basin is classified as nonattainment for the 1-hour and 8-hour O_3 standards at the State level and as extreme nonattainment for the 8-hour O_3 standard at the federal level.

National and State standards have also been established for $PM_{2.5}$ over 24-hour and yearly averaging periods. $PM_{2.5}$, because of the small size of individual particles, can be especially harmful to human

health. $PM_{2.5}$ is emitted by common combustion sources such as cars, trucks, buses, and power plants, in addition to ground-disturbing activities. On December 17, 2006, the USEPA strengthened the 24-hour $PM_{2.5}$ NAAQS from 65 micrograms per cubic meter ($\mu g/m^3$) to 35 $\mu g/m^3$, and the Basin was subsequently designated "moderate" nonattainment for 2006 24-hour $PM_{2.5}$ NAAQS on December 14, 2009. On February 7, 2024, the USEPA strengthened the NAAQS for $PM_{2.5}$ by revising the primary (health-based) annual standard from 12.0 $\mu g/m^3$ to 9.0 $\mu g/m^3$; however, a new attainment designation has not been issued. The Basin is also considered a nonattainment area for the $PM_{2.5}$ standard at the State level.

The Basin is classified as a PM_{10} nonattainment area at the State level. All areas of the Basin have continued to remain below the federal CO standards (35 ppm 1-hour and 9 ppm 8-hour) since 2003. The USEPA redesignated the Basin to attainment of the federal CO standards, effective June 11, 2017. The Basin is also well below the State CO standards (20 ppm 1-hour CO and 9 ppm 8-hour CO).

Air Quality Monitoring Results

Air quality monitoring stations are located throughout the nation and are maintained by the local air pollution control district and State air quality regulating agencies. The SCAQMD and the California Air Resources Board (CARB) maintain ambient air quality monitoring stations in the Basin. The air quality monitoring stations in Riverside County that are closest to the project site are the Lake Elsinore West Flint Street station located at 506 West Flint Street in Lake Elsinore, the Pechanga station located at 12705 Pechanga Road in Temecula, and the Riverside Rubidoux station located at 5888 Mission Boulevard in Jurupa Valley.

Pollutant monitoring results for years 2021 to 2023 at the nearby ambient air quality monitoring stations, which are shown in Table C, indicate that air quality in the area has generally been moderate. As indicated in the monitoring results shown in Table C, the State PM_{10} standard was exceeded 4 times in 2021, 1 time in 2022, and 7 times in 2023. In addition, the federal PM_{10} standard was not exceeded in 2021 or 2022, with one exceedance in 2023. The federal $PM_{2.5}$ standard had no exceedances in between 2021 and 2023. The State 1-hour ozone standard was exceeded 18 times in 2021 and 17 times in 2022 with 10 exceedances in 2023. The State 8-hour ozone standard was exceeded 45 times in 2021, 37 times in 2022, and 35 times in 2023. The federal 8-hour ozone standard was exceeded 44 times in 2021,37 times in 2022, and 31 times in 2023. The federal CO maximum 1-hour and federal CO maximum 8-hour standards were not exceeded in the 3-year period. The federal SO_2 standard was not exceeded between 2021 and 2023. The State SO_2 and standard has an unknown number of exceedances for the 3-year period. The State NO_2 maximum 1-hour standard was not exceeded between 2021 and 2023.

Table C: Ambient Air Quality Monitored in the Project Vicinity

Pollutant	Standard	2021	2022	2023
Carbon Monoxide (CO)[1]				
Maximum 1-hr concentration (ppm)		0.9	0.9	1.3
Number of days exceeded:	State: > 20 ppm	0	0	0
	Federal: > 35 ppm	0	0	0
Maximum 8-hr concentration (ppm)		0.8	0.6	0.7
Number of days exceeded:	State: ≥ 9.0 ppm	0	0	0
	Federal: ≥ 9.0 ppm	0	0	0
Ozone (O_3)[1]				
Maximum 1-hr concentration (ppm)		0.118	0.121	0.120
Number of days exceeded:	State: > 0.09 ppm	18	17	10
Maximum 8-hr concentration (ppm)		0.097	0.091	0.103
Number of days exceeded:	State: > 0.070 ppm	45	37	35
	Federal: > 0.070 ppm	44	37	31
Coarse Particulates (PM_{10})[1]				
Maximum 24-hr concentration (µg/m^3)		89.0	91.8	187.0
Number of days exceeded:	State: > 50 µg/m^3	4	1	7
	Federal: > 150 µg/m^3	0	0	1
Annual arithmetic average concentration (µg/m^3)		41.7	35.4	34.0
Exceeded for the year:	State: > 20 µg/m^3	Yes	Yes	Yes
	Federal: > 50 µg/m^3	No	No	No
Fine Particulates ($PM_{2.5}$)[3]				
Maximum 24-hr concentration (µg/m^3)		16.5	13.2	11.6
Number of days exceeded:	Federal: > 35 µg/m^3	0	0	0
Annual arithmetic average concentration (µg/m^3)		7.0	5.9	6.6
Exceeded for the year:	State: > 12 µg/m^3	No	No	No
	Federal: > 15 µg/m^3	No	No	No
Nitrogen Dioxide (NO_2)[1]				
Maximum 1-hr concentration (ppm)		0.0437	0.0372	0.0412
Number of days exceeded:	State: > 0.18 ppm	0	0	0
Annual arithmetic average concentration (ppm)		0.007	0.007	0.007
Exceeded for the year:	State: > 0.030 ppm	No	No	No
	Federal: > 0.053 ppm	No	No	No
Sulfur Dioxide (SO_2)[2]				
Maximum 24-hr concentration (ppm)		0.0027	0.0012	0.0023
Number of days exceeded:	State: > 0.04 ppm	ND	ND	ND
	Federal: > 0.14 ppm	0	0	0
Annual arithmetic average concentration (ppm)		0.00043	0.00034	0.00043
Exceeded for the year:	Federal: > 0.030 ppm	No	No	No

Source 1: 2021–2023 Air Quality Data, Website: www.epa.gov/outdoor-air-quality-data/monitor-values-report (USEPA 2024).
Source 2: iADAM: Air Quality Data Statistics, Website: www.arb.ca.gov/adam/index.html (CARB 2024).

[1] Data taken from the Lake Elsinore West Flint Street station located at 506 West Flint Street, Lake Elsinore, Riverside County, California.
[2] Data taken from the Riverside Rubidoux station located at 5888 Mission Boulevard, Jurupa Valley, Riverside County, California.
[3] Data taken from the Pechanga station located at 12705 Pechanga Road, Temecula, Riverside County, California.

µg/m^3 = micrograms per cubic meter
CARB = California Air Resources Board
hr = hour
ND = no data available
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
ppm = parts per million
SJVAPCD = San Joaquin Valley Air Pollution Control District
USEPA = United States Environmental Protection Agency

Energy

Electricity

Electricity is a man-made resource. The production of electricity requires the consumption or conversion of energy resources (including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources) into energy. Electricity is used for a variety of purposes (e.g., lighting, heating, cooling, and refrigeration, and for operating appliances, computers, electronics, machinery, and public transportation systems).

According to the most recent data available, in 2022, California's electricity was generated primarily by natural gas (47.5 percent), renewable sources (52.2 percent), large hydroelectric (7.2 percent), nuclear (8.7 percent), coal (<1.0 percent), and other unspecified sources. Total electric generation in California in 2022 was 287,220 gigawatt-hours (GWh), up 3.4 percent from the 2021 total generation of 277,764 GWh.[6]

The project site is within the service territory of Southern California Edison (SCE). SCE provides electricity to more than 15 million people in a 50,000-square-mile area of Central, Coastal, and Southern California.[7] According to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2022 was 85,870 GWh (31,603 GWh for the residential sector and 54,267 GWh for the non-residential sector). Total electricity consumption in Riverside County in 2022 was 17,780.6 GWh (17,780,573,271 kilowatt-hours [kWh]).[8]

Natural Gas

Natural gas is a nonrenewable fossil fuel. Fossil fuels are formed when layers of decomposing plant and animal matter are exposed to intense heat and pressure under the surface of the Earth over millions of years. Natural gas is a combustible mixture of hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas is found in naturally occurring reservoirs in deep underground rock formations. Natural gas is used for a variety of uses (e.g., heating buildings, generating electricity, and powering appliances such as stoves, washing machines and dryers, gas fireplaces, and gas grills).

Natural gas consumed in California is used for electricity generation (45 percent), residential uses (21 percent), industrial uses (25 percent), and commercial uses (9 percent). California continues to depend on out-of-state imports for nearly 90 percent of its natural gas supply.[9]

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6 California Energy Commission (CEC). 2022. *2022 Total System Electric Generation*. Website: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2022-total-system-electric-generation (accessed March 2025).

7 Southern California Edison (SCE). 2020. About Us. Website: https://www.sce.com/about-us/who-we-are (accessed March 2025).

8 California Energy Commission (CEC). 2020a. Electricity Consumption by County and Entity. Websites: http://www.ecdms.energy.ca.gov/ (accessed March 2025).

9 California Energy Commission (CEC). 2021. Supply and Demand of Natural Gas in California. Website: https://www.energy.ca.gov/data-reports/energy-almanac/californias-natural-gas-market/supply-and-demand-natural-gas-california (accessed March 2025).

The Southern California Gas Company (SoCalGas) is the natural gas service provider for the project site. SoCalGas provides natural gas to approximately 21.8 million people in a 24,000-square-mile service area throughout Central and Southern California, from Visalia to the Mexican border.[10] According to the CEC, total natural gas consumption in the SoCalGas service area in 2022 was 5,026 million therms (2,230 million therms for the residential sector). Total natural gas consumption in Riverside County in 2022 was 431 million therms (431,052,392 therms) of which 284 million therms were residential.[11] However, as described, in the Project Description, the proposed project would not include natural gas.

Fuel

Petroleum is also a nonrenewable fossil fuel. Petroleum is a thick, flammable, yellow-to-black mixture of gaseous, liquid, and solid hydrocarbons that occurs naturally beneath the Earth's surface. Petroleum is primarily recovered by oil drilling. It is refined into a large number of consumer products, primarily fuel oil, gasoline, and diesel.

The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles [SUVs]) in the United States has steadily increased from about 14.9 miles per gallon (mpg) in 1980 to 22.9 mpg in 2021.[12] Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. This Act, which originally mandated a national fuel economy standard of 35 mpg by year 2020,[13] applies to cars and light trucks of Model Years 2011 through 2020. In March 2020, the USEPA and National Highway Traffic Safety Administration (NHTSA) finalized the Corporate Average Fuel Economy (CAFE) standards for Model Years 2024–2026 Passenger Cars and Light Trucks, which is further detailed below.

Gasoline is the most-used transportation fuel in California, with 97 percent of all gasoline being consumed by light-duty cars, pickup trucks, and sport utility vehicles (SUVs). According to the most recent data available, in 2022, total gasoline consumption in California was 316,425 thousand barrels or 1,597.6 trillion British thermal units (BTU).[14] Of the total gasoline consumption, 299,304 thousand barrels or 1,511.2 trillion BTU were consumed for transportation.[15] Based on fuel consumption obtained from CARB's California Emissions Factor Model, Version 2021 (EMFAC2021),

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10 Southern California Gas Company (SoCalGas). 2020. About SoCalGas. Website: https://www.socalgas.com/about-us (accessed March 2025).

11 California Energy Commission (CEC). 2020b. Gas Consumption by County and Entity. Website: http://www.ecdms.energy.ca.gov/ (accessed March 2025).

12 United States Department of Transportation (USDOT). Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles. Website: https://www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles (accessed March 2025).

13 United States Department of Energy. 2007. Energy Independence & Security Act of 2007. Website: https://www.afdc.energy.gov/laws/eisa (accessed March 2025).

14 United States Energy Information Administration (EIA). 2022. California State Profile and Energy Estimates, Data. Website: www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_mg.html&sid=CA (accessed March 2025).

15 Ibid.

approximately 744.5 million gallons of gasoline and approximately 301.2 million gallons of diesel will be consumed from vehicle trips in Riverside County in 2024.

Greenhouse Gas Background

GHGs are present in the atmosphere naturally, are released by natural sources, or form from secondary reactions taking place in the atmosphere. Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, which is believed to be causing global warming. Although man-made GHGs include naturally occurring GHGs such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O), some gases like hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), nitrogen trifluoride (NF_3), and sulfur hexafluoride (SF_6) are completely new to the atmosphere.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of global warming potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP is based on several factors, including the relative effectiveness of a gas in absorbing infrared radiation and the length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO_2, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalents" (CO_2e).

REGULATORY SETTING

This section provides regulatory background information for air quality, GHG, and energy.

Air Quality

Applicable federal, State, regional, and local air quality regulations are discussed below.

Federal Regulations

The 1970 federal Clean Air Act (CAA) authorized the establishment of national health-based air quality standards and set deadlines for their attainment. The CAA Amendments of 1990 changed deadlines for attaining national standards as well as the remedial actions required for areas of the nation that exceed the standards. Under the CAA, State and local agencies in areas that exceed the national standards are required to develop State Implementation Plans (SIPs) to demonstrate how they will achieve the national standards by specified dates.

State Regulations

In 1988, the California Clean Air Act (CCAA) required that all air districts in the State endeavor to achieve and maintain California Ambient Air Quality Standards (CAAQS) for CO, O_3, SO_2, and NO_2 by the earliest practical date. The CCAA provides districts with the authority to regulate indirect sources and mandates that air quality districts focus particular attention on reducing emissions from transportation and areawide emission sources. Each nonattainment district is required to adopt a plan to achieve a 5 percent annual reduction, averaged over consecutive 3-year periods, in districtwide emissions of each nonattainment pollutant or its precursors. A Clean Air Plan shows how a district would reduce emissions to achieve air quality standards. Generally, the State standards for these pollutants are more stringent than the national standards.

CARB is the State's "clean air agency." CARB's goals are to attain and maintain healthy air quality, protect the public from exposure to toxic air contaminants (TACs), and oversee compliance with air pollution rules and regulations.

Regional Regulations

The proposed project would be required to comply with regional rules that assist in reducing short-term air pollutant emissions. SCAQMD Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emissions source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. SCAQMD Rule 1113 limits the volatile organic compound (VOC) content of architectural coatings. Applicable dust suppression techniques from SCAQMD Rule 403 and low VOC content in paints under SCAQMD Rule 1113 are summarized below. Implementation of these dust suppression techniques can reduce the fugitive dust generation (and thus the PM_{10} component). Compliance with these rules would reduce impacts on nearby sensitive receptors.

- **South Coast Air Quality Management District Rule 403 Measures**
    - Water active sites at least two times daily (locations where grading is to occur will be thoroughly watered prior to earthmoving).
    - All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard in accordance with the requirements of California Vehicle Code Section 23114 (freeboard means vertical space between the top of the load and top of the trailer).
    - Traffic speeds on all unpaved roads shall be reduced to 15 miles per hour (mph) or less.
- **South Coast Air Quality Management District Rule 1113 Measures:** SCAQMD Rule 1113 governs the sale, use, and manufacture of architectural coating and limits the VOC content in paints and paint solvents. This rule regulates the VOC content of paints available during construction and operation of the proposed project. Therefore, all paints and solvents used during construction and operation of the proposed project must comply with SCAQMD Rule 1113.

Local Regulations

City of Moreno Valley General Plan 2006. The City of Moreno Valley addresses air quality in the Conservation Element of the General Plan 2006.[16] The following policy from the Conservation Element is applicable to the proposed project:

- **Policy 7.1.1:** Require that grading plans include appropriate and feasible measures to minimize erosion, sedimentation, wind erosion and fugitive dust.

Energy

Federal and State agencies regulate energy use and consumption through various means and programs. On the federal level, the United States Department of Transportation (USDOT), the United States Department of Energy, and the USEPA are three federal agencies with substantial influence over energy policies and programs. Generally, federal agencies influence and regulate transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements. On the State level, the California Public Utilities Commission (CPUC) and the CEC are two agencies with authority over different aspects of energy.

The CPUC regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies and serves the public interest by protecting consumers and ensuring the provision of safe, reliable utility service and infrastructure at reasonable rates, with a commitment to environmental enhancement and a healthy California economy.

The CEC is the State's primary energy policy and planning agency. The CEC forecasts future energy needs, promotes energy efficiency, supports energy research, develops renewable energy resources, and plans for/directs State response to energy emergencies. The applicable federal, State, regional, and local regulatory framework is discussed below.

Federal Regulations

Energy Policy Act of 2005. The Energy Policy Act of 2005 seeks to reduce reliance on nonrenewable energy resources and provide incentives to reduce current demand on these resources. For example, under this Act, consumers and businesses can obtain federal tax credits for purchasing fuel-efficient appliances and products (including hybrid vehicles), building energy-efficient buildings, and improving the energy efficiency of commercial buildings. Additionally, tax credits are available for the installation of qualified fuel cells, stationary microturbine power plants, and solar power equipment.

Corporate Average Fuel Economy Standards. On March 31, 2022, the NHTSA finalized the CAFE standards for Model Years 2024–2026 Passenger Cars and Light Trucks. The amended CAFE

[16] City of Moreno Valley. 2006. Moreno Valley General Plan, Chapter 9 Goals and Objectives. Website: https://moval.gov/city_hall/general-plan/06gpfinal/gp/9-goals.pdf (accessed March 2025)

standards would require an industry-wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026 by increasing fuel efficiency by 8 percent annually for model years 2024–2025 and 10 percent annually for model year 2026. The final standards are estimated to save about 234 billion gallons of gasoline between model years 2030 and 2050.

State Regulations

Assembly Bill 1575, Warren-Alquist Act. In 1975, largely in response to the oil crisis of the 1970s, the State Legislature adopted Assembly Bill (AB) 1575 (also known as the Warren-Alquist Act), which created the CEC. The statutory mission of the CEC is to forecast future energy needs; license power plants of 50 megawatts (MW) or larger; develop energy technologies and renewable energy resources; plan for and direct State responses to energy emergencies; and, perhaps most importantly, promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards. AB 1575 also amended Public Resources Code (PRC) Section 21100(b)(3) and *State CEQA Guidelines* Section 15126.4 to require Environmental Impact Reports (EIRs) to include, where relevant, mitigation measures proposed to minimize the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Thereafter, the State Resources Agency created Appendix F to the *State CEQA Guidelines*. Appendix F assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. Appendix F of the *State CEQA Guidelines* also states that the goal of conserving energy implies the wise and efficient use of energy and the means of achieving this goal, including (1) decreasing overall per capita energy consumption; (2) decreasing reliance on fossil fuels such as coal, natural gas, and oil; and (3) increasing reliance on renewable energy sources.

Senate Bill 1389, Energy: Planning and Forecasting. In 2002, the State Legislature passed Senate Bill (SB) 1389, which required the CEC to develop an integrated energy plan every 2 years for electricity, natural gas, and transportation fuels for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies (including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles [ZEVs] and their infrastructure needs) for encouraging urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

In compliance with the requirements of SB 1389, the CEC adopts an Integrated Energy Policy Report every 2 years and an update every other year. The most recently adopted report includes the *2023 Integrated Energy Policy Report.*[17] The *Integrated Energy Policy Report* covers a broad range of topics, including decarbonizing buildings, integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecast, and the California Energy Demand Forecast. The *Integrated Energy Policy Report* provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these

[17] California Energy Commission (CEC). 2023. *2023 Integrated Energy Policy Report*. California Energy Commission. Docket Number: 23-IEPR-01.

issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs.

Renewable Portfolio Standard. SB 1078 established the California Renewable Portfolio Standards program in 2002. SB 1078 initially required that 20 percent of electricity retail sales be served by renewable resources by 2017; however, this standard has become more stringent over time. In 2006, SB 107 accelerated the standard by requiring that the 20 percent mandate be met by 2010. In April 2011, SB 2 required that 33 percent of electricity retail sales be served by renewable resources by 2020. In 2015, SB 350 established tiered increases to the Renewable Portfolio Standards of 50 percent by 2030. In 2018, SB 100 increased the requirement to 60 percent by 2030 and required that all the State's electricity come from carbon-free resources by 2045. SB 100 took effect on January 1, 2019.[18]

California Energy Code. Energy consumption by new buildings in California is regulated by the Building Energy Efficiency Standards in Part 6 of Title 24 of the California Code of Regulations (CCR), known as the Energy Code. The CEC first adopted the Building Energy Efficiency Standards for Residential and Non-Residential Buildings in 1978 in response to a legislative mandate to reduce energy consumption in the State. The Energy Code is updated every 3 years, with the most recent update consisting of the 2022 Energy Code that became effective January 1, 2023. Mid-cycle supplements to the 2022 Code will become effective on July 1, 2024. The efficiency standards apply to both new construction and rehabilitation of both residential and nonresidential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided these standards meet or exceed those provided in the Energy Code.

California Green Building Standards Code (CALGreen Code). In 2010, the California Building Standards Commission (CBSC) adopted Part 11 of the Title 24 Building Energy Efficiency Standards, referred to as the CALGreen Code. The CALGreen Code took effect on January 1, 2011. The CALGreen Code is updated on a regular basis, with the most recent update consisting of the 2022 CALGreen Code standards that became effective January 1, 2023. The CALGreen Code established mandatory measures for residential and nonresidential building construction and encouraged sustainable construction practices in the following five categories: (1) planning and design, (2) energy efficiency, (3) water efficiency and conservation, (4) material conservation and resource efficiency, and (5) indoor environmental quality. Although the CALGreen Code was adopted as part of the State's efforts to reduce GHG emissions, the CALGreen Code standards have co-benefits of reducing energy consumption from residential and nonresidential buildings subject to the standard.

California Energy Efficiency Strategic Plan. On September 18, 2008, the CPUC adopted California's first Long-Term Energy Efficiency Strategic Plan (Strategic Plan), presenting a roadmap for energy efficiency in California. The Strategic Plan was updated in 2011. The Plan articulates a long-term vision and goals for each economic sector and identifies specific near-term, mid-term, and long-term strategies to assist in achieving those goals. The Strategic Plan also reiterates the following four

[18] California Public Utilities Commission (CPUC). 2019. Renewables Portfolio Standard Program. Website: Renewables Portfolio Standard (RPS) Program (accessed March 2025).

specific programmatic goals known as the "Big Bold Energy Efficiency Strategies" that were established by the CPUC in Decisions D.07-10-032 and D.07-12-051:

- All new residential construction will be zero net energy (ZNE) by 2020.
- All new commercial construction will be ZNE by 2030.
- 50 percent of commercial buildings will be retrofitted to ZNE by 2030.
- 50 percent of new major renovations of State buildings will be ZNE by 2025.

Regional Regulations

There are no regional regulations that apply to the proposed project.

Local Regulations

City of Moreno Valley General Plan 2006. The City of Moreno Valley addresses energy in the Conservation Element of the General Plan 2006.[19] The following policies from the Conservation Element are applicable to the proposed project:

- **Policy 7.5.1:** Encourage building, site design, and landscaping techniques that provide passive heating and cooling to reduce energy demand.
- **Policy 7.5.2:** Encourage energy efficient modes of transportation and fixed facilities, including transit, bicycle, equestrian, and pedestrian transportation. Emphasize fuel efficiency in the acquisition and use of City-owned vehicles.
- **Policy 7.5.3**: Locate areas planned for commercial, industrial and multiple family density residential development within areas of high transit potential and access.
- **Policy 7.5.5:** Encourage the use of solar power and other renewable energy systems.

Greenhouse Gas Emissions

This section describes regulations related to global climate change at the federal, State, and local levels.

Federal Regulations

The United States has historically had a voluntary approach to reducing GHG emissions. However, on April 2, 2007, the United States Supreme Court ruled that the USEPA has the authority to regulate CO_2 emissions under the CAA.

Although there currently are no adopted federal regulations for the control or reduction of GHG emissions, the USEPA commenced several actions in 2009 to implement a regulatory approach to global climate change, including the 2009 USEPA final rule for mandatory reporting of GHGs from large GHG emission sources in the United States. Additionally, the USEPA Administrator signed an

[19] City of Moreno Valley. 2006. Moreno Valley General Plan, Chapter 9 Goals and Objectives. Website: https://moval.gov/city_hall/general-plan/06gpfinal/gp/9-goals.pdf (accessed March 2025)

endangerment finding action in 2009 under the CAA, finding that seven GHGs (CO_2, CH_4, N_2O, HFCs, NF_3, PFCs, and SF_6) constitute a threat to public health and welfare, and that the combined emissions from motor vehicles cause and contribute to global climate change, leading to national GHG emission standards.

State Regulations

CARB is the lead agency for implementing climate change regulations in the State. Since its formation, CARB has worked with the public, the business sector, and local governments to find solutions to California's air pollution problems. Key efforts by the State are described below.

Assembly Bill 32 (2006), California Global Warming Solutions Act. California's major initiative for reducing GHG emissions is AB 32, passed by the State Legislature on August 31, 2006. This effort set a target to reduce GHG emissions to 1990 levels by 2020. CARB has established the level of GHG emissions in 1990 at 427 million metric tons (MMT) of CO_2e. The emission target of 427 MMT requires the reduction of 169 MMT from the State's projected business-as-usual 2020 emissions of 596 MMT. AB 32 requires CARB to prepare a Scoping Plan that outlines the main State strategies for meeting the 2020 deadline and to reduce GHGs that contribute to global climate change. CARB approved the Scoping Plan on December 11, 2008, which contains the main strategies California will implement to achieve the reduction goals and includes CARB-recommended GHG reductions for each emissions sector of the State's GHG inventory.

The CARB approved the First Update to the Climate Change Scoping Plan on May 22, 2014. The First Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. The First Update defines CARB climate change priorities until 2020 and sets the groundwork to reach long-term goals set forth in Executive Orders (EOs) S-3-05 and B-16-2012. The First Update highlights California's progress toward meeting the "near-term" 2020 GHG emission reduction goals as defined in the initial Scoping Plan. It also evaluates how to align the State's "longer-term" GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan,[20] to reflect the 2030 target that was set by EO B-30-15 and codified by SB 32.

The 2022 Scoping Plan[21] was approved in December 2022 and assesses progress toward the statutory 2030 target while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan Update focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission

[20] California Air Resources Board (CARB). 2017. *California's 2017 Climate Change Scoping Plan*. November.

[21] California Air Resources Board (CARB). 2022b. *2022 Scoping Plan Update*. May 10. Website: https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf (accessed March 2025).

infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels, including adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California be zero emission by 2035 and that all other fleets transition to zero emission as fully as possible by 2045, which will reduce the percentage of fossil fuel combustion vehicles.

Senate Bill 375 (2008). Signed into law on October 1, 2008, SB 375 supplements GHG reductions from new vehicle technology and fuel standards with reductions from more efficient land use patterns and improved transportation. Under the law, CARB-approved GHG reduction targets in February 2011 for California's 18 federally designated regional planning bodies, known as Metropolitan Planning Organizations (MPOs). CARB may update the targets every 4 years and must update them every 8 years. MPOs, in turn, must demonstrate how their plans, policies, and transportation investments meet the targets set by CARB through Sustainable Community Strategies (SCSs). The SCSs are included with the Regional Transportation Plan (RTP), a report required by State law. However, if an MPO finds that its SCS will not meet the GHG reduction targets, it may prepare an Alternative Planning Strategy. The Alternative Planning Strategy identifies the impediments to achieving the targets.

Executive Order B-30-15 (2015). Governor Jerry Brown signed EO B-30-15 on April 29, 2015, which added the immediate target of:

- GHG emissions should be reduced to 40 percent below 1990 levels by 2030.

All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the AB 32 Scoping Plan to reflect the 2030 target and, therefore, is moving forward with the update process. The mid-term target is critical to help frame the suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure needed to continue reducing emissions.

Senate Bill 350 (2015) Clean Energy and Pollution Reduction Act. SB 350, signed by Governor Jerry Brown on October 7, 2015, updates and enhances AB 32 by introducing the following set of objectives in clean energy, clean air, and pollution reduction for 2030:

- Raise California's renewable portfolio standard from 33 percent to 50 percent.
- Increase energy efficiency in buildings by 50 percent by the year 2030.

The 50 percent renewable energy standard will be implemented by the CPUC for the private utilities and by the CEC for municipal utilities. Each utility must submit a procurement plan showing it will purchase clean energy to displace other nonrenewable resources. The 50 percent increase in energy efficiency in buildings must be achieved through the use of existing energy efficiency retrofit funding and regulatory tools already available to State energy agencies under existing law. The addition

made by this legislation requires State energy agencies to plan for and implement those programs in a manner that achieves the energy efficiency target.

Senate Bill 32, California Global Warming Solutions Act of 2016, and Assembly Bill 197. In summer 2016, the Legislature passed, and the Governor signed, SB 32 and AB 197. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Governor Brown's April 2015 EO B-30-15. SB 32 builds on AB 32 and keeps the State on the path toward achieving its 2050 objective of reducing emissions to 80 percent below 1990 levels, consistent with an Intergovernmental Panel on Climate Change analysis of the emission trajectory that would stabilize atmospheric GHG concentrations at 450 ppm CO_2e and reduce the likelihood of catastrophic impacts from climate change.

AB 197, the companion bill to SB 32, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 meant to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

Senate Bill 100. On September 10, 2018, Governor Brown signed SB 100, which raises California's renewable portfolio standard 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.EO B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." EO B-55-18 directs CARB to work with relevant State agencies to ensure that future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning that not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions should be offset by equivalent net removals of CO_2e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Assembly Bill 1279. AB 1279 was signed in September 2022 and codifies the State goals of achieving net carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter. This bill also requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels by 2045 and directs CARB to work with relevant State agencies to achieve these goals.

Assembly Bill 1279. AB 1279 was signed in September of 2022, and codifies the State goals of achieving net carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter. This bill also requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels by 2045 and directs CARB to work with relevant State agencies to achieve these goals.

Regional Regulations

Southern California Association of Governments. The Southern California Association of Governments (SCAG) is a regional council consisting of the following six counties: Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. In total, the SCAG region encompasses 191 cities and over 38,000 square miles within Southern California. SCAG is the MPO serving the region under federal law and serves as the Joint Powers Authority, the Regional Transportation Planning Agency, and the Council of Governments under State law. As the Regional Transportation Planning Agency, SCAG prepares long-range transportation plans for the Southern California region, including the RTP/SCS and the 2008 Regional Comprehensive Plan (RCP).

On April 4, 2024, SCAG adopted *Connect SoCal: The 2024–2050 Regional Transportation Plan/ Sustainable Communities Strategy* (2024–2050 RTP/SCS).[22] In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light-duty trucks and thereby reduce GHG emissions from these sources. For the SCAG region, CARB has set GHG reduction targets at 8 percent below 2005 per-capita emission levels by 2020 and 19 percent below 2005 per capita emission levels by 2035. The RTP/SCS lays out a strategy for the region to meet these targets. Overall, the SCS is meant to provide growth strategies that will achieve the regional GHG emission reduction targets. Land use strategies to achieve the region's targets include planning for new growth around high-quality transit areas and livable corridors and creating neighborhood mobility areas to integrate land use and transportation and plan for more active lifestyles.[23] However, the SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the SCS; instead, it provides incentives to governments and developers for consistency.

South Coast Air Quality Management District. In 2008, the SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAQMD. The Working Group developed several different options that are contained in the SCAQMD 2008 draft guidance document titled *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* (2008) that could be applied by lead agencies. On September 28, 2010, SCAQMD Working Group Meeting No. 15 provided further guidance, including a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency. SCAQMD has not presented a finalized version of these thresholds to its governing board.

SCAQMD identifies the emissions level for which a project would not be expected to substantially conflict with any State legislation adopted to reduce statewide GHG emissions. As such, the utilization of a service population represents the rates of emissions needed to achieve a fair share of the State's mandated emissions reductions. Overall, SCAQMD identifies a GHG efficiency level that, when applied statewide or to a defined geographic area, would meet the 2020 and post-2020 emission targets as required by AB 32 and SB 32. If projects are able to achieve targeted rates of

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22 Southern California Association of Governments (SCAG). 2024. *Connect SoCal: The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments*. Website: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1712261565 (accessed March 2025).

23 Ibid.

emissions per the service population, the State would be able to accommodate expected population growth and achieve economic development objectives while also abiding by AB 32's emissions target and future post-2020 targets. The SCAQMD has established a flowchart for evaluating GHG significance and indicates that when a project is exempt from CEQA, no further analysis is required.

Local Regulations

City of Moreno Valley General Plan 2006. The City of Moreno Valley addresses greenhouse gases in the Conservation Element of the General Plan 2006.[24] The following policies from the Conservation Element are applicable to the proposed project:

- **Policy 7.3.1**: Require water conserving landscape and irrigation systems through development review. Minimize the use of lawn within private developments, and within parkway areas. The use of mulch and native and drought tolerant landscaping shall be encouraged.

- **Policy 7.5.1:** Encourage building, site design, and landscaping techniques that provide passive heating and cooling to reduce energy demand.

- **Policy 7.5.2:** Encourage energy efficient modes of transportation and fixed facilities, including transit, bicycle, equestrian, and pedestrian transportation. Emphasize fuel efficiency in the acquisition and use of City-owned vehicles.

- **Policy 7.8.1:** Encourage recycling projects by individuals, non-profit organizations, or corporations and local businesses, as well as programs sponsored through government agencies.

City of Moreno Valley Climate Action Plan (CAP). The City of Moreno Valley adopted the CAP on June 15, 2021.[25] The City's CAP is designed to reinforce the City's commitment to reducing GHG emissions and demonstrate how the City will comply with the State's GHG emission reduction standards. The CAP has been prepared concurrently with the updated Moreno Valley General Plan, reflecting the City's most current land use and transportation strategy, and GHG implications of various General Plan's goals and policies. While there is no sunset year for the CAP, the CAP provides analysis of GHG emissions to the year 2040, which is the General Plan horizon year. The following reduction measures from the City's CAP will be applicable to the proposed project:

- Implement trip reduction programs in new residential, commercial, and mixed-use developments.

- Expand efforts to install energy efficient lighting technologies in new and existing private parking lots.

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[24] City of Moreno Valley. 2006. Moreno Valley General Plan, Chapter 9 Goals and Objectives. Website: https://moval.gov/city_hall/general-plan/06gpfinal/gp/9-goals.pdf (accessed March 2025)

[25] City of Moreno Valley. 2021. *City of Moreno Valley Climate Action Plan.* June 15. Website: https://moval.gov/city_hall/general-plan2040/MV-CAP.pdf (accessed March 2025).

- Facilitate energy efficiency improvements in nonresidential buildings through incentives and regulations that may include energy performance reports, time of sale upgrades, and/or innovative partnerships such as expansion of utility provider (e.g., Moreno Valley Electric Utility [MVU], SCE, SoCalGas) programs to reduce energy use.

- Encourage residents and businesses to use efficient lawn and garden maintenance equipment or to reduce the need for landscape maintenance through native planting.

- Reduce emissions from heavy-duty construction equipment by limiting idling based on SCAQMD requirements and utilizing cleaner fuels, equipment, and vehicles.

- Require new landscaping to be climate appropriate.

METHODOLOGY

Construction Emissions

Construction activities can generate a substantial amount of air pollution. Construction activities are considered temporary; however, short-term impacts can contribute to exceedances of air quality standards. Construction activities include site preparation, earthmoving, and general construction. The emissions generated from these common construction activities include fugitive dust from soil disturbance and fuel combustion from mobile heavy-duty, diesel- and gasoline-powered equipment, portable auxiliary equipment, and worker commute trips.

The California Emissions Estimator Model version 2022.1 (CalEEMod) computer program was used to calculate emissions from on-site construction equipment and emissions from worker and vehicle trips to the site. This analysis assumes that construction of the proposed project is anticipated to occur over a period of 12 months, ending in the second quarter of 2027. This analysis also assumes that the proposed project would comply with SCAQMD Rule 403 measures. Site preparation, grading, and building activities would involve the use of standard earthmoving equipment such as large excavators, cranes, and other related equipment. In addition, the proposed project would result in approximately 4,210 cubic yards of soil exportation.[26] All other construction details are not yet known; therefore, default assumptions (e.g., construction equipment, construction worker and truck trips, and fleet activities) from CalEEMod were used.

Operational Emissions

This air quality analysis includes estimating emissions associated with long-term operation of the project. Indirect emissions of criteria pollutants with regional impacts would be emitted by project-generated vehicle trips. In addition, localized air quality impacts (i.e., higher CO concentrations or

[26] The CalEEMod modeling evaluated the project emissions assuming construction would begin in November 2025 and end in November 2026 and require approximately 5,000 cubic yards of soil export. The project schedule and grading plans have since been modified to assume construction would end in the second quarter of 2027 and approximately 4,210 cubic yards of soil export would be required. The 12-month construction duration remained the same. These modifications to the project have been reviewed by LSA and it was determined that the modified construction schedule and soil export quantities would not result in more severe impacts than what is described within.

"hot spots") near intersections or roadway segments in the project vicinity would also potentially occur due to project-generated vehicle trips.

Consistent with SCAQMD guidance for estimating emissions associated with land use development projects, the CalEEMod computer program was used to calculate the long-term operational emissions associated with the project. As previously discussed in the Project Location and Description section, the proposed project would construct a 132,003-square-foot, three-story, self-storage building including 20,777 square-feet of landscaping. Therefore, the proposed project analysis was conducted using the land use codes *Unrefrigerated Warehouse-No-Rail and Parking Lot.* Trip generation rates used in CalEEMod for the project were based on the project's trip generation analysis, which identifies that the project would generate approximately 216 average daily trips.[27] In addition, consistent with the project design plans, this CalEEMod analysis incorporates selections to reflect drought tolerant landscape, low water irrigation, and no natural gas. When project-specific data were not available, default assumptions from CalEEMod were used to estimate project emissions.

Energy Use

The analysis focuses on the three sources of energy that are relevant to the proposed project: electricity, the equipment fuel necessary for project construction, and vehicle fuel necessary for project operations. For the purpose of this analysis, the amounts of electricity, construction fuel, and fuel use from operations are quantified and compared to that consumed in Riverside County. The electricity of the proposed project is analyzed on an annual basis. Electricity uses were estimated for the project using default energy intensities by land use type in CalEEMod.

Greenhouse Gas Emissions

GHG emissions associated with the project would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust. There would also be long-term GHG emissions associated with project-related vehicular trips. Recognizing that the field of global climate change analysis is rapidly evolving, the approaches advocated most recently indicate that, for determining a project's contribution to GHG emissions, lead agencies should calculate, or estimate, emissions from vehicular traffic, energy consumption, water conveyance and treatment, waste generation, construction activities, and any other significant source of emissions within the project area. The CalEEMod results were used to quantify GHG emissions generated by the project.

THRESHOLDS OF SIGNIFICANCE

Air Quality

The *State CEQA Guidelines* indicate that a project would normally have a significant adverse air quality impact if project-generated pollutant emissions would do any of the following:

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

[27] LSA. 2024. Trip Generation and Vehicle Miles Traveled Analysis for the Public Storage Moreno Valley Project (LSA Project No. 20241908). October 16.

- Result in a cumulatively considerable net increase of any criteria pollutant for which the project is in nonattainment under applicable NAAQS or CAAQS;
- Expose sensitive receptors to substantial pollutant concentrations; or
- Result in other emissions (such as those leading to odors) affecting a substantial number of people.

Certain air districts (e.g., SCAQMD) have created guidelines and requirements to conduct air quality analysis. The SCAQMD's current guidelines, the *CEQA Air Quality Handbook*[28] with associated updates, were followed in this assessment of air quality impacts for the proposed project.

Regional Emissions Thresholds

SCAQMD has established daily emission thresholds for construction and operation of proposed projects. The emission thresholds were established based on the attainment status of the air basins within the SCAQMD with regard to air quality standards for specific criteria pollutants. Because the concentration standards were set at a level that protects public health with an adequate margin of safety, these emission thresholds are regarded as conservative and would overstate an individual project's contribution to health risks. Table D lists the CEQA significance thresholds for construction and operational emissions established for the SCAQMD.

Table D: Regional Thresholds for Construction and Operational Emissions

Emissions Source	Pollutant Emissions Threshold (lbs/day)					
	VOCs	NO_X	CO	PM_{10}	$PM_{2.5}$	SO_X
Construction	75	100	550	150	55	150
Operations	55	55	550	150	55	150

Source: South Coast Air Quality Management District (SCAQMD). 2019. Air Quality Significance Thresholds. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2 (accessed March 2025).

CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SO_X = sulfur oxides
VOCs = volatile organic compound

Projects in the SCAQMD with construction- or operations-related emissions that exceed any of their respective emission thresholds would be considered significant under SCAQMD guidelines. These thresholds, which SCAQMD developed and which apply throughout the SCAQMD, apply as both project and cumulative thresholds. If a project exceeds these standards, it is considered to have a project-specific and cumulative impact.

[28] South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook* (currently under revision). Website: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993) (accessed March 2025).

Local Microscale Concentration Standards

The significance of localized project impacts under CEQA depends on whether ambient CO levels in the project vicinity are above or below State and federal CO standards. Because ambient CO levels are below the standards throughout the SCAQMD, a project would be considered to have a significant CO impact if project emissions would result in an exceedance of one or more of the 1-hour or 8-hour standards. The following are applicable local emission concentration standards for CO:

- California State 1-hour CO standard of 20 ppm
- California State 8-hour CO standard of 9 ppm

Localized Impacts Analysis

The SCAQMD published its *Final Localized Significance Threshold Methodology* in July 2008, recommending that all air quality analyses include an assessment of air quality impacts to nearby sensitive receptors.[29] This guidance was used to analyze potential localized air quality impacts associated with construction of the proposed project. Localized significance thresholds (LSTs) are developed based on the size or total area of the emission source, the ambient air quality in the Source Receptor Area (SRA), and the distance to the project site. Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to adverse air quality.

LSTs are based on the ambient concentrations of that pollutant within the project's SRA and the distance to the nearest sensitive receptor. For the proposed project, the appropriate SRA for the LST is the Moreno Valley area (SRA 24). The SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances. The nearest sensitive receptors include the single-family residences along Pheasant Knoll Lane, which are located within 50 feet to the east of the project site (measured from the project site boundary to the center of the nearest residence). In cases where receptors may be closer than 82 feet (25 meters), any distances within the 82-foot (25-meter) buffer zone can be used. As such, the minimum distance of 25 meters was used for purposes of the LST assessment. Based on the anticipated construction equipment, it is assumed that the maximum daily disturbed acreage would be 3.5 acres for construction of the proposed project. The project site is 3.0 acres; therefore, the maximum daily disturbed acreage during operation of the proposed project would be 3.0 acres.[30] Table E lists the emissions thresholds that apply during project construction and operation.

[29] South Coast Air Quality Management District (SCAQMD). 2008. *Final Localized Significance Threshold Methodology*. July.

[30] South Coast Air Quality Management District (SCAQMD). n.d. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Website: https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf (accessed March 2025).

Table E: SCAQMD Localized Significance Thresholds

Emissions Source	Pollutant Emissions Threshold (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Construction (3.5 acres, 25-meter distance)	220.0	1,230.0	10.0	6.0
Operations (3.0 acres, 25-meter distance)	203.0	1,114.0	2.7	1.3

Source: South Coast Air Quality Management District (SCAQMD). 2008. *Final Localized Significance Threshold Methodology*. July.

CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance threshold
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size

Energy

The *State CEQA Guidelines* indicate that a project would normally have a significant adverse impact related to energy if the project would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Greenhouse Gas Thresholds

The *State CEQA Guidelines* indicate that a project would normally have a significant effect on the environment if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, SCAQMD has convened a GHG CEQA Significance Threshold Working Group (Working Group). Based on the last Working Group meeting modified in September 2010 (Meeting No. 15),[31] SCAQMD proposed to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency:

- **Tier 1—Exemptions:** If a project is exempt from CEQA, project-level and cumulative GHG emissions are less than significant.

[31] South Coast Air Quality Management District (SCAQMD). 2010. Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15. September 28. Website: https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf (accessed March 2025)

- **Tier 2—Consistency with a Locally Adopted GHG Reduction Plan:** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (i.e., city or county), project-level and cumulative GHG emissions are less than significant.

- **Tier 3—Numerical Screening Threshold:** If GHG emissions are less than the numerical screening-level threshold, project-level and cumulative GHG emissions are less than significant.

  For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, SCAQMD requires an assessment of GHG emissions. SCAQMD, under Option 1, is proposing a "bright-line" screening-level threshold of 3,000 MT CO_2e per year (or MT CO_2e/yr) for all land use types or, under Option 2, the following land use-specific thresholds: 1,400 MT CO_2e for commercial projects; 3,500 MT CO_2e for residential projects; or 3,000 MT CO_2e for mixed-use projects. This bright-line threshold is based on a review of the Office of Planning and Research (OPR) database of CEQA projects. Based on their review of 711 CEQA projects, 90 percent of CEQA projects would exceed the bright-line thresholds identified above. Therefore, projects that do not exceed the bright-line threshold would have a nominal and therefore less than cumulatively considerable impact on GHG emissions.

- **Tier 4—Performance Standards:** If emissions exceed the numerical screening threshold, a more detailed review of the project's GHG emissions is warranted. The SCAQMD has proposed an efficiency target for projects that exceed the bright-line threshold. The current recommended approach is per-capita efficiency targets. The SCAQMD is not recommending use of a percentage emissions reduction target. Instead, the SCAQMD proposes proposed a 2035 efficiency target of 3.0 MT CO_2e/yr per service population for project-level analyses and 4.1 MT CO_2e/yr per service population for plan-level projects (e.g., program-level projects such as General Plans).

For the purpose of this analysis, the proposed project will be compared to the threshold of 3,000 MT CO_2e/yr for all land use types. The proposed project is also evaluated for compliance with the City's CAP, the 2022 Scoping Plan, and the 2024–2050 RTP/SCS.

IMPACT ANALYSIS

This section identifies potential air quality, energy, and GHG impacts associated with implementation of the proposed project.

Air Quality Impacts

Air pollutant emissions associated with the project would occur over the short term from construction activities and over the long term from project-related vehicular trips and due to energy consumption (e.g., electricity and natural gas usage) by the proposed land uses.

Consistency with Applicable Air Quality Plans

A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the air quality plans. A consistency determination fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of the

project under consideration at a stage early enough to ensure that air quality concerns are addressed. Only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review due to the air quality plan strategy being based on projections from local General Plans.

The proposed project would construct a 132,003-square-foot, three-story, self-storage building and associated site improvements and 20,777 square-feet of landscaping. The proposed project is not considered a project of Statewide, regional, or areawide significance (e.g., large-scale projects such as airports, electrical generating facilities, petroleum and gas refineries, residential development of more than 500 dwelling units, or shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space) as defined in the California Code of Regulations (Title 14, Division 6, Chapter 3, Article 13, §15206(b)). Because the proposed project would not be defined as a regionally significant project under CEQA, it does not meet the SCAG Intergovernmental Review criteria.

The City's General Plan is consistent with the SCAG Regional Comprehensive Plan Guidelines and the SCAQMD Air Quality Management Plan (AQMP). Pursuant to the methodology provided in the SCAQMD *CEQA Air Quality Handbook*, consistency with the Basin 2022 AQMP is affirmed when a project (1) would not increase the frequency or severity of an air quality standards violation or cause a new violation, and (2) is consistent with the growth assumptions in the AQMP. Consistency review is presented as follows:

1. The project would result in short-term construction and long-term operational pollutant emissions that are less than the CEQA significance emissions thresholds established by SCAQMD, as demonstrated below; therefore, the project would not result in an increase in the frequency or severity of an air quality standards violation or cause a new air quality standards violation.

2. The *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Projects of statewide, regional, or areawide significance include large-scale projects such as airports, electrical generating facilities, petroleum and gas refineries, residential developments of more than 500 dwelling units, and shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space), as defined in CCR Title 14, Division 6, Chapter 3, Article 13, Section 15206(b). As discussed in the Project Location and Description section, the project site is currently zoned as NC and has a land use designation of Commercial. Per the City Municipal Code Permitted Uses Table 9.02.020-1 in Section 9.02.020,[32] self-storage facilities are not permitted uses in the NC zone. Therefore, the proposed project would require a zone change to change the zoning designation of the project site from NC to CC and a CUP to allow development of the proposed project within the CC zone.

[32] City of Moreno Valley. 2024. Permitted Uses Table 9.02.020-1. Website: https://ecode360.com/attachment/MO4973/MO4973-009a%20Permitted%20Uses%20Table%209.02.020-1.pdf (accessed March 2025).

The projections in the AQMP for achieving air quality goals are based, in part, on assumptions in SCAG's RTP/SCS regarding population, housing, and growth trends, as well as assumptions and projections of local planning agencies to determine control strategies for regional compliance status. According to SCAG's 2024–2050 RTP/SCS, the City's households and employment are forecasted to increase by approximately 21,900 households and 38,700 jobs, respectively, between 2019 and 2050.[33] The City's General Plan has a year 2040 buildout horizon; however, the General Plan does not specify or anticipate when complete buildout would occur because long-range demographic and economic trends are speculative. The designation within the General Plan of a site for a certain use does not necessarily mean that the site would be developed with that use during the planning period because most development depends on property owner initiative.

Based on information provided by the applicant, proposed project would include up to two employees per shift to operate the facility.[34] Therefore, the proposed project has the potential to employ 4 employees, some of which may already reside in Moreno Valley. According to SCAG, up to 4 employees would represent approximately 0.01 percent of the city's forecast employment growth from 2019 to 2050. Therefore, growth projections of the proposed project would be within the parameters of expected overall growth in the city, and a zone change designation of the site from NC to CC for development of the proposed 132,003-square-foot, three-story, self-storage building would not result in growth in the area or in Moreno Valley beyond that which was planned for by SCAG.

Furthermore, the 2024–2050 RTP/SCS analyzed the region's transportation system, future growth projections, and potential funding sources in order to develop a long-term framework for transportation improvements and maintenance.[35] The RTP includes policies and regulations set forth to ensure that development of transportation infrastructure within the SCAG regional area is within planned and forecast socioeconomic projections in order to achieve federal- and State-mandated regional emissions standards and GHG reduction targets. As part of the RTP, SCAG developed an SCS, which was required by SB 375, the Sustainable Communities Act of 2008. The SCS is intended to combine land use and transportation planning with the overall goal of reducing air pollutant and GHG emissions generated from vehicle travel. The City currently has approximately 5,700 unemployed persons eligible to work.[36] Therefore, development of the project site, as proposed, would provide employment opportunities within Moreno Valley and

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33 Southern California Association of Governments (SCAG). 2024. 2024–2050 Regional Transportation Plan/ Sustainable Communities Strategy. Demographics and Growth Forecast, Technical Report, Table 13. Adopted April 4, 2024.

34 Assumes up to two shifts per day.

35 Southern California Association of Governments (SCAG). 2024. *2024-2050 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Navigating to a Brighter Future*. April. Website: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547 (accessed March 2025).

36 State of California, Employment Development Department. 2023. Monthly Labor Force and Unemployment Rate for Cities and Census Designated Places. September. Website: https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Flabormarketinfo.edd.ca.gov%2Ffile%2Flfmonth%2Fsanbrsub.xls&wdOrigin=BROWSELINK (accessed March 2025).

support the AQMP's and SCAG's goal of reducing air pollutant and GHG emissions generated from vehicle travel.

Based on the proposed self-storage building size (132,003 square feet with 20,777 square-feet of landscaping), the project is expected to generate up to 4 employees. Therefore, the proposed project is not considered a project of Statewide, regional, or areawide significance (e.g., large-scale projects such as airports, electrical generating facilities, petroleum and gas refineries, residential developments of more than 500 dwelling units, and shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space) as defined in CCR Title 14, Division 6, Chapter 3, Article 13, Section 15206(b). Because the proposed project would not be defined as a regionally significant project under CEQA, it does not meet SCAG's Intergovernmental Review criteria.

Based on the analysis above, the proposed project would not represent substantial or unplanned employment or population growth forecasted by SCAG or the AQMP. Therefore, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan.

Criteria Pollutant Analysis

The Basin is currently designated nonattainment for the federal and State standards for 8-hour O_3 and PM_{10}. The Basin is also nonattainment for the State standard for 1-hour O_3. The Basin's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of an ambient air quality standard. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is not necessary. The following analysis assesses the potential project-level air quality impacts associated with construction and operation of the proposed project.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by grading, building construction, paving, and other activities. Emissions from construction equipment are also anticipated and would include CO, nitrogen oxides (NO_X), VOCs, directly emitted $PM_{2.5}$ or PM_{10}, and TACs such as diesel exhaust particulate matter.

Project construction activities would include grading, site preparation, building construction, architectural coating, and paving activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of

soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. SCAQMD has established Rule 403: Fugitive Dust, which would require the applicant to implement measures that would reduce the amount of particulate matter generated during the construction period. The Rule 403 measures that were incorporated in this analysis include:

- Water active sites at least twice daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving).
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 mph or less.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides (SO_X), NO_X, VOCs, and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the project using CalEEMod and are summarized in Table F. CalEEMod output sheets are included in Attachment B.

The results shown in Table F indicate the proposed project would not exceed the significance criteria for daily VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, construction of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under applicable NAAQS or CAAQS.

Table F: Short-Term Regional Construction Emissions

Construction Phase	Maximum Daily Regional Pollutant Emissions (lbs/day)					
	VOCs	NO_X	CO	SO_X	Total PM_{10}	Total $PM_{2.5}$
Site Preparation	1.3	49.8	36.1	<0.1	9.7	5.1
Grading	0.7	22.0	16.4	<0.1	4.0	2.1
Building Construction	0.8	17.5	17.0	<0.1	1.6	0.8
Architectural Coating	12.4	1.1	1.8	<0.1	0.7	0.1
Paving	0.6	10.4	9.1	<0.1	0.1	0.5
Peak Daily Emissions	**13.2**	**71.8**	**52.5**	**<0.1**	**13.7**	**7.2**
SCAQMD Threshold	**75.0**	**100.0**	**550.0**	**150.0**	**150.0**	**55.0**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (January 2025).
Note: Maximum emissions occurred during the overlapping of site preparation and grading phases. VOCs maximum emissions occurred during the overlapping of building construction and architectural coating phases.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 10 microns in diameter
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

Operational Air Quality Impacts. Long-term air pollutant emissions associated with operation of the proposed project include emissions from area, energy, and mobile sources. Area-source emissions include architectural coatings, consumer products, and landscaping. Energy-source emissions would typically result from activities in buildings that use natural gas. The proposed project would be all electric; therefore, the proposed project would not generate energy source emissions. Mobile-source emissions result from vehicle trips associated with operation of the project.

Mobile source emissions include VOC and NO_X emissions that contribute to the formation of O_3. Additionally, PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways.

Long-term operational emissions associated with the proposed project were calculated using CalEEMod. Table G provides the estimated existing emission estimates and the proposed project's estimated operational emissions. CalEEMod output sheets are included in Attachment B.

The results shown in Table G indicate the proposed project would not exceed the significance criteria for daily VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under applicable NAAQS or CAAQS.

Table G: Long-Term Regional Operational Emissions

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NO_X	CO	SO_X	Total PM_{10}	Total $PM_{2.5}$
Mobile Sources	0.8	0.7	5.6	<0.1	1.2	0.3
Area Sources	4.1	<0.1	5.7	<0.1	<0.1	<0.1

Energy Sources	0.0	0.0	0.0	0.0	0.0	0.0
Total Project Emissions	**4.9**	**0.7**	**11.3**	**<0.1**	**1.2**	**0.3**
SCAQMD Threshold	**55.0**	**55.0**	**550.0**	**150.0**	**150.0**	**55.0**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (January 2025).
Note: Some values may not appear to add correctly due to rounding.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns diameter
PM_{10} = particulate matter less than 10 microns in diameter
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

Long-Term Microscale (CO Hot Spot) Analysis. Vehicular trips associated with the proposed project would contribute to congestion at intersections and along roadway segments in the vicinity of the proposed project site. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, thereby affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients).

Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service (LOS) or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate project vicinity are not available. Ambient CO levels monitored at the Lake Elsinore Monitoring station located at 506 West Flint Street (the closest station to the project site that monitors CO) showed a highest recorded 1-hour concentration of 1.3 ppm (the State standard is 20 ppm) and a highest 8-hour concentration of 0.8 ppm (the State standard is 9 ppm) from 2021 to 2023. The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis. Reduced speeds and vehicular congestion at intersections result in increased CO emissions.

The proposed project is expected to generate 216 average daily trips, with 14 trips occurring in the a.m. peak hour and 22 trips occurring in the p.m. peak hour. Because the proposed project would generate less than 400 daily trips, it is screened out from a VMT analysis and presumed to have less than significant transportation impact.[37] Therefore, given the extremely low level of CO concentrations in the project area and the lack of traffic impacts at any intersections, project-related vehicles are not expected to result in CO concentrations exceeding the State or federal CO standards. No CO hot

[37] LSA. 2024. Trip Generation and Vehicle Miles Traveled Analysis for the Public Storage Moreno Valley Project (LSA Project No. 20241908). October 16.

spots would occur, and the project would not result in any project-related impacts on CO concentrations.

Health Risk on Nearby Sensitive Receptors

Sensitive receptors are defined as residential uses, schools, daycare centers, nursing homes, and medical centers. Individuals particularly vulnerable to diesel particulate matter are children, whose lung tissue is still developing, and the elderly, who may have serious health problems that can be aggravated by exposure to diesel particulate matter. The nearest sensitive receptors include the single-family residences along Pheasant Knoll Lane that are located within 50 feet to the east of the project site (measured from the project site boundary to the center of the nearest residence).

Project construction and operation emissions were compared to the LST screening tables in SRA 24, based on a 25-meter source-receptor distance and a disturbed acreage of 3.5 acres for construction and an operational project site threshold of 3.0 acres. Table H shows the results of the LST analysis during project operation.

Table H: Project Localized Construction and Operational Emissions

Source	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Construction Emissions				
On-Site Emissions	49.7	35.2	8.3	4.0
Localized Significance Threshold	**220.0**	**1,230.0**	**10.0**	**6.0**
Significant?	**No**	**No**	**No**	**No**
Operational Emissions				
On-Site Emissions	0.7	6.0	<0.1	<0.1
Localized Significance Threshold	**203.0**	**1,114.0**	**2.7**	**1.3**
Significant?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (January 2025).
Note: Source Receptor Area 24, based on a 3.5-acre construction disturbance daily area and a 3-acre disturbance area for operation, at a distance of 25 meters from the project boundary to the nearest sensitive receptor.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 10 microns in diameter

By design, the localized impacts analysis only includes on-site sources; however, the CalEEMod outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions detailed in Table H assume that all area, stationary, and energy source emissions would occur on site, and 5 percent of the project-related new mobile sources (which is an estimate of the amount of project-related on-site vehicle travel) would occur on site. The 5 percent assumption is conservative because the localized impacts analysis only includes on-site sources and the majority of vehicle travel would occur off site, resulting in emissions that would also be released off site. Table H indicates the localized operational emissions would not exceed the LSTs at nearby residences. Therefore, the proposed operational activity would not result in a locally significant air quality impact.

As detailed in Table H, the emission levels indicate that the project would not exceed SCAQMD LSTs during project construction or operation. The project's peak operational on-site NO_X emissions are approximately less than 1 pound per day. Due to the small size of the proposed project in relation to the overall Basin, the level of emissions is not sufficiently high to use a regional modeling program to correlate health effects on a Basin-wide level. On a regional scale, the quantity of emissions from the project is incrementally minor. Because the SCAQMD has not identified any other methods to quantify health impacts from small projects, and due to the size of the project, it is speculative to assign any specific health effects to small project-related emissions. However, based on this localized analysis, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, the project would not expose sensitive receptors to substantial levels of pollutant concentrations.

Furthermore, as detailed in the Health Risk Assessment[38] prepared for the proposed project, the maximum cancer risk levels would be 13.18 in 1 million, which would exceed the SCAQMD cancer risk threshold of 10 in 1 million. Therefore, implementation of Mitigation Measure AIR-1, which would require the use of cleaner construction equipment, would be necessary to reduce substantial pollutant concentrations during project construction. Mitigation Measure AIR-1 would require all off-road diesel-powered construction equipment of 50 horsepower or more to meet CARB's Tier 2 emission standards and be equipped with Level 3 Diesel Particulate filters or equivalent. With implementation of Mitigation Measure AIR-1, the cancer risk levels would be reduced to 2.15 in 1 million, which would not exceed the SCAQMD cancer risk of 10 in 1 million. Therefore, with implementation of Mitigation Measure AIR-1, construction of the proposed project would not exceed SCAQMD thresholds and would not expose nearby sensitive receptors to substantial pollutant concentrations. Once the proposed project is constructed, the proposed project would not be a source of substantial emissions. Therefore, implementation of the proposed project would not result in new sources of TACs. Therefore, with implementation of Mitigation Measure AIR-1, the project would not expose sensitive receptors to substantial levels of TACs.

Odors

Heavy-duty equipment on the project site during construction would emit odors, primarily from equipment exhaust. However, the construction activity would cease after individual construction is completed. No other sources of objectionable odors have been identified for the proposed project.

The proposed project would comply with SCAQMD Rule 402 regarding odors and sources that could cause nuisances. SCAQMD Rule 402 states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." The proposed uses are not anticipated to emit any objectionable odors. The proposed project would also include trash enclosures, which would reduce any potential for odors from project-related waste. Therefore, the

[38] LSA. 2025. Health Risk Assessment for the Moreno Valley Public Storage. March.

proposed project would not result in other emissions (e.g., those leading to odors) adversely affecting a substantial number of people.

Naturally Occurring Asbestos

The project is in Riverside County, which is among the counties found to have serpentine and ultramafic rock in their soils.[39] However, according to the California Geological Survey, no such rock has been identified in the vicinity of the project site. When demolition is proposed during construction, the demolition of existing buildings may expose asbestos used in building materials. However, the proposed project would not involve any demolition or renovation because no current development exists on the project site. Therefore, the potential risk for naturally occurring asbestos during project construction is small and would not be significant.

Energy Use

This section discusses energy use resulting from implementation of the proposed project and evaluates whether the proposed project would result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with any applicable plans for renewable energy and energy efficiency.

Construction

The anticipated construction schedule assumes that the proposed project would be built in approximately 12 months. Construction-specific phases were assessed for their energy consumption under each construction sub-phase: grading, site preparation, building construction, paving, and architectural coating activities.

Construction would require energy for the manufacture and transportation of construction materials, preparation of the site for grading and building activities, and construction of the building. All or most of this energy would be derived from nonrenewable resources. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. However, construction activities are not anticipated to result in an inefficient use of energy as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the project. Energy (i.e., fuel) usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources.

Operation

Energy use associated with the proposed project would consist of electricity and vehicle fuel use associated with project operations.

Table I shows the estimated potential increased electricity, gasoline, and diesel demand associated with the proposed project. The electricity rates are from the CalEEMod analysis, while the gasoline and diesel rates are based on the traffic analysis in conjunction with USDOT fuel efficiency data and

[39] California Department of Conservation (DOC). n.d. California Geological Survey. Asbestos. Website: https://www.conservation.ca.gov/cgs/minerals/mineral-hazards (accessed March 2025).

using the USEPA's fuel economy estimates for 2020, and the California diesel fuel economy estimates for 2021.

Table I: Estimated Annual Energy Use of Proposed Project

	Electricity Use (kWh/yr)	Natural Gas Use (kBTU/yr)	Gasoline (gal/yr)	Diesel (gal/yr)
Proposed Project	629,861	0	20,559	14,752

Source: Compiled by LSA (January 2025).
gal/yr = gallons per year
kBTU/yr = thousand British thermal units per year
kWh/yr = kilowatt-hours per year

As shown in Table I, the estimated increase in electricity demand associated with the operation of the proposed project would be 629,861 kWh per year. Total electricity consumption in Riverside County in 2022 was 17,780,573,271 kWh;[40] therefore, operation of the proposed project would negligibly increase the annual electricity consumption in Riverside County by approximately less than 0.1 percent.

The project would also result in energy usage associated with motor vehicle gasoline to fuel project-related trips. As shown above in Table I, the proposed project would result in the consumption of 20,559 gallons of gasoline and 14,752 gallons of diesel per year. Based on fuel consumption obtained from EMFAC2021, approximately 744.5 million gallons of gasoline and approximately 301.2 million gallons of diesel will be consumed from vehicle trips in Riverside County in 2026. Therefore, vehicle trips associated with the proposed project would increase the annual fuel use in Riverside County by approximately less than 0.1 percent for gasoline fuel usage and approximately less than 0.1 percent for diesel fuel usage. The proposed project would result in fuel usage that is a small fraction of current annual fuel usage in Riverside County, and fuel consumption associated with vehicle trips generated by project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Therefore, gasoline demand generated by vehicle trips associated with the proposed project would be a minimal fraction of gasoline and diesel fuel consumption in California.

Furthermore, the proposed project would be constructed using energy efficient modern building materials and construction practices, and the proposed project also would use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (CCR Title 24, Sections 1601 through 1608). The expected energy consumption during construction and operation of the proposed project would be consistent with typical usage rates for public self-storage uses; however, energy consumption is largely a function of personal choice and the physical structure and layout of buildings. As such, the proposed project would not result in a potential significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

[40] California Energy Commission (CEC). 2022. Electricity Consumption by County. Website: www.ecdms.energy.ca.gov/elecbycounty.aspx (accessed March 2025).

Conflict with or Obstruction of a State or Local Plan for Renewable Energy or Energy Efficiency

The CEC recently adopted the 2023 Integrated Energy Policy Report.[41] The 2023 Integrated Energy Policy Report provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs. The 2023 Integrated Energy Policy Report covers a broad range of topics, including decarbonizing buildings, integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecasts, and the California Energy Demand Forecast.

As indicated above, energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the region's available energy sources, and energy impacts would be negligible at the regional level. Because California's energy conservation planning actions are conducted at a regional level, and because the project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the CEC's 2023 Integrated Energy Policy Report. Therefore, the proposed project would not lead to new or substantially more severe energy impacts.

Greenhouse Gas Emission Impacts

The following sections describe the proposed project's construction- and operation-related GHG impacts and consistency with applicable GHG reduction plans.

Generation of Greenhouse Gas Emissions

This section describes the proposed project's construction- and operation-related GHG emissions and contribution to global climate change. The SCAQMD has not addressed emission thresholds for construction in its *CEQA Air Quality Handbook*; however, SCAQMD requires quantification and disclosure. Thus, this section discusses construction emissions.

Construction Greenhouse Gas Emissions. Construction activities associated with the proposed project would produce combustion emissions from various sources. Construction would emit GHGs through the operation of construction equipment and from worker and builder supply vendor vehicles for the duration of the approximately 12-month construction period. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, the fueling of heavy equipment emits CH_4. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

As indicated above, SCAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are required to quantify and disclose GHG emissions

[41] California Energy Commission (CEC). 2023. *2023 Integrated Energy Policy Report*. California Energy Commission. Docket Number: 23-IEPR-01.

that would occur during construction. The SCAQMD then requires the construction GHG emissions to be amortized over the life of the project (which is defined as 30 years), added to the operational emissions, and compared to the applicable interim GHG significance threshold tier. Based on CalEEMod, it is estimated that the project would generate 447.97 MT CO_2e during construction of the project. When amortized over the 30-year life of the project, annual emissions would be 14.9 MT CO_2e.

Operational Greenhouse Gas Emissions. Long-term operation of the proposed project would generate GHG emissions from area, mobile, waste, and water sources, as well as indirect emissions from sources associated with energy consumption. Mobile-source GHG emissions would include project-generated vehicle trips associated with trips to the proposed project. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site and other sources. Waste-source emissions generated by the proposed project include energy generated by landfilling and other methods of disposal related to transporting and managing project-generated waste. In addition, water-source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

GHG emissions were estimated using CalEEMod. Table J shows the estimated operational GHG emissions for the proposed project. Motor vehicle emissions are the largest source of GHG emissions for the project, at approximately 43 percent of the project total. Energy sources are the next largest category, at approximately 30 percent. Water and waste sources are about 18 percent and 8 percent of the total emissions, respectively. Area-source emissions also make up less than 1 percent of the total emissions.

As discussed above, a project would have less than significant GHG emissions if it would result in operational GHG emissions of less than 3,000 MT CO_2e/yr. Based on the analysis results, the proposed project would result in approximately 517.5MT CO_2e/yr, which would not exceed the SCAQMD threshold of 3,000 MT CO_2e/yr. Therefore, operation of the proposed project does not have the potential to generate significant GHG emissions that would have a significant effect on the environment.

Table J: Greenhouse Gas Emissions

Emission Type	Operational Emissions (MT/yr)				
	CO_2	CH_4	N_2O	CO_2e	Percentage of Total
Mobile Source	212.8	<0.1	<0.1	216.7	43.1
Area Source	2.7	<0.1	<0.1	2.7	<1
Energy Source	152.0	<0.1	<0.1	152.6	30.3
Water Source	60.2	1.0	<0.1	92.3	18.3
Waste Source	11.1	1.1	0.0	38.7	7.7
Total Operational Emissions				**503.0**	**100.0**
Amortized Construction Emissions				14.9	—
Total Annual Emissions				**517.5**	**—**

Table J: Greenhouse Gas Emissions

Emission Type	Operational Emissions (MT/yr)				
	CO_2	CH_4	N_2O	CO_2e	Percentage of Total
SCAQMD Threshold				**3,000**	
Exceedance?				**No**	

Source: Compiled by LSA (January 2025).
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
GHG = greenhouse gas
MT/CO_2e = metric tons of carbon dioxide equivalent
MT/yr = metric tons per year
N_2O = nitrous oxide
SCAQMD = South Coast Air Quality Management District

Consistency with Greenhouse Gas Reduction Plans

The following discussion evaluates the proposed project according to the goals of the City's CAP, the 2022 Scoping Plan, and SCAG's 2024–2050 RTP/SCS.

City of Moreno Valley CAP. The City of Moreno Valley adopted the CAP on June 15, 2021.[42] The City's CAP is designed to reinforce the City's commitment to reducing GHG emissions and demonstrate how the City will comply with State of California's GHG emission reduction standards. The CAP has been prepared concurrently with the updated Moreno Valley General Plan, reflecting the City's most current land use and transportation strategy, and GHG implications of various General Plan's goals and policies. While there is no sunset year for the CAP, the CAP provides analysis of GHG emissions to the year 2040, which is the General Plan horizon year. The following reduction measures from the City's CAP will be applicable to the proposed project:

- Implement trip reduction programs in new residential, commercial, and mixed-use developments.
- Expand efforts to install energy efficient lighting technologies in new and existing private parking lots.
- Facilitate energy efficiency improvements in nonresidential buildings through incentives and regulations that may include energy performance reports, time of sale upgrades, and/or innovative partnerships such as expansion of utility provider (e.g., MVU, SCE, SoCalGas) programs to reduce energy use.
- Encourage residents and businesses to use efficient lawn and garden maintenance equipment or to reduce the need for landscape maintenance through native planting.
- Reduce emissions from heavy-duty construction equipment by limiting idling based on SCAQMD requirements and utilizing cleaner fuels, equipment, and vehicles.

42 City of Moreno Valley. 2021. *City of Moreno Valley Climate Action Plan.* June 15. Website: https://moval.gov/city_hall/general-plan2040/MV-CAP.pdf (accessed March 2025)

- Require new landscaping to be climate appropriate.

The proposed project would construct a 132,003-square-foot, three-story, self-storage facility and associated site improvements including 20,777 square-feet of landscaping. The proposed project would be consistent with the CAP goal of increasing energy efficiency in new buildings by complying with the latest California Building Code (Title 24), including the latest CALGreen Code standards. In addition, the proposed project would comply with local and State laws regarding solar energy and would be designed to be all-electric, consistent with the CAP goals. The proposed project would also use drought tolerant landscaping that requires low water and maintenance. Therefore, the project would also be consistent with the CAP goal of climate appropriate landscaping. Based on the proposed project traffic study, the proposed project would be screened out from a VMT analysis and presumed to have less than significant transportation impact. Therefore, the proposed project would not be implementing a trip reduction program. As such, the proposed project would be generally consistent with applicable CAP measures.

2022 Scoping Plan. EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reduction target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. CARB released the 2017 Scoping Plan to reflect the 2030 target set by EO B-30-15 and codified by SB 32.[43] SB 32 builds on AB 32 and keeps us on the path toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels. AB 197, the companion bill to SB 32, provides additional direction to CARB that is related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 that is intended to provide easier public access to air emission data collected by CARB was posted in December 2016. AB 1279 codifies the State goals of achieving net carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter.

In addition, the 2022 Scoping Plan[44] assesses progress toward the statutory 2030 target while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

- **Energy-efficient measures** are intended to maximize energy-efficiency building and appliance standards, pursue additional efficiency efforts (including new technologies and new policy and implementation mechanisms), and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. As mentioned above, the proposed project would not be powered by natural gas, and no natural gas demand is anticipated during construction or

[43] California Air Resources Board (CARB). 2022a. *2022 Scoping Plan for Achieving Carbon Neutrality.* December. Website: https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdfpdf (accessed March 2025).

[44] California Air Resources Board (CARB). 2017. *California's 2017 Climate Change Scoping Plan*. November.

operation of the proposed project. The elimination of natural gas in new development would help projects implement their "fair share" of achieving long-term 2045 carbon neutrality consistent with State goals. As such, if a project does not utilize natural gas, a lead agency can conclude that it would be consistent with achieving the 2045 neutrality goal and will not have a cumulative considerable impact on climate change.[45] In addition, the proposed project would comply with the latest Title 24 standards regarding energy conservation and green building standards. The project would also include solar roof areas, which would allow for future use of renewable energy. Therefore, the proposed project would comply with applicable energy measures.

- **Water conservation and efficiency measures** are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the project would be required to comply with the latest Title 24 standards, which include a variety of different measures, including reduction of wastewater and water use. The proposed project would also include new drought tolerant landscaping that requires low water and maintenance. In addition, the proposed project would be required to comply with the California Model Water Efficient Landscape Ordinance. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.

- The goal of **transportation and motor vehicle measures** is to develop regional GHG emission reduction targets for passenger vehicles. Specific regional emission targets for transportation emissions would not directly apply to the proposed project. However, vehicles traveling to the project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program (Pavley standards). The second phase of Pavley standards will reduce GHG emissions from new cars by 34 percent from 2016 levels by 2025, resulting in a 3 percent decrease in average vehicle emissions for all vehicles by 2020. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

The proposed project would comply with existing State regulations adopted to achieve the overall GHG emission reduction goals identified in the 2022 Scoping Plan, EO B-30-15, SB 32, AB 197, and AB 1279.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy. SCAG's 2024–2050 RTP/SCS identifies land use strategies that focus on new housing and job growth in areas served by high-quality transit, and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The core vision in the 2024–2050 RTP/SCS is to better manage the existing transportation system through design management strategies, integrate land use decisions and technological advancements, create complete streets that are safe for all roadway users, preserve the transportation system, expand transit, and foster development in transit-oriented communities. The 2024–2050 RTP/SCS contains

[45] Bay Area Air Quality Management District (BAAQMD). 2022. *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans.* April. Website: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines (accessed March 2025).

transportation projects to help more efficiently distribute population, housing, and employment growth, as well as providing a forecast development pattern that is generally consistent with regional-level General Plan data. The forecast development pattern, when integrated with the financially constrained transportation investments identified in the 2024–2050 RTP/SCS, would reach the regional target of reducing GHG emissions from automobiles and light-duty trucks by 8 percent per capita by 2020 and 19 percent by 2035 (compared to 2005 levels). The 2024–2050 RTP/SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the 2024–2050 RTP/SCS, but it provides incentives for consistency for governments and developers.

Implementing SCAG's RTP/SCS will greatly reduce the regional GHG emissions from transportation, thereby helping to achieve statewide emissions reduction targets. The proposed project would construct a 132,003 square foot public self-storage building and associated site improvements. As demonstrated in the Consistency with Applicable Air Quality Plans section above, the proposed project does not meet the criteria identified in *State CEQA Guidelines* Section 15205.b.2 (Projects of Statewide, Regional, or Areawide Significance) for projects of Statewide, regional, or areawide significance. The proposed project would require a zone change to change the zoning designation of the project site from NC to CC and a CUP to allow development of the proposed project within the CC zone. The proposed project has the potential to employ 4 employees, some of which may already reside in Moreno Valley. According to SCAG's 2024–2050 RTP/SCS, Moreno Valley households and employment are forecasted to increase by approximately 21,900 households and 38,700 jobs, respectively, between 2019 and 2050.[46] According to SCAG, up to 4 employees would represent approximately 0.01 percent of the city's forecast employment growth from 2019 to 2050. As such, the proposed project would not interfere with SCAG's ability to achieve the region's GHG reduction target of 19 percent below 2005 per capita emissions levels by 2035. Furthermore, the proposed project is not regionally significant per *State CEQA Guidelines* Section 15206 and, as such, it would not conflict with the SCAG RTP/SCS targets because those targets were established and are applicable on a regional level. Therefore, it is anticipated that implementation of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS.

The proposed project would be consistent with applicable plans and programs designed to reduce GHG emissions. Therefore, the proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

CONCLUSION

Based on the analysis presented above, construction and operation of the proposed project would not result in the generation of criteria air pollutants that would exceed SCAQMD thresholds of significance. Compliance with SCAQMD Rule 403: Fugitive Dust would further reduce construction dust impacts. The proposed project is not expected to produce significant emissions that would affect nearby sensitive receptors. The project would also be consistent with the 2022 AQMP. The project would not result in objectionable odors affecting a substantial number of people. The

[46] Southern California Association of Governments (SCAG). 2024. *2024–2050 Regional Transportation Plan/ Sustainable Communities Strategy. Demographics and Growth Forecast*, Technical Report, Table 13. Adopted April 4, 2024.

proposed project would also not result in a potential significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. As demonstrated above, GHG emissions released during construction and operation of the project would not lead to new or substantially more severe significant impacts associated with operational GHG emissions. The proposed project would also be generally consistent with the City's CAP, the 2022 Scoping Plan, and the SCAG RTP/SCS.

Attachments: A: Figures
B: CalEEMod Output Files

ATTACHMENT A

FIGURES

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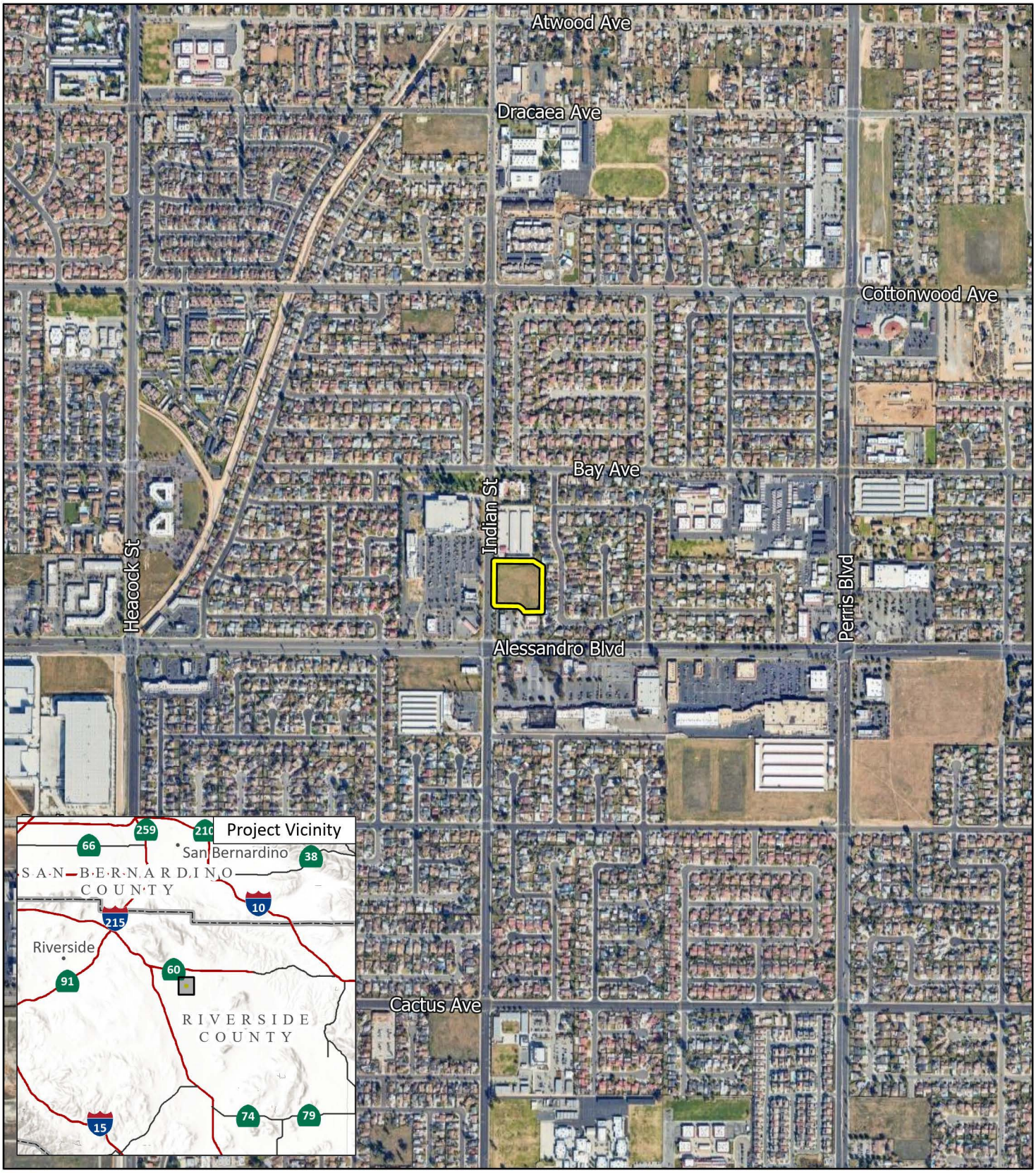


LSA

Project Location

FIGURE 1

N

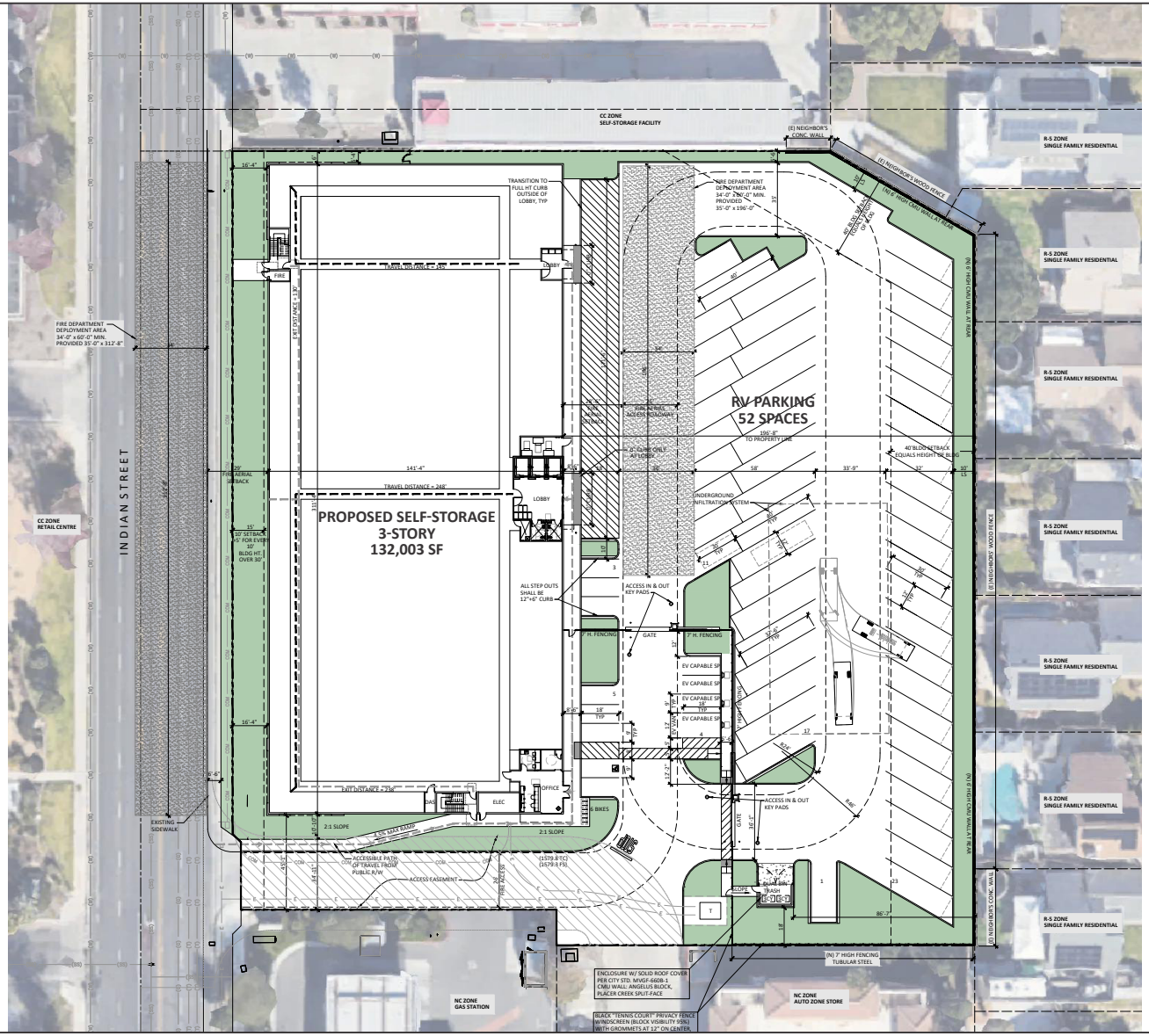
0 500 1000
FEET

SOURCE: Google Maps (2024)

I:\2024\20241908\GIS\Pro\Moreno Valley Public Storage\Public Storage Moreno Valley Project.aprx (1/12/2025)

Public Storage Moreno Valley Project

Regional and Project Location



LSA

FIGURE 2

N

0 40 80

FEET

SOURCE: KSP Studios

I:\2024\20241908\G\Site_Plan.ai (1/29/2025)

Public Storage Moreno Valley

Site Plan

ATTACHMENT B

CALEEMOD OUTPUT FILES

Public Storage Moreno Valley v3 Custom Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Public Storage Moreno Valley v3
Construction Start Date	11/4/2025
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.50
Precipitation (days)	10.0
Location	33.91861051541407, -117.23448767025208
County	Riverside-South Coast
City	Moreno Valley
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5591
EDFZ	11
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Unrefrigerated Warehouse-No Rail	132	1000sqft	2.42	132,003	20,777	—	—	—

Parking Lot	65.0	Space	0.58	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Transportation	T-14*	Provide Electric Vehicle Charging Infrastructure

* Qualitative or supporting measure. Emission reductions not included in the mitigated emissions results.

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	13.2	18.6	18.7	0.03	0.73	1.05	1.78	0.67	0.25	0.93	—	3,903	3,903	0.15	0.15	3,957
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	13.0	71.8	52.5	0.10	1.91	11.9	13.8	1.73	5.55	7.28	—	11,527	11,527	0.43	0.36	11,645
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.84	9.94	9.28	0.02	0.38	0.60	0.90	0.35	0.27	0.48	—	2,004	2,004	0.06	0.08	2,030
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.70	1.81	1.69	< 0.005	0.07	0.11	0.17	0.06	0.05	0.09	—	332	332	0.01	0.01	336

2.2. Construction Emissions by Year, Unmitigated

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

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	13.2	18.6	18.7	0.03	0.73	1.05	1.78	0.67	0.25	0.93	—	3,903	3,903	0.15	0.15	3,957
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	2.01	71.8	52.5	0.10	1.91	11.9	13.8	1.73	5.55	7.28	—	11,527	11,527	0.43	0.36	11,645
2026	13.0	17.5	16.0	0.03	0.66	0.91	1.57	0.61	0.22	0.83	—	3,556	3,556	0.11	0.15	3,602
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.12	3.90	2.94	0.01	0.11	0.60	0.71	0.10	0.27	0.37	—	667	667	0.02	0.03	675
2026	3.84	9.94	9.28	0.02	0.38	0.52	0.90	0.35	0.13	0.48	—	2,004	2,004	0.06	0.08	2,030
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.02	0.71	0.54	< 0.005	0.02	0.11	0.13	0.02	0.05	0.07	—	110	110	< 0.005	< 0.005	112
2026	0.70	1.81	1.69	< 0.005	0.07	0.10	0.17	0.06	0.02	0.09	—	332	332	0.01	0.01	336

2.3. Construction Emissions by Year, Mitigated

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

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	13.2	18.6	18.7	0.03	0.73	1.05	1.78	0.67	0.25	0.93	—	3,903	3,903	0.15	0.15	3,957
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	2.01	71.8	52.5	0.10	1.91	11.9	13.8	1.73	5.55	7.28	—	11,527	11,527	0.43	0.36	11,645
2026	13.0	17.5	16.0	0.03	0.66	0.91	1.57	0.61	0.22	0.83	—	3,556	3,556	0.11	0.15	3,602
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2025	0.12	3.90	2.94	0.01	0.11	0.60	0.71	0.10	0.27	0.37	—	667	667	0.02	0.03	675
2026	3.84	9.94	9.28	0.02	0.38	0.52	0.90	0.35	0.13	0.48	—	2,004	2,004	0.06	0.08	2,030
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.02	0.71	0.54	< 0.005	0.02	0.11	0.13	0.02	0.05	0.07	—	110	110	< 0.005	< 0.005	112
2026	0.70	1.81	1.69	< 0.005	0.07	0.10	0.17	0.06	0.02	0.09	—	332	332	0.01	0.01	336

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.93	0.67	11.4	0.01	0.02	1.14	1.16	0.02	0.29	0.31	125	2,602	2,727	12.8	0.22	3,117
Mit.	4.93	0.67	11.4	0.01	0.02	1.14	1.16	0.02	0.29	0.31	125	2,602	2,727	12.8	0.22	3,117
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.93	0.67	4.84	0.01	0.01	1.14	1.15	0.01	0.29	0.30	125	2,497	2,623	12.8	0.22	3,008
Mit.	3.93	0.67	4.84	0.01	0.01	1.14	1.15	0.01	0.29	0.30	125	2,497	2,623	12.8	0.22	3,008
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.57	0.71	8.94	0.01	0.02	1.14	1.15	0.01	0.29	0.30	125	2,525	2,651	12.8	0.22	3,038
Mit.	4.57	0.71	8.94	0.01	0.02	1.14	1.15	0.01	0.29	0.30	125	2,525	2,651	12.8	0.22	3,038
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	0.83	0.13	1.63	< 0.005	< 0.005	0.21	0.21	< 0.005	0.05	0.06	20.8	418	439	2.12	0.04	503
Mit.	0.83	0.13	1.63	< 0.005	< 0.005	0.21	0.21	< 0.005	0.05	0.06	20.8	418	439	2.12	0.04	503
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.83	0.62	5.62	0.01	0.01	1.14	1.15	0.01	0.29	0.30	—	1,355	1,355	0.06	0.06	1,380
Area	4.11	0.05	5.74	< 0.005	0.01	—	0.01	0.01	—	0.01	—	23.6	23.6	< 0.005	< 0.005	23.7
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	918	918	0.06	0.01	921
Water	—	—	—	—	—	—	—	—	—	—	58.5	305	364	6.02	0.14	557
Waste	—	—	—	—	—	—	—	—	—	—	66.9	0.00	66.9	6.68	0.00	234
Total	4.93	0.67	11.4	0.01	0.02	1.14	1.16	0.02	0.29	0.31	125	2,602	2,727	12.8	0.22	3,117
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.77	0.67	4.84	0.01	0.01	1.14	1.15	0.01	0.29	0.30	—	1,274	1,274	0.06	0.07	1,295
Area	3.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	918	918	0.06	0.01	921
Water	—	—	—	—	—	—	—	—	—	—	58.5	305	364	6.02	0.14	557
Waste	—	—	—	—	—	—	—	—	—	—	66.9	0.00	66.9	6.68	0.00	234
Total	3.93	0.67	4.84	0.01	0.01	1.14	1.15	0.01	0.29	0.30	125	2,497	2,623	12.8	0.22	3,008
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.76	0.68	5.01	0.01	0.01	1.14	1.15	0.01	0.29	0.30	—	1,286	1,286	0.06	0.07	1,309
Area	3.81	0.03	3.93	< 0.005	0.01	—	0.01	0.01	—	0.01	—	16.2	16.2	< 0.005	< 0.005	16.2

Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	918	918	0.06	0.01	921
Water	—	—	—	—	—	—	—	—	—	—	58.5	305	364	6.02	0.14	557
Waste	—	—	—	—	—	—	—	—	—	—	66.9	0.00	66.9	6.68	0.00	234
Total	4.57	0.71	8.94	0.01	0.02	1.14	1.15	0.01	0.29	0.30	125	2,525	2,651	12.8	0.22	3,038
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.14	0.12	0.91	< 0.005	< 0.005	0.21	0.21	< 0.005	0.05	0.05	—	213	213	0.01	0.01	217
Area	0.70	0.01	0.72	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.68	2.68	< 0.005	< 0.005	2.69
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	152	152	0.01	< 0.005	153
Water	—	—	—	—	—	—	—	—	—	—	9.68	50.6	60.2	1.00	0.02	92.3
Waste	—	—	—	—	—	—	—	—	—	—	11.1	0.00	11.1	1.11	0.00	38.7
Total	0.83	0.13	1.63	< 0.005	< 0.005	0.21	0.21	< 0.005	0.05	0.06	20.8	418	439	2.12	0.04	503

2.6. Operations Emissions by Sector, Mitigated

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

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.83	0.62	5.62	0.01	0.01	1.14	1.15	0.01	0.29	0.30	—	1,355	1,355	0.06	0.06	1,380
Area	4.11	0.05	5.74	< 0.005	0.01	—	0.01	0.01	—	0.01	—	23.6	23.6	< 0.005	< 0.005	23.7
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	918	918	0.06	0.01	921
Water	—	—	—	—	—	—	—	—	—	—	58.5	305	364	6.02	0.14	557
Waste	—	—	—	—	—	—	—	—	—	—	66.9	0.00	66.9	6.68	0.00	234
Total	4.93	0.67	11.4	0.01	0.02	1.14	1.16	0.02	0.29	0.31	125	2,602	2,727	12.8	0.22	3,117
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.77	0.67	4.84	0.01	0.01	1.14	1.15	0.01	0.29	0.30	—	1,274	1,274	0.06	0.07	1,295
Area	3.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	918	918	0.06	0.01	921
Water	—	—	—	—	—	—	—	—	—	—	58.5	305	364	6.02	0.14	557
Waste	—	—	—	—	—	—	—	—	—	—	66.9	0.00	66.9	6.68	0.00	234
Total	3.93	0.67	4.84	0.01	0.01	1.14	1.15	0.01	0.29	0.30	125	2,497	2,623	12.8	0.22	3,008
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.76	0.68	5.01	0.01	0.01	1.14	1.15	0.01	0.29	0.30	—	1,286	1,286	0.06	0.07	1,309
Area	3.81	0.03	3.93	< 0.005	0.01	—	0.01	0.01	—	0.01	—	16.2	16.2	< 0.005	< 0.005	16.2
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	918	918	0.06	0.01	921
Water	—	—	—	—	—	—	—	—	—	—	58.5	305	364	6.02	0.14	557
Waste	—	—	—	—	—	—	—	—	—	—	66.9	0.00	66.9	6.68	0.00	234
Total	4.57	0.71	8.94	0.01	0.02	1.14	1.15	0.01	0.29	0.30	125	2,525	2,651	12.8	0.22	3,038
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.14	0.12	0.91	< 0.005	< 0.005	0.21	0.21	< 0.005	0.05	0.05	—	213	213	0.01	0.01	217
Area	0.70	0.01	0.72	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.68	2.68	< 0.005	< 0.005	2.69
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	152	152	0.01	< 0.005	153
Water	—	—	—	—	—	—	—	—	—	—	9.68	50.6	60.2	1.00	0.02	92.3
Waste	—	—	—	—	—	—	—	—	—	—	11.1	0.00	11.1	1.11	0.00	38.7
Total	0.83	0.13	1.63	< 0.005	< 0.005	0.21	0.21	< 0.005	0.05	0.06	20.8	418	439	2.12	0.04	503

3. Construction Emissions Details

3.1. Site Preparation (2025) - Unmitigated

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

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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.26	49.7	35.2	0.06	1.25	—	1.25	1.12	—	1.12	—	6,850	6,850	0.28	0.06	6,874
Dust From Material Movement	—	—	—	—	—	8.29	8.29	—	4.01	4.01	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	2.04	1.45	< 0.005	0.05	—	0.05	0.05	—	0.05	—	282	282	0.01	< 0.005	282
Dust From Material Movement	—	—	—	—	—	0.34	0.34	—	0.16	0.16	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.37	0.26	< 0.005	0.01	—	0.01	0.01	—	0.01	—	46.6	46.6	< 0.005	< 0.005	46.8
Dust From Material Movement	—	—	—	—	—	0.06	0.06	—	0.03	0.03	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.06	0.07	0.88	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	194	194	0.01	0.01	197
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
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.09	8.09	< 0.005	< 0.005	8.20
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.34	1.34	< 0.005	< 0.005	1.36
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
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

3.2. Site Preparation (2025) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.26	49.7	35.2	0.06	1.25	—	1.25	1.12	—	1.12	—	6,850	6,850	0.28	0.06	6,874
Dust From Material Movement	—	—	—	—	—	8.29	8.29	—	4.01	4.01	—	—	—	—	—	—
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

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	2.04	1.45	< 0.005	0.05	—	0.05	0.05	—	0.05	—	282	282	0.01	< 0.005	282
Dust From Material Movement	—	—	—	—	—	0.34	0.34	—	0.16	0.16	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.37	0.26	< 0.005	0.01	—	0.01	0.01	—	0.01	—	46.6	46.6	< 0.005	< 0.005	46.8
Dust From Material Movement	—	—	—	—	—	0.06	0.06	—	0.03	0.03	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.07	0.88	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	194	194	0.01	0.01	197
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
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.09	8.09	< 0.005	< 0.005	8.20
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
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

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.34	1.34	< 0.005	< 0.005	1.36
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
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

3.3. Grading (2025) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.61	19.9	15.2	0.02	0.62	—	0.62	0.57	—	0.57	—	2,596	2,596	0.11	0.02	2,605
Dust From Material Movement	—	—	—	—	—	2.77	2.77	—	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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	1.36	1.04	< 0.005	0.04	—	0.04	0.04	—	0.04	—	178	178	0.01	< 0.005	178
Dust From Material Movement	—	—	—	—	—	0.19	0.19	—	0.09	0.09	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.01	0.25	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	29.4	29.4	< 0.005	< 0.005	29.5
Dust From Material Movement	—	—	—	—	—	0.03	0.03	—	0.02	0.02	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.06	0.73	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	162	162	0.01	0.01	164
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
Hauling	0.03	2.00	0.47	0.01	0.03	0.45	0.49	0.03	0.13	0.16	—	1,724	1,724	0.03	0.27	1,805
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.2	11.2	< 0.005	< 0.005	11.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.14	0.03	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	118	118	< 0.005	0.02	124
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.86	1.86	< 0.005	< 0.005	1.89
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
Hauling	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	19.5	19.5	< 0.005	< 0.005	20.5

3.4. Grading (2025) - Mitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.61	19.9	15.2	0.02	0.62	—	0.62	0.57	—	0.57	—	2,596	2,596	0.11	0.02	2,605
Dust From Material Movement	—	—	—	—	—	2.77	2.77	—	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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	1.36	1.04	< 0.005	0.04	—	0.04	0.04	—	0.04	—	178	178	0.01	< 0.005	178
Dust From Material Movement	—	—	—	—	—	0.19	0.19	—	0.09	0.09	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.25	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	29.4	29.4	< 0.005	< 0.005	29.5
Dust From Material Movement	—	—	—	—	—	0.03	0.03	—	0.02	0.02	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.06	0.73	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	162	162	0.01	0.01	164
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
Hauling	0.03	2.00	0.47	0.01	0.03	0.45	0.49	0.03	0.13	0.16	—	1,724	1,724	0.03	0.27	1,805
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.2	11.2	< 0.005	< 0.005	11.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.14	0.03	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	118	118	< 0.005	0.02	124
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.86	1.86	< 0.005	< 0.005	1.89
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
Hauling	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	19.5	19.5	< 0.005	< 0.005	20.5

3.5. 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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.57	16.5	12.8	0.02	0.65	—	0.65	0.60	—	0.60	—	2,201	2,201	0.09	0.02	2,209
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.01	0.32	0.25	< 0.005	0.01	—	0.01	0.01	—	0.01	—	43.1	43.1	< 0.005	< 0.005	43.2
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.06	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.13	7.13	< 0.005	< 0.005	7.16
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.23	0.27	3.24	0.00	0.00	0.72	0.72	0.00	0.17	0.17	—	718	718	0.03	0.03	727
Vendor	0.01	0.76	0.23	< 0.005	0.01	0.19	0.19	0.01	0.05	0.06	—	662	662	0.01	0.10	693
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	14.2	14.2	< 0.005	< 0.005	14.4
Vendor	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	13.0	13.0	< 0.005	< 0.005	13.6
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.36	2.36	< 0.005	< 0.005	2.39
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.15	2.15	< 0.005	< 0.005	2.25
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

3.6. 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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.57	16.5	12.8	0.02	0.65	—	0.65	0.60	—	0.60	—	2,201	2,201	0.09	0.02	2,209
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.32	0.25	< 0.005	0.01	—	0.01	0.01	—	0.01	—	43.1	43.1	< 0.005	< 0.005	43.2
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.06	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.13	7.13	< 0.005	< 0.005	7.16
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.23	0.27	3.24	0.00	0.00	0.72	0.72	0.00	0.17	0.17	—	718	718	0.03	0.03	727
Vendor	0.01	0.76	0.23	< 0.005	0.01	0.19	0.19	0.01	0.05	0.06	—	662	662	0.01	0.10	693
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

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	14.2	14.2	< 0.005	< 0.005	14.4
Vendor	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	13.0	13.0	< 0.005	< 0.005	13.6
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.36	2.36	< 0.005	< 0.005	2.39
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.15	2.15	< 0.005	< 0.005	2.25
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

3.7. Building Construction (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.57	16.5	12.8	0.02	0.65	—	0.65	0.60	—	0.60	—	2,201	2,201	0.09	0.02	2,208
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.57	16.5	12.8	0.02	0.65	—	0.65	0.60	—	0.60	—	2,201	2,201	0.09	0.02	2,208
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.30	8.68	6.69	0.01	0.34	—	0.34	0.31	—	0.31	—	1,154	1,154	0.05	0.01	1,158

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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	1.58	1.22	< 0.005	0.06	—	0.06	0.06	—	0.06	—	191	191	0.01	< 0.005	192
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.23	0.22	3.98	0.00	0.00	0.72	0.72	0.00	0.17	0.17	—	765	765	0.03	0.03	776
Vendor	0.01	0.70	0.22	< 0.005	0.01	0.19	0.19	0.01	0.05	0.06	—	651	651	0.01	0.10	683
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.24	3.02	0.00	0.00	0.72	0.72	0.00	0.17	0.17	—	703	703	0.01	0.03	712
Vendor	0.01	0.73	0.22	< 0.005	0.01	0.19	0.19	0.01	0.05	0.06	—	652	652	0.01	0.10	682
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.14	1.66	0.00	0.00	0.38	0.38	0.00	0.09	0.09	—	373	373	0.01	0.01	378
Vendor	0.01	0.38	0.11	< 0.005	0.01	0.10	0.10	0.01	0.03	0.03	—	342	342	0.01	0.05	358
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.03	0.30	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	61.8	61.8	< 0.005	< 0.005	62.7
Vendor	< 0.005	0.07	0.02	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	56.6	56.6	< 0.005	0.01	59.3
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

3.8. Building Construction (2026) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.57	16.5	12.8	0.02	0.65	—	0.65	0.60	—	0.60	—	2,201	2,201	0.09	0.02	2,208
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.57	16.5	12.8	0.02	0.65	—	0.65	0.60	—	0.60	—	2,201	2,201	0.09	0.02	2,208
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.30	8.68	6.69	0.01	0.34	—	0.34	0.31	—	0.31	—	1,154	1,154	0.05	0.01	1,158
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	1.58	1.22	< 0.005	0.06	—	0.06	0.06	—	0.06	—	191	191	0.01	< 0.005	192
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.23	0.22	3.98	0.00	0.00	0.72	0.72	0.00	0.17	0.17	—	765	765	0.03	0.03	776
Vendor	0.01	0.70	0.22	< 0.005	0.01	0.19	0.19	0.01	0.05	0.06	—	651	651	0.01	0.10	683

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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.24	3.02	0.00	0.00	0.72	0.72	0.00	0.17	0.17	—	703	703	0.01	0.03	712
Vendor	0.01	0.73	0.22	< 0.005	0.01	0.19	0.19	0.01	0.05	0.06	—	652	652	0.01	0.10	682
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.14	1.66	0.00	0.00	0.38	0.38	0.00	0.09	0.09	—	373	373	0.01	0.01	378
Vendor	0.01	0.38	0.11	< 0.005	0.01	0.10	0.10	0.01	0.03	0.03	—	342	342	0.01	0.05	358
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.03	0.30	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	61.8	61.8	< 0.005	< 0.005	62.7
Vendor	< 0.005	0.07	0.02	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	56.6	56.6	< 0.005	0.01	59.3
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

3.9. Paving (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.40	10.4	8.32	0.01	0.46	—	0.46	0.43	—	0.43	—	1,244	1,244	0.05	0.01	1,248
Paving	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.40	10.4	8.32	0.01	0.46	—	0.46	0.43	—	0.43	—	1,244	1,244	0.05	0.01	1,248
Paving	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.43	0.34	< 0.005	0.02	—	0.02	0.02	—	0.02	—	51.1	51.1	< 0.005	< 0.005	51.3
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.08	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.46	8.46	< 0.005	< 0.005	8.49
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	1.08	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	207	207	0.01	0.01	210
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
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.07	0.82	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	190	190	< 0.005	0.01	193
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

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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.92	7.92	< 0.005	< 0.005	8.02
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.31	1.31	< 0.005	< 0.005	1.33
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
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

3.10. Paving (2026) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.40	10.4	8.32	0.01	0.46	—	0.46	0.43	—	0.43	—	1,244	1,244	0.05	0.01	1,248
Paving	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.40	10.4	8.32	0.01	0.46	—	0.46	0.43	—	0.43	—	1,244	1,244	0.05	0.01	1,248
Paving	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.43	0.34	< 0.005	0.02	—	0.02	0.02	—	0.02	—	51.1	51.1	< 0.005	< 0.005	51.3
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.08	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.46	8.46	< 0.005	< 0.005	8.49
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	1.08	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	207	207	0.01	0.01	210
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
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.07	0.82	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	190	190	< 0.005	0.01	193
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
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.92	7.92	< 0.005	< 0.005	8.02
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.31	1.31	< 0.005	< 0.005	1.33
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
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

3.11. Architectural Coating (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	1.09	0.96	< 0.005	0.07	—	0.07	0.06	—	0.06	—	134	134	0.01	< 0.005	134
Architectural Coatings	12.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	1.09	0.96	< 0.005	0.07	—	0.07	0.06	—	0.06	—	134	134	0.01	< 0.005	134
Architectural Coatings	12.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.30	0.26	< 0.005	0.02	—	0.02	0.02	—	0.02	—	36.6	36.6	< 0.005	< 0.005	36.7

Architectural Coatings	3.37	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.05	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.06	6.06	< 0.005	< 0.005	6.08
Architectural Coatings	0.62	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.80	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	153	153	0.01	0.01	155
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
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.05	0.60	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	141	141	< 0.005	0.01	142
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
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.17	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	39.0	39.0	< 0.005	< 0.005	39.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.46	6.46	< 0.005	< 0.005	6.55

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
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

3.12. Architectural Coating (2026) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	1.09	0.96	< 0.005	0.07	—	0.07	0.06	—	0.06	—	134	134	0.01	< 0.005	134
Architectural Coatings	12.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	1.09	0.96	< 0.005	0.07	—	0.07	0.06	—	0.06	—	134	134	0.01	< 0.005	134
Architectural Coatings	12.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.30	0.26	< 0.005	0.02	—	0.02	0.02	—	0.02	—	36.6	36.6	< 0.005	< 0.005	36.7
Architectural Coatings	3.37	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.05	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.06	6.06	< 0.005	< 0.005	6.08
Architectural Coatings	0.62	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.80	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	153	153	0.01	0.01	155
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
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.05	0.60	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	141	141	< 0.005	0.01	142
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
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.17	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	39.0	39.0	< 0.005	< 0.005	39.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.46	6.46	< 0.005	< 0.005	6.55
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
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

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.83	0.62	5.62	0.01	0.01	1.14	1.15	0.01	0.29	0.30	—	1,355	1,355	0.06	0.06	1,380
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
Total	0.83	0.62	5.62	0.01	0.01	1.14	1.15	0.01	0.29	0.30	—	1,355	1,355	0.06	0.06	1,380
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.77	0.67	4.84	0.01	0.01	1.14	1.15	0.01	0.29	0.30	—	1,274	1,274	0.06	0.07	1,295
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
Total	0.77	0.67	4.84	0.01	0.01	1.14	1.15	0.01	0.29	0.30	—	1,274	1,274	0.06	0.07	1,295
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.14	0.12	0.91	< 0.005	< 0.005	0.21	0.21	< 0.005	0.05	0.05	—	213	213	0.01	0.01	217

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
Total	0.14	0.12	0.91	< 0.005	< 0.005	0.21	0.21	< 0.005	0.05	0.05	—	213	213	0.01	0.01	217

4.1.2. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.83	0.62	5.62	0.01	0.01	1.14	1.15	0.01	0.29	0.30	—	1,355	1,355	0.06	0.06	1,380
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
Total	0.83	0.62	5.62	0.01	0.01	1.14	1.15	0.01	0.29	0.30	—	1,355	1,355	0.06	0.06	1,380
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.77	0.67	4.84	0.01	0.01	1.14	1.15	0.01	0.29	0.30	—	1,274	1,274	0.06	0.07	1,295
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
Total	0.77	0.67	4.84	0.01	0.01	1.14	1.15	0.01	0.29	0.30	—	1,274	1,274	0.06	0.07	1,295
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.14	0.12	0.91	< 0.005	< 0.005	0.21	0.21	< 0.005	0.05	0.05	—	213	213	0.01	0.01	217

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
Total	0.14	0.12	0.91	< 0.005	< 0.005	0.21	0.21	< 0.005	0.05	0.05	—	213	213	0.01	0.01	217

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	885	885	0.05	0.01	889
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	32.5	32.5	< 0.005	< 0.005	32.7
Total	—	—	—	—	—	—	—	—	—	—	—	918	918	0.06	0.01	921
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	885	885	0.05	0.01	889
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	32.5	32.5	< 0.005	< 0.005	32.7
Total	—	—	—	—	—	—	—	—	—	—	—	918	918	0.06	0.01	921
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated Warehouse-No	—	—	—	—	—	—	—	—	—	—	—	147	147	0.01	< 0.005	147
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	5.39	5.39	< 0.005	< 0.005	5.41
Total	—	—	—	—	—	—	—	—	—	—	—	152	152	0.01	< 0.005	153

4.2.2. Electricity Emissions By Land Use - Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	885	885	0.05	0.01	889
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	32.5	32.5	< 0.005	< 0.005	32.7
Total	—	—	—	—	—	—	—	—	—	—	—	918	918	0.06	0.01	921
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	885	885	0.05	0.01	889
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	32.5	32.5	< 0.005	< 0.005	32.7
Total	—	—	—	—	—	—	—	—	—	—	—	918	918	0.06	0.01	921
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated	—	—	—	—	—	—	—	—	—	—	—	147	147	0.01	< 0.005	147
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	5.39	5.39	< 0.005	< 0.005	5.41
Total	—	—	—	—	—	—	—	—	—	—	—	152	152	0.01	< 0.005	153

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00
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
Total	0.00	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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00
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
Total	0.00	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated Warehouse-No	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00
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
Total	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00

4.2.4. Natural Gas Emissions By Land Use - Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00
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
Total	0.00	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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00
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
Total	0.00	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00
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
Total	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	0.00

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	2.83	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.34	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.94	0.05	5.74	< 0.005	0.01	—	0.01	0.01	—	0.01	—	23.6	23.6	< 0.005	< 0.005	23.7
Total	4.11	0.05	5.74	< 0.005	0.01	—	0.01	0.01	—	0.01	—	23.6	23.6	< 0.005	< 0.005	23.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	2.83	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.34	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	3.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.52	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.12	0.01	0.72	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.68	2.68	< 0.005	< 0.005	2.69
Total	0.70	0.01	0.72	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.68	2.68	< 0.005	< 0.005	2.69

4.3.2. Mitigated

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

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	2.83	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.34	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.94	0.05	5.74	< 0.005	0.01	—	0.01	0.01	—	0.01	—	23.6	23.6	< 0.005	< 0.005	23.7
Total	4.11	0.05	5.74	< 0.005	0.01	—	0.01	0.01	—	0.01	—	23.6	23.6	< 0.005	< 0.005	23.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	2.83	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architect Coatings	0.34	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	3.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.52	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.12	0.01	0.72	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.68	2.68	< 0.005	< 0.005	2.69
Total	0.70	0.01	0.72	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.68	2.68	< 0.005	< 0.005	2.69

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	58.5	305	364	6.02	0.14	557
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	58.5	305	364	6.02	0.14	557
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrige Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	58.5	305	364	6.02	0.14	557
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	58.5	305	364	6.02	0.14	557
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrige rated Warehou se-No Rail	—	—	—	—	—	—	—	—	—	—	9.68	50.6	60.2	1.00	0.02	92.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	9.68	50.6	60.2	1.00	0.02	92.3

4.4.2. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrige rated Warehou se-No Rail	—	—	—	—	—	—	—	—	—	—	58.5	305	364	6.02	0.14	557
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	58.5	305	364	6.02	0.14	557
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated Warehou Rail	—	—	—	—	—	—	—	—	—	—	58.5	305	364	6.02	0.14	557
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	58.5	305	364	6.02	0.14	557
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	9.68	50.6	60.2	1.00	0.02	92.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	9.68	50.6	60.2	1.00	0.02	92.3

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	66.9	0.00	66.9	6.68	0.00	234
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	66.9	0.00	66.9	6.68	0.00	234

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	66.9	0.00	66.9	6.68	0.00	234
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	66.9	0.00	66.9	6.68	0.00	234
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	11.1	0.00	11.1	1.11	0.00	38.7
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	11.1	0.00	11.1	1.11	0.00	38.7

4.5.2. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	66.9	0.00	66.9	6.68	0.00	234
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	66.9	0.00	66.9	6.68	0.00	234

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	66.9	0.00	66.9	6.68	0.00	234
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	66.9	0.00	66.9	6.68	0.00	234
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	11.1	0.00	11.1	1.11	0.00	38.7
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	11.1	0.00	11.1	1.11	0.00	38.7

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

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

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.6.2. Mitigated

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

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

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

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

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

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

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

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	11/3/2025	11/21/2025	5.00	15.0	—
Grading	Grading	11/17/2025	12/19/2025	5.00	25.0	—
Building Construction	Building Construction	12/22/2025	9/25/2026	5.00	200	—
Paving	Paving	9/28/2026	10/16/2026	5.00	15.0	—
Architectural Coating	Architectural Coating	6/22/2026	11/6/2026	5.00	100	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Graders	Diesel	Tier 2	1.00	8.00	148	0.41
Site Preparation	Scrapers	Diesel	Tier 2	1.00	8.00	423	0.48
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Tier 2	1.00	7.00	84.0	0.37
Site Preparation	Rubber Tired Dozers	Diesel	Tier 2	3.00	8.00	367	0.40
Grading	Graders	Diesel	Tier 2	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 2	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 2	2.00	7.00	84.0	0.37
Grading	Excavators	Diesel	Tier 2	1.00	8.00	36.0	0.38
Building Construction	Cranes	Diesel	Tier 2	1.00	8.00	367	0.29
Building Construction	Forklifts	Diesel	Tier 2	2.00	7.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Tier 2	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Tier 2	1.00	6.00	84.0	0.37

Building Construction	Welders	Diesel	Tier 2	3.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Tier 2	1.00	8.00	10.0	0.56
Paving	Pavers	Diesel	Tier 2	1.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Tier 2	1.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Tier 2	2.00	8.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Tier 2	1.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Tier 2	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
Site Preparation	Graders	Diesel	Tier 2	1.00	8.00	148	0.41
Site Preparation	Scrapers	Diesel	Tier 2	1.00	8.00	423	0.48
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Tier 2	1.00	7.00	84.0	0.37
Site Preparation	Rubber Tired Dozers	Diesel	Tier 2	3.00	8.00	367	0.40
Grading	Graders	Diesel	Tier 2	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 2	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 2	2.00	7.00	84.0	0.37
Grading	Excavators	Diesel	Tier 2	1.00	8.00	36.0	0.38
Building Construction	Cranes	Diesel	Tier 2	1.00	8.00	367	0.29
Building Construction	Forklifts	Diesel	Tier 2	2.00	7.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Tier 2	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Tier 2	1.00	6.00	84.0	0.37
Building Construction	Welders	Diesel	Tier 2	3.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Tier 2	1.00	8.00	10.0	0.56

Paving	Pavers	Diesel	Tier 2	1.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Tier 2	1.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Tier 2	2.00	8.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Tier 2	1.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Tier 2	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	15.0	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	12.5	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	25.0	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	55.4	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	21.6	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT

Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	11.1	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	15.0	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	12.5	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	25.0	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	55.4	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	21.6	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT

Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	11.1	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	198,005	66,002	1,529

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	0.00	0.00	7.50	0.00	—
Grading	0.00	5,000	8.00	0.00	—
Paving	0.00	0.00	0.00	0.00	0.58

5.6.2. Construction Earthmoving Control Strategies

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

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Unrefrigerated Warehouse-No Rail	0.00	0%
Parking Lot	0.58	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	532	0.03	< 0.005
2026	0.00	532	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Unrefrigerated Warehouse-No Rail	216	216	216	78,824	1,613	1,613	1,613	588,798
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
Unrefrigerated Warehouse-No Rail	216	216	216	78,824	1,613	1,613	1,613	588,798

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

5.10.1.2. Mitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	198,005	66,002	1,529

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Unrefrigerated Warehouse-No Rail	607,538	532	0.0330	0.0040	0.00
Parking Lot	22,323	532	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)
Unrefrigerated Warehouse-No Rail	607,538	532	0.0330	0.0040	0.00
Parking Lot	22,323	532	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Unrefrigerated Warehouse-No Rail	30,525,694	329,434
Parking Lot	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Unrefrigerated Warehouse-No Rail	30,525,694	329,434
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)

Unrefrigerated Warehouse-No Rail	124	—
Parking Lot	0.00	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Unrefrigerated Warehouse-No Rail	124	—
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

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

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

5.15.2. 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)

8. User Changes to Default Data

Screen	Justification
Land Use	The project would include the construction of a 132,003 sq ft self-storage facility, inclusive of self-storage area, a rental office, and a lobby. The proposed project would also include 12 passenger vehicle parking spaces, 6 bicycle parking spaces, and 53 recreational vehicle (RV) parking spaces. Total project area is 3.0 acres. The project would also include 20,777 sq ft of landscaping.
Construction: Construction Phases	No demolition would be required. Construction is expected to start in November 2025 and occur for 12 months, ending in November 2026. Construction schedule was updated to reflect a 12-month schedule. Assumed overlap between building construction, paving, and architectural coating phases.
Construction: Off-Road Equipment	Default equipment with Tier 2
Operations: Energy Use	No natural gas, project will be all electric
Construction: Dust From Material Movement	project would require 5,000 CY of soil export
Operations: Vehicle Data	Project is anticipated to generate 216 average daily trips Trip rate = 216 ADT/ 132.006 = 1.636