

# **Addendum to the Chassis Depot and Repair Facilities at Berths 206-209 Final Initial Study and Negative Declaration**

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## Acronyms and Abbreviations

APP	Application for Port Permit
CalEEMod	California Emissions Estimator Model
CCC	California Coastal Commission
CCR	California Code of Regulations
CEM	Container Equipment Maintenance
CEQA	California Environmental Quality Act
CFS	Container Freight Station
DPM	diesel particulate matter
EIR	Environmental Impact Report
GHG	greenhouse gas
I	Interstate
IS/ND	Initial Study/Negative Declaration
LADOT	City of Los Angeles Department of Transportation
LAHD	Los Angeles Harbor Department
LID	Low Impact Development
LST	localized significance threshold
MS4	Municipal Separate Storm Sewer System
ND	Negative Declaration
NPDES	National Pollutant Discharge Elimination System
OPR	Office of Planning and Research
PMP	Port Master Plan
Port	Port of Los Angeles
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
VMT	vehicle miles traveled

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## 1.0 PROJECT OVERVIEW AND BACKGROUND

The Los Angeles Harbor Department (LAHD) has prepared this Addendum to the Chassis Depot and Repair Facilities Berths 206-209 (approved Project) Final Initial Study/Negative Declaration (IS/ND) (LAHD 2019) for the Berth 208-209 Container Freight Station (CFS) Building Demolition and Lot Conversion Project (proposed Project). The purpose of this Addendum is to assess the impacts associated with changes to the proposed Project since the Final IS/ND was certified in July 2019 (State Clearinghouse [SCH] Number 2019049132 and Application for Port Permit (APP) Numbers (180515-080/180628-112)). The Final IS/ND evaluated the potential environmental impacts associated with proposed renovation of two former Matson buildings at the Berths 206--209 mixed-use cargo terminal and use of the existing warehouses for chassis depot, chassis storage, and maintenance and repair. The proposed Project includes a modified variation for the CFS Warehouse that LAHD previously evaluated in the Final IS/ND. The proposed Project would be similar to the approved Project evaluated in the Final IS/ND, but it would include complete demolition of the CFS Warehouse and reuse of the site for chassis depot and repair operations with container and chassis storage. LAHD is the lead agency under the California Environmental Quality Act (CEQA).

### 1.1 Background and Previous Environmental Documentation

#### 1.1.1 Project Background

The overall concept of the approved Project evaluated in the Final IS/ND was to renovate and reuse two existing warehouses at Berths 206-209 for maintenance, repairs, and refurbishment of chassis and tire storage. Descriptions of the two buildings are as follows:

- **CFS Warehouse:** A 124-bay steel transloading and sorting facility with a two-story -high roll-up door on the western end to accommodate container handling equipment entry and exit. The warehouse is dock high on the southern end and grade level on the northern end to accommodate the movement of freight from containers to conventional tractor trailers. Each bay has a load leveler for accommodating freight movement in and out of containers. It is located at 849 E. New Dock Street (currently 935 E. New Dock Street). The CFS Warehouse was constructed in 1970 and consisted of approximately 62,000 square feet of gross leasable area. The mezzanine was demolished when safety concerns were discovered with its stability. The warehouse is currently vacant.
- **Container Equipment Maintenance (CEM) Building:** A two-story, 32-bay warehouse located at 921 E. New Dock Street. The CEM Building was constructed in 1970, just north of the CFS Warehouse. The CEM Building is currently being leased and utilized by Port Maintenance Group, Inc. under Permit No. 951, which is a 3-year permit with two 1-year options to extend. The permitted use is to repair and maintain chassis, including repair of tires and generator sets.

As part of the approved Project, proposed repairs to the CFS Warehouse included demolishing 20,000 square feet of the western end of the building; rebuilding the western wall of the building;

demolishing a cinder block wall; installing a ramp at the base of the demolished wall and fencing; and repairing roll-up bay doors. Prior to demolition, lead and asbestos abatement would be required at the building, and hazardous materials would be managed in accordance with applicable local, state, and federal regulations. No construction or demolition was proposed for the CEM Building. Subsequent to renovation of the CFS Warehouse, both buildings would be used by two separate operators to perform chassis maintenance and repair services. The approved Project included issuance of permits for proposed chassis maintenance facilities operations for up to 25 years.

Table 1.1-1 provides a comparison of the previously approved Project elements, as presented in the Final IS/ND, and the proposed Project.

**Table 1.1-1. Project Elements Comparison**

<b>Project Element</b>	<b>Approved Project (2019 Final IS/ND)</b>	<b>Proposed Project</b>
CFS Warehouse (849 E. New Dock Street [currently 935 E. New Dock Street]) – Construction	Renovate building  Construction: <ul style="list-style-type: none"> <li>• Demolish western portion of building (20,000 sf)</li> <li>• Rebuild the western wall of the building</li> <li>• Demolish cinder block wall</li> <li>• Install a ramp at the base of the demolished wall</li> <li>• Install fencing (k-rail base with chain-link top)</li> <li>• Remove one palm tree and its cinder block planter box</li> <li>• Repair rollup bay doors</li> </ul> Construction Period: 3 months	Demolish building  Construction: <ul style="list-style-type: none"> <li>• Lead stabilization and asbestos abatement and removal</li> <li>• Building and foundation demolition (62,000 sf)</li> <li>• Remove piping and other electrical and mechanical equipment</li> <li>• Remove railroad tracks</li> <li>• Remove asphalt and concrete pavement</li> <li>• Remove and dispose of crushed miscellaneous base and chemically impacted soil</li> <li>• Grading (approximately 9.5 acres)</li> <li>• Install infiltration/biofiltration system (15,200 sf)</li> <li>• Connect infiltration/biofiltration system to existing storm drain system</li> <li>• Install trash capture devices in storm drain inlets</li> <li>• Paving</li> <li>• Construct concrete gutters and catch basins</li> <li>• Install fencing</li> </ul> Construction Period: 12 months
CEM Building (921 E. New Dock Street) – Construction	No demolition or construction  Building renovations to support expanded intermodal equipment maintenance and repair	N/A <sup>1</sup>

**Table 1.1-1. Project Elements Comparison**

<b>Project Element</b>	<b>Approved Project (2019 Final IS/ND)</b>	<b>Proposed Project</b>
CFS Warehouse (849 E. New Dock Street [currently 935 E. New Dock Street]) – Operations	Chassis depot and repair operations: <ul style="list-style-type: none"> <li>• Tractor-trailer trucks (15 trips/day)</li> <li>• Vendor parts supplier delivery trucks (5 trips/day)</li> <li>• Employee commute automobiles (60 trips/day)</li> </ul> Issuance of a 25-year permit	Chassis depot and repair operations with container and chassis storage: <ul style="list-style-type: none"> <li>• Tractor-trailer trucks (15 trips/day)</li> <li>• Vendor parts supplier delivery trucks (5 trips/day)</li> <li>• Employee commute automobiles (60 trips/day)</li> </ul> Issuance of an up to 25-year entitlement
CEM Building (921 E. New Dock Street) – Operations	Intermodal equipment maintenance and repair operations: <ul style="list-style-type: none"> <li>• Tractor-trailer trucks (25 trips/day)</li> <li>• Tire hauling trucks (up to 5 trips/day)</li> <li>• Flatbed generator set hauler trucks (up to 5 trips/week)</li> <li>• Vendor parts supply trucks (up to 5 trips/day)</li> <li>• Employee commute automobiles (21 trips/day)</li> <li>• Welding and tire repairs</li> </ul> Issuance of a 25-year permit	N/A <sup>1</sup>

Key: CEM = Container Equipment Maintenance; CFS = Container Freight Station; IS/ND = Initial Study/Negative Declaration; N/A = not applicable; sf = square feet

Notes:

<sup>1</sup> Previously approved Project elements associated with the CEM Building (921 E. New Dock Street) would not be affected by the proposed Project.

### 1.1.2 Previous Environmental Documents Incorporated by Reference

Consistent with CEQA Guidelines Section 15150, the following document was used in preparation of this Addendum and is incorporated herein by reference:

- Port of Los Angeles Final Initial Study/Negative Declaration Chassis Depot and Repair Facilities Berths 206-209. APP Numbers 180515-080/180628-112. SCH Number 2019049132.

## 1.2 California Environmental Quality Act Process

This document was prepared in accordance with CEQA (California Public Resources Code, Section 21000 et seq.), the CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.), and the City of Los Angeles CEQA Guidelines (City of Los Angeles 2006). A primary objective of CEQA is to disclose the potential environmental effects of proposed activities to the public and decision-makers. CEQA requires that the potential environmental effects of a project be evaluated prior to project approval and implementation. Under CEQA, the lead agency is the

public agency with primary responsibility over approval of a proposed project. Pursuant to Section 15367 of the CEQA Guidelines (14 CCR 15000 et seq.), LAHD is the lead agency for the proposed Project. As the lead agency, LAHD must complete an environmental review to evaluate the potential changes in the impacts that were previously described in the 2019 Final IS/ND with respect to the proposed Project. To fulfill the purpose of CEQA, this Addendum has been prepared to evaluate the impacts that would occur as a result of the proposed Project.

CEQA Guidelines Section 15162 states that, for a project covered by a certified Environmental Impact Report (EIR) or Negative Declaration (ND), preparation of a subsequent EIR or ND is required only if one or more of the following conditions occur:

- Substantial changes are proposed in the project that will require major revisions of the previous EIR or ND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- Substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions of the previous EIR or ND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the ND was adopted, shows any of the following:
  - The project will have one or more significant effects not discussed in the previous EIR or ND.
  - Significant effects previously examined will be substantially more severe than shown in the previous EIR.
  - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.
  - Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

### **1.3 Scope and Content of the Addendum**

This Addendum has been prepared in accordance with the requirements of CEQA and the CEQA Guidelines. This Addendum describes the affected environmental resources and evaluates the potential changes in the impacts from what were previously assessed in the 2019 Final IS/ND with respect to building and operating the proposed Project. The analysis in this Addendum focuses on the changes to the impacts that would potentially occur as a result of the proposed Project modifications.

The criteria for determining the significance of environmental impacts in this Addendum analysis are the same as those contained within the certified Final IS/ND, with modifications to comply with changes in CEQA law since the Final IS/ND was certified, which includes a new resource area of study (i.e., wildfire) in CEQA Guidelines Appendix G (Environmental Checklist). The threshold of significance for a given environmental effect is the level at which LAHD, as CEQA lead agency, finds a potential effect of the proposed Project to be significant. Threshold of significance can be defined as a “quantitative or qualitative standard, or set of criteria, pursuant to which significance of a given environmental effect may be determined” (CEQA Guidelines Section 15064.7[a]).

#### **1.4 Document Format**

This Addendum contains the following sections:

- Section 1.0. Project Overview and Background. This section provides an overview of the proposed Project and the CEQA environmental documentation process.
- Section 2.0. Project Description. This section provides a detailed description of the proposed Project's objectives and components.
- Section 3.0. Environmental Analysis. This section presents the environmental analysis for each issue area evaluated in the Final IS/ND. The analysis analyzes if the impacts that were previously evaluated in the Final IS/ND compared to the proposed Project would be significant. If the proposed Project does not have the potential to significantly impact a given issue area compared to the previous CEQA evaluations, the relevant section provides a brief discussion of the reasons why no or less than significant impacts are expected. If the proposed Project could potentially result in significant impacts compared to the previous CEQA evaluations on a resource, the issue area discussion provides a description of potential impacts.
- Section 4.0. Conclusion. This section provides a conclusion of the environmental analysis associated with the proposed Project.
- Section 5.0. References. This section provides a list of reference materials used during preparation of this Addendum.

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## 2.0 PROJECT DESCRIPTION

### 2.1 Project Overview

The proposed Project would include complete demolition of the CFS Warehouse and reuse of the site for chassis depot and repair operations with container and chassis storage. The proposed Project includes a modified variation for the CFS Warehouse that LAHD previously evaluated in the Chassis Depot and Repair Facilities Project Berths 206-209 Final IS/ND (SCH Number 2019049132 and APP Numbers 180515-080/180628-112).

This section discusses the location, description, background, and objectives of the proposed Project. This document has been prepared in accordance with CEQA (California Public Resources Code, Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.).

#### 2.1.1 Project Location

##### Regional Setting

The Port of Los Angeles (Port) is located in San Pedro Bay, approximately 20 miles south of downtown Los Angeles (Figure 2.1-1). The Port encompasses approximately 7,500 acres of land and water along 43 miles of waterfront and provides a major gateway for international goods and services. The Port comprises approximately 24 major cargo terminals, including dry and liquid bulk, container, break bulk, automobile, and passenger facilities. In addition to cargo business operations, the Port is home to commercial fishing vessels, shipyards, and boat repair facilities, as well as recreational, community, and educational facilities. The Port also provides slips for approximately 3,800 recreational vessels, 78 commercial fishing boats, 35 miscellaneous small service crafts, and 15 charter vessels that handle sport fishing and harbor cruises. The Port has retail shops and restaurants primarily located along the west side of the Main Channel. It also accommodates recreation, community, and educational facilities, such as the Cabrillo Beach Youth Waterfront Sports Center, Cabrillo Marine Aquarium, Los Angeles Maritime Museum, 22<sup>nd</sup> Street Park, Wilmington Waterfront Park, and a public swimming beach.

##### Project Setting

The Project site is located at the former Matson terminal (Berths 206-209) in the northern portion of Terminal Island, between New Dock Street and Cerritos Channel (Figure 2.1-2). Berths 206--209 is an 86-acre parcel that was formerly occupied by Matson Navigation Company from 1970 to 2003 as a multi-use cargo terminal. The Project site encompasses approximately 9.5 acres at Berths 208-209 within the footprint of the approved Project (Figure 2.1-3). Landside access to the Project site is provided by a network of arterial routes and freeways, including Harbor Freeway (Interstate [I]-110), the Long Beach Freeway (I-710), the San Diego Freeway (I-405), and the Seaside Freeway (State Route 47).

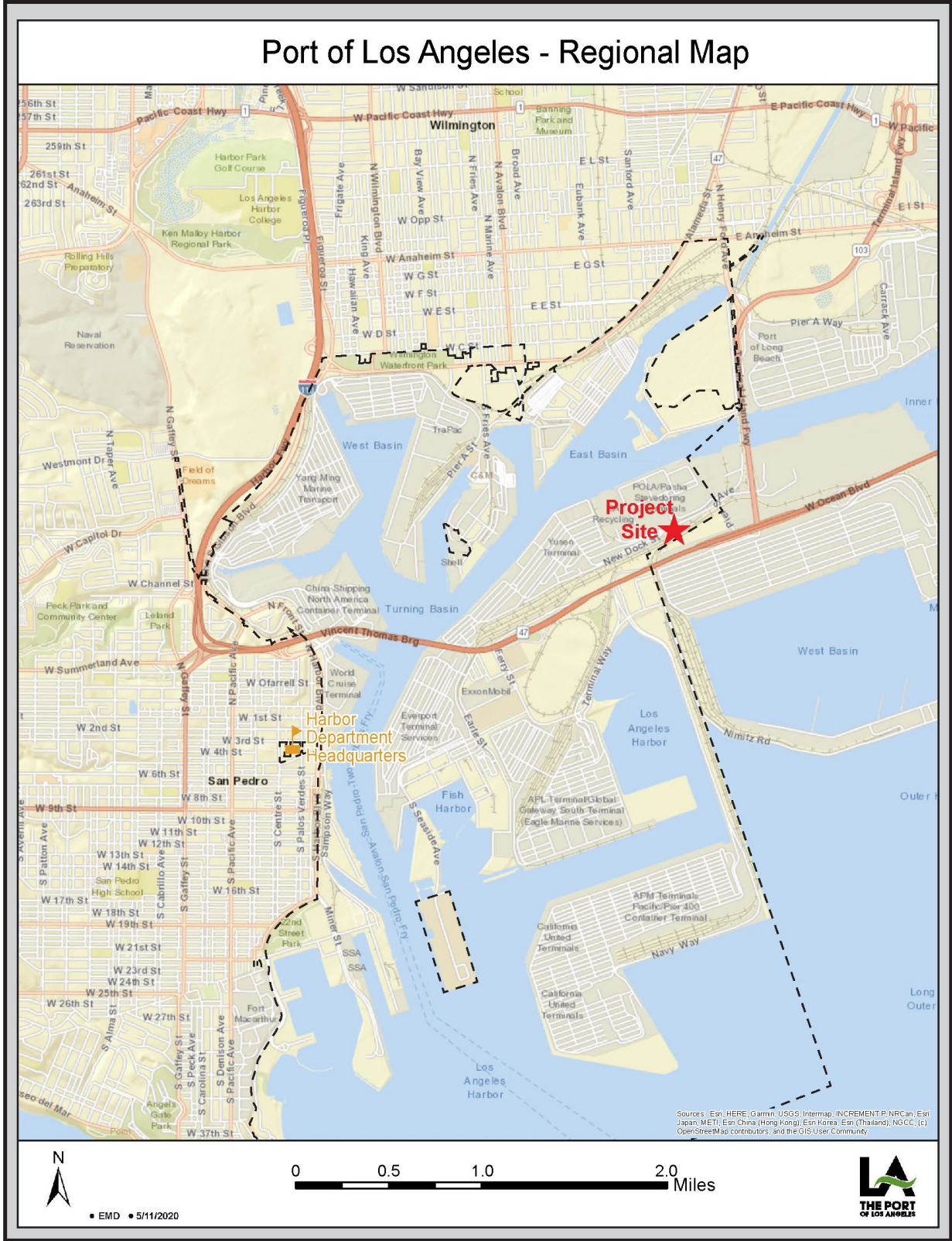


Figure 2.1-1. Regional Location Map



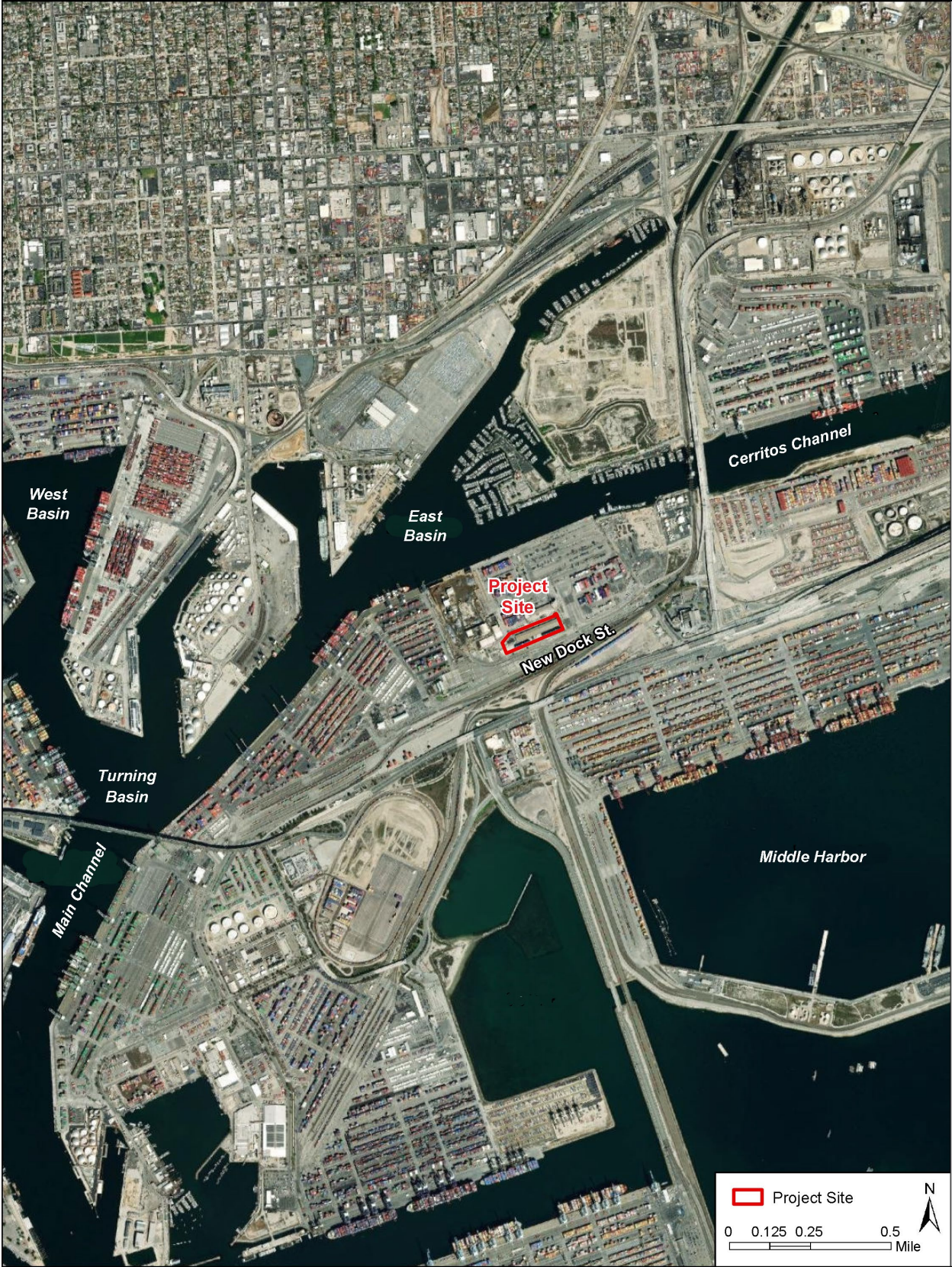


Figure 2.1-2. Vicinity Map





Figure 2.1-3. Conceptual Site Plan

## Land Use and Zoning

The Project site is located in the Port, which is part of the City of Los Angeles General Plan. The Port Master Plan (PMP) establishes policies and guidelines to direct future development of the Port and property within the coastal zone under the California Coastal Act (LAHD 2018). The original PMP became effective in April 1980, after it was approved by the Board of Harbor Commissioners and certified by the California Coastal Commission (CCC). The PMP was comprehensively updated in 2014 and certified by the CCC. The PMP was amended again in 2018 and certified by the CCC. The PMP includes five planning areas. The Project site is located in Planning Area 3 – Terminal Island. Planning Area 3 is the largest planning area and consists of all of Terminal Island with the exception of Fish Harbor. Planning Area 3 includes container operations, maritime support, and other mixed land uses. The PMP designates the Project site for container, dry bulk, and break bulk uses (LAHD 2018).

The Project site is located within Los Angeles County Assessor's Parcel Number 7440012902. This area is designated General/Bulk Cargo – Non-Hazardous (Industrial/Commercial) under the City of Los Angeles General Plan and zoned Qualified Heavy Industrial ([Q] M3) under the City of Los Angeles Zoning Ordinance. The Project site is subject to the State Enterprise Zone Harbor Gateway (ZI-2130) provisions, Local Emergency Temporary Regulations – Time Limits and Parking Relief – City of Los Angeles Municipal Code 16.02.1 (ZI-2498), and Construction Site Review: Department of Conservation, Division of Oil, Gas, and Geothermal Resources (ZI-1195) requirements.

### **2.1.2 Project Objectives**

The proposed Project's goal is to demolish the existing CFS Warehouse at Berths 208-209 and use the site for chassis depot and repair operations with container and chassis storage. The existing CFS Warehouse is currently vacant, physically deteriorated, and a safety hazard. To achieve that goal, the following objectives need to be met:

- Demolish the CFS Warehouse and reuse the site for chassis depot and repair operations with container and chassis storage;
- Provide adequate stormwater management infrastructure, including Low Impact Development (LID) features to comply with City of Los Angeles requirements for development; and
- Utilize the site in a manner that is consistent with LAHD's Tidelands Trust obligations by optimizing the use of existing land.

Together, these objectives define the proposed Project need and are consistent with those previously identified for the approved Project in the Final IS/ND.

## **2.2 Project Description**

### **2.2.1 Overview**

The proposed Project would demolish the CFS Warehouse and use the site for chassis depot and repair operations with container and chassis storage. The proposed Project would not include any modifications to the CEM Building.

### 2.2.2 Construction

Construction associated with the proposed Project would include landside demolition activities; no in-water construction activities would occur. Proposed construction activities would include:

- Lead stabilization and asbestos abatement and removal;
- Building and foundation demolition (62,000 square feet);
- Removal of piping and other electrical and mechanical equipment;
- Removal of railroad tracks;
- Removal of asphalt and concrete pavement;
- Removal and disposal of crushed miscellaneous base and chemically impacted soil;
- Grading (approximately 9.5 acres);
- Installation of an infiltration/biofiltration system (15,200 square feet);
- Connection of infiltration/biofiltration system to existing storm drain system;
- Installation of trash capture devices in storm drain inlets;
- Paving;
- Construction of concrete gutters and catch basins; and
- Installation of fencing.

Demolition activities (i.e., removal of the existing CFS Warehouse) would generate approximately 23,000 cubic yards of building debris that would be transported via dump truck (approximately 2,300 loads) to an off-site disposal and/or recycling facility. Demolition of the building foundation and site paving would generate an estimated 12,000 cubic yards of asphalt and concrete debris, which would require 1,200 dump truck loads for disposal. Removal and disposal of crushed miscellaneous base and chemically impacted soils would generate approximately 30,000 cubic yards of debris that would be transported via dump truck (approximately 3,000 loads). Asbestos abatement and lead -based paint stabilization will be required as part of the demolition activities. Asbestos abatement activities would comply with the South Coast Air Quality Management District (SCAQMD) Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities.

Subsequent to demolition, the Project site (approximately 9.5 acres) would be graded (Figure 2.1-3). An LID feature, consisting of a 15,200-square-foot infiltration/biofiltration system, would be installed. The infiltration/biofiltration system could consist of multiple layers (i.e., gravel, sand, and rock), infiltrate, and overflow would drain to the existing stormwater system. The depth of the system would be up to approximately 6 feet below finished grade. The infiltration/biofiltration system would be designed to meet the City of Los Angeles LID requirements (LA Sanitation & Environment 2021). Installation of State Water Resources Control Board certified full trash capture devices would be required for all storm drain inlets to comply with the Trash Prohibitions

in the Regional Phase 1 Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) permit. Connection of the infiltration/biofiltration system to the existing storm drain system could require trenching. A perimeter fence would also be installed around the Project site. The Project site would be built up from the subgrade using an estimated 24,000 cubic yards of crushed miscellaneous base and repaved with approximately 9,000 cubic yards of asphalt, requiring 2,400 and 900 truckloads, respectively.

In general, construction activities, such as demolition, grading, paving, and utility improvements, would require the use of forklifts, dump trucks, scrapers, asphalt pavers, backhoes, excavators, concrete mixers, pickup trucks, front loaders, cranes, compactors, electrical generators, and miscellaneous smaller equipment. Proposed construction activities are not anticipated to require the use of oversized trucks that would require a California Department of Transportation permit. Construction vehicle parking and staging/laydown areas would occur within the Project site. Demolition and construction activities would occur over a 12-month period.

### **2.2.3 Operation**

Following demolition and construction activities, the Project site would be used for chassis depot and repair operations with container and chassis storage. Proposed container and chassis storage operations would require the use of top handlers and/or terminal tractors to move and stack containers, and forklifts would be used for chassis stacking. All auxiliary equipment and vehicles would be parked within the Project site. Vehicle maintenance activities would also be conducted on-site to support proposed operations. Proposed operations would occur during normal business hours (7 a.m. to 5 p.m.), Monday through Friday. The type and magnitude of activities would be similar to current activities at the Project site. Operations would involve truck and vehicle traffic, consisting of approximately 40 heavy-duty diesel trucks per day and 81 employee commutes per day.

During operations, stormwater from the infiltration/biofiltration system would be discharged into the existing storm drain system through a connection located within the Project site. All stormwater discharged from the Project site would be governed by the Regional MS4 NPDES permit.

## **2.3 Project Permits and Approvals**

The approvals or permits that could be required for the proposed Project include, but are not limited to, the following actions by the identified agencies:

- Los Angeles Department of Building and Safety – approval of demolition permit
- LAHD – issuance of a Coastal Development Permit and property entitlement
- State Water Resources Control Board – issuance of a Construction General Permit and an Industrial General Permit
- Los Angeles Regional Water Quality Control Board – coverage under the Regional MS4 NPDES permit

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## 3.0 ENVIRONMENTAL ANALYSIS

The environmental analysis in this Addendum focuses on changes to impacts that would occur as a result of the proposed Project. The following resource topics were evaluated in the 2019 Final IS/ND and are re-evaluated as part of this Addendum:

- Aesthetics;
- Agriculture and Forestry Resources;
- Air Quality;
- Biological Resources;
- Cultural Resources;
- Energy;
- Geology and Soils;
- Greenhouse Gas (GHG) Emissions;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning;
- Mineral Resources;
- Noise;
- Population and Housing;
- Public Services;
- Recreation;
- Transportation
- Tribal Cultural Resources;
- Utilities and Service Systems; and
- Wildfire<sup>1</sup>.

For purposes of determining whether new or substantially more severe “significant effects” would occur under CEQA Guidelines Section 15162, the criteria for determining whether environmental effects would be significant in this analysis are the same as the significance thresholds used in the 2019 Final IS/ND.

### 3.1 Aesthetics

The 2019 Final IS/ND concluded that the approved Project would have no impact on scenic vistas and would not damage scenic resources, degrade the existing visual character or quality of the

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<sup>1</sup> The 2019 Final IS/ND did not evaluate impacts on wildfire. However, this resource area is evaluated in the Addendum to comply with changes in CEQA law that have occurred since approval of the 2019 Final IS/ND.

site and its surroundings, create substantial light or glare, or create substantial shade or shadow. The Project site is located within a highly industrialized Port complex and is not a prominent feature within or near any protected or designated scenic vistas. The Project site is not visible from any eligible or designated state scenic highway.

The visual elements of the proposed Project would be largely unchanged from those of the approved Project, with the exception that, following demolition and construction activities, the Project site would be used for chassis depot and repair operations with container and chassis storage. Vehicle maintenance activities would also be conducted on-site to support proposed operations. Proposed chassis depot and repair operations and vehicle maintenance activities would be similar in nature to the existing visual character of the Project site and surrounding areas and would be consistent with the visual context of an industrial Port complex. The proposed Project would not result in new significant impacts or a substantial increase in the severity of impacts previously identified in the 2019 Final IS/ND. Similar to the approved Project, no impacts on aesthetics would occur.

### **3.2 Agriculture and Forestry Resources**

The 2019 Final IS/ND determined that the approved Project would have no impacts to agriculture and forestry resources because the Project site is located in a highly developed, industrial area and does not contain any farmland, forest land, or timberland. The Project site is designated General/Bulk Cargo – Non-Hazardous (Industrial/Commercial) under the City of Los Angeles General Plan and zoned Qualified Heavy Industrial ([Q] M3-1) under the City of Los Angeles Zoning Ordinance. Therefore, the approved Project would not convert agricultural land to non-agricultural uses, conflict with existing zoning for agricultural use, forest land, or timberland, or result in the loss of forest land.

The proposed Project would occur on the same site as the approved Project and would not modify the Project site's existing land use or zoning designation. The addition of on-site chassis depot and repair operations with container and chassis storage would not result in new significant impacts or a substantial increase in the severity of previously identified impacts related to agriculture and forestry resources. Therefore, impacts from the proposed Project would be similar to and within the scope of impacts that were evaluated in the 2019 Final IS/ND for the approved Project. Similar to the approved Project, no impacts on agriculture and forestry resources would occur.

### **3.3 Air Quality**

The 2019 Final IS/ND determined that the approved Project would not conflict with or obstruct implementation of the Air Quality Management Plan, State Implementation Plan, San Pedro Bay Ports Clean Air Action Plan, and LAHD's Sustainable Construction Guidelines. The 2019 Final IS/ND concluded that the approved Project's peak daily construction and operation emissions would not exceed applicable significance thresholds, violate air quality standards, expose sensitive receptors to substantial pollutant concentrations, or result in objectionable odors.

### Consistency with Plans and Policies

Proposed Project activities would be required to comply with all applicable air quality regulations ensuring that the proposed Project would not obstruct implementation of the Air Quality Management Plan, State Implementation Plan, Clean Air Action Plan, or Sustainable Construction Guidelines. The proposed Project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts related to conflicts with applicable air quality plans. Impacts would remain less than significant.

### Criteria Pollutant Emissions

The proposed Project would result in increases in criteria pollutant emissions compared to current levels at the Project site. The following summarizes methods used to estimate emissions from these activities and compares these emissions estimates to the applicable SCAQMD air quality significance thresholds (SCAQMD 2023).

### *Construction Impacts*

Proposed Project construction activities would generate air emissions from 1) on-site use of construction equipment and trucks; 2) fugitive dust emissions during earth-moving activities, the operation of vehicles on paved and unpaved surfaces, and building demolition activities; and 3) off-site truck and worker vehicle trips. The California Emissions Estimator Model version 2022.1.1.13 (CalEEMod) was used to estimate emissions from the proposed Project (California Air Pollution Officers Association 2022). CalEEMod is a land use emissions computer model that quantifies potential criteria pollutant and GHG emissions associated with construction and operations for a variety of projects. CalEEMod is approved by SCAQMD as a tool for quantifying air quality impacts from land use projects.

Construction emissions were calculated for the proposed Project construction schedule, which is estimated to occur from June 2024 through April 2025. Proposed Project construction would comply with the fugitive dust reduction measures simulated in the CalEEMod analysis and LAHD's Sustainable Construction Guidelines, such as use of construction equipment that achieve California Air Resources Board Tier 4 off-road emission standards. Appendix A includes CalEEMod Project analyses outputs and emission summary tables. Table 3.3-1 presents the daily emissions estimated for proposed Project activities. These data show that the daily emissions from each Project activity would not exceed any SCAQMD daily emissions significance threshold. In addition, proposed Project peak daily emissions from overlapping construction activities would not exceed any SCAQMD daily emissions significance threshold. For comparative purposes, Table 3.3-1 includes peak day emissions estimated for the approved Project. The emissions vary somewhat between the two scenarios, due to differences in 1) the types of construction activities and resulting construction emission sources and 2) the daily scheduling of these activities.

The CFS Building contains asbestos and lead-based paint. Asbestos abatement activities would comply with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities.

**Table 3.3-1. Proposed Project – Construction Daily Emissions**

Construction Activity	Air Pollutant Emissions (pounds per day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Building and Foundation Demolition	0.8	10.2	19.6	0.1	3.4	0.9
Asphalt Removal	1.8	15.0	35.8	0.1	1.2	0.6
Grading and CMB Installation	0.8	11.1	20.2	0.1	2.3	0.7
Asphalt Paving	1.6	7.0	11.1	0.0	1.2	0.4
Fencing/Architectural Coatings Installation	38.3	0.7	1.5	0.0	0.0	0.0
Utilities Installation	0.4	2.0	11.7	0.0	0.2	0.1
<b>Proposed Project Peak Day Emissions<sup>1</sup></b>	<b>40.0</b>	<b>15.0</b>	<b>35.8</b>	<b>0.1</b>	<b>3.4</b>	<b>0.9</b>
<b>Approved Project Peak Day Emissions<sup>2</sup></b>	<b>4.7</b>	<b>49.9</b>	<b>25.8</b>	<b>&lt;0.1</b>	<b>4.5</b>	<b>2.5</b>
<b>SCAQMD Daily Emission Thresholds</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceed Emission Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>SCAQMD LSTs<sup>3</sup></b>	<b>NA</b>	<b>179</b>	<b>10,198</b>	<b>NA</b>	<b>191</b>	<b>120</b>
<b>Exceed Threshold?</b>	<b>NA</b>	<b>No</b>	<b>No</b>	<b>NA</b>	<b>No</b>	<b>No</b>

Key: CMB = crushed miscellaneous base; CO = carbon monoxide; LST = localized significance thresholds; NA = not applicable; NO<sub>x</sub> = nitrogen oxides; PM<sub>2.5</sub> = particulate matter less than 2.5 microns in diameter; PM<sub>10</sub> = particulate matter less than 10 microns in diameter; SCAQMD = South Coast Air Quality Management District; SO<sub>x</sub> = sulfur oxides; VOC = volatile organic compounds

Notes: Data designated as 0.0 are greater than zero but less than 0.05.

<sup>1</sup> The following are the sources of Project Peak Day Emissions: 1) VOCs – combined Asphalt Paving and Fencing/Architectural Coatings Installation; 2) NO<sub>x</sub>, CO, and SO<sub>x</sub> – Asphalt Removal; and 3) PM<sub>10</sub> and PM<sub>2.5</sub> – Building and Foundation Demolition.

<sup>2</sup> Source: LAHD 2018, Table 4.3-2.

<sup>3</sup> The LSTs represent maximum allowable daily emissions and pertain to an analysis area of 5 acres and receptor distance of 500 meters (approximately 1,600 feet). The Project site is in LST Source Receptor Area 4 (South Coastal Los Angeles County). These are compared to the Project Peak Day Emissions.

### *Operational Impacts*

After completion of the proposed demolition activities, the proposed Project would operate in a manner similar to what was approved in the 2019 Final IS/ND. Therefore, the proposed Project would not result in a substantial net change in emissions from current levels. Operation emissions primarily would occur from the use of heavy-duty diesel trucks, top handlers and/or terminal tractors, forklifts, and employee commuter vehicles.

As discussed above, emissions from the proposed Project would not exceed any SCAQMD daily emission threshold. Therefore, the proposed Project's contribution would not be considered cumulatively considerable under SCAQMD's policy. The proposed Project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts related to cumulatively considerable net increases of criteria pollutants. Impacts would remain less than significant.

### Sensitive Receptors

SCAQMD considers sensitive receptors to include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The nearest sensitive receptors to the Project site are liveaboard residents located about 2,000 feet to the north, across the Cerritos Channel.

The analysis used the SCAQMD localized significance thresholds (LST) methodology to estimate the ambient impact of proposed Project air pollutants to sensitive receptors (SCAQMD 2008). LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, based on ambient pollutant concentrations for each source receptor area and the distance to the nearest sensitive receptor. The proposed Project is located within LST Source Receptor Area 4 (South Coastal Los Angeles County). The analysis included the following assumptions:

- The highest density of peak day emissions and, therefore, the highest potential to exceed an LST would occur over 5 acres of the Project site (the maximum area evaluated by the LST methodology).
- The receptor distance used in the LST analysis was based on the nearest potential sensitive receptor, which includes liveaboard residents located about 2,000 feet to the north of the Project site, across the Cerritos Channel.
- The LST analysis evaluated the same proposed Project peak day emissions scenario for the criteria pollutants listed in Table 3.3-1.

Table 3.3-1 presents the results of the proposed Project LST analysis. These data show that peak daily emissions from the proposed Project would be substantially lower than any SCAQMD LST.

Proposed Project construction also could expose sensitive receptors and the public to toxic air contaminants, mainly in the form of diesel particulate matter (DPM) from the combustion of diesel fuel in equipment. Health effects from DPM are evaluated in terms of 1) annual noncancer effects and 2) lifetime cancer risks. Proposed Project construction would generate nominal amounts of DPM over a period of about 1 year (0.02 tons). Therefore, the proposed Project would not expose sensitive receptors or the public to substantial health effects. The proposed Project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts on sensitive receptor exposure to substantial pollutant concentrations. Similar to the approved Project, no impacts on sensitive receptors would occur.

### Odors

The proposed Project would generate odors from operation of diesel-powered equipment and application of asphalt. However, objectionable odors are not anticipated to affect a substantial number of people due to the distance from sensitive receptors and the relatively low odorous emission rates and intermittent nature of these sources. The proposed Project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts related to creating objectionable odors that could affect a substantial number of people. Impacts would remain less than significant.

## **3.4 Biological Resources**

The 2019 Final IS/ND concluded that the approved Project would have no impact on biological resources because no special status species or habitat, including riparian habitat and wetlands,

are present at the Project site. Activities associated with the approved Project would not interfere with the movements of fish or wildlife or impede use of nursery areas, or conflict with any plans or ordinances, including habitat conservation plans.

The proposed Project would be similar to the approved Project evaluated in the 2019 Final IS/ND, but it would include complete demolition of the CFS Warehouse and reuse of the site for chassis depot and repair operations with container and chassis storage. Construction associated with the proposed Project would include landside demolition activities; no in-water construction activities would occur. The elements of the proposed Project would be largely unchanged from those of the approved Project with respect to the potential for significant impacts on biological resources. Therefore, impacts on biological resources from the proposed Project would be within the scope of impacts that were analyzed in the 2019 Final IS/ND for the approved Project. Similar to the approved Project, no impacts on biological resources would occur.

### **3.5 Cultural Resources**

The 2019 Final IS/ND determined that the approved Project would have no impacts on cultural resources because it would not cause a substantial adverse change in the significance of a historical or archaeological resource, destroy a unique paleontological resource or site or unique geologic feature, or disturb any human remains. No eligible or listed historic resources have been recorded within the Project site. Additionally, the Project site is comprised of artificial fill and previously disturbed soils, which have a low potential for containing archaeological or ethnographic cultural resources. A historical resources assessment completed for the Project site in August 2018 concluded that the CFS Warehouse did not meet any of the eligibility criteria for listing in the National Register of Historic Places or the California Register of Historical Resources, or as a City of Los Angeles designated Historic-Cultural Monument.

The proposed Project would be similar to the approved Project evaluated in the 2019 Final IS/ND, but it would include complete demolition of the CFS Warehouse and reuse of the site for chassis depot and repair operations with container and chassis storage. The elements of the proposed Project would be largely unchanged from those of the approved Project with respect to the potential for significant impacts on cultural resources. Therefore, impacts on cultural resources from the proposed Project would be within the scope of impacts that were analyzed in the 2019 Final IS/ND for the approved Project. Similar to the approved Project, no impacts on cultural resources would occur.

### **3.6 Energy**

The 2019 Final IS/ND concluded that the approved Project would require minimal energy (in terms of fuel consumption) for construction and operation activities and would not use nonrenewable resources in a wasteful or inefficient manner. Proposed activities associated with the complete demolition of the CFS Warehouse and reuse of the site for chassis depot and repair operations with container and chassis storage would remain largely unchanged from those of the approved Project with respect to energy consumption. Therefore, the proposed Project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts

on energy. Consistent with the 2019 Final IS/ND, impacts associated with the proposed Project would be less than significant.

### 3.7 Geology and Soils

The 2019 Final IS/ND concluded that the approved Project would not expose people or structures to substantial adverse effects related to seismic conditions or expansive soils. The approved Project would result in less than significant impacts related to unstable soils because the Project site is located within an area susceptible to landslides and liquefaction (City of Los Angeles 1996). However, approved Project activities were determined to have a low likelihood of causing a landslide, lateral spreading, subsidence, liquefaction, or collapse.

The proposed Project would be similar to the approved Project evaluated in the 2019 Final IS/ND, but it would include complete demolition of the CFS Warehouse and reuse of the site for chassis depot and repair operations with container and chassis storage. The elements of the proposed Project would be largely unchanged from those of the approved Project with respect to the potential for significant impacts on geology and soils. Therefore, impacts on geology and soils from the proposed Project would be within the scope of impacts that were analyzed in the 2019 Final IS/ND for the approved Project. Impacts on geology and soils would remain less than significant.

### 3.8 Greenhouse Gas Emissions

The 2019 Final IS/ND determined that the approved Project would generate GHG emissions from the combustion of diesel and gasoline in equipment and vehicles that would be below SCAQMD's GHG significance threshold of 10,000 metric tons per year of carbon dioxide equivalent (CO<sub>2</sub>e) for industrial projects.

The proposed Project would generate GHG emissions from construction activities. Proposed Project GHG emissions were calculated with the same construction assumptions used in the proposed Project air quality analysis (see Section 3.3, Air Quality). The analysis relied on CalEEMod to estimate GHG emissions from construction sources. Appendix A includes CalEEMod Project analyses outputs and emission summary tables.

Table 3.8-1 presents the annual GHG emissions estimated for proposed Project construction activities. The main contributors to Project GHG emissions would occur from on-site equipment and the transport of debris and materials by heavy-duty trucks.

<b>Table 3.8-1. Proposed Project – Annual GHG Emissions</b>	
<b>Scenario</b>	<b>Annual CO<sub>2</sub>e (MT)</b>
Year 2024	519
Year 2025	250
<b>Proposed Project Construction – Total GHGs</b>	<b>769</b>

<b>Table 3.8-1. Proposed Project – Annual GHG Emissions</b>	
<b>Scenario</b>	<b>Annual CO<sub>2</sub>e (MT)</b>
<b>Proposed Project Construction – 30-Year Amortized</b>	<b>26</b>
<b>Approved Project Construction – Total GHGs<sup>1</sup></b>	<b>77</b>
<b>Approved Project Construction – 30-Year Amortized<sup>1</sup></b>	<b>2.6</b>
<b>SCAQMD Threshold</b>	<b>10,000</b>
<b>Exceed Threshold?</b>	<b>No</b>

Key: CO<sub>2</sub>e = carbon dioxide equivalent; GHG = greenhouse gas; MT = metric tons;  
SCAQMD = South Coast Air Quality Management District

<sup>1</sup>Source: LAHD 2019, Table 4.8-1

Similar to the 2019 Final IS/ND, this Addendum uses the SCAQMD adopted interim threshold of 10,000 metric tons per year of CO<sub>2</sub>e for industrial projects to evaluate the proposed Project's GHG emissions under CEQA. The proposed Project's annual construction GHG emissions would not exceed SCAQMD's significance threshold.

For comparative purposes, Table 3.8-1 includes annual and total GHG emissions estimated for the approved Project. GHG emissions from the proposed Project are ten times higher compared to the approved Project because the proposed Project would require substantially more construction and the usage of diesel-powered equipment to complete the proposed construction activities.

After completion of the proposed construction activities, the proposed Project would operate in a manner similar to what was approved in the 2019 Final IS/ND. Therefore, the proposed Project would not result in a substantial net change in GHG emissions from current levels.

Similar to the approved Project, the proposed Project would conform to state and local GHG emissions/climate change regulations, policies, and strategies.

In summary, the proposed Project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts. Therefore, impacts on GHG emissions from the proposed Project would be within the scope of impacts that were analyzed in the 2019 Final IS/ND for the approved Project. Impacts on GHG emissions would remain less than significant.

### **3.9 Hazards and Hazardous Materials**

The 2019 Final IS/ND concluded that the approved Project would not emit or handle hazardous materials or waste within one-quarter mile of a school, be included on a list of hazardous materials sites, located within an airport land use plan or the vicinity of a private airstrip, or interfere with an emergency response or evacuation plan. However, the approved Project would result in less than significant impacts on hazards because demolition of the existing warehouse would encounter



asbestos and lead-based paint, which would require abatement and disposal in accordance with applicable local, state, and federal regulations.

Construction and operations associated with the proposed Project would differ slightly from those of the approved Project with respect to hazards and hazardous materials (Table 1.1-1). The complete demolition of the CFS Warehouse would generate a comparatively larger volume of debris requiring disposal compared to the approved Project. However, the greater volume of construction and demolition debris would not affect risks associated with asbestos and lead-based paint because asbestos abatement and lead-based paint stabilization would be required as part of the demolition activities. Asbestos abatement activities would comply with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Additionally, the proposed Project would require removal and disposal of chemically impacted soils in accordance with applicable regulations and a health and safety plan, which would minimize risks associated with handling hazardous materials. Therefore, impacts on hazards and hazardous materials from the proposed Project would be within the scope of impacts that were analyzed in the 2019 Final IS/ND for the approved Project. Impacts on hazards and hazardous materials would remain less than significant.

### **3.10 Hydrology and Water Quality**

The 2019 Final IS/ND concluded that the approved Project would have no impacts on hydrology and water quality because it would not violate any water quality standards or waste discharge requirements, deplete groundwater supplies, alter the existing drainage patterns, create or contribute runoff water that would exceed the capacity of stormwater drainage systems, degrade water quality, place housing within a flood hazard area, expose people or structures to loss, injury, or death involving flooding or sea level rise, or cause inundation by a seiche, tsunami, or mudflow.

Construction activities associated with the proposed Project would differ slightly from those of the approved Project with respect to hydrology and water quality (Table 1.1-1). The proposed Project would involve grading and paving, which would alter stormwater runoff flow patterns. However, the proposed modifications would not substantially alter the existing drainage pattern of the Project site or surrounding area. In addition, the proposed Project would include installation of an infiltration/biofiltration system and trash capture devices that would comply with LID requirements to ensure that stormwater discharges comply with applicable permit conditions. The proposed Project would not result in new significant impacts or a substantial increase in the severity of impacts previously identified in the 2019 Final IS/ND. Similar to the approved Project, no impacts on hydrology and water quality would occur.

### **3.11 Land Use and Planning**

The 2019 Final IS/ND concluded that the approved Project would have no impacts on land use and planning because it would not physically divide an established community or conflict with a specific plan, general plan, zoning ordinance, habitat conservation plan, or natural community conservation plan. The proposed Project would be similar to the approved Project evaluated in the 2019 Final IS/ND, but it would include complete demolition of the CFS Warehouse and reuse

of the site for chassis depot and repair operations with container and chassis storage. The elements of the proposed Project would be largely unchanged from those of the approved Project with respect to land use and planning (refer to Table 1.1-1). Therefore, impacts on land use and planning from the proposed Project would be within the scope of impacts that were analyzed in the 2019 Final IS/ND for the approved Project. Similar to the approved Project, no impacts on land use and planning would occur.

### **3.12 Mineral Resources**

The 2019 Final IS/ND concluded that the approved Project would have no impacts on mineral resources because it would not result in the loss of availability of a known mineral resource or access to a known mineral resource recovery site. The elements of the proposed Project would be similar to those of the approved Project with respect to the potential for significant impacts on mineral resources. Therefore, impacts on mineral resources from the proposed Project would be within the scope of impacts that were analyzed in the 2019 Final IS/ND for the approved Project. Similar to the approved Project, no impacts on mineral resources would occur.

### **3.13 Noise**

The 2019 Final IS/ND concluded that the approved Project would not result in a substantial permanent increase in ambient noise levels in the Project vicinity or expose people residing or working in the Project area to excessive noise levels. However, the 2019 Final IS/ND determined that the approved Project would have less than significant impacts because construction activities could result in temporary increases in ambient noise levels in the Project area. Construction-related noise and vibration levels would be temporary, comply with the Los Angeles City Noise Ordinance, and be unlikely to affect the nearest residential receptors, which are the liveaboard residents located in the marinas approximately 2,000 feet north of the Project site, across the Cerritos Channel.

Construction and operations associated with the proposed Project would differ slightly from those of the approved Project with respect to noise (Table 1.1-1). Demolition activities associated with the proposed Project would be more extensive than those associated with the approved Project, and the overall construction period would be relatively longer (i.e., 12 months). However, construction of the proposed Project would use similar types of equipment with comparable noise generation levels. Similar to the approved Project, construction-related noise generated by the proposed Project would comply with the Los Angeles City Noise Ordinance and would not be expected to affect the nearest residential receptors, approximately 2,000 feet from the Project site. Proposed Project operations are not expected to generate excess noise levels above those evaluated for the approved Project. Therefore, impacts on noise from the proposed Project would be within the scope of impacts that were analyzed in the 2019 Final IS/ND for the approved Project. Impacts on noise would remain less than significant.

### **3.14 Population and Housing**

The 2019 Final IS/ND concluded that the approved Project would have no impact on population and housing because it would not induce substantial population growth in an area or displace

existing housing or people. The proposed Project would be similar to the approved Project evaluated in the 2019 Final IS/ND, but it would include complete demolition of the CFS Warehouse and reuse of the site for chassis depot and repair operations with container and chassis storage. The elements of the proposed Project would be largely unchanged from those of the approved Project with respect to population and housing (refer to Table 1.1-1). Therefore, impacts on population and housing from the proposed Project would be within the scope of impacts that were analyzed in the 2019 Final IS/ND for the approved Project. Similar to the approved Project, no impacts on population and housing would occur.

### **3.15 Public Services**

The 2019 Final IS/ND concluded that the approved Project would have no impacts on public services because it would not result in substantial adverse physical impacts associated with the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for fire and police protection, schools, parks, or other public facilities. The proposed Project would be similar to the approved Project evaluated in the 2019 Final IS/ND, but it would include complete demolition of the CFS Warehouse and reuse of the site for chassis depot and repair operations with container and chassis storage. The elements of the proposed Project would be largely unchanged from those of the approved Project with respect to public services (refer to Table 1.1-1). Therefore, impacts on public services from the proposed Project would be within the scope of impacts that were analyzed in the 2019 Final IS/ND for the approved Project. Similar to the approved Project, no impacts on public services would occur.

### **3.16 Recreation**

The 2019 Final IS/ND concluded that the approved Project would have no impacts on recreation because it would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. The elements of the proposed Project would be largely unchanged from those of the approved Project with respect to recreation (refer to Table 1.1-1). Therefore, impacts on recreation from the proposed Project would be within the scope of impacts that were analyzed in the 2019 Final IS/ND for the approved Project. Similar to the approved Project, no impacts on recreation would occur.

### **3.17 Transportation**

The 2019 Final IS/ND concluded that the approved Project would not result in a change in air traffic patterns, increase traffic-related hazards due to a design element, or conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. However, the 2019 Final IS/ND determined that the approved Project would have less than significant impacts on transportation because construction activities would generate additional traffic above current levels. The increased traffic would not conflict with an applicable plan, ordinance, or policy establishing measures of

effectiveness for the performance of the circulation system, including level of service standards and travel demand measures, or result in inadequate emergency access.

This Addendum assesses the proposed Project's transportation impacts using the CEQA vehicle miles traveled (VMT) methodology of California Public Resources Code Section 21099 and CEQA Guidelines Section 15064.3, and the City of Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines. Therefore, the traffic impact analysis in the 2019 Final IS/ND does not directly compare to the VMT analysis of this Addendum.

#### Consistency with City of Los Angeles Circulation System Policies

The 2022 LADOT Transportation Assessment Guidelines state that a project that "generally conforms with and does not obstruct the City's development policies and standards will generally be considered to be consistent" and not in conflict. The 2022 LADOT Transportation Assessment Guidelines include three screening criteria questions to help determine whether a project conflicts with City of Los Angeles circulation system policies. If the answer is "no" to all of the following questions, a "no impact" determination can be made for this threshold (LADOT 2022).

- (i) Does the project require discretionary action that requires the decision-maker to find that the project would substantially conform to the purpose, intent, and provisions of the general plan?

The proposed Project requires approval by the Board of Harbor Commissioners, which is a discretionary action. However, this discretionary action does not require the decision-maker to amend any project component to conform to the purpose, intent, or provision of any existing general plan. Therefore, the proposed Project would comply with all required City of Los Angeles circulation system policies and does not deviate from any general plan.

- (ii) Is the project known to directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety?

The proposed Project would not alter existing transportation routes or options, nor would it affect public safety. The proposed Project would not require any modifications or closures to the public right-of-way, and no in-street construction activities would occur. Therefore, the proposed Project would not directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety.

- (iii) Is the project required to or proposing to make any voluntary or required modifications to the public right-of-way (e.g., dedications and/or improvements in the right-of-way, reconfigurations of curb line)?

The proposed Project does not include any modifications to existing roadways that support current or future bike lanes or bus stops and is not required to make any voluntary or required modifications to the public right-of-way. The proposed Project would not include dedications or physical modifications to the public right-of-way, nor

is it required. The proposed Project does not include any in-street construction activities.

Accordingly, the proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The proposed Project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts related to conflicts with applicable circulation plans and policies. No impacts would occur.

#### Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)(1)

CEQA Guidelines Section 15064.3, subdivision (b)(1), provides criteria for analyzing transportation impacts. The guidelines state that a significant impact may occur if VMT exceed an applicable threshold of significance.

The intent of CEQA Guidelines Section 15064.3 and Threshold T-2.1 in the 2022 LADOT Transportation Assessment Guidelines is to assess whether a land use project would have a potential impact on transportation. The 2022 LADOT Transportation Assessment Guidelines include the following screening criteria to evaluate VMT generated by a project (LADOT 2022):

- (i) Would the land use project generate a net increase of 250 or more daily vehicle trips?
- (ii) Would the project generate a net increase in daily VMT?

The LADOT threshold of 250 daily vehicle trips was proposed for automobiles (the Office of Planning and Research [OPR] does not require VMT analysis of commercial trucks in CEQA documents). OPR has confirmed that heavy-duty truck trips do not need to be included in this transportation analysis but need to be analyzed in other resource areas, such as air quality, GHG emissions, energy, and noise (OPR 2020).

Construction of the proposed Project would generate approximately 25 daily vehicle trips, and operation would generate approximately 81 daily vehicle trips (not including heavy-duty trucks). Therefore, the proposed Project would not generate a net increase of 250 or more daily vehicle trips (i.e., automobile or light-duty vehicle trips) during construction or operation. Therefore, no impacts would occur.

#### Increase Hazards Due to a Geometric Design Feature

The 2022 LADOT Transportation Assessment Guidelines provide two screening criteria questions that must be answered to assess whether the proposed Project would result in impacts due to geometric design hazards or incompatible uses:

- (i) Is the project proposing new driveways or introducing new vehicle access to the property from the public right-of-way?
- (ii) Is the project proposing to, or required to, make any voluntary or required modifications to the public right-of-way (e.g., street dedications or reconfigurations of curb line)?

The proposed Project is not proposing new driveways or introducing new vehicle access to the Project site from the public right-of-way. Also, as previously discussed, the proposed Project does not include any voluntary or required modifications to the public right-of-way. The proposed Project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts related to design hazards or incompatible uses. Similar to the approved Project, no impacts would occur.

#### Inadequate Emergency Access

The proposed Project would not alter the existing configuration of local access roads or block an access point. Therefore, the proposed Project would not result in inadequate emergency access within the surrounding area. The proposed Project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts related to design hazards or incompatible uses. Similar to the approved Project, no impacts would occur.

#### Air Traffic Patterns

The proposed Project would not result in changes to air traffic patterns, including an increase in traffic levels or a change in location that could result in substantial safety risks. The proposed Project would not result in new significant impacts or a substantial increase in the severity of previously identified impacts related to air traffic patterns. Similar to the approved Project, no impacts would occur.

### **3.18 Tribal Cultural Resources**

The 2019 Final IS/ND concluded that the approved Project would have no impact on tribal cultural resources because it would not cause a substantial adverse change in the significance of a tribal cultural resource (defined in California Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe) that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources pursuant to criteria set forth in subdivision (c) of California Public Resources Code Section 5024.1. The elements of the proposed Project would be largely unchanged from those of the approved Project with respect to tribal cultural resources (refer to Table 1.1-1). Therefore, impacts on tribal cultural resources from the proposed Project would be within the scope of impacts that were analyzed in the 2019 Final IS/ND for the approved Project. Similar to the approved Project, no impacts on tribal cultural resources would occur.

### **3.19 Utilities and Service Systems**

The 2019 Final IS/ND concluded that the approved Project would not generate volumes of wastewater that would exceed the capacity of the existing wastewater treatment facilities or require the construction of new water or wastewater treatment facilities or expansion of existing facilities, generate stormwater volumes that would result in the construction of new stormwater drainage facilities or expansion of an existing system, or generate volumes of solid wastes that would exceed the capacity of local landfills. However, the 2019 Final IS/ND determined that the

approved Project would have less than significant impacts on utilities and service systems because operations would result in a minimal increase in water demands due to the increased number of employees on site. The increased water demand would not exceed the current supply or require construction of new facilities or related infrastructure. Additionally, the approved Project would comply with federal, state, and local statutes and regulations related to solid waste, including the City of Los Angeles's Solid Waste Integrated Resource Plan.

Construction and operations associated with the proposed Project would differ slightly from those of the approved Project with respect to utilities and service systems (Table 1.1-1). Compared to the approved Project, the proposed Project would generate larger volumes of solid wastes for disposal, but these volumes would not exceed the current capacities of local landfills and/or permitted disposal facilities. The proposed Project would install new stormwater management infrastructure, including an infiltration/biofiltration LID system and trash capture devices in storm drain inlets. These improvements to stormwater drainage facilities would ensure adequate capacity for managing expected stormwater runoff volumes and compliance with applicable permit conditions. Installation of the proposed stormwater drainage improvements would not result in significant environmental impacts. Therefore, impacts on utilities and service systems from the proposed Project would be within the scope of impacts that were analyzed in the 2019 Final IS/ND for the approved Project. Impacts on utilities and service systems would remain less than significant.

### **3.20 Wildfire**

The 2019 Final IS/ND did not evaluate impacts on wildfire.

Public Resources Code Sections 4201–4204 direct the California Department of Forestry and Fire Protection to map fire hazard based on relevant factors such as fuels, terrain, and weather. The Port is not located in or near a state responsibility area or lands classified as a Very High Fire Severity Zone within its Local Responsibility Area (California Department of Forestry and Fire Protection 2022). Accordingly, the proposed Project would not impair an emergency evacuation plan, exacerbate fire risks, require the installation or maintenance of associated infrastructure, or expose people or structures to significant risks related to wildfires. Therefore, no impacts on wildfire would occur.

## 4.0 CONCLUSION

The proposed Project would demolish the CFS Warehouse and use the site for chassis depot and repair operations with container and chassis storage. The Project site would be graded and paved, and stormwater infrastructure improvements would be constructed on-site. The proposed Project includes a modified variation for the CFS Warehouse that LAHD previously evaluated in the 2019 Final IS/ND (i.e., complete demolition of the warehouse and other minor modifications). Based on the findings in Section 3.0, Environmental Analysis, the proposed Project would not result in any new significant impacts or a substantial increase in the severity of impacts previously identified in the 2019 Final IS/ND. In addition, the proposed Project would not result in any of the conditions stipulated in CEQA Guidelines Section 15162 that would require preparation of a subsequent EIR or ND. Therefore, an addendum is the appropriate CEQA document for the proposed Project.



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## **Appendix A**

# **Berths 208-209 Container Freight Station Building Demolition and Lot Conversion Project Detailed Report**

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# Berths 208-209 Container Freight Station Building Demolition and Lot Conversion Project Detailed Report

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# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	Chassis Depot and Repair Facilities Berths 206-209 FND Addendum v2
Construction Start Date	—
Lead Agency	Los Angeles Harbor Department
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.50
Precipitation (days)	16.0
Location	33.75874698278706, -118.2486075506542
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4613
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.13

## 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
General Light Industry	62.0	1000sqft	9.50	62,000	0.00	0.00	—	—

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## 1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-2*	Limit Heavy-Duty Diesel Vehicle Idling
Construction	C-4*	Use Local and Sustainable Building Materials
Construction	C-9	Use Dust Suppressants
Construction	C-10-A	Water Exposed Surfaces
Construction	C-10-B	Water Active Demolition Sites
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads
Construction	C-12	Sweep Paved Roads
Construction	C-13	Use Low-VOC Paints for Construction

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

## 2. Emissions Summary

## 2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	40.0	15.0	35.8	0.09	0.42	4.09	4.30	0.39	0.80	0.99	—	10,254	10,254	0.44	0.86	12.6	10,393
Mit.	40.0	15.0	35.8	0.09	0.42	3.16	3.36	0.39	0.66	0.85	—	10,254	10,254	0.44	0.86	12.6	10,393
% Reduced	—	—	—	—	—	23%	22%	—	18%	14%	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.81	15.1	35.6	0.09	0.42	2.90	3.19	0.39	0.60	0.88	—	11,740	11,740	0.55	0.90	0.36	12,022
Mit.	1.81	15.1	35.6	0.09	0.42	2.22	2.52	0.39	0.52	0.81	—	11,740	11,740	0.55	0.90	0.36	12,022

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% Reduced	—	—	—	—	—	23%	21%	—	12%	8%	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.79	3.84	8.74	0.02	0.09	0.93	1.02	0.09	0.19	0.27	—	3,066	3,066	0.14	0.22	1.37	3,136
Mit.	1.79	3.84	8.74	0.02	0.09	0.73	0.82	0.09	0.16	0.24	—	3,066	3,066	0.14	0.22	1.37	3,136
% Reduced	—	—	—	—	—	21%	19%	—	16%	11%	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.33	0.70	1.59	< 0.005	0.02	0.17	0.19	0.02	0.03	0.05	—	508	508	0.02	0.04	0.23	519
Mit.	0.33	0.70	1.59	< 0.005	0.02	0.13	0.15	0.02	0.03	0.04	—	508	508	0.02	0.04	0.23	519
% Reduced	—	—	—	—	—	21%	19%	—	16%	11%	—	—	—	—	—	—	—
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	75.0	100	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	75.0	100	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	1.82	15.0	35.8	0.09	0.42	4.09	4.30	0.39	0.80	0.99	—	10,254	10,254	0.44	0.86	12.6	10,393
2025	40.0	7.51	12.6	0.04	0.15	1.11	1.26	0.14	0.30	0.43	—	5,491	5,491	0.27	0.58	8.73	5,678
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	1.81	15.1	35.6	0.09	0.42	0.74	1.16	0.39	0.19	0.59	—	10,245	10,245	0.44	0.41	0.14	10,379
2025	1.63	13.0	31.9	0.09	0.30	2.90	3.19	0.29	0.60	0.88	—	11,740	11,740	0.55	0.90	0.36	12,022
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.38	3.84	8.74	0.02	0.09	0.93	1.02	0.09	0.19	0.27	—	3,066	3,066	0.14	0.22	1.37	3,136
2025	1.79	1.76	3.59	0.01	0.04	0.37	0.40	0.04	0.08	0.12	—	1,471	1,471	0.07	0.13	0.85	1,512
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.07	0.70	1.59	< 0.005	0.02	0.17	0.19	0.02	0.03	0.05	—	508	508	0.02	0.04	0.23	519
2025	0.33	0.32	0.66	< 0.005	0.01	0.07	0.07	0.01	0.01	0.02	—	244	244	0.01	0.02	0.14	250

### 2.3. Construction Emissions by Year, Mitigated

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

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	1.82	15.0	35.8	0.09	0.42	3.16	3.36	0.39	0.66	0.85	—	10,254	10,254	0.44	0.86	12.6	10,393
2025	40.0	7.51	12.6	0.04	0.15	1.09	1.24	0.14	0.29	0.43	—	5,491	5,491	0.27	0.58	8.73	5,678
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	1.81	15.1	35.6	0.09	0.42	0.73	1.15	0.39	0.19	0.58	—	10,245	10,245	0.44	0.41	0.14	10,379

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2025	1.63	13.0	31.9	0.09	0.30	2.22	2.52	0.29	0.52	0.81	—	11,740	11,740	0.55	0.90	0.36	12,022
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.38	3.84	8.74	0.02	0.09	0.73	0.82	0.09	0.16	0.24	—	3,066	3,066	0.14	0.22	1.37	3,136
2025	1.79	1.76	3.59	0.01	0.04	0.29	0.33	0.04	0.07	0.11	—	1,471	1,471	0.07	0.13	0.85	1,512
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.07	0.70	1.59	< 0.005	0.02	0.13	0.15	0.02	0.03	0.04	—	508	508	0.02	0.04	0.23	519
2025	0.33	0.32	0.66	< 0.005	0.01	0.05	0.06	0.01	0.01	0.02	—	244	244	0.01	0.02	0.14	250

### 3. Construction Emissions Details

#### 3.1. Demolition (2024) - Unmitigated

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

Location	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	0.61	3.71	16.2	0.03	0.14	—	0.14	0.13	—	0.13	—	3,554	3,554	0.14	0.03	—	3,566
Dust From Material Movement	—	—	—	—	—	0.03	0.03	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Demolition	—	—	—	—	—	2.54	2.54	—	0.39	0.39	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.76	3.33	0.01	0.03	—	0.03	0.03	—	0.03	—	730	730	0.03	0.01	—	733
Dust From Material Movement	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Demolition	—	—	—	—	—	0.52	0.52	—	0.08	0.08	—	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.14	0.61	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	121	121	< 0.005	< 0.005	—	121
Dust From Material Movement	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Demolition	—	—	—	—	—	0.10	0.10	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.94	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	176	176	0.01	0.01	0.70	179
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.11	6.46	2.48	0.03	0.06	1.36	1.42	0.06	0.37	0.44	—	5,160	5,160	0.28	0.83	11.9	5,425
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



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Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.17	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	34.9	34.9	< 0.005	< 0.005	0.06	35.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.02	1.40	0.51	0.01	0.01	0.28	0.29	0.01	0.08	0.09	—	1,060	1,060	0.06	0.17	1.05	1,114
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.78	5.78	< 0.005	< 0.005	0.01	5.85
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.26	0.09	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	176	176	0.01	0.03	0.17	184

3.2. Demolition (2024) - Mitigated

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

Location	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	0.61	3.71	16.2	0.03	0.14	—	0.14	0.13	—	0.13	—	3,554	3,554	0.14	0.03	—	3,566
Dust From Material Movement	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Demolition	—	—	—	—	—	1.63	1.63	—	0.25	0.25	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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Off-Road Equipment	0.12	0.76	3.33	0.01	0.03	—	0.03	0.03	—	0.03	—	730	730	0.03	0.01	—	733
Dust From Material Movement	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Demolition	—	—	—	—	—	0.33	0.33	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.14	0.61	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	121	121	< 0.005	< 0.005	—	121
Dust From Material Movement	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Demolition	—	—	—	—	—	0.06	0.06	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.94	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	176	176	0.01	0.01	0.70	179
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.11	6.46	2.48	0.03	0.06	1.36	1.42	0.06	0.37	0.44	—	5,160	5,160	0.28	0.83	11.9	5,425
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.17	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	34.9	34.9	< 0.005	< 0.005	0.06	35.4

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Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.02	1.40	0.51	0.01	0.01	0.28	0.29	0.01	0.08	0.09	—	1,060	1,060	0.06	0.17	1.05	1,114
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.78	5.78	< 0.005	< 0.005	0.01	5.85
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.26	0.09	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	176	176	0.01	0.03	0.17	184

3.3. Demolition (2024) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.72	12.3	33.8	0.07	0.39	—	0.39	0.37	—	0.37	—	7,952	7,952	0.32	0.06	—	7,979
Dust From Material Movement	—	—	—	—	—	0.02	0.02	—	< 0.005	< 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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.72	12.3	33.8	0.07	0.39	—	0.39	0.37	—	0.37	—	7,952	7,952	0.32	0.06	—	7,979
Dust From Material Movement	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005	—	—	—	—	—	—	—

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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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	1.15	3.15	0.01	0.04	—	0.04	0.03	—	0.03	—	741	741	0.03	0.01	—	743
Dust From Material Movement	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.21	0.57	< 0.005	0.01	—	0.01	0.01	—	0.01	—	123	123	< 0.005	< 0.005	—	123
Dust From Material Movement	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.94	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	176	176	0.01	0.01	0.70	179
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.05	2.66	1.02	0.01	0.03	0.56	0.59	0.03	0.15	0.18	—	2,125	2,125	0.11	0.34	4.89	2,235
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.07	0.80	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	167	167	0.01	0.01	0.02	169
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

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Hauling	0.04	2.76	1.02	0.01	0.03	0.56	0.59	0.03	0.15	0.18	—	2,126	2,126	0.11	0.34	0.13	2,231
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	15.8	15.8	< 0.005	< 0.005	0.03	16.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.26	0.09	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	198	198	0.01	0.03	0.20	208
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.62	2.62	< 0.005	< 0.005	< 0.005	2.65
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	32.8	32.8	< 0.005	0.01	0.03	34.4

3.4. Demolition (2024) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.72	12.3	33.8	0.07	0.39	—	0.39	0.37	—	0.37	—	7,952	7,952	0.32	0.06	—	7,979
Dust From Material Movement	—	—	—	—	—	0.01	0.01	—	< 0.005	< 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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.72	12.3	33.8	0.07	0.39	—	0.39	0.37	—	0.37	—	7,952	7,952	0.32	0.06	—	7,979

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Dust From Material Movement	—	—	—	—	—	0.01	0.01	—	< 0.005	< 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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	1.15	3.15	0.01	0.04	—	0.04	0.03	—	0.03	—	741	741	0.03	0.01	—	743
Dust From Material Movement	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.21	0.57	< 0.005	0.01	—	0.01	0.01	—	0.01	—	123	123	< 0.005	< 0.005	—	123
Dust From Material Movement	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.94	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	176	176	0.01	0.01	0.70	179
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.05	2.66	1.02	0.01	0.03	0.56	0.59	0.03	0.15	0.18	—	2,125	2,125	0.11	0.34	4.89	2,235
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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Worker	0.06	0.07	0.80	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	167	167	0.01	0.01	0.02	169
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	2.76	1.02	0.01	0.03	0.56	0.59	0.03	0.15	0.18	—	2,126	2,126	0.11	0.34	0.13	2,231
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	15.8	15.8	< 0.005	< 0.005	0.03	16.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.26	0.09	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	198	198	0.01	0.03	0.20	208
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.62	2.62	< 0.005	< 0.005	< 0.005	2.65
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	32.8	32.8	< 0.005	0.01	0.03	34.4

3.5. Grading (2025) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.68	4.19	16.7	0.04	0.16	—	0.16	0.15	—	0.15	—	3,824	3,824	0.16	0.03	—	3,837
Dust From Material Movement	—	—	—	—	—	1.11	1.11	—	0.12	0.12	—	—	—	—	—	—	—
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

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Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.45	1.79	< 0.005	0.02	—	0.02	0.02	—	0.02	—	409	409	0.02	< 0.005	—	410
Dust From Material Movement	—	—	—	—	—	0.12	0.12	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.08	0.33	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	67.7	67.7	< 0.005	< 0.005	—	67.9
Dust From Material Movement	—	—	—	—	—	0.02	0.02	—	< 0.005	< 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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.07	0.88	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	197	197	0.01	0.01	0.02	199
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.08	6.80	2.57	0.04	0.07	1.43	1.49	0.07	0.39	0.46	—	5,331	5,331	0.29	0.84	0.32	5,588
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	21.3	21.3	< 0.005	< 0.005	0.04	21.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00



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Hauling	0.01	0.73	0.27	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	569	569	0.03	0.09	0.57	597
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.53	3.53	< 0.005	< 0.005	0.01	3.58
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.13	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	94.3	94.3	0.01	0.01	0.09	98.9

3.6. Grading (2025) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.68	4.19	16.7	0.04	0.16	—	0.16	0.15	—	0.15	—	3,824	3,824	0.16	0.03	—	3,837
Dust From Material Movement	—	—	—	—	—	0.43	0.43	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.45	1.79	< 0.005	0.02	—	0.02	0.02	—	0.02	—	409	409	0.02	< 0.005	—	410
Dust From Material Movement	—	—	—	—	—	0.05	0.05	—	0.01	0.01	—	—	—	—	—	—	—

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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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.08	0.33	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	67.7	67.7	< 0.005	< 0.005	—	67.9
Dust From Material Movement	—	—	—	—	—	0.01	0.01	—	< 0.005	< 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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.07	0.88	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	197	197	0.01	0.01	0.02	199
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.08	6.80	2.57	0.04	0.07	1.43	1.49	0.07	0.39	0.46	—	5,331	5,331	0.29	0.84	0.32	5,588
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	21.3	21.3	< 0.005	< 0.005	0.04	21.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.73	0.27	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	569	569	0.03	0.09	0.57	597
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.53	3.53	< 0.005	< 0.005	0.01	3.58
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.13	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	94.3	94.3	0.01	0.01	0.09	98.9

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## 3.7. Paving (2025) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.40	2.44	8.67	0.01	0.10	—	0.10	0.09	—	0.09	—	1,601	1,601	0.06	0.01	—	1,606
Dust From Material Movement	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Paving	1.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.40	2.44	8.67	0.01	0.10	—	0.10	0.09	—	0.09	—	1,601	1,601	0.06	0.01	—	1,606
Dust From Material Movement	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Paving	1.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.15	0.52	< 0.005	0.01	—	0.01	0.01	—	0.01	—	96.5	96.5	< 0.005	< 0.005	—	96.8

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Dust From Material Movement	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Paving	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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.03	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	16.0	16.0	< 0.005	< 0.005	—	16.0
Dust From Material Movement	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.70	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	138	138	0.01	< 0.005	0.51	140
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.06	4.35	1.69	0.02	0.05	0.95	0.99	0.05	0.26	0.30	—	3,543	3,543	0.19	0.56	8.22	3,721
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.05	0.59	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	131	131	0.01	< 0.005	0.01	133
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.05	4.52	1.71	0.02	0.05	0.95	0.99	0.05	0.26	0.30	—	3,544	3,544	0.19	0.56	0.21	3,715
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.02	8.02	< 0.005	< 0.005	0.01	8.12

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Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.28	0.10	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	214	214	0.01	0.03	0.21	224
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.33	1.33	< 0.005	< 0.005	< 0.005	1.35
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	35.4	35.4	< 0.005	0.01	0.04	37.1

3.8. Paving (2025) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.40	2.44	8.67	0.01	0.10	—	0.10	0.09	—	0.09	—	1,601	1,601	0.06	0.01	—	1,606
Dust From Material Movement	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Paving	1.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.40	2.44	8.67	0.01	0.10	—	0.10	0.09	—	0.09	—	1,601	1,601	0.06	0.01	—	1,606
Dust From Material Movement	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—

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Paving	1.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.15	0.52	< 0.005	0.01	—	0.01	0.01	—	0.01	—	96.5	96.5	< 0.005	< 0.005	—	96.8
Dust From Material Movement	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Paving	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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.03	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	16.0	16.0	< 0.005	< 0.005	—	16.0
Dust From Material Movement	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.70	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	138	138	0.01	< 0.005	0.51	140
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.06	4.35	1.69	0.02	0.05	0.95	0.99	0.05	0.26	0.30	—	3,543	3,543	0.19	0.56	8.22	3,721

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Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.05	0.59	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	131	131	0.01	< 0.005	0.01	133
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.05	4.52	1.71	0.02	0.05	0.95	0.99	0.05	0.26	0.30	—	3,544	3,544	0.19	0.56	0.21	3,715
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.02	8.02	< 0.005	< 0.005	0.01	8.12
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.28	0.10	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	214	214	0.01	0.03	0.21	224
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.33	1.33	< 0.005	< 0.005	< 0.005	1.35
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	35.4	35.4	< 0.005	0.01	0.04	37.1

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	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	0.03	0.68	1.50	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	210	210	0.01	< 0.005	—	210
Architectural Coatings	38.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

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Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.03	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.62	8.62	< 0.005	< 0.005	—	8.65
Architectural Coatings	1.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.43	1.43	< 0.005	< 0.005	—	1.43
Architectural Coatings	0.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
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
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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



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Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
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
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
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
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

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	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	0.03	0.68	1.50	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	210	210	0.01	< 0.005	—	210
Architectural Coatings	38.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.03	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.62	8.62	< 0.005	< 0.005	—	8.65
Architectural Coatings	1.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.43	1.43	< 0.005	< 0.005	—	1.43
Architectural Coatings	0.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
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
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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
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
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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

3.11. Trenching (2024) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34	2.08	11.0	0.02	0.08	—	0.08	0.07	—	0.07	—	2,224	2,224	0.09	0.02	—	2,231
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.25	1.31	< 0.005	0.01	—	0.01	0.01	—	0.01	—	265	265	0.01	< 0.005	—	266
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.05	0.24	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	43.9	43.9	< 0.005	< 0.005	—	44.1
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.07	0.80	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	167	167	0.01	0.01	0.02	169
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

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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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	20.3	20.3	< 0.005	< 0.005	0.04	20.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.36	3.36	< 0.005	< 0.005	0.01	3.40
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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

3.12. Trenching (2024) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34	2.08	11.0	0.02	0.08	—	0.08	0.07	—	0.07	—	2,224	2,224	0.09	0.02	—	2,231
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.25	1.31	< 0.005	0.01	—	0.01	0.01	—	0.01	—	265	265	0.01	< 0.005	—	266
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

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Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.05	0.24	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	43.9	43.9	< 0.005	< 0.005	—	44.1
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.07	0.80	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	167	167	0.01	0.01	0.02	169
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	20.3	20.3	< 0.005	< 0.005	0.04	20.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.36	3.36	< 0.005	< 0.005	0.01	3.40
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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

3.13. Trenching (2025) - Unmitigated

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

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

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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34	1.93	11.0	0.02	0.07	—	0.07	0.07	—	0.07	—	2,224	2,224	0.09	0.02	—	2,232
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.12	0.66	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	135	135	0.01	< 0.005	—	135
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.02	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	22.3	22.3	< 0.005	< 0.005	—	22.4
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.06	0.74	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	164	164	0.01	0.01	0.02	166
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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Worker	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.1	10.1	< 0.005	< 0.005	0.02	10.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.67	1.67	< 0.005	< 0.005	< 0.005	1.69
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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

3.14. Trenching (2025) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34	1.93	11.0	0.02	0.07	—	0.07	0.07	—	0.07	—	2,224	2,224	0.09	0.02	—	2,232
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.12	0.66	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	135	135	0.01	< 0.005	—	135
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.02	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	22.3	22.3	< 0.005	< 0.005	—	22.4



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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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.06	0.74	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	164	164	0.01	0.01	0.02	166
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.1	10.1	< 0.005	< 0.005	0.02	10.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.67	1.67	< 0.005	< 0.005	< 0.005	1.69
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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

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

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

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

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

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

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4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

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

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

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

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

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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
Building and Foundation Demolition	Demolition	6/1/2024	9/15/2024	5.00	75.0	Building and foundation demolition and remove equipment and railroad tracks. Debris would be transported via dump truck to an off-site disposal and/or recycling facility.
Asphalt Removal	Demolition	9/16/2024	10/31/2024	5.00	34.0	Demolition of site paving that would be transported via dump truck to an off-site disposal and/or recycling facility
Grading and Install CMB	Grading	1/21/2025	3/15/2025	5.00	39.0	The site would be graded and built up from the subgrade with ~24,000 cubic yards of crushed miscellaneous base (CMB), requiring 2,400 truck loads.
Asphalt Paving	Paving	3/16/2025	4/15/2025	5.00	22.0	The site would be repaved with ~9,000 cubic yards of asphalt, requiring 900 truck loads.
Architectural Coating and Install Fencing	Architectural Coating	4/1/2025	4/21/2025	5.00	15.0	Minimal AC requirement but a perimeter fence would be installed around the site.

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Install Utilities	Trenching	11/1/2024	1/31/2025	5.00	66.0	Includes utility improvements and installation of a biofiltration system (15,000 square feet) - the depth of the system would be approximately 6 feet below finished grade.
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## 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
Building and Foundation Demolition	Excavators	Diesel	Tier 4 Final	1.00	8.00	308	0.38
Building and Foundation Demolition	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	8.00	127	0.40
Building and Foundation Demolition	Off-Highway Trucks	Diesel	Average	1.00	8.00	300	0.38
Building and Foundation Demolition	Rubber Tired Loaders	Diesel	Tier 4 Final	1.00	8.00	205	0.36
Building and Foundation Demolition	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	4.00	115	0.46
Asphalt Removal	Concrete/Industrial Saws	Diesel	Tier 4 Final	1.00	8.00	50.0	0.73
Asphalt Removal	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	8.00	127	0.38
Asphalt Removal	Off-Highway Trucks	Diesel	Average	1.00	8.00	300	0.38
Asphalt Removal	Rubber Tired Loaders	Diesel	Tier 4 Final	1.00	8.00	205	0.38
Asphalt Removal	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	6.00	115	0.46
Grading and Install CMB	Graders	Diesel	Tier 4 Final	1.00	8.00	180	0.41

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Grading and Install CMB	Crawler Tractors	Diesel	Tier 4 Final	1.00	8.00	185	0.43
Grading and Install CMB	Rubber Tired Loaders	Diesel	Tier 4 Final	1.00	8.00	205	0.36
Grading and Install CMB	Off-Highway Trucks	Diesel	Average	1.00	8.00	300	0.38
Grading and Install CMB	Rollers	Diesel	Average	1.00	8.00	114	0.38
Grading and Install CMB	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	4.00	115	0.46
Asphalt Paving	Pavers	Diesel	Tier 4 Final	1.00	8.00	174	0.42
Asphalt Paving	Rollers	Diesel	Average	1.00	8.00	36.0	0.38
Asphalt Paving	Off-Highway Trucks	Diesel	Average	1.00	4.00	300	0.38
Asphalt Paving	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	4.00	115	0.46
Architectural Coating and Install Fencing	Air Compressors	Diesel	Tier 4 Final	1.00	6.00	37.0	0.48
Architectural Coating and Install Fencing	Forklifts	Diesel	Tier 4 Final	1.00	4.00	82.0	0.20
Install Utilities	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	8.00	127	0.37
Install Utilities	Cranes	Diesel	Tier 4 Final	1.00	6.00	330	0.29
Install Utilities	Off-Highway Trucks	Diesel	Average	1.00	4.00	300	0.38
Install Utilities	Rubber Tired Loaders	Diesel	Tier 4 Final	1.00	4.00	205	0.36
Install Utilities	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	4.00	115	0.46

## 5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Building and Foundation Demolition	Excavators	Diesel	Tier 4 Final	1.00	8.00	308	0.38
Building and Foundation Demolition	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	8.00	127	0.40

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Building and Foundation Demolition	Off-Highway Trucks	Diesel	Average	1.00	8.00	300	0.38
Building and Foundation Demolition	Rubber Tired Loaders	Diesel	Tier 4 Final	1.00	8.00	205	0.36
Building and Foundation Demolition	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	4.00	115	0.46
Asphalt Removal	Concrete/Industrial Saws	Diesel	Tier 4 Final	1.00	8.00	50.0	0.73
Asphalt Removal	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	8.00	127	0.38
Asphalt Removal	Off-Highway Trucks	Diesel	Average	1.00	8.00	300	0.38
Asphalt Removal	Rubber Tired Loaders	Diesel	Tier 4 Final	1.00	8.00	205	0.38
Asphalt Removal	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	6.00	115	0.46
Grading and Install CMB	Graders	Diesel	Tier 4 Final	1.00	8.00	180	0.41
Grading and Install CMB	Crawler Tractors	Diesel	Tier 4 Final	1.00	8.00	185	0.43
Grading and Install CMB	Rubber Tired Loaders	Diesel	Tier 4 Final	1.00	8.00	205	0.36
Grading and Install CMB	Off-Highway Trucks	Diesel	Average	1.00	8.00	300	0.38
Grading and Install CMB	Rollers	Diesel	Average	1.00	8.00	114	0.38
Grading and Install CMB	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	4.00	115	0.46
Asphalt Paving	Pavers	Diesel	Tier 4 Final	1.00	8.00	174	0.42
Asphalt Paving	Rollers	Diesel	Average	1.00	8.00	36.0	0.38
Asphalt Paving	Off-Highway Trucks	Diesel	Average	1.00	4.00	300	0.38
Asphalt Paving	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	4.00	115	0.46
Architectural Coating and Install Fencing	Air Compressors	Diesel	Tier 4 Final	1.00	6.00	37.0	0.48



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Architectural Coating and Install Fencing	Forklifts	Diesel	Tier 4 Final	1.00	4.00	82.0	0.20
Install Utilities	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	8.00	127	0.37
Install Utilities	Cranes	Diesel	Tier 4 Final	1.00	6.00	330	0.29
Install Utilities	Off-Highway Trucks	Diesel	Average	1.00	4.00	300	0.38
Install Utilities	Rubber Tired Loaders	Diesel	Tier 4 Final	1.00	4.00	205	0.36
Install Utilities	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	4.00	115	0.46

### 5.3. Construction Vehicles

#### 5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Building and Foundation Demolition	—	—	—	—
Building and Foundation Demolition	Worker	12.5	18.5	LDA,LDT1,LDT2
Building and Foundation Demolition	Vendor	—	10.2	HHDT,MHDT
Building and Foundation Demolition	Hauling	73.2	20.0	HHDT
Building and Foundation Demolition	Onsite truck	—	—	HHDT
Asphalt Removal	—	—	—	—
Asphalt Removal	Worker	12.5	18.5	LDA,LDT1,LDT2
Asphalt Removal	Vendor	—	10.2	HHDT,MHDT
Asphalt Removal	Hauling	30.1	20.0	HHDT
Asphalt Removal	Onsite truck	—	—	HHDT
Grading and Install CMB	—	—	—	—
Grading and Install CMB	Worker	15.0	18.5	LDA,LDT1,LDT2
Grading and Install CMB	Vendor	—	10.2	HHDT,MHDT
Grading and Install CMB	Hauling	76.9	20.0	HHDT
Grading and Install CMB	Onsite truck	—	—	HHDT

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Asphalt Paving	—	—	—	—
Asphalt Paving	Worker	10.0	18.5	LDA,LDT1,LDT2
Asphalt Paving	Vendor	—	10.2	HHDT,MHDT
Asphalt Paving	Hauling	51.1	20.0	HHDT
Asphalt Paving	Onsite truck	—	—	HHDT
Architectural Coating and Install Fencing	—	—	—	—
Architectural Coating and Install Fencing	Worker	0.00	18.5	LDA,LDT1,LDT2
Architectural Coating and Install Fencing	Vendor	—	10.2	HHDT,MHDT
Architectural Coating and Install Fencing	Hauling	0.00	20.0	HHDT
Architectural Coating and Install Fencing	Onsite truck	—	—	HHDT
Install Utilities	—	—	—	—
Install Utilities	Worker	12.5	18.5	LDA,LDT1,LDT2
Install Utilities	Vendor	—	10.2	HHDT,MHDT
Install Utilities	Hauling	0.00	20.0	HHDT
Install Utilities	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Building and Foundation Demolition	—	—	—	—
Building and Foundation Demolition	Worker	12.5	18.5	LDA,LDT1,LDT2
Building and Foundation Demolition	Vendor	—	10.2	HHDT,MHDT
Building and Foundation Demolition	Hauling	73.2	20.0	HHDT
Building and Foundation Demolition	Onsite truck	—	—	HHDT
Asphalt Removal	—	—	—	—

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Asphalt Removal	Worker	12.5	18.5	LDA,LDT1,LDT2
Asphalt Removal	Vendor	—	10.2	HHDT,MHDT
Asphalt Removal	Hauling	30.1	20.0	HHDT
Asphalt Removal	Onsite truck	—	—	HHDT
Grading and Install CMB	—	—	—	—
Grading and Install CMB	Worker	15.0	18.5	LDA,LDT1,LDT2
Grading and Install CMB	Vendor	—	10.2	HHDT,MHDT
Grading and Install CMB	Hauling	76.9	20.0	HHDT
Grading and Install CMB	Onsite truck	—	—	HHDT
Asphalt Paving	—	—	—	—
Asphalt Paving	Worker	10.0	18.5	LDA,LDT1,LDT2
Asphalt Paving	Vendor	—	10.2	HHDT,MHDT
Asphalt Paving	Hauling	51.1	20.0	HHDT
Asphalt Paving	Onsite truck	—	—	HHDT
Architectural Coating and Install Fencing	—	—	—	—
Architectural Coating and Install Fencing	Worker	0.00	18.5	LDA,LDT1,LDT2
Architectural Coating and Install Fencing	Vendor	—	10.2	HHDT,MHDT
Architectural Coating and Install Fencing	Hauling	0.00	20.0	HHDT
Architectural Coating and Install Fencing	Onsite truck	—	—	HHDT
Install Utilities	—	—	—	—
Install Utilities	Worker	12.5	18.5	LDA,LDT1,LDT2
Install Utilities	Vendor	—	10.2	HHDT,MHDT
Install Utilities	Hauling	0.00	20.0	HHDT
Install Utilities	Onsite truck	—	—	HHDT

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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 and Install Fencing	0.00	0.00	93,000	31,000	—

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 (Building Square Footage)	Acres Paved (acres)
Building and Foundation Demolition	—	26,800	0.00	186,000	—
Asphalt Removal	—	8,200	4.50	0.00	—
Grading and Install CMB	24,000	—	9.50	0.00	—
Asphalt Paving	9,000	—	9.50	0.00	9.50

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
General Light Industry	9.50	100%

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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	690	0.05	0.01
2025	0.00	690	0.05	0.01

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

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5.18.2.1. Unmitigated

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

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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## 6. Climate Risk Detailed Report

### 6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	6.24	annual days of extreme heat
Extreme Precipitation	4.10	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

### 6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
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Temperature and Extreme Heat	2	3	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	0	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	5	3	0	N/A

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

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

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

### 6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	2	3	1	4
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	5	3	1	5

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

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

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

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## 6.4. Climate Risk Reduction Measures

## 7. Health and Equity Details

## 7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	16.8
AQ-PM	68.1
AQ-DPM	99.7
Drinking Water	42.4
Lead Risk Housing	—
Pesticides	0.00
Toxic Releases	93.8
Traffic	64.0
Effect Indicators	—
CleanUp Sites	99.7
Groundwater	99.9
Haz Waste Facilities/Generators	99.1
Impaired Water Bodies	97.5
Solid Waste	96.8
Sensitive Population	—
Asthma	93.1
Cardio-vascular	62.5
Low Birth Weights	—
Socioeconomic Factor Indicators	—



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Education	34.4
Housing	—
Linguistic	—
Poverty	—
Unemployment	—

7.2. Healthy Places Index Scores

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

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	—
Employed	—
Median HI	—
Education	—
Bachelor's or higher	—
High school enrollment	—
Preschool enrollment	—
Transportation	—
Auto Access	—
Active commuting	—
Social	—
2-parent households	—
Voting	—
Neighborhood	—
Alcohol availability	—
Park access	—
Retail density	—

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Supermarket access	—
Tree canopy	—
Housing	—
Homeownership	—
Housing habitability	—
Low-inc homeowner severe housing cost burden	—
Low-inc renter severe housing cost burden	—
Uncrowded housing	—
Health Outcomes	—
Insured adults	—
Arthritis	77.8
Asthma ER Admissions	13.7
High Blood Pressure	49.4
Cancer (excluding skin)	49.7
Asthma	98.6
Coronary Heart Disease	25.9
Chronic Obstructive Pulmonary Disease	62.6
Diagnosed Diabetes	47.0
Life Expectancy at Birth	0.0
Cognitively Disabled	99.8
Physically Disabled	99.8
Heart Attack ER Admissions	32.2
Mental Health Not Good	71.0
Chronic Kidney Disease	64.9
Obesity	35.5
Pedestrian Injuries	0.0
Physical Health Not Good	61.7

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Stroke	58.2
Health Risk Behaviors	—
Binge Drinking	1.0
Current Smoker	35.6
No Leisure Time for Physical Activity	70.6
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	38.0
Children	99.4
Elderly	83.1
English Speaking	0.0
Foreign-born	0.0
Outdoor Workers	98.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	17.2
Traffic Density	0.0
Traffic Access	23.0
Other Indices	—
Hardship	0.0
Other Decision Support	—
2016 Voting	0.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	—
Healthy Places Index Score for Project Location (b)	—
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes

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Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	Wilmington Long Beach Carson

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

**7.4. Health & Equity Measures**

No Health & Equity Measures selected.

**7.5. Evaluation Scorecard**

Health & Equity Evaluation Scorecard not completed.

**7.6. Health & Equity Custom Measures**

No Health & Equity Custom Measures created.

**8. User Changes to Default Data**

Screen	Justification
Characteristics: Project Details	Corrected County.
Land Use	Project-specific inputs.
Construction: Construction Phases	Project-specific activities and inputs.
Construction: Off-Road Equipment	Project-specific equipment list.
Construction: Dust From Material Movement	Site area.
Construction: Demolition	Asphalt removal does not include building demo.
Construction: Paving	Project site area.

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