Appendix A –
Air Quality Technical Report – Encinitas Sanctuary Project

Air Quality Technical Report

Encinitas Sanctuary Project

City of Encinitas, California

MARCH 2023

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
$\mu g/m^3$	micrograms per cubic meter
AQMP	Air Quality Management Plan
BenMAP	Benefits Mapping and Analysis Program
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Associatioin
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
City	City of Encinitas
CO	carbon monoxide
DPM	diesel particulate matter
EMFAC	EMissions FACtor model
EPA	U.S. Environmental Protection Agency
g/L	grams per liter
H_2S	hydrogen sulfide
HAP	hazardous air pollutant
HRA	Health Risk Assessment
LOS	level of service
MPO	metropolitan planning organization
NAAQS	National Ambient Air Quality Standards
NO	nitric oxide
NO_2	nitrogen dioxide
NO_x	oxides of nitrogen
$PM_{2.5}$	fine particulate matter
PM_{10}	coarse particulate matter
ppb	parts per billion
ppm	parts per million
Project	Encinitas Sanctuary Project
RAQS	Regional Air Quality Strategy
RTP	Regional Transportation Plan
SANDAG	San Diego Association of Governments
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDG&E	San Diego Gas & Electric Company
SIP	state implementation plan
SO_2	sulfur dioxide

Acronym/Abbreviation	Definition
SO_x	sulfur oxides
TAC	toxic air contaminant
VMT	vehicle miles traveled
VOC	volatile organic compound

Executive Summary

The purpose of this technical report is to assess the potential air quality impacts associated with implementation of the Encinitas Sanctuary Project (Project). This assessment uses the significance thresholds in Appendix G of the California Environmental Quality Act (CEQA) Guidelines.

Project Overview

The proposed Project involves the subdivision and development of one 8.23-acre (358,293 SF) lot into eleven lots: nine residential lots, one private street/drainage lot, and one open space lot. Construction of the residential subdivision will include site grading, drainage, and utility improvements, one private cul-de-sac street, and frontage improvements along Ranch View Terrace. Access to the residential subdivision will be taken from Ranch View Terrace, off which the new private cul-de-sac street will be constructed. The project will increase available housing stock in the City of Encinitas and conforms with the City's existing land use and zoning designations, as well as the surrounding residential uses.

Project Design Features

The proposed Project would implement the following construction-related project design features (PDFs) intended to emissions from Project construction. The Project would implement **PDF-AQ-1 – PDF-AQ-3**, as follows:

PDF-AQ-1: Standard construction practices would be employed to reduce fugitive dust emissions and include watering of the active sites and exposed surfaces up two times per day, depending on weather conditions; watering unpaved roads, and limiting vehicle speeds on unpaved roads. Construction of the Project would be subject to SDAPCD Rule 55 – Fugitive Dust Control. Compliance with Rule 55 would limit fugitive dust that may be generated during grading and construction activities.

PDF-AQ-2: The Project will provide temporary electricity to the project site during the building construction phases and prohibit the use of diesel-fueled/natural gas fueled generators during the building construction phases.

PDF-AQ-3: The Project will limit air compressors used during the architectural coating/painting phases to equipment that is electric-powered.

Air Quality

The air quality impact analysis evaluated the potential for adverse impacts to air quality due to construction and operational emissions resulting from the Project. The State CEQA Guidelines allow lead agencies to use the significance criteria established by the applicable air quality management district or air pollution control district to evaluate a project's impacts to air quality. The San Diego Air Pollution Control District (SDAPCD) has not developed thresholds of significance for air quality and health risk, however, the SDAPCD has provided emission levels under its permitting authority for new source review for which an Air Quality Impact Assessment (AQIA) is triggered. The County of San Diego has reviewed SDAPCD's trigger levels, as well as EPA rulemaking, and CEQA thresholds adopted by the South Coast Air Quality Management District (SCAQMD) to develop screening-level thresholds (SLTs) to assist lead agencies in determining the significance of project-level air quality impacts within the County. The City of Encinitas has chosen to apply the County of San Diego SLT's for determining mass daily criteria air pollutant thresholds of significance. Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards (criteria) for outdoor concentrations to protect public health. Criteria air pollutants include ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), and lead. Pollutants that are evaluated include volatile organic compounds (VOCs), oxides of nitrogen (NO_x), CO, sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$. VOCs and NO_x are important because they are precursors to O_3.

Air Quality Plan Consistency

If a project proposes development that is greater than that anticipated in the local plan and the growth projections set by the San Diego Association of Governments (SANDAG), the project might be in conflict with the State Implementation Plan and SDAPCD Regional Air Quality Strategy, and therefore may contribute to a potentially significant cumulative impact on air quality. The Project was deemed to be consistent with the current air quality plan because it would not require a general plan amendment and rezone, the development intensity would be consistent with the existing land use designations and the anticipated growth associated with the Project does not exceed that projected by SANDAG. In addition, the Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations as evidenced by its construction and operational emissions being less than County of San Diego thresholds of significance. Based on these considerations, impacts related to the Project's potential to conflict with or obstruct implementation of the applicable air quality plan would be less than significant.

Cumulatively Considerable Net Increase in Nonattainment Criteria Air Pollutant Emissions

Construction of the Project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). The maximum daily construction emissions would not exceed the County of San Diego significance thresholds for VOCs, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during construction. Therefore, the Project would have a less than significant impact.

The analysis herein assumed an operational year of 2025. Operation of the Project would generate operational criteria air pollutants from mobile sources (vehicles), area sources (consumer product use, architectural coatings, and landscape maintenance equipment), and energy (natural gas). Maximum operational emissions would not exceed the County of San Diego operational significance thresholds for VOCs, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$.

The potential for a project to result in a cumulatively considerable impact is based on the project's potential to exceed the project-specific daily thresholds. Because maximum construction and operational emissions would not exceed the County of San Diego significance thresholds for VOCs, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$, the Project would not result in a cumulatively considerable increase in criteria air pollutants.

Exposure of Sensitive Receptors

Regarding potential carbon monoxide (CO) violations or hotspots, the County of San Diego concluded in its General Plan Update (2011) that there are no intersections within the County that are more congested than the South Coast Air Quality Management District's (SCAQMD) most congested intersections evaluated for CO hotspots in its 2003 CO attainment redesignation request to the United States Environmental Protection Agency (US EPA). As such, the County of San Diego concluded that there were no potential CO violations in the County. The proposed development will not result in traffic that exceeds traffic volumes considered in the County of San Diego General Plan Update analysis and CO concentrations in the project area are well below ambient air quality standards. The Project would not result in a CO hotspot given the above information and continued improvements in vehicle emissions. The impact would be less than significant.

A health risk assessment (HRA) was also conducted to determine the potential impacts of exposure to diesel particulate matter (DPM), which is a TAC, at existing proximate sensitive receptors in the Project vicinity and future onsite receptors. The results of the HRA demonstrate that after implementation of **MM-AQ-1**, which requires use of Tier 4 Interim or equivalent (e.g. Tier 4 Final) for equipment greater than 80 horsepower during construction, the TAC exposure from construction diesel exhaust emissions would not result in cancer risk above the 10 in 1 million threshold, nor a Chronic Hazard Index greater than 1.0. Therefore, impacts to sensitive receptors would be less than significant with mitigation.

Other Emissions

Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application, which would disperse rapidly from the Project site and generally occur at magnitudes that would not affect substantial numbers of people. Impacts associated with odors during construction would be less than significant. The Project would be a mixed-use residential development that would not include land uses with sources that have the potential to generate substantial odors, and impacts associated with odors during operation would be less than significant.

Mitigation Measures

Mitigation Measure AQ-1

Tier 4 Interim Construction Equipment. Prior to the commencement of any construction activities, the applicant or its designee shall provide evidence to the City of Encinitas (City) that for off-road equipment with engines rated at 80 horsepower or greater, no construction equipment shall be used that is less than Tier 4 Interim or equivalent (e.g. Tier 4 Final or other technology that achieves equivalent particulate matter control). An exemption from these requirements may be granted by the City if the applicant documents that equipment with the required tier is not reasonably available and equivalent reductions in PM_{10} exhaust emissions are achieved from other construction equipment. The applicant shall be responsible for preparation of a new air quality assessment demonstrating that health risks are below significance thresholds of 10 in a million with the revised equipment mix. Before an exemption may be considered by the City, the applicant shall be required to demonstrate that three construction fleet owners/operators in the San Diego Region were contacted and that those owners/operators confirmed Tier 4 equipment could not be located within the San Diego region. The City shall review the exemption request and provide a determination within 10 business days from receipt of the request.

Summary of Findings

Table ES-1. Summary of Impact Determinations

Analysis	Report Section	CEQA Checklist Question	Significance Determinations	
			Unmitigated	Mitigated
Air Quality Management Plan	2.4.1	AQ-1	Less than Significant	No Mitigation Required.
Cumulatively Considerable Net Increase of Any Criteria Pollutant	2.4.2	AQ-2	Less than Significant	No Mitigation Required.
Sensitive Receptors	2.4.3	AQ-3	Less than Significant	Less than Significant with Mitigation.
Other Emissions and Odors	2.4.4	AQ-4	Less than Significant	No Mitigation Required.

1 Introduction

1.1 Report Purpose and Scope

The purpose of this technical report is to assess the potential air quality impacts associated with construction and operation of the Encinitas Sanctuary (Project). This analysis uses the significance thresholds in Appendix G of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.) and the emissions-based significance thresholds recommended by the County of San Diego and other applicable thresholds of significance.

1.2 Project Location

The project site is a vacant 8.23-acre parcel (APN 265-331-49) located on the southwest corner of Rancho Santa Fe Road and Ranch View Terrace, in the eastern-central part of the City of Encinitas, California. The project site is set in a mostly residential area of the City, with residential housing developments contiguous to the subject site in all directions excepting a church that is contiguous to the northeast portion of the site. A larger rectangular portion of the subject site extends 800 feet on its major axis (perpendicular to Ranch Santa Fe Road) and 400 feet on its minor axis (Parallel to Ranch Santa Fe Road). A smaller narrow rectangular strip extends the subject site further east from its northeast corner to contact the subject site with Rancho Santa Fe Road. This narrow strip has approximate dimensions of 500 feet by 50 feet. See Figure 1 Project Location for details.

1.3 Project Description

The project site is a vacant 8.23-acre parcel (APN 265-331-49) located on the southwest corner of Rancho Santa Fe Road and Ranch View Terrace, in the eastern-central part of the City of Encinitas, California (See Figure 1). The proposed Project involves the subdivision and development of one 8.23-acre (358,293 SF) lot into eleven lots: nine residential lots, one private street/drainage lot, and one open space lot. Construction of the residential subdivision will include site grading, drainage, and utility improvements, one private cul-de-sac street, and frontage improvements along Ranch View Terrace. Access to the residential subdivision will be taken from Ranch View Terrace, off which the new private cul-de-sac street will be constructed. The project will increase available housing stock in the City of Encinitas and conforms with the City's existing land use and zoning designations, as well as the surrounding residential uses. See Figure 2 Site Plan for details.

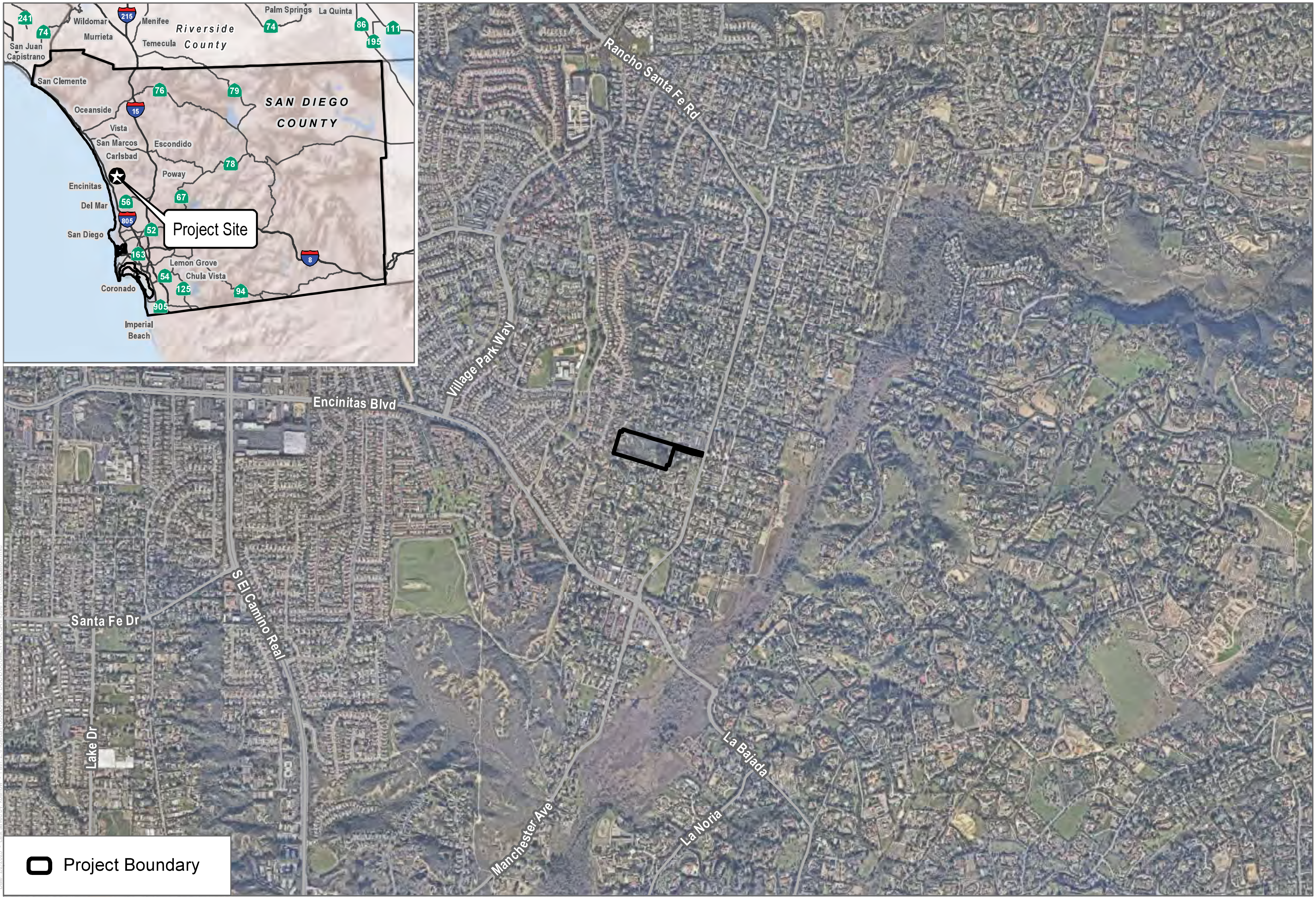
1.4 Project Design Features

The Project would implement construction-related and operational project design features (PDFs) intended to reduce emissions of criteria air pollutants and toxic air contaminants (TACs) as follows:

PDF-AQ-1: Standard construction practices would be employed to reduce fugitive dust emissions and include watering of the active sites and exposed surfaces up two times per day, depending on weather conditions; watering unpaved roads, and limiting vehicle speeds on unpaved roads. Construction of the Project would be subject to SDAPCD Rule 55 – Fugitive Dust Control. Compliance with Rule 55 would limit fugitive dust that may be generated during grading and construction activities.

PDF-AQ-2: The Project will provide temporary electricity to the project site during the building construction phases and prohibit the use of diesel-fueled/natural gas fueled generators during the building construction phases.

PDF-AQ-3: The Project will limit air compressors used during the architectural coating/painting phases to equipment that is electric-powered.



SOURCE: SanGIS 2019

0 1,000 2,000 Feet

FIGURE 1

Project Location

Encinitas Sanctuary Project

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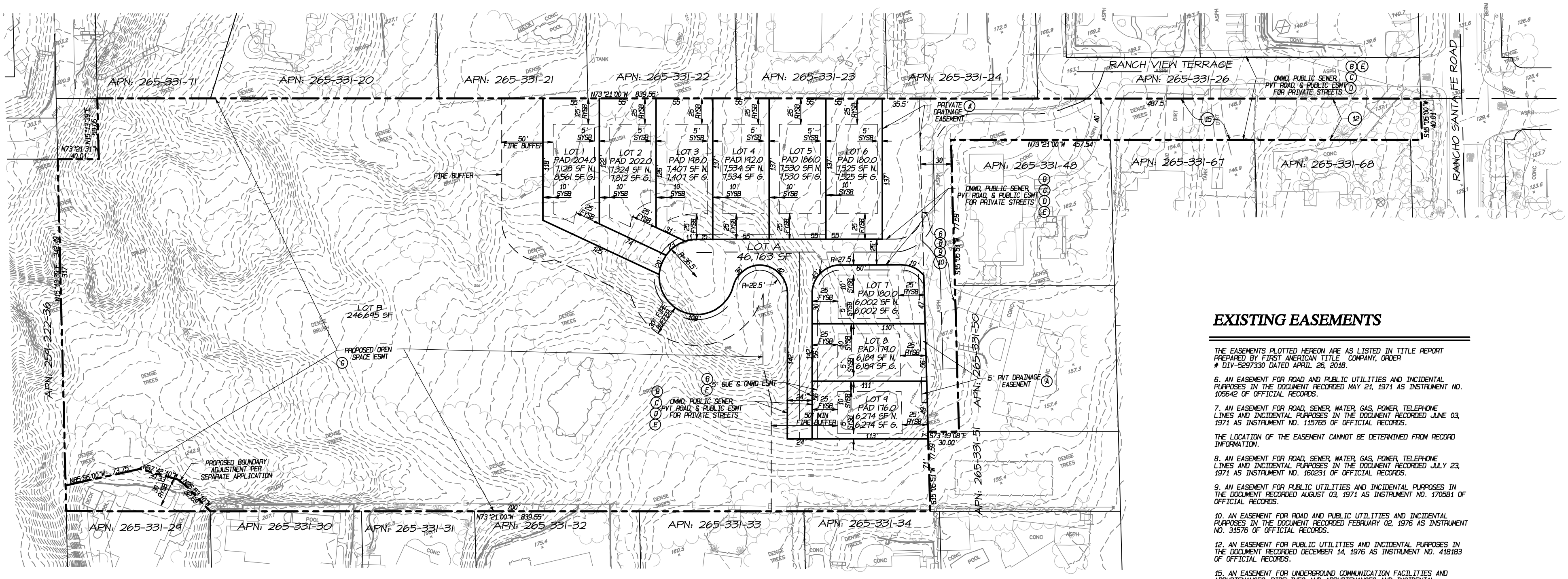

LOTS A & B MAY NOT BE FURTHER SUBDIVIDED.

LEGEND

SUBDIVISION BOUNDARY	
LOT LINE	
LOT NUMBER	LOT 4
LOT AREA	5,000 SF
PROPOSED SETBACKS	
CENTERLINE OF RIGHT-OF-WAY	

EXISTING EASEMENTS

THE EASEMENTS PLOTTED HEREON ARE AS LISTED IN TITLE REPORT PREPARED BY FIRST AMERICAN TITLE COMPANY, ORDER # DIV-5297330 DATED APRIL 26, 2018.

6. AN EASEMENT FOR ROAD AND PUBLIC UTILITIES AND INCIDENTAL PURPOSES IN THE DOCUMENT RECORDED MAY 21, 1971 AS INSTRUMENT NO. 105642 OF OFFICIAL RECORDS.

7. AN EASEMENT FOR ROAD, SEWER, WATER, GAS, POWER, TELEPHONE LINES AND INCIDENTAL PURPOSES IN THE DOCUMENT RECORDED JUNE 03, 1971 AS INSTRUMENT NO. 115765 OF OFFICIAL RECORDS.

THE LOCATION OF THE EASEMENT CANNOT BE DETERMINED FROM RECORD INFORMATION.

8. AN EASEMENT FOR ROAD, SEWER, WATER, GAS, POWER, TELEPHONE LINES AND INCIDENTAL PURPOSES IN THE DOCUMENT RECORDED JULY 23, 1971 AS INSTRUMENT NO. 160231 OF OFFICIAL RECORDS.

9. AN EASEMENT FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSES IN THE DOCUMENT RECORDED AUGUST 03, 1971 AS INSTRUMENT NO. 170581 OF OFFICIAL RECORDS.

10. AN EASEMENT FOR ROAD AND PUBLIC UTILITIES AND INCIDENTAL PURPOSES IN THE DOCUMENT RECORDED FEBRUARY 02, 1976 AS INSTRUMENT NO. 31576 OF OFFICIAL RECORDS.

12. AN EASEMENT FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSES IN THE DOCUMENT RECORDED DECEMBER 14, 1976 AS INSTRUMENT NO. 418183 OF OFFICIAL RECORDS.

15. AN EASEMENT FOR UNDERGROUND COMMUNICATION FACILITIES AND APPURTENANCES, PIPELINES AND APPURTENANCES AND INCIDENTAL PURPOSES IN THE DOCUMENT RECORDED MARCH 28, 2001 AS INSTRUMENT NO. 01-182048 OF OFFICIAL RECORDS.

PROPOSED EASEMENTS

- A PRIVATE DRAINAGE EASEMENT
- B OLIVENHAIN MUNICIPAL WATER DISTRICT EASEMENT
- C PUBLIC SEWER EASEMENT
- D PRIVATE ACCESS EASEMENT
- E PUBLIC EASEMENT FOR PRIVATE STREETS
- F GENERAL UTILITY EASEMENT
- G OPEN SPACE EASEMENT

SOURCE: Pasco Laret Suiter & Associates 2021

DUDEK

FIGURE 2

Site Plan

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2 Air Quality

2.1 Environmental Setting

2.1.1 Climate and Topography

The weather of the San Diego region, as in most of Southern California, is influenced by the Pacific Ocean and its semi-permanent high-pressure systems that result in dry, warm summers and mild, occasionally wet winters. The average temperature ranges (in degrees Fahrenheit) from the mid-40s to the high 90s. Most of the region's precipitation falls from November to April, with infrequent (approximately 10%) precipitation during the summer. The average seasonal precipitation along the coast is approximately 10 inches; the amount increases with elevation as moist air is lifted over the mountains (WRCC 2016).

The topography in the San Diego region varies greatly, from beaches on the west to mountains and desert on the east; along with local meteorology, it influences the dispersal and movement of pollutants in the basin. The mountains to the east prohibit dispersal of pollutants in that direction and help trap them in inversion layers.

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

2.1.2 San Diego Air Basin Climatology

The Project area is located within the San Diego Air Basin (SDAB) and is subject to the SDAPCD guidelines and regulations. The SDAB is one of 15 air basins that geographically divide the State of California. The SDAB is currently classified as a federal nonattainment area for ozone (O_3) and a state nonattainment area for particulate matter less than 10 microns (PM_{10}), particulate matter less than 2.5 microns ($PM_{2.5}$), and O_3.

The SDAB, which lies in the southwest corner of California and comprises the entire San Diego region, covers 4,260 square miles and is an area of high air pollution potential. The SDAB experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds.

The SDAB experiences frequent temperature inversions. Subsidence inversions occur during the warmer months as descending air associated with the Pacific High-Pressure Zone meets cool marine air. The boundary between the two layers of air creates a temperature inversion that traps pollutants. The other type of inversion, a radiation inversion, develops on winter nights when air near the ground cools by heat radiation and air aloft remains warm. The shallow inversion layer formed between these two air masses also can trap pollutants. As the pollutants become more concentrated in the atmosphere, photochemical reactions occur that produce O_3, which contributes to the formation of smog. Smog is a combination of smoke and other particulates, O_3, hydrocarbons, oxides of nitrogen (NO_x) and other chemically reactive compounds which, under certain conditions of weather and sunlight, may result in a murky brown haze that causes adverse health effects (CARB 2022a).

Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to carbon monoxide (CO) and NO_x emissions. CO concentrations are generally higher in the morning and late evening. In the morning, CO levels are elevated due to cold temperatures and the large number of motor vehicles traveling. Higher CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO is produced almost entirely from automobiles, the highest CO concentrations in the SDAB are associated with heavy traffic. Nitrogen dioxide (NO_2) levels are also generally higher during fall and winter days.

Under certain conditions, atmospheric oscillation results in the offshore transport of air from the Los Angeles region to San Diego County. This often produces high O_3 concentrations, as measured at air pollutant monitoring stations within San Diego County. The transport of air pollutants from Los Angeles to San Diego has also occurred within the stable layer of the elevated subsidence inversion, where high levels of O_3 are transported.

2.1.3 Sensitive Receptors

Air quality varies as a direct function of the amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions. Air quality problems arise when the rate of pollutant emissions exceeds the rate of dispersion.

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution, as identified by the California Air Resources Board (CARB), include children, older adults, and people with cardiovascular and chronic respiratory diseases. According to the SDAPCD, sensitive receptors are those who are especially susceptible to adverse health effects from exposure to toxic air contaminants, such as children, the elderly, and the ill. Sensitive receptors include residences, schools (grades Kindergarten through 12), libraries, day care centers, nursing homes, retirement homes, health clinics, and hospitals within 2 kilometers of the facility (SDAPCD 2022a). The closest sensitive receptors to the Project site are single-family residences immediately adjacent on the northern and eastern boundaries of the site.

2.1.4 Pollutants and Effects

2.1.4.1 Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal and state standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include O_3, NO_2, CO, sulfur dioxide (SO_2), PM_{10}, $PM_{2.5}$, and lead. These pollutants are discussed in the following paragraphs.[1] In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants.

Ozone (O_3). O_3 is a strong-smelling, pale blue, reactive, toxic chemical gas consisting of three oxygen atoms. It is a secondary pollutant formed in the atmosphere by a photochemical process involving the sun's energy and O_3

1 The following descriptions of health effects for each of the criteria air pollutants associated with project construction and operations are based on the U.S. Environmental Protection Agency's "Six Common Air Pollutants" (EPA 2017a) and the California Air Resources Board's "Glossary of Air Pollutant Terms" (CARB 2017) published information.

precursors. These precursors are mainly NO_x and VOCs. The maximum effects of precursor emissions on O_3 concentrations usually occur several hours after they are emitted and many miles from the source. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. O_3 exists in the upper atmosphere O_3 layer (stratospheric O_3) and at the Earth's surface in the troposphere.[2] The O_3 that the U.S. Environmental Protection Agency (EPA) and the CARB regulate as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. Ground-level O_3 is a harmful air pollutant that causes numerous adverse health effects and is thus considered "bad" O_3. Stratospheric, or "good," O_3 occurs naturally in the upper atmosphere, where it reduces the amount of ultraviolet light (i.e., solar radiation) entering the Earth's atmosphere. Without the protection of the beneficial stratospheric O_3 layer, plant and animal life would be seriously harmed.

O_3 in the troposphere causes numerous adverse health effects; short-term exposures (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes (EPA 2013).

Inhalation of O_3 causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms. Exposure to O_3 can reduce the volume of air that the lungs breathe in, thereby causing shortness of breath. O_3 in sufficient doses increases the permeability of lung cells, rendering them more susceptible to toxins and microorganisms. The occurrence and severity of health effects from O_3 exposure vary widely among individuals, even when the dose and the duration of exposure are the same. Research shows adults and children who spend more time outdoors participating in vigorous physical activities are at greater risk from the harmful health effects of O_3 exposure. While there are relatively few studies on the effects of O_3 on children, the available studies show that children are no more or less likely to suffer harmful effects than adults. However, there are a number of reasons why children may be more susceptible to O_3 and other pollutants. Children and teens spend nearly twice as much time outdoors and engaged in vigorous activities as adults. Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults. Also, children are less likely than adults to notice their own symptoms and avoid harmful exposures. Further research may be able to better distinguish between health effects in children and adults. Children, adolescents and adults who exercise or work outdoors, where O_3 concentrations are the highest, are at the greatest risk of harm from this pollutant (CARB 2023a).

Nitrogen Dioxide (NO_2). NO_2 is a brownish, highly reactive gas that is present in all urban atmospheres. The major mechanism for the formation of NO_2 in the atmosphere is the oxidation of the primary air pollutant nitric oxide (NO), which is a colorless, odorless gas. NO_x plays a major role, together with VOCs, in the atmospheric reactions that produce O_3. NO_x is formed from fuel combustion under high temperature or pressure. In addition, NO_x is an important precursor to acid rain and may affect both terrestrial and aquatic ecosystems. The two major emissions sources are transportation and stationary fuel combustion sources such as electric utility and industrial boilers.

NO_2 can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections (EPA 2016a). A large body of health science literature indicates that exposure to NO_2 can induce adverse health effects. The strongest health evidence, and the health basis for the ambient air quality standards for NO_2, results from controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics.

2 The troposphere is the layer of the Earth's atmosphere nearest to the surface of the Earth. The troposphere extends outward about 5 miles at the poles and about 10 miles at the equator.

In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses. Infants and children are particularly at risk because they have disproportionately higher exposure to NO_2 than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration. Several studies have shown that long-term NO_2 exposure during childhood, the period of rapid lung growth, can lead to smaller lungs at maturity in children with higher levels of exposure compared to children with lower exposure levels. In addition, children with asthma have a greater degree of airway responsiveness compared with adult asthmatics. In adults, the greatest risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease (CARB 2023b).

Carbon Monoxide (CO). CO is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon, or fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, such as the Project location, automobile exhaust accounts for the majority of CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions—primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November to February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent.

CO is harmful because it binds to hemoglobin in the blood, reducing the ability of blood to carry oxygen. This interferes with oxygen delivery to the body's organs. The most common effects of CO exposure are fatigue, headaches, confusion and reduced mental alertness, light-headedness, and dizziness due to inadequate oxygen delivery to the brain. For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress. Inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance. Unborn babies whose mothers experience high levels of CO exposure during pregnancy are at risk of adverse developmental effects. Unborn babies, infants, elderly people, and people with anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO (CARB 2023c).

Sulfur Dioxide (SO_2). SO_2 is a colorless, pungent gas formed primarily from incomplete combustion of sulfur-containing fossil fuels. The main sources of SO_2 are coal and oil used in power plants and industries; as such, the highest levels of SO_2 are generally found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels.

Controlled human exposure and epidemiological studies show that children and adults with asthma are more likely to experience adverse responses with SO_2 exposure, compared with the non-asthmatic population. Effects at levels near the 1-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath, and chest tightness, especially during exercise or physical activity. Also, exposure at elevated levels of SO_2 (above 1 parts per million [ppm]) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of mortality. Older people and people with cardiovascular disease or chronic lung disease (such as bronchitis or emphysema) are most likely to experience these adverse effects (CARB 2023d).

SO_2 is of concern both because it is a direct respiratory irritant and because it contributes to the formation of sulfate and sulfuric acid in particulate matter (NRC 2005). People with asthma are of particular concern, both because they have increased baseline airflow resistance and because their SO_2-induced increase in airflow resistance is greater than in healthy people, and it increases with the severity of their asthma (NRC 2005). SO_2 is thought to induce airway constriction via neural reflexes involving irritant receptors in the airways (NRC 2005).

Particulate Matter (PM). Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter. Coarse particulate matter (PM_{10}) consists of particulate matter that is 10 microns or less in diameter and is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. Fine particulate matter ($PM_{2.5}$) consists of particulate matter that is 2.5 microns or less in diameter and is roughly 1/28 the diameter of a human hair. $PM_{2.5}$ results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as sulfur oxides (SO_x), NO_x, and VOCs.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances such as lead, sulfates, and nitrates can cause lung damage directly or be absorbed into the blood stream, causing damage elsewhere in the body. Additionally, these substances can transport adsorbed gases such as chlorides or ammonium into the lungs, also causing injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissue. Suspended particulates also damage and discolor surfaces on which they settle and produce haze and reduce regional visibility.

A number of adverse health effects have been associated with exposure to both $PM_{2.5}$ and PM_{10}. For $PM_{2.5}$, short-term exposures (up to 24-hour duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases. In addition, of all of the common air pollutants, $PM_{2.5}$ is associated with the greatest proportion of adverse health effects related to air pollution, both in the United States and worldwide based on the World Health Organization's Global Burden of Disease Project. Short-term exposures to PM_{10} have been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits (CARB 2017).

Long-term exposure (months to years) to $PM_{2.5}$ has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children. The effects of long-term exposure to PM_{10} are less clear, although several studies suggest a link between long-term PM_{10} exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer (CARB 2017).

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

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

Volatile Organic Compounds (VOCs). Hydrocarbons are organic gases that are formed from hydrogen and carbon and sometimes other elements. Hydrocarbons that contribute to formation of O_3 are referred to and regulated as VOCs (also referred to as reactive organic gases). Combustion engine exhaust, oil refineries, and fossil-fueled power plants are the sources of hydrocarbons. Other sources of hydrocarbons include evaporation from petroleum fuels, solvents, dry-cleaning solutions, and paint.

The primary health effects of VOCs result from the formation of O_3 and its related health effects. High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. Carcinogenic forms of hydrocarbons, such as benzene, are considered TACs.

Sulfates. Sulfates are the fully oxidized form of sulfur, which typically occur in combination with metals or hydrogen ions. Sulfates are produced from reactions of SO_2 in the atmosphere and can result in respiratory impairment, as well as reduced visibility.

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

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

Visibility-Reducing Particles. Visibility-reducing particles are any particles in the air that obstruct the range of visibility. Effects of reduced visibility can include obscuring the viewshed of natural scenery, reducing airport safety, and discouraging tourism. Sources of visibility-reducing particles are the same as for $PM_{2.5}$.

2.1.4.2 Non-Criteria Pollutants

Toxic Air Contaminants (TACs). A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic noncancer health effects. A toxic substance released into the air is considered a TAC. TACs are identified by federal and state agencies based on a review of available scientific evidence. In the State of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. In addition, the California Air Toxics “Hot Spots” Information and Assessment Act, Assembly Bill (AB) 2588, was enacted by the legislature in 1987 to address public concern over the release of TACs into the atmosphere. The law requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hotspots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years.

Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources such as automobiles; and area sources such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

Diesel Particulate Matter (DPM). DPM is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More than 90% of DPM is less than 1 micrometer in diameter (about 1/70th the diameter of a human hair), and thus is a subset of $PM_{2.5}$ (CARB 2022b). DPM is typically composed of carbon particles (“soot,” also called black carbon) and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene (CARB 2022b). CARB classified “particulate emissions from diesel-fueled engines” (i.e., DPM) as a TAC in August 1998 (17 CCR 93000). DPM is emitted from a broad range of diesel engines: on-road diesel engines of trucks, buses, and cars and off-road diesel engines including locomotives, marine vessels, and heavy-duty construction equipment, among others. Approximately 70% of all airborne cancer risk in California is associated with DPM (CARB 2000). To reduce the cancer risk associated with DPM, CARB adopted a diesel risk reduction plan in 2000 (CARB 2000). Because it is part of $PM_{2.5}$, DPM also contributes to the same non-cancer health effects as $PM_{2.5}$ exposure. These effects include premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies (CARB 2022b). Those most vulnerable to non-cancer health effects are children whose lungs are still developing and the elderly who often have chronic health problems.

Odorous Compounds. Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person’s reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting and headache). The ability to detect odors varies considerably among the population and overall is quite subjective. People may have different reactions to the same odor. An odor that is offensive to one person may be perfectly acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. In a phenomenon known as odor fatigue, a person can become desensitized to almost any odor, and recognition may only occur with an alteration in the intensity. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors.

Valley Fever. Coccidioidomycosis, more commonly known as "Valley Fever," is an infection caused by inhalation of the spores of the *Coccidioides immitis* fungus, which grows in the soils of the southwestern United States. The fungus is very prevalent in the soils of California's San Joaquin Valley, particularly in Kern County. Kern County is considered a highly endemic county (i.e., more than 20 cases annually of Valley Fever per 100,000 people) based on the incidence rates reported through 2016 (California Department of Public Health 2017). The ecologic factors that appear to be most conducive to survival and replication of the spores are high summer temperatures, mild winters, sparse rainfall, and alkaline, sandy soils.

San Diego County (County) is not considered a highly endemic region for Valley Fever, as the latest report from the County of San Diego Health and Human Services Agency Public Health Services indicated the County has 8.3 cases per 100,000 people (County of San Diego 2019). In the zip code area of the Project site, the case rate is reported as 3.5 cases per 100,000 people (County of San Diego 2021).

2.2 Regulatory Setting

2.2.1 Federal

2.2.1.1 Criteria Pollutants

The federal Clean Air Act (CAA), passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The EPA is responsible for implementing most aspects of the CAA, including the setting of National Ambient Air Quality Standards (NAAQS) for major air pollutants, hazardous air pollutant (HAP) standards, approval of state attainment plans, motor vehicle emission standards, stationary source emission standards and permits, acid rain control measures, stratospheric O_3 protection, and enforcement provisions.

NAAQS are established by the EPA for "criteria pollutants" under the CAA, which are O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead. The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The CAA requires the EPA to reassess the NAAQS at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the NAAQS must prepare a state implementation plan (SIP) that demonstrates how those areas will attain the standards within mandated time frames.

2.2.1.2 Hazardous Air Pollutants

The 1977 CAA Amendments required the EPA to identify national emission standards for hazardous air pollutants to protect the public health and welfare. HAPs include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 CAA Amendments, which expanded the control program for HAPs, 189 substances and chemical families were identified as HAPs.

2.2.2 State

2.2.2.1 Criteria Pollutants

The California Clean Air Act was adopted in 1988 and establishes the state's air quality goals, planning mechanisms, regulatory strategies, and standards of progress. Under the California Clean Air Act, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB is responsible for ensuring implementation of the California Clean Air Act, responding to the federal CAA, and regulating emissions from motor vehicles and consumer products. Pursuant to the authority granted to it, CARB has established California Ambient Air Quality Standards (CAAQS), which are generally more restrictive than the NAAQS.

The NAAQS and CAAQS are presented in Table 1.

Table 1. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	Primary[c,d]	Secondary[c,e]
O_3	1 hour	0.09 ppm (180 μg/m³)	—	Same as primary standard[f]
	8 hours	0.070 ppm (137 μg/m³)	0.070 ppm (137 μg/m³)[f]	
NO_2[g]	1 hour	0.18 ppm (339 μg/m³)	0.100 ppm (188 μg/m³)	Same as primary standard
	Annual arithmetic mean	0.030 ppm (57 μg/m³)	0.053 ppm (100 μg/m³)	
CO	1 hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)	None
	8 hours	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)	
SO_2[h]	1 hour	0.25 ppm (655 μg/m³)	0.075 ppm (196 μg/m³)	—
	3 hours	—	—	0.5 ppm (1,300 μg/m³)
	24 hours	0.04 ppm (105 μg/m³)	0.14 ppm (for certain areas)[g]	—
	Annual	—	0.030 ppm (for certain areas)[g]	—
PM_{10}[i]	24 hours	50 μg/m³	150 μg/m³	Same as primary standard
	Annual arithmetic mean	20 μg/m³	—	
$PM_{2.5}$[i]	24 hours	—	35 μg/m³	Same as primary standard
	Annual arithmetic mean	12 μg/m³	12.0 μg/m³	15.0 μg/m³
Lead[j, k]	30-day average	1.5 μg/m³	—	—
	Calendar quarter	—	1.5 μg/m³ (for certain areas)[k]	Same as primary standard
	Rolling 3-month average	—	0.15 μg/m³	
Hydrogen sulfide	1 hour	0.03 ppm (42 μg/m³)	—	—
Vinyl chloride[j]	24 hours	0.01 ppm (26 μg/m³)	—	—
Sulfates	24- hours	25 μg/m³	—	—

Table 1. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	Primary[c,d]	Secondary[c,e]
Visibility reducing particles	8 hour (10:00 a.m. to 6:00 p.m. PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to the number of particles when the relative humidity is less than 70%	—	—

Source: CARB 2016.

Notes: O_3 = ozone; ppm = parts per million by volume; µg/m³ = micrograms per cubic meter; NO_2 = nitrogen dioxide; CO = carbon monoxide; mg/m³= milligrams per cubic meter; SO_2 = sulfur dioxide; PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns.

a California standards for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, suspended particulate matter (PM_{10}, $PM_{2.5}$), and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

b National standards (other than O_3, NO_2, SO_2, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once per year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than 1. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

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

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

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

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

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

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

i On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m³ were also retained. The form of the annual primary and secondary standards is the annual mean averaged over 3 years.

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

k The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

Ambient Air Quality Monitoring Data

SDAPCD operates a network of ambient air monitoring stations throughout the County, which measure ambient concentrations of pollutants and determine whether the ambient air quality meets the CAAQS and the NAAQS. SDAPCD monitors air quality conditions at 10 locations throughout the basin. The Camp Pendleton monitoring station represents the closest monitoring station to the Project site for concentrations for O_3, $PM_{2.5}$, and NO_2. The Escondido monitoring station is the closest monitoring station for CO. The closest monitoring station for SO_2 and PM_{10} is the El Cajon monitoring station. Ambient concentrations of pollutants from 2019 through 2021 are presented in Table 2.

Table 2. Local Ambient Air Quality Data

Monitoring Station	Unit	Averaging Time	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
					2019	2020	2021	2019	2020	2021
Ozone (O_3)										
Camp Pendleton	ppm	Maximum 1-hour concentration	State	0.09	0.075	0.094	0.074	0	0	0
	ppm	Maximum 8-hour concentration	State	0.070	0.065	0.074	0.059	0	3	0
			Federal	0.070	0.064	0.074	0.059	0	3	0
Nitrogen Dioxide (NO_2)										
Camp Pendleton	ppm	Maximum 1-hour concentration	State	0.18	0.053	0.058	0.059	*0*	*0*	*0*
			Federal	0.100	0.053	0.058	0.059	*0*	*0*	*0*
	ppm	Annual concentration	State	0.030	0.004	0.005	0.005	0	0	0
			Federal	0.053	0.004	0.005	0.005	0	0	0
Carbon Monoxide (CO)										
Escondido-Rancho Carmel Drive	ppm	Maximum 1-hour concentration	State	20	4.1	3.3	3.0	0	0	0
			Federal	35	4.1	3.3	3.0	0	0	0
	ppm	Maximum 8-hour concentration	State	9.0	2.5	1.7	1.8	0	0	0
			Federal	9	2.5	1.7	1.8	0	0	0
Sulfur Dioxide (SO_2)										
El Cajon	ppm	Maximum 1-hour concentration	Federal	0.075	0.001	0.002	0.002	0	0	0
	ppm	Maximum 24-hour concentration	State	0.04	0.000	0.000	0.000	0	0	0
			Federal	0.140	0.000	0.000	0.000	0	0	0

Table 2. Local Ambient Air Quality Data

Monitoring Station	Unit	Averaging Time	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
					2019	2020	2021	2019	2020	2021
	ppm	Annual concentration	Federal	0.030	0.000	0.000	0.000	0	0	0
Coarse Particulate Matter (PM_{10})[a]										
El Cajon	μg/ m³	Maximum 24-hour concentration	State	50	37.4	ND	ND	0	0	0
			Federal	150	38.7	ND	ND	0	0	0
	μg/ m³	Annual concentration	State	20	ND	ND	ND	ND	ND	ND
Fine Particulate Matter ($PM_{2.5}$)[a]										
Camp Pendleton	μg/ m³	Maximum 24-hour concentration	Federal	35	16.2	47.5	20.9	0	2	0
	μg/ m³	Annual concentration	State	12	ND	ND	ND	ND	ND	ND
			Federal	12.0	7.0	8.7	7.6	0	5.8	0

Sources: CARB 2022c; EPA 2022a.

Notes: ppm = parts per million; — = not available or applicable; μg/m³ = micrograms per cubic meter; ND = insufficient data available to determine the value.

Data taken from CARB iADAM (http://www.arb.ca.gov/adam) and EPA AirData (http://www.epa.gov/airdata/) represent the highest concentrations experienced over a given year.

Exceedances of federal and state standards are only shown for O_3 and particulate matter. Daily exceedances for particulate matter are estimated days because PM_{10} and $PM_{2.5}$ are not monitored daily. All other criteria pollutants did not exceed federal or state standards during the years shown. There is no federal standard for 1-hour O_3, annual PM_{10}, or 24-hour SO_2, nor is there a state 24-hour standard for $PM_{2.5}$.

The Camp Pendleton monitoring station is located at 21441-W B Street, Oceanside, California.

The Escondido monitoring station is located at 600 East Valley Pkwy, Escondido, California.

The El Cajon monitoring station is located at 10537 Floyd Smith Drive, El Cajon, California.

a Measurements of PM_{10} and $PM_{2.5}$ are usually collected every 6 days and every 1 to 3 days, respectively. Number of days exceeding the standards is a mathematical estimate of the number of days concentrations would have been greater than the level of the standard had each day been monitored. The numbers in parentheses are the measured number of samples that exceeded the standard.

SDAB Attainment Designation

Pursuant to the 1990 CAA Amendments, EPA classifies air basins (or portions thereof) as "attainment" or "nonattainment" for each criteria air pollutant, based on whether the NAAQS have been achieved. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as "attainment" for that pollutant. If an area exceeds the standard, the area is classified as "nonattainment" for that pollutant. As previously discussed, these standards are set by EPA or CARB for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated as "unclassified" or "unclassifiable."

The designation of "unclassifiable/attainment" means that the area meets the standard or is expected to be meet the standard despite a lack of monitoring data. Areas that achieve the standards after a nonattainment designation are redesignated as maintenance areas and must have approved maintenance plans to ensure continued attainment of the standards. The California Clean Air Act, like its federal counterpart, called for the designation of areas as "attainment" or "nonattainment," but based on the CAAQS rather than the NAAQS.

Table 3 summarizes SDAB's federal and state attainment designations for each of the criteria pollutants.

Table 3. SDAB Attainment Designation

Pollutant	Federal Designation	State Designation
O_3 (8-hour)	**Nonattainment**	**Nonattainment**
O_3 (1-hour)	Attainment[a]	**Nonattainment**
CO	Attainment	Attainment
PM_{10}	Unclassifiable[b]	**Nonattainment**
$PM_{2.5}$	Attainment	**Nonattainment**[c]
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(No federal standard)	Attainment
Hydrogen sulfide	(No federal standard)	Unclassified
Visibility-reducing particles	(No federal standard)	Unclassified
Vinyl chloride	(No federal standard)	No designation

Sources: SDAPCD 2022b

Definitions: attainment = meets the standards; nonattainment = does not meet the standards; unclassified or unclassifiable = insufficient data to classify

Notes: SDAB = San Diego; O_3 = ozone; CO = carbon monoxide; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide.

[a] The federal 1-hour standard of 0.12 parts per million (ppm) was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in SIPs.

[b] At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

[c] CARB has not reclassified the region to attainment yet due to (1) incomplete data, and (2) the use of non-California Approved Samplers (CAS). While data collected does meet the requirements for designation of attainment with federal $PM_{2.5}$ standards, the data completeness requirements for state $PM_{2.5}$ standards substantially exceed federal requirements and mandates, and have historically not been feasible for most air districts to adhere to given local resources. APCD has begun replacing most regional filter-based $PM_{2.5}$ monitors as they reach the end of their useful life with continuous $PM_{2.5}$ air monitors to ensure collected data meets stringent completeness requirements in the future. APCD anticipates these new monitors will be approved as "CAS" monitors once CARB review the list of approved monitors, which has not been updated since 2013.

2.2.2.2 Toxic Air Contaminants

The state Air Toxics Program was established in 1983 under AB 1807 (Tanner). The California TAC list identifies more than 700 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. In accordance with AB 2728, the state list includes the (federal) HAPs. The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588) seeks to identify and evaluate risk from air toxics sources; however, AB 2588 does not regulate air toxics emissions.

TAC emissions from individual facilities are quantified and prioritized. “High-priority” facilities are required to perform a health risk assessment (HRA), and if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

In 2000, CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines. The regulation was anticipated to result in an 80% decrease in statewide diesel health risk in 2020 compared with the diesel risk in 2000. Additional regulations apply to new trucks and diesel fuel, including the On-Road Heavy Duty Diesel Vehicle (In-Use) Regulation, the On-Road Heavy Duty (New) Vehicle Program, the In-Use Off-Road Diesel Vehicle Regulation, and the New Off-Road Compression-Ignition (Diesel) Engines and Equipment program. All of these regulations and programs have timetables by which manufacturers must comply and existing operators must upgrade their diesel powered equipment. Several Airborne Toxic Control Measures that reduce diesel emissions including In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449 et seq.) and In-Use On-Road Diesel-Fueled Vehicles (13 CCR 2025).

California Health and Safety Code Section 41700

Section 41700 of the Health and Safety Code states that a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. This section also applies to sources of objectionable odors.

2.2.3 Local

2.1.7.1 San Diego Air Pollution Control District

While CARB is responsible for the regulation of mobile emission sources within the state, local air quality management districts and air pollution control districts are responsible for enforcing standards and regulating stationary sources. The Project site is located within the SDAB and is subject to the guidelines and regulations of SDAPCD.

In San Diego County, O_3 and particulate matter are the pollutants of main concern, since exceedances of CAAQS for those pollutants are experienced here in most years. For this reason, the SDAB has been designated as a nonattainment area for the state PM_{10}, $PM_{2.5}$, and O_3 standards. The SDAB is also a federal O_3 attainment (maintenance) area for 1997 8-hour O_3 standard, a O_3 nonattainment area for the 2008 8-hour O_3 standard, and a CO maintenance area (western and central part of the SDAB only). The Project area is in the CO maintenance area.

2.1.7.2 Federal Attainment Plans

In November 2020, the SDAPCD adopted the Air Quality Management Plan for attaining the federal 8-hour 75 ppb and 70 ppb Ozone standards (2020 Attainment Plan), which is the air basin’s input to the State Implementation Plan (SIP) and required to demonstrate how the SDACPD proposes to attain the federal ozone standards. The plan anticipates attainment of the 75ppb and 70ppb NAAQS standards by 2026 and 2032, respectively. The 2020 Attainment Plan includes planning requirements for attaining the O_3 NAAQS including on-road motor vehicle emissions budgets for transportation conformity, a VMT offset demonstration, Reasonably Available Control

Measures (RACM), Reasonable Further Progress (RFP), an Attainment Demonstration, and contingency measures in the event of a failure to meet a milestone or to attain by the predicted attainment date (SDAPCD 2020).

2.1.7.3 State Attainment Plans

SDAPCD and SANDAG are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The RAQS for the SDAB was initially adopted in 1991 and is updated every 3 years, most recently in 2016 (SDAPCD 2016c). The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for O_3. The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County and the cities in the County, to forecast future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. The CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their general plans (SANDAG 2017a, 2017b).

SDAPCD released the 2022 Draft RAQS in November and is scheduled to adopt the final RAQS in early 2023. The RAQS seeks to protect public health and the environment by improving air quality. The 2022 update also complements regional actions addressing greenhouse gases and climate change.

In regard to particulate matter emissions reduction efforts, in December 2005, SDAPCD prepared a report titled "Measures to Reduce Particulate Matter in San Diego County" to address implementation of Senate Bill 656 in San Diego County (Senate Bill 656 required additional controls to reduce ambient concentrations of PM10 and PM2.5) (SDAPCD 2005). In the report, SDAPCD evaluated the implementation of source-control measures that would reduce particulate matter emissions associated with residential wood combustion; various construction activities including earthmoving, demolition, and grading; bulk material storage and handling; carryout and trackout removal and cleanup methods; inactive disturbed land; disturbed open areas; unpaved parking lots/staging areas; unpaved roads; and windblown dust (SDAPCD 2005).

2.1.7.4 SDAPCD Rules and Regulations

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

- **SDAPCD Regulation IV: Prohibitions; Rule 50: Visible Emissions.** Prohibits any activity causing air contaminant emissions darker than 20% opacity for more than an aggregate of 3 minutes in any consecutive 60-minute time period. In addition, Rule 50 prohibits any diesel pile-driving hammer activity causing air contaminant emissions for a period or periods aggregating more than 4 minutes during the driving of a single pile (SDAPCD 1997).
- **SDAPCD Regulation IV: Prohibitions; Rule 51: Nuisance.** Prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or have a tendency to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property (SDAPCD 1976).

- **SDAPCD Regulation IV: Prohibitions; Rule 55: Fugitive Dust.** Regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site (SDAPCD 2009b).
- **SDAPCD Regulation IV: Prohibitions; Rule 67.0.1: Architectural Coatings.** Requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (SDAPCD 2015).

2.3 Significance Criteria and Methodology

2.3.1 Thresholds of Significance

The State of California has developed guidelines to address the significance of air quality impacts based on Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.), which provides guidance that a project would have a significant environmental impact if it would:

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

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) indicates that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to determine whether a project would have a significant impact on air quality.

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) indicates that, where available, the significance criteria established by the applicable air quality management district or pollution control district may be relied upon to determine whether the project would have a significant impact on air quality. As discussed earlier, the SDAPCD has not developed thresholds of significance for air quality and health risk, however, the SDAPCD has provided emission levels under its permitting authority for new source review for which an AQIA is triggered. The County of San Diego has reviewed SDAPCD's trigger levels, as well as EPA rulemaking, and CEQA thresholds adopted by the SCAQMD to develop SLTs to assist lead agencies in determining the significance of project-level air quality impacts within the County. The City of Encinitas has chosen to apply the County of San Diego SLT's for determining mass daily criteria air pollutant thresholds of significance. Project related air quality impacts estimated in this environmental analysis would be considered significant if any of the applicable significance thresholds in Table 4 are exceeded.

For CEQA purposes, these screening criteria can be used as numeric methods to demonstrate that the Project's total emissions would or would not result in a significant impact to air quality.

Table 4. Air Quality Significance Thresholds

Construction Emissions			
Pollutant	Total Emissions (Pounds per Day)		
Coarse particulate matter (PM_{10})	100		
Fine particulate matter ($PM_{2.5}$)	55		
Oxides of nitrogen (NO_x)	250		
Sulfur oxides (SO_x)	250		
Carbon monoxide (CO)	550		
Volatile organic compounds (VOCs)	75[a]		
Operational Emissions			
Pollutant	Total Emissions		
	Pounds per Hour	Pounds per Day	Tons per Year
Coarse particulate matter (PM_{10})	—	100	15
Fine particulate matter ($PM_{2.5}$)	—	55	10
Oxides of nitrogen (NO_x)	25	250	40
Sulfur oxides (SO_x)	25	250	40
Carbon monoxide (CO)	100	550	100
Lead and lead compounds	—	3.2	0.6
Volatile organic compounds (VOCs)	—	75*	13.7

Source: SDAPCD 2016a.
Notes: SDAPCD = San Diego Air Pollution Control District.
a VOC threshold based on the threshold of significance for VOCs from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley as stated in the San Diego County Guidelines for Determining Significance.

The thresholds listed in Table 4 represent screening-level thresholds that can be used to evaluate whether Project-related emissions would cause a significant impact on air quality. Emissions below the screening-level thresholds would not cause a significant impact. In the event that emissions exceed these thresholds, modeling would be required to demonstrate that the Project's total air quality impacts result in ground-level concentrations that are below the CAAQS and NAAQS, including appropriate background levels. For non-attainment pollutants, if emissions exceed the thresholds shown in Table 4, the Project could have the potential to result in a cumulatively considerable net increase in these pollutants and thus could have a significant impact on the ambient air quality.

SDAPCD Rule 51 (Public Nuisance) prohibits emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person (SDAPCD 1976). A project that proposes a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors.

2.3.2 Approach and Methodology

2.3.2.1 Construction Mass Emissions

Emissions from the construction phase of Project components were estimated using the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.5[3]. The CalEEMod default construction schedule for this proposed land use was used in the analysis. The equipment mix assumptions were also based on CalEEMod default assumptions based on proposed land use and is meant to represent a reasonably conservative estimate of construction activity. For the analysis, it is generally assumed that heavy construction equipment would be operating at the site for a maximum of 8 hours per day, 5 days per week. Default assumptions provided in CalEEMod were used to determine worker trips and vendor truck trips for each potential construction phase. The default CalEEMod trip distance for construction vehicles was assumed, which was a one-way distance of 11.97 miles for worker trips, 7.63 miles for vendor truck trips, and 20 miles for haul truck trips. In addition, it was assumed that one on-site truck would be present during earthmoving activities to assist with fugitive dust control through watering.

It was assumed that construction of the Project would begin in January 2024 and would last approximately 13 months. The construction schedule used in the analysis represents a “worst-case” analysis scenario since emission factors for construction equipment decrease as the analysis year increases due to improvements in technology and more stringent regulatory requirements. The following represents the construction phasing assumed for the Project:

- Site Preparation: January 2024 (5 days)
- Grading: January 2024 (8 days)
- Building Construction: January 2024 to December 2024 (230 days)
- Paving: December 2024 (18 days)
- Architectural Coating: January 2025 (18 days)

Table 5 provides the construction equipment mix and vehicle trips assumed for estimating Project-generated construction emissions.

Table 5. Construction Scenario Assumptions

Construction Phase	Average Daily Vehicle Trips			Equipment		
	Worker Trips	Vendor Truck Trips	Truck Trips	Equipment Type	Quantity	Usage Hours
Site Preparation	18	2	0	Rubber Tired Dozers	3	8
				Tractors/Loaders/Backhoes	4	8
Grading	16	2	126	Excavators	1	8
				Graders	1	8
				Rubber Tired Dozers	1	8
				Tractors/Loaders/Backhoes	3	8
	18	2	0	Cranes	1	7

3 CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform to calculate construction and operational emissions from land use development projects. The model was developed for the California Air Pollution Control Officers Association in collaboration with multiple air districts across the state. Numerous lead agencies in the state, including SDAPCD, use CalEEMod to estimate GHG emissions in accordance with CEQA Guidelines Section 15064.4(a)(1).

Table 5. Construction Scenario Assumptions

Construction Phase	Average Daily Vehicle Trips			Equipment		
	Worker Trips	Vendor Truck Trips	Truck Trips	Equipment Type	Quantity	Usage Hours
Building Construction				Forklifts	3	8
				Generator Sets	1	8
				Tractors/Loaders/Backhoes	3	7
				Welders	1	8
Paving	20	0	0C	Cement and Mortar Mixers	2	6
				Pavers	1	8
				Paving Equipment	2	6
				Rollers	2	6
				Tractors/Loaders/Backhoes	1	8
Architectural Coating	10	2	0	Air Compressors	1	6

Note: See Appendix A for additional details.

Implementation of the Project would generate criteria air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, architectural coatings, and asphalt pavement application. Based on project specific information, approximately 12,500 cubic yards of soil will be cut and 4,500 cubic yards will be fill for a net export of 8,00 cubic yards. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. Construction of Project components would be subject to SDAPCD Rule 55 – Fugitive Dust Control. Compliance with Rule 55 would limit fugitive dust (PM_{10} and $PM_{2.5}$) that may be generated during grading and construction activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites two times per day, depending on weather conditions as indicated by PDF-AQ-1.

Internal combustion engines used by construction equipment, vendor trucks (i.e., delivery trucks), haul trucks, and worker vehicles would result in emissions of VOCs, NO_x, CO, PM_{10}, and $PM_{2.5}$. The application of architectural coatings, such as exterior application/interior paint and other finishes, and application of asphalt pavement would also produce VOC emissions; however, the contractor is required to procure architectural coatings from a supplier in compliance with the requirements of SDAPCD Rule 67.0.1 for Architectural Coatings. For additional details see Appendix A, *Air Quality Emissions CalEEMod Output Files*.

2.3.2.2 Construction Health Risk Analysis

An HRA was performed to assess the impact of construction on sensitive receptors proximate to the Project site. This report includes an HRA associated with emissions from construction of the Project based on the methodologies prescribed in the Office of Environmental Health Hazard Assessment (OEHHA) document, Air Toxics Hot Spots Program Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments (OEHHA Guidelines) (OEHHA 2015). To implement the OEHHA Guidelines based on proposed project information, the SDAPCD has developed a three-tiered approach where each successive tier is progressively more refined, with fewer conservative assumptions. The SDAPCD document, Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments (SDAPCD 2022), provides guidance with which to perform HRAs within the SDAB.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SDAPCD recommends a carcinogenic (cancer) risk threshold of 10 in one million. Additionally, some TACs increase non-cancer health risk due to long-term (chronic) exposures. The Chronic Hazard Index is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system. The SDAPCD recommends a Chronic Hazard Index significance threshold of one (project increment). The exhaust from diesel engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. DPM has established cancer risk factors and relative exposure values for long-term chronic health hazard impacts. No short-term, acute relative exposure level has been established for DPM; therefore, acute impacts of DPM are not addressed in this assessment.

The HRA for the Project evaluated the risk to existing off-site residents from diesel emissions from exhaust from on-site construction equipment and diesel haul and vendor trucks.

The dispersion modeling of DPM was performed using the American Meteorological Society/EPA Regulatory Model (AERMOD), which is the model SDAPCD requires for atmospheric dispersion of emissions. AERMOD is a steady-state Gaussian plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of surface and elevated sources, building downwash, and simple and complex terrain (EPA 2021). For the Project, AERMOD was run with all sources emitting unit emissions (one gram per second) to obtain the “X/Q” values. X/Q is a dispersion factor that is the average effluent concentration normalized by source strength and is used as a way to simplify the representation of emissions from many sources. The X/Q values of ground-level concentrations were determined for construction emissions using AERMOD and the maximum concentrations determined for the one-hour and period-averaging periods. Principal parameters of this modeling are presented in Table 6.

Table 6. AERMOD Principal Parameters

Parameter	Details
Meteorological Data	The latest three-year meteorological data (2019-2021) for the McClellan-Palomar Airport Station were obtained from SDAPCD as the recommended meteorological station and input to AERMOD.
Urban versus Rural Option	Urban areas typically have more surface roughness, as well as structures and low-albedo surfaces that absorb more sunlight—and thus more heat—relative to rural areas. Per the SDAPCD guidelines, the land use procedure from 4.4.1 of the OEHHA Guidance Manual indicated that urban dispersion was appropriate for the project site.
Terrain Characteristics	The elevation of the modeled site is 92 meters above sea level. Digital elevation model files were imported into AERMOD so that complex terrain features were evaluated as appropriate.
Elevation Data	Digital elevation data were imported into AERMOD, and elevations were assigned to the emission sources and receptors. Digital elevation data were obtained through AERMOD View in the U.S. Geological Survey’s National Elevation Dataset format with a 10-meter resolution.

Table 6. AERMOD Principal Parameters

Parameter	Details
Emission Sources and Release Parameters	Air dispersion modeling of DPM from construction equipment was conducted using emissions estimated using CalEEMod, assuming emissions would occur eight hours per day, five days per week. Vendor and hauling trips were modified to account only for emissions occurring within 1,320 ft of the project site. The Project area was modeled as a series of adjacent line-volume sources. The line of adjacent volume sources was assumed to have a release height of 5 meters, a plume height of 10 meters, and a plume width of 10 meters (SCAQMD 2008).
Receptors	The HRA evaluates the risk to existing off-site and future on-site sensitive receptors located in proximity to the Project Site. For the off-site receptors, a uniform fine 1.0 by 1.0-kilometer (0.62- by 0.62-mile) Cartesian grid with 20-meter (66-foot) spacing was centered over the Project Site and converted into discrete receptors to capture the maximum point of impact.

Notes: AERMOD = American Meteorological Society/EPA Regulatory Model; SDAPCD = San Diego Air Pollution Control District; DPM = diesel particulate matter; CalEEMod = California Emissions Estimator Model.
See Appendix B for additional information.

Dispersion model plot files from AERMOD were then imported into CARB's Hotspots Analysis and Reporting Program Version 2 (Version 222118) to determine health risk, which requires peak one-hour emission rates and annual emission rates for all pollutants for each modeling source. For the offsite residential health risk, the HRA assumes exposure would start in the third trimester of pregnancy for a duration of 13 months. A construction HRA CalEEMod run was performed to estimate on-site emissions of exhaust PM_{10}, which was used as a surrogate for DPM.[4] The predominant source of construction exhaust PM_{10} is operation of off-road diesel construction equipment. However, it was conservatively assumed that emissions from heavy-duty haul and vendor trucks, which could be diesel- or gasoline-fueled, traveling 0.25 miles would occur on site to represent potential on-site travel and nearby local off-site travel. Total exhaust PM_{10} emissions from CalEEMod were averaged over the Project's construction duration to estimate the annual and hourly exposure, which were estimated to be 122.08 pounds per year and 0.06 pounds per hour of DPM.

2.3.2.3 Operation

Operation of the proposed Project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from area sources, energy sources and mobile sources, which are discussed below. Emissions from these sources were estimated based on CalEEMod default assumptions for operations of the Project land uses. It was assumed that the project would be fully operational following the completion of construction, which would occur in 2025.

Area

The area source category calculates direct sources of air pollutant emissions located at the Project site, including consumer product use, architectural coatings, and landscape maintenance equipment. CalEEMod defaults were used to estimate emissions from area sources during operation of the Project. Other area sources include fireplaces

4 Under California regulatory guidelines, DPM is used as a surrogate measure of carcinogen exposure for the mixture of chemicals that make up diesel exhaust as a whole. The California Environmental Protection Agency has concluded that "potential cancer risk from inhalation exposure to whole diesel exhaust will outweigh the multi-pathway cancer risk from the speciated components" (OEHHA 2003).

and wood stoves, which may be included in the Project. CalEEMod defaults were used to estimate fireplace and wood stove emissions.

Consumer products are various solvents used in non-industrial applications which emit VOCs during their product use. These typically include cleaning supplies, kitchen aerosols, cosmetics and toiletries. Consumer product VOC emissions are estimated in CalEEMod based on the floor area of residential and nonresidential buildings and on the default factor of pounds of VOC per building square foot per day. For parking lot land uses, CalEEMod estimates VOC emissions associated with use of parking surface degreasers based on a square footage of parking surface area and pounds of VOC per square foot per day. The CalEEMod default utilization rates and emission factors were assumed.

This VOC emissions associated with the reapplication rate and coating for each building surface type and parking surface was also estimated using CalEEMod. The reapplication rate is the percentage of the total surface area that is repainted each year. A default of 10% is used, meaning that 10% of the surface area is repainted each year (i.e., all surface areas are repainted once every 10 years). Daily emissions divide the annual rate by 365 days per year. It was assumed that the Project would comply with SDAPCD Rule 67.0.1 for Architectural Coatings.

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chainsaws, and hedge trimmers, as well as air compressors, generators, and pumps. The emissions associated from landscape equipment use were estimated using CalEEMod. The emission factors are multiplied by the number of summer days that represent the number of operational days.

Energy

As represented in CalEEMod, energy sources include emissions associated with natural gas usage. Electricity use would contribute indirectly to criteria air pollutant emissions; however, the emissions from electricity use are only quantified for GHGs in CalEEMod, since criteria pollutant emissions occur at the site of the power plant, which is typically off site. CalEEMod default values for energy consumption for each land use were applied for the Project analysis. The energy use from residential land uses is calculated in CalEEMod based on the Residential Appliance Saturation Survey.

Mobile Sources (Motor Vehicles)

Following the completion of construction activities, the Project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources (vehicular traffic) as a result of the 9 additional residential units. The CalEEMod Version 2022.1.1.5 was used to estimate daily emissions from proposed vehicular sources in combination with trip rates provided by the applicant (9 trips per dwelling unit per day). CalEEMod default data, including trip characteristics, variable start information, emissions factors, and trip distances, were used for the model inputs. Emission factors representing the vehicle mix and emissions for 2025 were used to estimate emissions associated with vehicular sources. For additional details see Appendix A, *Air Quality CalEEMod Output Files*.

2.4 Impact Analysis

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

2.4.1.1 Analysis

As stated in Section 2.2.3, Local, SDAPCD and SANDAG are responsible for developing and implementing the clean air plans for attainment and maintenance of the NAAQS and CAAQS in the SDAB; specifically, the SIP and RAQS.[5] The federal O_3 maintenance plan, which is part of the SIP, was last updated in 2020. The SIP includes a demonstration that current strategies and tactics will maintain acceptable air quality in the SDAB based on the NAAQS. The RAQS was initially adopted in 1991 and is updated every 3 years (most recently in 2016). The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for O_3. The SIP and RAQS rely on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the County as part of the development of their general plans. The Draft 2022 RAQS was released in November 2022 and continues to build upon previous progress to reduce ground-level ozone, but also complements regional actions addressing greenhouse gases and climate change.

If a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might conflict with the SIP and RAQS and may contribute to a potentially significant cumulative impact on air quality.

The City of Encinitas General Plan identifies the site as Rural Residential 1.01-2.00 dwelling units/acre and the project site is zoned Rural Residential 2 (RR2). The Project would be consistent with the existing land use designation and zoning.

SANDAG produces a Regional Growth Forecast, which is important for developing regional plans and strategies mandated by federal and state governments such as the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), the Program Environmental Impact Report (EIR) for the RTP/SCS, the Air Quality Management Plan, the Federal Transportation Improvement Program, and the Regional Housing Needs Assessment (RHNA). The most recent RTP/SCS was adopted in December 2021 with a planning horizon of 2016 through 2050. The growth forecasts are appended to the RTP/SCS. Appendix F of the 2021 Regional Plan describes the trends in population, housing, and employment. The San Diego region is expected to grow by nearly 437,000 people and the growth in population will add about 440,000 jobs and more than 280,000 housing units (SANDAG 2021).

The forecast process includes two main phases. The first phase of the forecast is produced using California Department of Finance (DOF) population projections and rates developed by SANDAG based on historic economic and demographic trends. The size and makeup of the working age population in the region and high labor force participation is used to project future job growth. The projected higher values in working age population, coupled

5 For the purpose of this discussion, the relevant federal air quality plan is the O_3 maintenance plan (SDAPCD 2016b). The RAQS is the applicable plan for purposes of state air quality planning. Both plans reflect growth projections in the SDAB.

with older residents staying in the labor force longer results in more jobs in the region by the end of the forecast period. Housing units and households in the region were forecasted based on rates developed from historical data as well as assumptions of housing unit development and household formation in the future. The second phase of the forecast allocates the forecasted growth down to the jurisdictions and smaller geographical areas. The subregional forecast distributes growth based on a variety of factors, including available capacity for housing and accessibility to jobs and transportation. SANDAG works with the region's 18 cities, the County of San Diego, and other agencies that manage land use to understand local land use plans, such as general plans, community plans, and specific plans, as well as constraints to development and already permitted projects to develop the subregional projections for housing and employment. Table 7 shows the population, housing units, and employment projections for the City and the San Diego region for the 2021 Regional Plan.

Table 7. Population, Housing, and Employment

Year	City of Encinitas			San Diego Region		
	Population	Housing Units	Employment	Population	Housing Units	Employment
2016	62,625	26,040	28,812	3,309,510	1,190,555	1,646,419
2025	63,476	26,750	29,264	3,470,848	1,288,216	1,761,747
2035	64,157	27,690	29,950	3,620,348	1,409,866	1,921,475
2050	64,591	27,690	30,753	3,746,073	1,471,299	2,086,318
Change in Number (2016-2050)	1,966 (3.1%)	1,650 (6.3%)	1,941 (6.7%)	436,563 (14.2%)	280,744 (23.6%)	439,899 (26.7%)

Source: SANDAG Regional Plan 2021, Appendix F: Regional Growth Forecast and Sustainable Communities Strategy Land Use Pattern

The Project would add 9 residential units with an estimated population of 25 residents. The added residents would represent approximately 1% of the anticipated population growth and 0.5% of the housing growth over the RTP/SCS planning horizon. Based on the above information, the increase in population and housing units would be well within the growth projections. Therefore, the Project would not conflict with SANDAG's regional growth forecast for the City.

2.4.1.2 Conclusion

The increase in the housing units and associated vehicle source emissions is not anticipated to result in air quality impacts that were not envisioned in the growth projections and RAQS, and the increase in residential units in the region would not obstruct or impede implementation of local air quality plans. Based on the analysis above, implementation of the Project would not result in development in excess of that anticipated in local plans or increases in population/housing growth beyond those contemplated by SANDAG. As such, vehicle trip generation and planned development for the Project are considered to be anticipated in the SIP and RAQS. Because the proposed land uses and associated vehicle trips are anticipated in local air quality plans, the Project would be consistent at a regional level with the underlying growth forecasts in the RAQS. Impacts would be **less than significant.**

2.4.2 Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and SDAPCD develops and implements plans for future attainment of the NAAQS and CAAQS. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether the Project's individual emissions would have a cumulatively significant impact on air quality.

2.4.2.1 Construction

Construction of the proposed Project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (vendor and haul truck trips, and worker vehicle trips). Construction emissions can vary substantially day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions.

Criteria air pollutant emissions associated with construction activities were quantified using CalEEMod. Default values provided by the program were used where detailed Project information was not available. A detailed depiction of the construction schedule—including information regarding phasing, equipment used during each phase, haul trucks, vendor trucks, and worker vehicles—is included in Section 2.3.2. above.

Development of the Project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, asphalt pavement application, and architectural coatings. As described previously, fugitive dust would be limited through compliance with SDAPCD Rule 55, which requires the restriction of visible emissions of fugitive dust beyond the property line. This measure is incorporated into the project PDF-AQ-1.

Table 8 shows the estimated maximum unmitigated daily construction emissions associated with the construction phases of the Project. Complete details of the emissions calculations are provided in Appendix A, *Air Quality CalEEMod Output Files*.

Table 8. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions

Construction Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
2024	3.72	36.2	33.8	0.09	9.78	5.49
2025	1.54	0.99	1.58	<0.01	0.13	0.05
Maximum	***3.72***	***36.2***	***33.8***	***0.09***	***9.78***	***5.49***
County threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter;
See Appendix A for complete results.
The values shown are the maximum summer or winter daily emissions results from CalEEMod and include fugitive dust mitigation pursuant to PDF AQ-1.)

As shown in Table 8, daily construction emissions for the Project would not exceed the County of San Diego's significance thresholds. Therefore, the Project would have a **less than significant impact** related to emissions of criteria air pollutant emissions during construction.

2.4.2.2 Operations

Operation of the proposed Project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources (vehicle trips), area sources (consumer products, landscape maintenance equipment), and energy sources. Criteria air pollutant emissions associated with long-term operations were quantified using CalEEMod. Project-generated mobile source emissions were estimated in CalEEMod based on project-specific trip rates. CalEEMod default values were used to estimate emissions fro.m the Project area and energy sources.

Table 9 presents the unmitigated maximum daily emissions associated with the operation of the Project in 2025 after all phases of construction have been completed. Complete details of the emissions calculations are provided in Appendix A, *Air Quality CalEEMod Output Files*. Emissions represent maximum of summer and winter. "Summer" emissions are representative of the conditions that may occur during the O_3 season (May 1 to October 31), and "winter" emissions are representative of the conditions that may occur during the balance of the year (November 1 to April 30).

Table 9. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Summer						
Mobile	0.38	0.28	2.87	0.01	0.23	0.04
Area	14.2	0.27	17.5	0.03	2.34	2.33
Energy	<0.01	0.06	0.03	<0.01	0.01	0.01
Total	14.6	0.62	20.4	0.04	2.58	2.38
County threshold	75	250	550	250	100	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Winter						
Mobile	0.38	0.31	2.70	0.01	0.23	0.04

Table 9. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Area	14.2	0.27	17.0	0.03	2.34	2.33
Energy	<0.01	0.06	0.03	<0.01	0.01	0.01
Total	***14.6***	***0.64***	***19.7***	***0.04***	***2.58***	***2.38***
County threshold	*75*	*250*	*550*	*250*	*100*	*55*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; <0.01 = reported value is less than 0.01.
See Appendix A for complete results.

As shown in Table 9, daily operational emissions for the Project would not exceed County of San Diego's significance thresholds for any criteria air pollutant. Therefore, the Project would result in a **less than significant impact** related to emissions of criteria air pollutant emissions during operation.

2.4.2.3 Conclusion

In analyzing cumulative impacts from a project, the analysis must specifically evaluate the project's contribution to the cumulative increase in pollutants for which the SDAB is designated as nonattainment for the CAAQS and NAAQS. If the project does not exceed thresholds and is determined to have less than significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality if the emissions from the project components, in combination with the emissions from other proposed or reasonably foreseeable future projects, are in excess of established thresholds. However, the project would only be considered to have a significant cumulative impact if its contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact).

Additionally, for the SDAB, the RAQS serves as the long-term regional air quality planning document for the purpose of assessing cumulative operational emissions within the basin to ensure the SDAB continues to make progress toward NAAQS and CAAQS attainment status. As such, cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to air quality if, in combination, they would conflict with or obstruct implementation of the RAQS. Similarly, individual projects that are inconsistent with the regional planning documents on which the RAQS is based would have the potential to result in cumulative impacts if they represent development beyond regional projections.

The SDAB has been designated as a federal nonattainment area for O_3 and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. PM_{10} and $PM_{2.5}$ emissions associated with construction generally result in near-field impacts. The nonattainment status is the result of cumulative emissions from all sources of these air pollutants and their precursors within the SDAB. As shown in Tables 8, the emissions of all criteria pollutants from the Project's construction would be below the significance levels. Construction would be short term, temporary in nature, and activities would be considered typical of a residential project. Once construction is completed, construction-related emissions would cease. As shown in Table 9, operational emissions generated by the Project would not result in emissions that exceed significance thresholds for any criteria air pollutant. As such, the Project would result in less than significant impacts to air quality.

Regarding long-term cumulative operational emissions in relation to consistency with local air quality plans, the SIP and RAQS serve as the primary air quality planning documents for the state and SDAB, respectively. The SIP and RAQS rely on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and by the County as part of the development of their general plans. Therefore, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the SIP and RAQS and would not be considered to result in cumulatively considerable impacts from operational emissions. As discussed in Section 2.4.1 of this report, the Project is consistent with the SANDAG growth projections. Thus, it would be consistent at a regional level with the underlying growth forecasts in the SIP and RAQS.

As a result, the Project would not result in a cumulatively considerable contribution to regional O_3 concentrations or other criteria pollutant emissions. Cumulative impacts for construction and operation would be **less than significant** for the Project.

2.4.3 Would the Project expose sensitive receptors to substantial pollutant concentrations?

2.4.3.1 Carbon Monoxide Hotspots

Mobile-source impacts occur on two basic scales of motion. Regionally, Project-related travel will add to regional trip generation and increase the vehicle miles traveled within the local airshed and the SDAB. Locally, Project traffic will be added to the City's roadway system. If such traffic occurs during periods of poor atmospheric ventilation, consists of a large number of vehicles "cold-started" and operating at pollution-inefficient speeds, and operates on roadways already crowded with non-Project traffic, there is a potential for the formation of microscale CO "hotspots" in the area immediately around points of congested traffic. Because of continued improvement in mobile emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the basin is steadily decreasing.

Projects contributing to adverse traffic impacts may result in the formation of CO hotspots. To verify that the Project would not cause or contribute to a violation of the CO standard, a screening evaluation of the potential for CO hotspots was conducted. The City does not have guidance regarding CO hotspots; as such, the County's CO hotspot screening guidance (County of San Diego 2007) was followed to determine whether the Project would require a site-specific hotspot analysis. Per guidance, any project that would place receptors within 500 feet of a signalized intersection operating at or below LOS E (peak-hour trips exceeding 3,000 trips) must conduct a "hotspot" analysis for CO. Likewise, projects that will cause road intersections to operate at or below a level of service (LOS) E (i.e., with intersection peak-hour trips exceeding 3,000) will also have to conduct a CO "hotspot" analysis. There are no signalized intersections within 500 feet of the project site. The Local Transportation Analysis prepared by LOS Engineering, Inc. determined that the Project would not result in any traffic effects relative to LOS under existing, existing plus project, cumulative, and cumulative plus project. Thus, the potential to cause a CO hotspot is less than significant.

Since the last update of the SDAPCD's guidance (2007), the County has evaluated the potential for the growth anticipated under the General Plan Update to result in CO "hot spots" throughout the County (County of San Diego 2009). To do this, the County reviewed the CO "hot spot" analysis conducted by the South Coast Air Quality Management District (SCAQMD) for their request to the USEPA for redesignation as a CO attainment area (SCAQMD

2003). In SCAQMD's analysis, they modeled the four most congested intersections identified in their basin (South Coast Air Basin [SCAB]), which included the following:

- **Long Beach Boulevard and Imperial Highway –** proximity to the Lynwood monitoring station, which consistently records the highest 8-hour CO concentrations in the SCAB each year.
- **Wilshire Boulevard and Veteran Avenue –** the most congested intersection in Los Angeles County, with an average daily traffic volume of 100,000 vehicles/day.
- **Highland Avenue and Sunset Boulevard –** one of the most congested intersections in the City of Los Angeles.
- **Century Boulevard and La Cienega Boulevard –** one of the most congested intersections in the City of Los Angeles.

The SCAQMD's analysis found that these intersections had an average 7.7 ppm 1-hour CO concentrations predicted by the models, which is only 38.5% of the 1-hour CO CAAQS of 20 ppm. Therefore, even the most congested intersections in SCAQMD's air basin would not experience a CO "hot spot".

The air quality monitoring station closest to the most congested intersection in Los Angeles County (Wilshire Boulevard/Veteran Avenue) is the VA Hospital, West Los Angeles Station (Site ID 060370113) located at Wilshire Boulevard and Sawtelle Boulevard, approximately 0.5 miles to the southwest. Ambient CO levels monitored at this representative monitoring station are outlined in Table 11 for the original analysis year (2002), and for the most recent year of available data (2021). As shown, there is noticeable improvement in background levels of CO since the SCAQMD's regional hotspot analysis.

Table 10. Ambient Carbon Monoxide Concentrations for SCAQMD's Most Congested Intersection

Year	CO Concentration (ppm)	
	Maximum 1-hour	Maximum 8-hour
2002	4.3	2.7
2021	1.5	1.0

Source: EPA 2022

For the County of San Diego, there are no roadways/segments identified as deficient facilities under the worst-case traffic scenario that have an ADT greater than the 100,000 that was anticipated for the most congested intersection analyzed by SCAQMD. The most congested intersection in the County is Campo Road/SR-94 between Jamacha Boulevard and Jamacha Road in Valle De Oro. According to Table 5.23 of the Traffic and Circulation Assessment: County of San Diego General Plan Update (Wilson and Company 2009), this intersection has an ADT of 79,200, which is only 79% of the most congested intersection in the SCAB.

Project-generated trips would only represent 0.1% of the most congested intersection in the SCAB, which were determined to not experience a CO "hot spot" according to SCAQMD's 2003 analysis.

In addition, the CO "hot spot" analysis performed by the SCAQMD included emissions for 1997 and 2002. Both running exhaust emission factors and idling emission factors predicted by the EMFAC model decreased from 1997 through 2002 as outlined in Table 11 below. This decrease in CO emission factors is indicative of a phase-out of older vehicles and increasingly strict emissions standards implemented by CARB. Emission factors for San Diego County from the EMFAC2007 Model, which were used in the General Plan Update analysis, indicated that running exhaust emissions of CO would be less than 6.708 g CO per mile in 2010. Continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion means that the potential for CO hotspots in the SDAB is likely to decrease.

Table 11. Carbon Monoxide Emission Factors Predicted by the EMFAC Model

Year	CO Emission Factors (grams CO/mile)	
	Running Exhaust	Idling Exhaust
1997	13.13	2.43
2002	7.98	1.30

Source: South Coast Air Quality Management District 2003

The County of San Diego concluded in the General Plan Update (2011) that because the most congested intersections in San Diego are less congested than those from the SCAB, and because emissions of CO would be lower than those used in the SCAQMD analysis, CO concentrations would be lower within San Diego County, and no CO "hot spots" are anticipated as was concluded in the SCAQMD analysis.

Given that proposed development will not result in traffic that exceeds traffic volumes considered in the General Plan Update analysis, coupled with the considerably low level of CO concentrations in the project area, and continued improvements in vehicle emissions, the Project is not anticipated to result in CO "hot spots". Consequently, implementation of the Project would not result in CO concentrations in excess of the health protective CAAQS or NAAQS, and as such, would not expose sensitive receptors to significant pollutant concentrations or health effects. Therefore, impacts related to sensitive receptor exposure to substantial CO concentrations would be less than significant, and no mitigation measures are required.

2.4.3.2 Toxic Air Contaminants

In addition to impacts from criteria pollutants, Project impacts may include emissions of pollutants identified by the state and federal government as TACs or HAPs. The greatest potential for TAC emissions during construction would be DPM emissions from heavy equipment operations and heavy-duty trucks, and the associated health impacts to sensitive receptors. Construction of the Project would occur over a period of 13 months and following completion of construction activities, Project-related TAC emissions would cease. The closest sensitive receptors to the Project site are single-family residences immediately adjacent on the northern and eastern boundaries of the site. As such, a construction health risk analysis was performed for the Project as discussed below.

Based on results from the HRA, the maximally exposed individual resident offsite would be located at the single-family residences to the east of the Project site and south of the new proposed private roadway. Table 12 summarizes the results of the HRA for Project construction, and detailed results are provided in Appendix B, *Health Risk Assessment Output Files*.

Table 12. Construction Activity Health Risk Assessment Results Prior to Mitigation

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Offsite				
Cancer Risk	Per Million	33.71	10.0	**Potentially Significant**
HIC	Not Applicable	0.04	1.0	Less than Significant

Source: Appendix B
Notes: CEQA = California Environmental Quality Act; HIC = Chronic Hazard Index.

The results of the HRA demonstrate that the TAC exposure from construction diesel exhaust emissions would result in cancer risk above the 10 in 1 million threshold and Chronic Hazard Index less than 1. Therefore, TAC emissions from construction of the Project would result in a **potentially significant** impact and thus mitigation is required. Mitigation Measure (**MM) AQ-1** would require the use of Tier 4 Interim or Equivalent (e.g. Tier 4 Final) for construction equipment greater than 80 horsepower. Table 13 shows the mitigated HRA results.

Table 13. Construction Activity Health Risk Assessment Results With Mitigation

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Offsite				
Cancer Risk	Per Million	7.78	10.0	Less than Significant
HIC	Not Applicable	<0.01	1.0	Less than Significant

Source: Appendix B
Notes: CEQA = California Environmental Quality Act; HIC = Chronic Hazard Index.

The results of the HRA as shown in Table 13 demonstrate that the TAC exposure from construction diesel exhaust emissions after implementation of mitigation would not result in cancer risk above the 10 in 1 million threshold and Chronic Hazard Index less than 1. Therefore, TAC emissions from construction of the Project would result in a **less than significant impact with mitigation.**

2.4.3.3 Health Effects of Criteria Air Pollutants

Construction and operation of the Project would not result in emissions that exceed SDAPCD's emission thresholds for any criteria air pollutants. The SDAPCD thresholds are based on the SDAB complying with the NAAQS and CAAQS which are protective of public health; therefore, no adverse effects to human health would result from the Project. The following provides a general discussion of criteria air pollutants and their health effects.

Regarding VOCs, some VOCs would be associated with motor vehicles and construction equipment, while others are associated with architectural coatings and asphalt off-gassing, the emissions of which would not result in exceedances of County of San Diego thresholds. Generally, the VOCs in architectural coatings and asphalt are of relatively low toxicity. Additionally, SDAPCD Rule 67.0.1 restricts the VOC content of coatings for both construction and operational applications.

In addition, VOCs and NO_x are precursors to O_3, for which the SDAB is designated as nonattainment with respect to the NAAQS and CAAQS (the SDAB is designated by EPA as an attainment area for the 1-hour O_3 NAAQS standard and 1997 8-hour NAAQS standard). The health effects associated with O_3, as discussed in Section 2.1.4, Criteria

Air Pollutants, are generally associated with reduced lung function. The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SDAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O_3 NAAQS and CAAQS tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative due to the lack of quantitative methods to assess this impact. Nonetheless, the VOC and NO_x emissions associated with Project construction could minimally contribute to regional O_3 concentrations and the associated health impacts. Due to the minimal contribution during construction and operation, as well as the existing good air quality in coastal San Diego areas, health impacts would be considered less than significant.

Regarding NO_2, which is a constituent of NO_x, construction of the Project would not contribute to exceedances of the NAAQS and CAAQS for NO_2 since NO_x emissions would be less than the applicable SDAPCD threshold. As described in Section 3.1, NO_2 health impacts are associated with respiratory irritation, which may be experienced by nearby receptors during the periods of heaviest use of off-road construction equipment. However, these operations would be relatively short term, and the off-road construction equipment would be operating on various portions of the site and would not be concentrated in one portion of the site at any one time. Construction of the Project would not require any stationary emission sources that would create substantial, localized NO_2 impacts.

As discussed earlier, $PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Similar to O_3, construction of the Project would not exceed thresholds for PM_{10} or $PM_{2.5}$ and would not contribute to exceedances of the NAAQS and CAAQS for particulate matter. Due to the minimal contribution of particulate matter during construction and operation, health impacts would be considered less than significant.

Based on the preceding considerations, health impacts from Project-related criteria air pollutant emissions would be considered **less than significant.**

2.4.3.4 Conclusion

The results of the HRA demonstrate that after implementation of **MM-AQ-1**, which requires use of Tier 4 equipment during construction for equipment greater than 80 horsepower, the TAC exposure from construction diesel exhaust emissions would not result in cancer risk above the 10 in 1 million threshold, nor a Chronic Hazard Index greater than 1.0. VOC and NO_x emissions, as described previously, would minimally contribute to regional O_3 concentrations and the associated health effects. In addition to O_3, NO_x emissions would not contribute to potential exceedances of the NAAQS and CAAQS for NO_2. As shown in Table 2, the existing NO_2 concentrations in the area are well below the NAAQS and CAAQS standards. Thus, it is not expected the Project's operational NO_x emissions would result in exceedances of the NO_2 standards or contribute to the associated health effects. CO tends to be a localized impact associated with congested intersections. The associated CO "hotspots" were discussed previously as a less than significant impact. Thus, the Project's CO emissions would not contribute to significant health effects associated with this pollutant. PM_{10} and $PM_{2.5}$ would not contribute to potential exceedances of the NAAQS and CAAQS for particulate matter and would not obstruct the SDAB from coming into attainment for these pollutants and would not contribute to significant health effects associated with particulates. Therefore, overall health impacts associated with criteria air pollutants would be considered **less than significant with mitigation**.

Mitigation Measure AQ-1 **Tier 4 Interim Construction Equipment.** Prior to the commencement of any construction activities, the applicant or its designee shall provide evidence to the City of Encinitas (City) that for off-road equipment with engines rated at 80 horsepower or greater, no construction equipment shall be used that is less than Tier 4 Interim or equivalent (e.g. Tier 4 Final or other technology that achieves equivalent particulate matter control). An exemption from these requirements may be granted by the City if the applicant documents that equipment with the required tier is not reasonably available and equivalent reductions in PM_{10} exhaust emissions are achieved from other construction equipment. The applicant shall be responsible for preparation of a new air quality assessment demonstrating that health risks are below significance thresholds of 10 in a million with the revised equipment mix. Before an exemption may be considered by the City, the applicant shall be required to demonstrate that three construction fleet owners/operators in the San Diego Region were contacted and that those owners/operators confirmed Tier 4 equipment could not be located within the San Diego region. The City shall review the exemption request and provide a determination within 10 business days from receipt of the request.

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

2.4.4.1 Construction

Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the Project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. Such odors are temporary and for the types of construction activities anticipated for Project components, would generally remain localized and occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be considered **less than significant.**

2.4.4.2 Operational

Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there are no quantitative or formulaic methodologies to determine if potential odors would have a significant impact. Examples of land uses and industrial operations that are commonly associated with odor complaints include agricultural uses, wastewater treatment plants, food processing facilities, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding facilities. In addition to the odor source, the distance between the sensitive receptor(s) and the odor source, as well as the local meteorological conditions, are considerations in the potential for a project to frequently expose the public to objectionable odors. Although localized air quality impacts are focused on potential impacts to sensitive receptors, such as residences and schools, other land uses where people may congregate (e.g., workplaces) or uses with the intent to attract people (e.g., restaurants and visitor-serving accommodations) should also be considered in the evaluation of potential odor nuisance impacts. The Project is a residential development, which is not expected to produce any nuisance odors; therefore, impacts related to odors caused by the Project would be **less than significant**.

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Appendix A
CalEEMod Outputs and Estimated Emissions

Encinitas Sanctuary Custom Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Encinitas Sanctuary
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.20
Precipitation (days)	21.2
Location	33.043938631219575, -117.23784188923133
County	San Diego
City	Encinitas
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6216
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric

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
Single Family Housing	9.00	Dwelling Unit	2.46	17,550	42,385	0.00	25.0	—
Other Asphalt Surfaces	0.97	Acre	0.97	0.00	0.00	0.00	—	—

City Park	0.12	Acre	0.12	0.00	0.00	0.00	—	—
Other Non-Asphalt Surfaces	1.07	Acre	1.07	0.00	0.00	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-10-A	Water Exposed Surfaces
Construction	C-10-C	Water Unpaved Construction Roads
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads
Construction	C-13	Use Low-VOC Paints for Construction
Area Sources	AS-2	Use Low-VOC Paints

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.52	1.28	11.4	14.0	0.02	0.50	0.17	0.66	0.46	0.04	0.50	—	2,623	2,623	0.11	0.03	0.83	2,636
Mit.	1.52	1.28	11.4	14.0	0.02	0.50	0.17	0.66	0.46	0.04	0.50	—	2,623	2,623	0.11	0.03	0.83	2,636
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.43	7.65	36.2	33.8	0.09	1.60	21.2	22.8	1.47	10.3	11.8	—	12,412	12,412	0.63	1.52	0.53	12,881
Mit.	4.43	3.72	36.2	33.8	0.09	1.60	8.18	9.78	1.47	4.01	5.49	—	12,412	12,412	0.63	1.52	0.53	12,881

% Reduced	—	51%	—	—	—	—	61%	57%	—	61%	53%	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.14	0.95	8.69	10.3	0.02	0.37	0.64	1.02	0.34	0.26	0.60	—	2,073	2,073	0.09	0.06	0.44	2,093
Mit.	1.14	0.95	8.69	10.3	0.02	0.37	0.35	0.72	0.34	0.13	0.47	—	2,073	2,073	0.09	0.06	0.44	2,093
% Reduced	—	—	—	—	—	—	46%	29%	—	51%	22%	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.21	0.17	1.59	1.87	< 0.005	0.07	0.12	0.19	0.06	0.05	0.11	—	343	343	0.01	0.01	0.07	346
Mit.	0.21	0.17	1.59	1.87	< 0.005	0.07	0.06	0.13	0.06	0.02	0.09	—	343	343	0.01	0.01	0.07	346
% Reduced	—	—	—	—	—	—	46%	29%	—	51%	22%	—	—	—	—	—	—	—
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	250	550	250	—	—	100	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	250	550	250	—	—	100	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	40.0	40.0	100	40.0	—	—	15.0	—	—	15.0	—	—	—	—	—	—	—

Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	1.52	1.28	11.4	14.0	0.02	0.50	0.17	0.66	0.46	0.04	0.50	—	2,623	2,623	0.11	0.03	0.83	2,636
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	4.43	3.72	36.2	33.8	0.09	1.60	21.2	22.8	1.47	10.3	11.8	—	12,412	12,412	0.63	1.52	0.53	12,881
2025	0.20	7.65	0.99	1.58	< 0.005	0.03	0.10	0.13	0.03	0.02	0.05	—	273	273	0.01	0.01	0.01	277
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	1.14	0.95	8.69	10.3	0.02	0.37	0.64	1.02	0.34	0.26	0.60	—	2,073	2,073	0.09	0.06	0.44	2,093
2025	0.01	0.38	0.05	0.08	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	13.5	13.5	< 0.005	< 0.005	0.01	13.7
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.21	0.17	1.59	1.87	< 0.005	0.07	0.12	0.19	0.06	0.05	0.11	—	343	343	0.01	0.01	0.07	346
2025	< 0.005	0.07	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.24	2.24	< 0.005	< 0.005	< 0.005	2.27

2.3. Construction Emissions by Year, Mitigated

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

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

2024	1.52	1.28	11.4	14.0	0.02	0.50	0.17	0.66	0.46	0.04	0.50	—	2,623	2,623	0.11	0.03	0.83	2,636
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	4.43	3.72	36.2	33.8	0.09	1.60	8.18	9.78	1.47	4.01	5.49	—	12,412	12,412	0.63	1.52	0.53	12,881
2025	0.20	1.54	0.99	1.58	< 0.005	0.03	0.10	0.13	0.03	0.02	0.05	—	273	273	0.01	0.01	0.01	277
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	1.14	0.95	8.69	10.3	0.02	0.37	0.35	0.72	0.34	0.13	0.47	—	2,073	2,073	0.09	0.06	0.44	2,093
2025	0.01	0.08	0.05	0.08	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	13.5	13.5	< 0.005	< 0.005	0.01	13.7
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.21	0.17	1.59	1.87	< 0.005	0.07	0.06	0.13	0.06	0.02	0.09	—	343	343	0.01	0.01	0.07	346
2025	< 0.005	0.01	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.24	2.24	< 0.005	< 0.005	< 0.005	2.27

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	14.5	14.6	0.62	20.4	0.04	2.35	0.22	2.58	2.34	0.04	2.38	254	964	1,218	0.66	0.05	2.63	1,251
Mit.	14.5	14.6	0.62	20.4	0.04	2.35	0.22	2.58	2.34	0.04	2.38	254	964	1,218	0.66	0.05	2.63	1,251
% Reduced	—	< 0.5%	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	14.4	14.6	0.64	19.7	0.04	2.35	0.22	2.58	2.34	0.04	2.38	254	932	1,186	0.66	0.05	0.19	1,217
Mit.	14.4	14.5	0.64	19.7	0.04	2.35	0.22	2.58	2.34	0.04	2.38	254	932	1,186	0.66	0.05	0.19	1,217

% Reduced	—	< 0.5%	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.58	3.91	0.43	6.80	0.01	0.54	0.22	0.76	0.53	0.04	0.57	60.0	857	917	0.48	0.03	1.21	940
Mit.	3.58	3.88	0.43	6.80	0.01	0.54	0.22	0.76	0.53	0.04	0.57	60.0	857	917	0.48	0.03	1.21	940
% Reduced	—	1%	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.65	0.71	0.08	1.24	< 0.005	0.10	0.04	0.14	0.10	0.01	0.10	9.93	142	152	0.08	0.01	0.20	156
Mit.	0.65	0.71	0.08	1.24	< 0.005	0.10	0.04	0.14	0.10	0.01	0.10	9.93	142	152	0.08	0.01	0.20	156
% Reduced	—	1%	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	250	550	250	—	—	100	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	250	550	250	—	—	100	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	40.0	40.0	100	40.0	—	—	15.0	—	—	15.0	—	—	—	—	—	—	—

Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.42	0.38	0.28	2.87	0.01	0.01	0.22	0.23	< 0.005	0.04	0.04	—	685	685	0.03	0.03	2.51	696
Area	14.1	14.2	0.27	17.5	0.03	2.34	—	2.34	2.33	—	2.33	250	106	356	0.23	0.02	—	367
Energy	0.01	< 0.005	0.06	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	164	164	0.01	< 0.005	—	165
Water	—	—	—	—	—	—	—	—	—	—	—	0.61	9.26	9.87	0.06	< 0.005	—	11.9
Waste	—	—	—	—	—	—	—	—	—	—	—	3.20	0.00	3.20	0.32	0.00	—	11.2
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.13	0.13
Total	14.5	14.6	0.62	20.4	0.04	2.35	0.22	2.58	2.34	0.04	2.38	254	964	1,218	0.66	0.05	2.63	1,251
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.41	0.38	0.31	2.70	0.01	0.01	0.22	0.23	< 0.005	0.04	0.04	—	655	655	0.03	0.03	0.06	664
Area	14.0	14.2	0.27	17.0	0.03	2.34	—	2.34	2.33	—	2.33	250	104	354	0.23	0.02	—	365
Energy	0.01	< 0.005	0.06	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	164	164	0.01	< 0.005	—	165
Water	—	—	—	—	—	—	—	—	—	—	—	0.61	9.26	9.87	0.06	< 0.005	—	11.9
Waste	—	—	—	—	—	—	—	—	—	—	—	3.20	0.00	3.20	0.32	0.00	—	11.2
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.13	0.13
Total	14.4	14.6	0.64	19.7	0.04	2.35	0.22	2.58	2.34	0.04	2.38	254	932	1,186	0.66	0.05	0.19	1,217
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.41	0.37	0.30	2.70	0.01	0.01	0.22	0.23	< 0.005	0.04	0.04	—	659	659	0.03	0.03	1.08	670

Area	3.17	3.54	0.06	4.07	0.01	0.53	—	0.53	0.52	—	0.52	56.2	24.1	80.2	0.05	< 0.005	—	82.7
Energy	0.01	< 0.005	0.06	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	164	164	0.01	< 0.005	—	165
Water	—	—	—	—	—	—	—	—	—	—	—	0.61	9.26	9.87	0.06	< 0.005	—	11.9
Waste	—	—	—	—	—	—	—	—	—	—	—	3.20	0.00	3.20	0.32	0.00	—	11.2
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.13	0.13
Total	3.58	3.91	0.43	6.80	0.01	0.54	0.22	0.76	0.53	0.04	0.57	60.0	857	917	0.48	0.03	1.21	940
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.07	0.07	0.06	0.49	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	109	109	0.01	< 0.005	0.18	111
Area	0.58	0.65	0.01	0.74	< 0.005	0.10	—	0.10	0.10	—	0.10	9.30	3.99	13.3	0.01	< 0.005	—	13.7
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	27.2	27.2	< 0.005	< 0.005	—	27.2
Water	—	—	—	—	—	—	—	—	—	—	—	0.10	1.53	1.63	0.01	< 0.005	—	1.97
Waste	—	—	—	—	—	—	—	—	—	—	—	0.53	0.00	0.53	0.05	0.00	—	1.85
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02
Total	0.65	0.71	0.08	1.24	< 0.005	0.10	0.04	0.14	0.10	0.01	0.10	9.93	142	152	0.08	0.01	0.20	156

2.6. Operations Emissions by Sector, Mitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.42	0.38	0.28	2.87	0.01	0.01	0.22	0.23	< 0.005	0.04	0.04	—	685	685	0.03	0.03	2.51	696
Area	14.1	14.2	0.27	17.5	0.03	2.34	—	2.34	2.33	—	2.33	250	106	356	0.23	0.02	—	367
Energy	0.01	< 0.005	0.06	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	164	164	0.01	< 0.005	—	165
Water	—	—	—	—	—	—	—	—	—	—	—	0.61	9.26	9.87	0.06	< 0.005	—	11.9
Waste	—	—	—	—	—	—	—	—	—	—	—	3.20	0.00	3.20	0.32	0.00	—	11.2
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.13	0.13
Total	14.5	14.6	0.62	20.4	0.04	2.35	0.22	2.58	2.34	0.04	2.38	254	964	1,218	0.66	0.05	2.63	1,251

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.41	0.38	0.31	2.70	0.01	0.01	0.22	0.23	< 0.005	0.04	0.04	—	655	655	0.03	0.03	0.06	664
Area	14.0	14.2	0.27	17.0	0.03	2.34	—	2.34	2.33	—	2.33	250	104	354	0.23	0.02	—	365
Energy	0.01	< 0.005	0.06	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	164	164	0.01	< 0.005	—	165
Water	—	—	—	—	—	—	—	—	—	—	—	0.61	9.26	9.87	0.06	< 0.005	—	11.9
Waste	—	—	—	—	—	—	—	—	—	—	—	3.20	0.00	3.20	0.32	0.00	—	11.2
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.13	0.13
Total	14.4	14.5	0.64	19.7	0.04	2.35	0.22	2.58	2.34	0.04	2.38	254	932	1,186	0.66	0.05	0.19	1,217
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.41	0.37	0.30	2.70	0.01	0.01	0.22	0.23	< 0.005	0.04	0.04	—	659	659	0.03	0.03	1.08	670
Area	3.17	3.51	0.06	4.07	0.01	0.53	—	0.53	0.52	—	0.52	56.2	24.1	80.2	0.05	< 0.005	—	82.7
Energy	0.01	< 0.005	0.06	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	164	164	0.01	< 0.005	—	165
Water	—	—	—	—	—	—	—	—	—	—	—	0.61	9.26	9.87	0.06	< 0.005	—	11.9
Waste	—	—	—	—	—	—	—	—	—	—	—	3.20	0.00	3.20	0.32	0.00	—	11.2
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.13	0.13
Total	3.58	3.88	0.43	6.80	0.01	0.54	0.22	0.76	0.53	0.04	0.57	60.0	857	917	0.48	0.03	1.21	940
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.07	0.07	0.06	0.49	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	109	109	0.01	< 0.005	0.18	111
Area	0.58	0.64	0.01	0.74	< 0.005	0.10	—	0.10	0.10	—	0.10	9.30	3.99	13.3	0.01	< 0.005	—	13.7
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	27.2	27.2	< 0.005	< 0.005	—	27.2
Water	—	—	—	—	—	—	—	—	—	—	—	0.10	1.53	1.63	0.01	< 0.005	—	1.97
Waste	—	—	—	—	—	—	—	—	—	—	—	0.53	0.00	0.53	0.05	0.00	—	1.85
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02
Total	0.65	0.71	0.08	1.24	< 0.005	0.10	0.04	0.14	0.10	0.01	0.10	9.93	142	152	0.08	0.01	0.20	156

3. Construction Emissions Details

3.1. Site Preparation (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.34	3.65	36.0	32.9	0.05	1.60	—	1.60	1.47	—	1.47	—	5,296	5,296	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.07	0.04	< 0.005	< 0.005	1.39	1.39	< 0.005	0.14	0.14	—	10.7	10.7	< 0.005	< 0.005	< 0.005	11.2
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.49	0.45	< 0.005	0.02	—	0.02	0.02	—	0.02	—	72.5	72.5	< 0.005	< 0.005	—	72.8
Dust From Material Movement	—	—	—	—	—	—	0.27	0.27	—	0.14	0.14	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	—	0.15	0.15	< 0.005	< 0.005	< 0.005	0.15
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.09	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.0	12.0	< 0.005	< 0.005	—	12.1

Dust From Material Movement	—	—	—	—	—	—	0.05	0.05	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.02	0.02	< 0.005	< 0.005	< 0.005	0.03
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.07	0.78	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	164	164	0.01	0.01	0.02	167
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	51.0	51.0	< 0.005	0.01	< 0.005	53.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.27	2.27	< 0.005	< 0.005	< 0.005	2.31
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.70	0.70	< 0.005	< 0.005	< 0.005	0.73
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.38	0.38	< 0.005	< 0.005	< 0.005	0.38
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.12	0.12	< 0.005	< 0.005	< 0.005	0.12
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.2. Site Preparation (2024) - Mitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.34	3.65	36.0	32.9	0.05	1.60	—	1.60	1.47	—	1.47	—	5,296	5,296	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.07	0.04	< 0.005	< 0.005	0.35	0.35	< 0.005	0.04	0.04	—	10.7	10.7	< 0.005	< 0.005	< 0.005	11.2
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.49	0.45	< 0.005	0.02	—	0.02	0.02	—	0.02	—	72.5	72.5	< 0.005	< 0.005	—	72.8
Dust From Material Movement	—	—	—	—	—	—	0.11	0.11	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.15	0.15	< 0.005	< 0.005	< 0.005	0.15
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.09	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.0	12.0	< 0.005	< 0.005	—	12.1
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.02	0.02	< 0.005	< 0.005	< 0.005	0.03
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.07	0.78	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	164	164	0.01	0.01	0.02	167
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	51.0	51.0	< 0.005	0.01	< 0.005	53.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.27	2.27	< 0.005	< 0.005	< 0.005	2.31
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.70	0.70	< 0.005	< 0.005	< 0.005	0.73
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.38	0.38	< 0.005	< 0.005	< 0.005	0.38
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.12	0.12	< 0.005	< 0.005	< 0.005	0.12
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.26	1.90	18.2	18.8	0.03	0.84	—	0.84	0.77	—	0.77	—	2,958	2,958	0.12	0.02	—	2,969

Dust From Material Movement	—	—	—	—	—	—	7.13	7.13	—	3.43	3.43	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.07	0.04	< 0.005	< 0.005	1.39	1.39	< 0.005	0.14	0.14	—	10.7	10.7	< 0.005	< 0.005	< 0.005	11.2
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.40	0.41	< 0.005	0.02	—	0.02	0.02	—	0.02	—	64.8	64.8	< 0.005	< 0.005	—	65.1
Dust From Material Movement	—	—	—	—	—	—	0.16	0.16	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	< 0.005	—	0.23	0.23	< 0.005	< 0.005	< 0.005	0.25
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.7	10.7	< 0.005	< 0.005	—	10.8
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	0.04	0.04	< 0.005	< 0.005	< 0.005	0.04
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.06	0.69	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	146	146	0.01	0.01	0.02	148
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	51.0	51.0	< 0.005	0.01	< 0.005	53.1
Hauling	0.70	0.19	12.9	4.48	0.06	0.17	2.34	2.50	0.17	0.64	0.81	—	9,245	9,245	0.50	1.48	0.51	9,700

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.23	3.23	< 0.005	< 0.005	0.01	3.28
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.12	1.12	< 0.005	< 0.005	< 0.005	1.17
Hauling	0.02	< 0.005	0.28	0.10	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	203	203	0.01	0.03	0.19	213
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.54	0.54	< 0.005	< 0.005	< 0.005	0.54
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.18	0.18	< 0.005	< 0.005	< 0.005	0.19
Hauling	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	33.5	33.5	< 0.005	0.01	0.03	35.2

3.4. Grading (2024) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.26	1.90	18.2	18.8	0.03	0.84	—	0.84	0.77	—	0.77	—	2,958	2,958	0.12	0.02	—	2,969
Dust From Material Movement	—	—	—	—	—	—	2.78	2.78	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.07	0.04	< 0.005	< 0.005	0.35	0.35	< 0.005	0.04	0.04	—	10.7	10.7	< 0.005	< 0.005	< 0.005	11.2
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.40	0.41	< 0.005	0.02	—	0.02	0.02	—	0.02	—	64.8	64.8	< 0.005	< 0.005	—	65.1

Dust From Material Movement	—	—	—	—	—	—	0.06	0.06	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	0.23	0.23	< 0.005	< 0.005	< 0.005	0.25
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.7	10.7	< 0.005	< 0.005	—	10.8
Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.04	0.04	< 0.005	< 0.005	< 0.005	0.04
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.06	0.69	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	146	146	0.01	0.01	0.02	148
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	51.0	51.0	< 0.005	0.01	< 0.005	53.1
Hauling	0.70	0.19	12.9	4.48	0.06	0.17	2.34	2.50	0.17	0.64	0.81	—	9,245	9,245	0.50	1.48	0.51	9,700
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.23	3.23	< 0.005	< 0.005	0.01	3.28
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.12	1.12	< 0.005	< 0.005	< 0.005	1.17
Hauling	0.02	< 0.005	0.28	0.10	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	203	203	0.01	0.03	0.19	213
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.54	0.54	< 0.005	< 0.005	< 0.005	0.54
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.18	0.18	< 0.005	< 0.005	< 0.005	0.19

Hauling	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	33.5	33.5	< 0.005	0.01	0.03	35.2

3.5. Building Construction (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.76	7.07	8.26	0.01	0.31	—	0.31	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	1.29	1.51	< 0.005	0.06	—	0.06	0.05	—	0.05	—	250	250	0.01	< 0.005	—	251
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.06	0.89	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	174	174	0.01	0.01	0.70	177
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	50.9	50.9	< 0.005	0.01	0.13	53.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.07	0.78	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	164	164	0.01	0.01	0.02	167
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	51.0	51.0	< 0.005	0.01	< 0.005	53.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.50	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	105	105	0.01	< 0.005	0.19	106
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	32.1	32.1	< 0.005	< 0.005	0.04	33.5
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	17.3	17.3	< 0.005	< 0.005	0.03	17.6
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.32	5.32	< 0.005	< 0.005	0.01	5.55
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.6. Building Construction (2024) - Mitigated

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

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

Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.76	7.07	8.26	0.01	0.31	—	0.31	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	1.29	1.51	< 0.005	0.06	—	0.06	0.05	—	0.05	—	250	250	0.01	< 0.005	—	251
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.06	0.89	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	174	174	0.01	0.01	0.70	177
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	50.9	50.9	< 0.005	0.01	0.13	53.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.07	0.78	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	164	164	0.01	0.01	0.02	167

Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	51.0	51.0	< 0.005	0.01	< 0.005	53.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.50	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	105	105	0.01	< 0.005	0.19	106
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	32.1	32.1	< 0.005	< 0.005	0.04	33.5
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	17.3	17.3	< 0.005	< 0.005	0.03	17.6
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.32	5.32	< 0.005	< 0.005	0.01	5.55
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Paving (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.76	6.87	8.89	0.01	0.33	—	0.33	0.30	—	0.30	—	1,351	1,351	0.05	0.01	—	1,355
Paving	—	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.04	0.04	0.34	0.44	< 0.005	0.02	—	0.02	0.01	—	0.01	—	66.6	66.6	< 0.005	< 0.005	—	66.8
Paving	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.0	11.0	< 0.005	< 0.005	—	11.1
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.07	0.87	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	183	183	0.01	0.01	0.02	185
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	51.0	51.0	< 0.005	0.01	< 0.005	53.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.09	9.09	< 0.005	< 0.005	0.02	9.22
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.51	2.51	< 0.005	< 0.005	< 0.005	2.62
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.51	1.51	< 0.005	< 0.005	< 0.005	1.53
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.42	0.42	< 0.005	< 0.005	< 0.005	0.43
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Paving (2024) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.76	6.87	8.89	0.01	0.33	—	0.33	0.30	—	0.30	—	1,351	1,351	0.05	0.01	—	1,355
Paving	—	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.04	0.34	0.44	< 0.005	0.02	—	0.02	0.01	—	0.01	—	66.6	66.6	< 0.005	< 0.005	—	66.8
Paving	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.0	11.0	< 0.005	< 0.005	—	11.1
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.07	0.87	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	183	183	0.01	0.01	0.02	185
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	51.0	51.0	< 0.005	0.01	< 0.005	53.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.09	9.09	< 0.005	< 0.005	0.02	9.22
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.51	2.51	< 0.005	< 0.005	< 0.005	2.62
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.51	1.51	< 0.005	< 0.005	< 0.005	1.53
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.42	0.42	< 0.005	< 0.005	< 0.005	0.43
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Architectural Coating (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	7.48	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.04	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.58	6.58	< 0.005	< 0.005	—	6.61
Architect ural Coatings	—	0.37	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.09	1.09	< 0.005	< 0.005	—	1.09
Architect ural Coatings	—	0.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.41	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	89.6	89.6	< 0.005	< 0.005	0.01	90.8
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	50.1	50.1	< 0.005	0.01	< 0.005	52.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.46	4.46	< 0.005	< 0.005	0.01	4.52
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.47	2.47	< 0.005	< 0.005	< 0.005	2.58

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.74	0.74	< 0.005	< 0.005	< 0.005	0.75
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.41	0.41	< 0.005	< 0.005	< 0.005	0.43
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Architectural Coating (2025) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	1.37	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.04	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.58	6.58	< 0.005	< 0.005	—	6.61
Architectural Coatings	—	0.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.09	1.09	< 0.005	< 0.005	—	1.09
Architectural Coatings	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.41	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	89.6	89.6	< 0.005	< 0.005	0.01	90.8
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	50.1	50.1	< 0.005	0.01	< 0.005	52.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.46	4.46	< 0.005	< 0.005	0.01	4.52
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.47	2.47	< 0.005	< 0.005	< 0.005	2.58
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.74	0.74	< 0.005	< 0.005	< 0.005	0.75
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.41	0.41	< 0.005	< 0.005	< 0.005	0.43
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.42	0.38	0.28	2.87	0.01	0.01	0.22	0.23	< 0.005	0.04	0.04	—	685	685	0.03	0.03	2.51	696
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	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	0.42	0.38	0.28	2.87	0.01	0.01	0.22	0.23	< 0.005	0.04	0.04	—	685	685	0.03	0.03	2.51	696
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.41	0.38	0.31	2.70	0.01	0.01	0.22	0.23	< 0.005	0.04	0.04	—	655	655	0.03	0.03	0.06	664
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	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	0.41	0.38	0.31	2.70	0.01	0.01	0.22	0.23	< 0.005	0.04	0.04	—	655	655	0.03	0.03	0.06	664

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.07	0.07	0.06	0.49	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	109	109	0.01	< 0.005	0.18	111
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	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	0.07	0.07	0.06	0.49	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	109	109	0.01	< 0.005	0.18	111

4.1.2. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.42	0.38	0.28	2.87	0.01	0.01	0.22	0.23	< 0.005	0.04	0.04	—	685	685	0.03	0.03	2.51	696
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	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	0.42	0.38	0.28	2.87	0.01	0.01	0.22	0.23	< 0.005	0.04	0.04	—	685	685	0.03	0.03	2.51	696
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	0.41	0.38	0.31	2.70	0.01	0.01	0.22	0.23	< 0.005	0.04	0.04	—	655	655	0.03	0.03	0.06	664
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	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	0.41	0.38	0.31	2.70	0.01	0.01	0.22	0.23	< 0.005	0.04	0.04	—	655	655	0.03	0.03	0.06	664
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.07	0.07	0.06	0.49	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	109	109	0.01	< 0.005	0.18	111
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	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	0.07	0.07	0.06	0.49	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	109	109	0.01	< 0.005	0.18	111

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

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

Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	81.8	81.8	< 0.005	< 0.005	—	82.1
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	81.8	81.8	< 0.005	< 0.005	—	82.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	81.8	81.8	< 0.005	< 0.005	—	82.1
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	81.8	81.8	< 0.005	< 0.005	—	82.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	13.5	13.5	< 0.005	< 0.005	—	13.6
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	13.5	13.5	< 0.005	< 0.005	—	13.6

4.2.2. Electricity Emissions By Land Use - Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	81.8	81.8	< 0.005	< 0.005	—	82.1
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	81.8	81.8	< 0.005	< 0.005	—	82.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	81.8	81.8	< 0.005	< 0.005	—	82.1
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	81.8	81.8	< 0.005	< 0.005	—	82.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	13.5	13.5	< 0.005	< 0.005	—	13.6
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	13.5	13.5	< 0.005	< 0.005	—	13.6

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.01	< 0.005	0.06	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	82.3	82.3	0.01	< 0.005	—	82.5
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	0.00	0.00	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	0.01	< 0.005	0.06	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	82.3	82.3	0.01	< 0.005	—	82.5
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.01	< 0.005	0.06	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	82.3	82.3	0.01	< 0.005	—	82.5
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	0.00	0.00	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	0.01	< 0.005	0.06	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	82.3	82.3	0.01	< 0.005	—	82.5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.6	13.6	< 0.005	< 0.005	—	13.7
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.6	13.6	< 0.005	< 0.005	—	13.7

4.2.4. Natural Gas Emissions By Land Use - Mitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.01	< 0.005	0.06	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	82.3	82.3	0.01	< 0.005	—	82.5
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	0.00	0.00	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	0.01	< 0.005	0.06	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	82.3	82.3	0.01	< 0.005	—	82.5
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.01	< 0.005	0.06	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	82.3	82.3	0.01	< 0.005	—	82.5
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	0.00	0.00	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	0.01	< 0.005	0.06	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	82.3	82.3	0.01	< 0.005	—	82.5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.6	13.6	< 0.005	< 0.005	—	13.7
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.6	13.6	< 0.005	< 0.005	—	13.7

4.3. Area Emissions by Source

4.3.2. Unmitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	14.0	13.8	0.27	17.0	0.03	2.34	—	2.34	2.33	—	2.33	250	104	354	0.23	0.02	—	365
Consumer Products	—	0.38	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.05	0.05	< 0.005	0.51	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.37	1.37	< 0.005	< 0.005	—	1.37
Total	14.1	14.2	0.27	17.5	0.03	2.34	—	2.34	2.33	—	2.33	250	106	356	0.23	0.02	—	367
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	14.0	13.8	0.27	17.0	0.03	2.34	—	2.34	2.33	—	2.33	250	104	354	0.23	0.02	—	365
Consumer Products	—	0.38	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architect Coatings	—	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	14.0	14.2	0.27	17.0	0.03	2.34	—	2.34	2.33	—	2.33	250	104	354	0.23	0.02	—	365
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.57	0.56	0.01	0.70	< 0.005	0.10	—	0.10	0.10	—	0.10	9.30	3.88	13.2	0.01	< 0.005	—	13.6
Consumer Products	—	0.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	< 0.005	< 0.005	< 0.005	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.11	0.11	< 0.005	< 0.005	—	0.11
Total	0.58	0.65	0.01	0.74	< 0.005	0.10	—	0.10	0.10	—	0.10	9.30	3.99	13.3	0.01	< 0.005	—	13.7

4.3.1. Mitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	14.0	13.8	0.27	17.0	0.03	2.34	—	2.34	2.33	—	2.33	250	104	354	0.23	0.02	—	365
Consumer Products	—	0.38	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.05	0.05	< 0.005	0.51	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.37	1.37	< 0.005	< 0.005	—	1.37

Total	14.1	14.2	0.27	17.5	0.03	2.34	—	2.34	2.33	—	2.33	250	106	356	0.23	0.02	—	367
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	14.0	13.8	0.27	17.0	0.03	2.34	—	2.34	2.33	—	2.33	250	104	354	0.23	0.02	—	365
Consumer Products	—	0.38	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	14.0	14.2	0.27	17.0	0.03	2.34	—	2.34	2.33	—	2.33	250	104	354	0.23	0.02	—	365
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.57	0.56	0.01	0.70	< 0.005	0.10	—	0.10	0.10	—	0.10	9.30	3.88	13.2	0.01	< 0.005	—	13.6
Consumer Products	—	0.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	< 0.005	< 0.005	< 0.005	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.11	0.11	< 0.005	< 0.005	—	0.11
Total	0.58	0.64	0.01	0.74	< 0.005	0.10	—	0.10	0.10	—	0.10	9.30	3.99	13.3	0.01	< 0.005	—	13.7

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	0.61	9.26	9.87	0.06	< 0.005	—	11.9
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.61	9.26	9.87	0.06	< 0.005	—	11.9
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	0.61	9.26	9.87	0.06	< 0.005	—	11.9
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.61	9.26	9.87	0.06	< 0.005	—	11.9
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	0.10	1.53	1.63	0.01	< 0.005	—	1.97
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.10	1.53	1.63	0.01	< 0.005	—	1.97

4.4.1. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	0.61	9.26	9.87	0.06	< 0.005	—	11.9
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.61	9.26	9.87	0.06	< 0.005	—	11.9
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	0.61	9.26	9.87	0.06	< 0.005	—	11.9
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.61	9.26	9.87	0.06	< 0.005	—	11.9
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	0.10	1.53	1.63	0.01	< 0.005	—	1.97
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.10	1.53	1.63	0.01	< 0.005	—	1.97

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	3.19	0.00	3.19	0.32	0.00	—	11.2
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.01	0.00	0.01	< 0.005	0.00	—	0.02

Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	3.20	0.00	3.20	0.32	0.00	—	11.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	3.19	0.00	3.19	0.32	0.00	—	11.2
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.01	0.00	0.01	< 0.005	0.00	—	0.02
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	3.20	0.00	3.20	0.32	0.00	—	11.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	0.53	0.00	0.53	0.05	0.00	—	1.85
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	< 0.005	0.00	< 0.005	< 0.005	0.00	—	< 0.005
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.53	0.00	0.53	0.05	0.00	—	1.85

4.5.1. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	3.19	0.00	3.19	0.32	0.00	—	11.2
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.01	0.00	0.01	< 0.005	0.00	—	0.02
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	3.20	0.00	3.20	0.32	0.00	—	11.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	3.19	0.00	3.19	0.32	0.00	—	11.2
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.01	0.00	0.01	< 0.005	0.00	—	0.02
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	3.20	0.00	3.20	0.32	0.00	—	11.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	0.53	0.00	0.53	0.05	0.00	—	1.85

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	< 0.005	0.00	< 0.005	< 0.005	0.00	—	< 0.005
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.53	0.00	0.53	0.05	0.00	—	1.85

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.13	0.13
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.13	0.13
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.13	0.13
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.13	0.13
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02

4.6.2. Mitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.13	0.13
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.13	0.13
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.13	0.13
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.13	0.13
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

4.7.2. Mitigated

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

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

4.8.2. Mitigated

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

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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

4.9.2. Mitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

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

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

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

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

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

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

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

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

Remove	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	1/2/2024	1/8/2024	5.00	5.00	—
Grading	Grading	1/9/2024	1/18/2024	5.00	8.00	—
Building Construction	Building Construction	1/19/2024	12/5/2024	5.00	230	—
Paving	Paving	12/6/2024	12/31/2024	5.00	18.0	—
Architectural Coating	Architectural Coating	1/2/2025	1/27/2025	5.00	18.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

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

Paving	Rollers	Diesel	Average	2.00	6.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.2.2. Mitigated

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

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	18.0	12.0	LDA,LDT1,LDT2
Site Preparation	Vendor	2.00	7.63	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	4.00	0.25	HHDT
Grading	—	—	—	—
Grading	Worker	16.0	12.0	LDA,LDT1,LDT2
Grading	Vendor	2.00	7.63	HHDT,MHDT
Grading	Hauling	126	20.0	HHDT
Grading	Onsite truck	4.00	0.25	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	18.0	12.0	LDA,LDT1,LDT2
Building Construction	Vendor	2.00	7.63	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	0.00	—	HHDT
Paving	—	—	—	—
Paving	Worker	20.0	12.0	LDA,LDT1,LDT2
Paving	Vendor	2.00	7.63	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	0.00	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	10.0	12.0	LDA,LDT1,LDT2
Architectural Coating	Vendor	2.00	7.63	HHDT,MHDT

Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	0.00	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	18.0	12.0	LDA,LDT1,LDT2
Site Preparation	Vendor	2.00	7.63	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	4.00	0.25	HHDT
Grading	—	—	—	—
Grading	Worker	16.0	12.0	LDA,LDT1,LDT2
Grading	Vendor	2.00	7.63	HHDT,MHDT
Grading	Hauling	126	20.0	HHDT
Grading	Onsite truck	4.00	0.25	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	18.0	12.0	LDA,LDT1,LDT2
Building Construction	Vendor	2.00	7.63	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	0.00	—	HHDT
Paving	—	—	—	—
Paving	Worker	20.0	12.0	LDA,LDT1,LDT2
Paving	Vendor	2.00	7.63	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	0.00	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	10.0	12.0	LDA,LDT1,LDT2

Architectural Coating	Vendor	2.00	7.63	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	0.00	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	35,539	11,846	0.00	0.00	5,332

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	8,000	8.00	0.00	—
Paving	0.00	0.00	0.00	0.00	2.14

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Single Family Housing	0.10	0%

Other Asphalt Surfaces	0.97	100%
City Park	0.00	0%
Other Non-Asphalt Surfaces	1.07	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	540	0.03	< 0.005
2025	0.00	540	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
Single Family Housing	90.0	90.0	90.0	32,850	811	811	811	295,950
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	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
Single Family Housing	90.0	90.0	90.0	32,850	811	811	811	295,950
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	3
Gas Fireplaces	5
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	1
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.1.2. Mitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	3
Gas Fireplaces	5
Propane Fireplaces	0
Electric Fireplaces	0

No Fireplaces	1
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
35538.75	11,846	0.00	0.00	5,332

5.10.3. Landscape Equipment

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

5.10.4. Landscape Equipment - Mitigated

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

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	55,271	540	0.0330	0.0040	256,652

Other Asphalt Surfaces	0.00	540	0.0330	0.0040	0.00
City Park	0.00	540	0.0330	0.0040	0.00
Other Non-Asphalt Surfaces	0.00	540	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)
Single Family Housing	55,271	540	0.0330	0.0040	256,652
Other Asphalt Surfaces	0.00	540	0.0330	0.0040	0.00
City Park	0.00	540	0.0330	0.0040	0.00
Other Non-Asphalt Surfaces	0.00	540	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)
Single Family Housing	316,198	774,166
Other Asphalt Surfaces	0.00	0.00
City Park	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	316,198	774,166
Other Asphalt Surfaces	0.00	0.00
City Park	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	2.13	0.00
Other Asphalt Surfaces	0.00	0.00
City Park	0.01	0.00
Other Non-Asphalt Surfaces	0.00	0.00

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	2.13	0.00
Other Asphalt Surfaces	0.00	0.00
City Park	0.01	0.00
Other Non-Asphalt Surfaces	0.00	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
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
City Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

City Park	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
City Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
City Park	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00

8. User Changes to Default Data

Screen	Justification
Land Use	Project Description
Construction: Construction Phases	Default schedule lengths. No demo.
Construction: Trips and VMT	Even numbers
Operations: Vehicle Data	Traffic Study. Active open space modeled as park, no trip generation.
Characteristics: Utility Information	—

Appendix B
Health Risk Assessment Output File

Encinitas Sanctuary
Construction HRA - Off-site

Project Construction Emissions

	Unmitigated	Mitigated
	DPM	DPM
Year	tons/year	tons/year
2024	0.0600	0.0100
2025	0.0050	0.0050
Total	**0.065**	**0.015**
Total Lbs	**130.000**	**30.000**
Lbs/year	**122.079**	**28.172**
Lbs/hour	**0.06**	**0.01**

Conversions:					
1 ton =	2,000	lb			
Construction =	8	hours/day	Project Construction:	279	active days
	2096	hours/year		1.06	years
	262	days/year			
	12	months			

AERMOD Assumptions

Source Name	Description	No. of Vol. Sources	Emission Rate g/s	Release Height m	Plume Height m	Plume Width m
SLINE1	Off-Road Equipment and Trucks		1.00	5.00	10.00	10.00

Receptor Grid

Grid Sizes	Spacing	
1 km x 1 km	20 m	

Meteorological Data

Station Name		Years	Lat	Long	Elev (m)
CRQ	Palomar Airport	2019-2021	33.130822	-117.272686	92

Source: SDAPCD 2020. Annual Air Quality Monitoring Network. https://www.sdapcd.org/content/dam/sdapcd/documents/monitoring/2020-Network-Report.pdf

Population

County	2021 Population
San Diego County	3,287,306

Source: State of California, Department of Finance. https://dof.ca.gov/forecasting/demographics/estimates-e1/

Other Model Assumption

Terrain Data	NED 1/3
Lakes Version	11.2
AERMOD Versio	22112

Encinitas Sanctuary - Health Risk Assessment Detailed Report

Table of Contents

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Encinitas Sanctuary - Health Risk Assessment
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.20
Precipitation (days)	21.2
Location	33.043938631219575, -117.23784188923133
County	San Diego
City	Encinitas
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6216
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric

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
Single Family Housing	9.00	Dwelling Unit	2.46	17,550	42,385	0.00	25.0	—
Other Asphalt Surfaces	0.97	Acre	0.97	0.00	0.00	0.00	—	—

City Park	0.12	Acre	0.12	0.00	0.00	0.00	—	—
Other Non-Asphalt Surfaces	1.07	Acre	1.07	0.00	0.00	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-5	Use Advanced Engine Tiers
Construction	C-10-A	Water Exposed Surfaces
Construction	C-10-C	Water Unpaved Construction Roads
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads
Construction	C-13	Use Low-VOC Paints for Construction
Area Sources	AS-2	Use Low-VOC Paints

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.32	1.10	10.4	12.6	0.02	0.46	< 0.005	0.47	0.43	< 0.005	0.43	—	2,298	2,298	0.09	0.02	< 0.005	2,306
Mit.	0.52	0.48	8.48	14.5	0.02	0.09	< 0.005	0.09	0.08	< 0.005	0.08	—	2,298	2,298	0.09	0.02	< 0.005	2,306
% Reduced	60%	57%	19%	-15%	—	81%	—	81%	80%	—	80%	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.34	7.48	36.0	33.0	0.05	1.60	21.0	22.6	1.47	10.2	11.7	—	5,310	5,310	0.22	0.08	0.01	5,329

Mit.	0.65	1.37	14.8	28.4	0.05	0.11	8.02	8.12	0.11	3.98	4.07	—	5,310	5,310	0.22	0.08	0.01	5,329
% Reduced	85%	82%	59%	14%	—	93%	62%	64%	93%	61%	65%	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.99	0.83	7.86	9.28	0.02	0.35	0.48	0.83	0.32	0.22	0.54	—	1,660	1,660	0.07	0.02	< 0.005	1,666
Mit.	0.38	0.35	6.13	10.4	0.02	0.06	0.18	0.24	0.06	0.08	0.15	—	1,660	1,660	0.07	0.02	< 0.005	1,666
% Reduced	62%	58%	22%	-12%	—	82%	62%	71%	81%	61%	73%	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.18	0.15	1.43	1.69	< 0.005	0.06	0.09	0.15	0.06	0.04	0.10	—	275	275	0.01	< 0.005	< 0.005	276
Mit.	0.07	0.06	1.12	1.90	< 0.005	0.01	0.03	0.04	0.01	0.02	0.03	—	275	275	0.01	< 0.005	< 0.005	276
% Reduced	62%	58%	22%	-12%	—	82%	62%	71%	81%	61%	73%	—	—	—	—	—	—	—
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	250	550	250	—	—	100	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	250	550	250	—	—	100	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Threshol	—	40.0	40.0	100	40.0	—	—	15.0	—	—	15.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	1.32	1.10	10.4	12.6	0.02	0.46	< 0.005	0.47	0.43	< 0.005	0.43	—	2,298	2,298	0.09	0.02	< 0.005	2,306
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	4.34	3.65	36.0	33.0	0.05	1.60	21.0	22.6	1.47	10.2	11.7	—	5,310	5,310	0.22	0.08	0.01	5,329
2025	< 0.005	7.48	0.02	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.17	6.17	< 0.005	< 0.005	< 0.005	6.36
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.99	0.83	7.86	9.28	0.02	0.35	0.48	0.83	0.32	0.22	0.54	—	1,660	1,660	0.07	0.02	< 0.005	1,666
2025	< 0.005	0.37	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.30	0.30	< 0.005	< 0.005	< 0.005	0.31
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.18	0.15	1.43	1.69	< 0.005	0.06	0.09	0.15	0.06	0.04	0.10	—	275	275	0.01	< 0.005	< 0.005	276
2025	< 0.005	0.07	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.05	0.05	< 0.005	< 0.005	< 0.005	0.05

2.3. Construction Emissions by Year, Mitigated

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

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

Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.52	0.48	8.48	14.5	0.02	0.09	< 0.005	0.09	0.08	< 0.005	0.08	—	2,298	2,298	0.09	0.02	< 0.005	2,306
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.65	0.64	14.8	28.4	0.05	0.11	8.02	8.12	0.11	3.98	4.07	—	5,310	5,310	0.22	0.08	0.01	5,329
2025	< 0.005	1.37	0.02	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.17	6.17	< 0.005	< 0.005	< 0.005	6.36
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.38	0.35	6.13	10.4	0.02	0.06	0.18	0.24	0.06	0.08	0.15	—	1,660	1,660	0.07	0.02	< 0.005	1,666
2025	< 0.005	0.07	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.30	0.30	< 0.005	< 0.005	< 0.005	0.31
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.07	0.06	1.12	1.90	< 0.005	0.01	0.03	0.04	0.01	0.02	0.03	—	275	275	0.01	< 0.005	< 0.005	276
2025	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.05	0.05	< 0.005	< 0.005	< 0.005	0.05

3. Construction Emissions Details

3.1. Site Preparation (2024) - Unmitigated

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

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

Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.07	0.04	< 0.005	< 0.005	1.39	1.39	< 0.005	0.14	0.14	—	10.7	10.7	< 0.005	< 0.005	< 0.005	11.2
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.49	0.45	< 0.005	0.02	—	0.02	0.02	—	0.02	—	72.5	72.5	< 0.005	< 0.005	—	72.8
Dust From Material Movement	—	—	—	—	—	—	0.27	0.27	—	0.14	0.14	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	—	0.15	0.15	< 0.005	< 0.005	< 0.005	0.15
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.09	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.0	12.0	< 0.005	< 0.005	—	12.1
Dust From Material Movement	—	—	—	—	—	—	0.05	0.05	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.02	0.02	< 0.005	< 0.005	< 0.005	0.03
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.84	3.84	< 0.005	< 0.005	< 0.005	4.03
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.05	0.05	< 0.005	< 0.005	< 0.005	0.06
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.01	0.01	< 0.005	< 0.005	< 0.005	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.2. Site Preparation (2024) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.64	0.64	14.7	28.3	0.05	0.10	—	0.10	0.10	—	0.10	—	5,296	5,296	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.07	0.04	< 0.005	< 0.005	0.35	0.35	< 0.005	0.04	0.04	—	10.7	10.7	< 0.005	< 0.005	< 0.005	11.2
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.20	0.39	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	72.5	72.5	< 0.005	< 0.005	—	72.8

Dust From Material Movemen	—	—	—	—	—	—	0.11	0.11	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.15	0.15	< 0.005	< 0.005	< 0.005	0.15
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.04	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.0	12.0	< 0.005	< 0.005	—	12.1
Dust From Material Movemen	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.02	0.02	< 0.005	< 0.005	< 0.005	0.03
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.84	3.84	< 0.005	< 0.005	< 0.005	4.03
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.05	0.05	< 0.005	< 0.005	< 0.005	0.06
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.01	0.01	< 0.005	< 0.005	< 0.005	0.01

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.26	1.90	18.2	18.8	0.03	0.84	—	0.84	0.77	—	0.77	—	2,958	2,958	0.12	0.02	—	2,969
Dust From Material Movement	—	—	—	—	—	—	7.13	7.13	—	3.43	3.43	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.07	0.04	< 0.005	< 0.005	1.39	1.39	< 0.005	0.14	0.14	—	10.7	10.7	< 0.005	< 0.005	< 0.005	11.2
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.40	0.41	< 0.005	0.02	—	0.02	0.02	—	0.02	—	64.8	64.8	< 0.005	< 0.005	—	65.1
Dust From Material Movement	—	—	—	—	—	—	0.16	0.16	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	< 0.005	—	0.23	0.23	< 0.005	< 0.005	< 0.005	0.25
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.7	10.7	< 0.005	< 0.005	—	10.8

Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	0.04	0.04	< 0.005	< 0.005	< 0.005	0.04
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.84	3.84	< 0.005	< 0.005	< 0.005	4.03
Hauling	0.15	0.08	2.12	1.41	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	337	337	0.06	0.05	0.01	354
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.08	0.08	< 0.005	< 0.005	< 0.005	0.09
Hauling	< 0.005	< 0.005	0.05	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.34	7.34	< 0.005	< 0.005	< 0.005	7.73
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.01	0.01	< 0.005	< 0.005	< 0.005	0.01
Hauling	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.22	1.22	< 0.005	< 0.005	< 0.005	1.28

3.4. Grading (2024) - Mitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.49	0.47	10.0	17.8	0.03	0.08	—	0.08	0.08	—	0.08	—	2,958	2,958	0.12	0.02	—	2,969
Dust From Material Movement	—	—	—	—	—	—	2.78	2.78	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.07	0.04	< 0.005	< 0.005	0.35	0.35	< 0.005	0.04	0.04	—	10.7	10.7	< 0.005	< 0.005	< 0.005	11.2
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.22	0.39	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	64.8	64.8	< 0.005	< 0.005	—	65.1
Dust From Material Movement	—	—	—	—	—	—	0.06	0.06	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	0.23	0.23	< 0.005	< 0.005	< 0.005	0.25
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.04	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.7	10.7	< 0.005	< 0.005	—	10.8
Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.04	0.04	< 0.005	< 0.005	< 0.005	0.04
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.84	3.84	< 0.005	< 0.005	< 0.005	4.03
Hauling	0.15	0.08	2.12	1.41	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	337	337	0.06	0.05	0.01	354
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.08	0.08	< 0.005	< 0.005	< 0.005	0.09
Hauling	< 0.005	< 0.005	0.05	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.34	7.34	< 0.005	< 0.005	< 0.005	7.73
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.01	0.01	< 0.005	< 0.005	< 0.005	0.01
Hauling	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.22	1.22	< 0.005	< 0.005	< 0.005	1.28

3.5. Building Construction (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.32	1.10	10.4	12.6	0.02	0.46	—	0.46	0.43	—	0.43	—	2,294	2,294	0.09	0.02	—	2,302
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.32	1.10	10.4	12.6	0.02	0.46	—	0.46	0.43	—	0.43	—	2,294	2,294	0.09	0.02	—	2,302
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.83	0.69	6.57	7.93	0.01	0.29	—	0.29	0.27	—	0.27	—	1,445	1,445	0.06	0.01	—	1,450
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.20	1.45	< 0.005	0.05	—	0.05	0.05	—	0.05	—	239	239	0.01	< 0.005	—	240
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.82	3.82	< 0.005	< 0.005	< 0.005	4.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.84	3.84	< 0.005	< 0.005	< 0.005	4.03
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.41	2.41	< 0.005	< 0.005	< 0.005	2.53
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.40	0.40	< 0.005	< 0.005	< 0.005	0.42
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.6. Building Construction (2024) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.52	0.48	8.46	14.5	0.02	0.09	—	0.09	0.08	—	0.08	—	2,294	2,294	0.09	0.02	—	2,302
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.52	0.48	8.46	14.5	0.02	0.09	—	0.09	0.08	—	0.08	—	2,294	2,294	0.09	0.02	—	2,302
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.33	0.30	5.33	9.12	0.01	0.05	—	0.05	0.05	—	0.05	—	1,445	1,445	0.06	0.01	—	1,450

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.97	1.66	< 0.005	0.01	—	0.01	0.01	—	0.01	—	239	239	0.01	< 0.005	—	240
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.82	3.82	< 0.005	< 0.005	< 0.005	4.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.84	3.84	< 0.005	< 0.005	< 0.005	4.03
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.41	2.41	< 0.005	< 0.005	< 0.005	2.53
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.40	0.40	< 0.005	< 0.005	< 0.005	0.42
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Paving (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.76	6.87	8.89	0.01	0.33	—	0.33	0.30	—	0.30	—	1,351	1,351	0.05	0.01	—	1,355
Paving	—	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.04	0.34	0.44	< 0.005	0.02	—	0.02	0.01	—	0.01	—	66.6	66.6	< 0.005	< 0.005	—	66.8
Paving	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.0	11.0	< 0.005	< 0.005	—	11.1
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.84	3.84	< 0.005	< 0.005	< 0.005	4.03
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.19	0.19	< 0.005	< 0.005	< 0.005	0.20
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.03	0.03	< 0.005	< 0.005	< 0.005	0.03
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Paving (2024) - Mitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.53	0.47	6.29	9.39	0.01	0.11	—	0.11	0.11	—	0.11	—	1,351	1,351	0.05	0.01	—	1,355
Paving	—	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.31	0.46	< 0.005	0.01	—	0.01	0.01	—	0.01	—	66.6	66.6	< 0.005	< 0.005	—	66.8
Paving	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.0	11.0	< 0.005	< 0.005	—	11.1
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.84	3.84	< 0.005	< 0.005	< 0.005	4.03
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.19	0.19	< 0.005	< 0.005	< 0.005	0.20
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.03	0.03	< 0.005	< 0.005	< 0.005	0.03
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Architectural Coating (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Architectural Coatings	—	7.48	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Architectural Coatings	—	0.37	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Architect Coatings	—	0.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.79	3.79	< 0.005	< 0.005	< 0.005	3.97
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.19	0.19	< 0.005	< 0.005	< 0.005	0.20
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.03	0.03	< 0.005	< 0.005	< 0.005	0.03
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Architectural Coating (2025) - Mitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Architectural Coatings	—	1.37	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Architectural Coatings	—	0.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Architectural Coatings	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.79	3.79	< 0.005	< 0.005	< 0.005	3.97
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.19	0.19	< 0.005	< 0.005	< 0.005	0.20
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.03	0.03	< 0.005	< 0.005	< 0.005	0.03
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

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

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

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

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

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

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

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

Remove	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	1/2/2024	1/8/2024	5.00	5.00	—
Grading	Grading	1/9/2024	1/18/2024	5.00	8.00	—
Building Construction	Building Construction	1/19/2024	12/5/2024	5.00	230	—
Paving	Paving	12/6/2024	12/31/2024	5.00	18.0	—
Architectural Coating	Architectural Coating	1/2/2025	1/27/2025	5.00	18.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29