

Rome Hill Commercial Project

Air Quality, Greenhouse Gas, and Energy Impact Study

County of Riverside, CA

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CalEEMod Emission Output

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EMFAC2021 Output

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GLOSSARY OF TERMS

AQMP	Air Quality Management Plan
CAAQS	California Ambient Air Quality Standards
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CFCs	Chlorofluorocarbons
CH ₄	Methane
CNG	Compressed natural gas
CO	Carbon monoxide
CO ₂	Carbon dioxide
CO ₂ e	Carbon dioxide equivalent
DPM	Diesel particulate matter
GHG	Greenhouse gas
HFCs	Hydrofluorocarbons
LST	Localized Significant Thresholds
MTCO ₂ e	Metric tons of carbon dioxide equivalent
MMTCO ₂ e	Million metric tons of carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
NO ₂	Nitrogen dioxide
N ₂ O	Nitrous oxide
O ₃	Ozone
PFCs	Perfluorocarbons
PM	Particle matter
PM ₁₀	Particles that are less than 10 micrometers in diameter
PM _{2.5}	Particles that are less than 2.5 micrometers in diameter
PMI	Point of maximum impact
PPM	Parts per million
PPB	Parts per billion
RTIP	Regional Transportation Improvement Plan
RTP	Regional Transportation Plan
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SF ₆	Sulfur hexafluoride
SIP	State Implementation Plan
SO _x	Sulfur Oxides
SRA	Source/Receptor Area
TAC	Toxic air contaminants
VOC	Volatile organic compounds
WRCC	Western Regional Climate Center

1.0 Introduction

1.1 Purpose of Analysis and Study Objectives

This air quality and greenhouse gas (GHG) analysis was prepared to evaluate whether the estimated criteria pollutants and GHG emissions generated from the project would cause a significant impact to the air resources in the project area. This assessment was conducted within the context of the California Environmental Quality Act (CEQA, California Public Resources Code Sections 21000, et seq.). The assessment is consistent with the methodology and emission factors endorsed by South Coast Air Quality Management District (SCAQMD), California Air Resource Board (CARB), and the United States Environmental Protection Agency (US EPA).

1.2 Project Summary

1.2.1 Site Location

The project site is located across two parcels (371-150-001 & 371-150-002) in the City of Lake Elsinore, California, as shown in Exhibit A. The project is seeking to merge the two parcels into one and rezone the land from the current designation of R-2 Light-Medium Residential to C-M Commercial-Manufacturing. The proposed use is commercial. Land uses surrounding the site include vacant land to the northwest and northeast, Grand Avenue to the southwest with commercial uses further, and single-family residential uses to the southeast.

1.2.2 Project Description

The Project proposes to develop the site with two buildings consisting of 121,490 square feet of warehouse space with mezzanines included in each building, covering a total of 6.77 acres for the entire site. The site is also to include a parking lot with 180 parking stalls. Exhibit B demonstrates the site plan for the project.

Construction activities within the Project area will consist of site preparation, on-site grading, building, paving, and architectural coating. Table 1 summarizes the land use description for the Project Site.

Table 1: Land Use Summary

Land Use	Unit Amount	Size Metric
Unrefrigerated Warehouse-No Rail ¹	107.79	1000sqft
Parking Lot ²	189	Space

1.2.3 Sensitive Receptors

Sensitive receptors are considered land uses or other types of population groups that are more sensitive to air pollution than others due to their exposure. Sensitive population groups include children, the elderly, the acutely and chronically ill, and those with cardio-respiratory diseases. For

CEQA purposes, a sensitive receptor would be a location where a sensitive individual could remain for 24-hours or longer, such as residences, hospitals, and schools (etc).

The closest existing sensitive receptors (to the site area) are the residential land uses located approximately 185 feet to the southeast of the project site.

1.3 Executive Summary of Findings and Mitigation Measures

The following is a summary of the analysis results:

Construction-Source Emissions

Project construction-source emissions would not exceed applicable regional thresholds of significance established by the SCAQMD. For localized emissions, the project will not exceed applicable Localized Significance Thresholds (LSTs) established by the SCAQMD.

Project construction-source emissions would not conflict with the Basin Air Quality Management Plan (AQMP). As discussed herein, the project will comply with all applicable SCAQMD construction-source emission reduction rules and guidelines. Project construction source emissions would not cause or substantively contribute to violation of the California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS).

Established requirements addressing construction equipment operations, and construction material use, storage, and disposal requirements act to minimize odor impacts that may result from construction activities. Moreover, construction-source odor emissions would be temporary, short-term, and intermittent in nature and would not result in persistent impacts that would affect substantial numbers of people. Potential construction-source odor impacts are therefore considered less-than-significant.

Operational-Source Emissions

The project operational-sourced emissions would not exceed applicable regional thresholds of significance established by the SCAQMD. Project operational-source emissions would not result in or cause a significant localized air quality impact as discussed in the Operations-Related Local Air Quality Impacts section of this report. Additionally, project-related traffic will not cause or result in CO concentrations exceeding applicable state and/or federal standards (CO "hotspots"). Project operational-source emissions would therefore not adversely affect sensitive receptors within the vicinity of the project.

Project operational-source emissions would not conflict with the Basin Air Quality Management Plan (AQMP). The project's emissions meet SCAQMD regional thresholds and will not result in a significant cumulative impact. The project does not propose any such uses or activities that would result in potentially significant operational-source odor impacts. Potential operational-source odor impacts are therefore considered less-than-significant.

Project-related GHG emissions meet the County of Riverside Climate Action Plan (CAP) Update screening threshold of 3,000 metric tons of carbon dioxide equivalents (MTCO₂e) per year and are also

considered to be less than significant. The project also complies with the goals of the City of Lake Elsinore Climate Action Plan, CARB Scoping Plan, AB-32, and SB-32.

Mitigation Measures

A. Construction Measures

Adherence to SCAQMD Rule 403 is required.

No construction mitigation required.

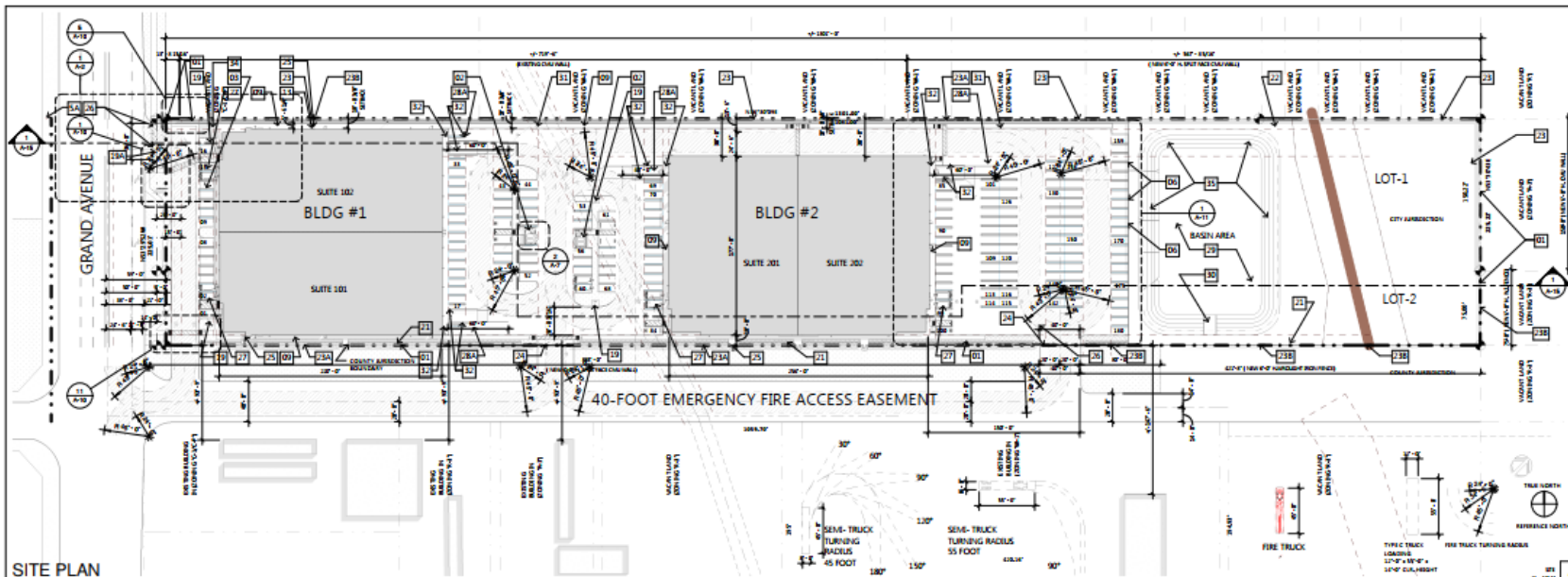
B. Operational Measures to Reduce Greenhouse Gas Emissions

No operational mitigation required.

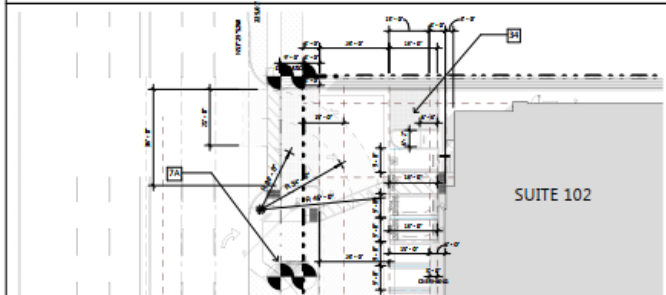
Exhibit A
Location Map



Exhibit B Site Plan



SITE PLAN



SUITE 102

BLDG. JUSTIFICATIONS - CBC									
BLDG.	AREA PER FLOOR (SF)	TOTAL AREA	OCCUPANCY (IBC 403)	CONSTRUCTION TYPE (IBC 403)	ALLOWABLE AREA (IBC 403)	NUMBER OF STORIES (IBC 403)	ALLOWABLE AREA (IBC 403)	ALLOWABLE HEIGHT (IBC 403)	COMPLIANCE (IBC 403)
BLDG. 1	1,100	1,100	R	III	1,100	1	1,100	10	YES
BLDG. 2	1,100	1,100	R	III	1,100	1	1,100	10	YES

NOTES:
1. ALL SETBACKS TO BE MAINTAINED.
2. ALL SETBACKS TO BE MAINTAINED.
3. ALL SETBACKS TO BE MAINTAINED.

CODE ANALYSIS

PROJECT DATA									
BLDG. 1	1,100	1,100	R	III	1,100	1	1,100	10	YES
BLDG. 2	1,100	1,100	R	III	1,100	1	1,100	10	YES

PROJECT DATA

SITE PLAN KEY NOTES									
1.	ALL SETBACKS TO BE MAINTAINED.								
2.	ALL SETBACKS TO BE MAINTAINED.								

SITE PLAN KEY NOTES



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PROJECT TITLE
ROME HILL COMMERCIAL

GRAND AVENUE (AT THE STREET)
LAKE ELISINORE, CA 92530
TRACT: 200 & LOT 200

1001 NEWPORT BLVD. LAKE ELISINORE, CA 92530

SITE PLAN

PLANNING APPLICATION NO. PA 2017-19
SUBMITTAL DATE: 08/01/2017
DATE OF DECISION: 08/01/2017
DATE OF PERMIT: 08/01/2017



DATE: 08/01/2017

REVISION	DATE
1. PLANNING CORRECTION	08/01/2017
2. PLANNING CORRECTION	08/01/2017
3. PLANNING CORRECTION	08/01/2017

DATE: 08/01/2017
JOHN HANSEN

DATE: 08/01/2017

DATE: 08/01/2017

DATE: 08/01/2017

DATE: 08/01/2017

DATE: 08/01/2017

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DATE: 08/01/2017

2.0 Regulatory Framework and Background

2.1 Air Quality Regulatory Setting

Air pollutants are regulated at the national, state, and air basin level; each agency has a different level of regulatory responsibility. The United States Environmental Protection Agency (EPA) regulates at the national level. The California Air Resources Board (ARB) regulates at the state level. The South Coast Air Quality Management District (SCAQMD) regulates at the air basin level.

2.1.1 National and State

The EPA is responsible for global, international, and interstate air pollution issues and policies. The EPA sets national vehicle and stationary source emission standards, oversees approval of all State Implementation Plans, provides research and guidance for air pollution programs, and sets National Air Quality Standards, also known as federal standards. There are six common air pollutants, called criteria pollutants, which were identified from the provisions of the Clean Air Act of 1970.

- Ozone
- Nitrogen Dioxide
- Lead
- Particulate Matter (PM10 and PM2.5)
- Carbon Monoxide
- Particulate Matter
- Sulfur Dioxide

The federal standards were set to protect public health, including that of sensitive individuals; thus, the standards continue to change as more medical research is available regarding the health effects of the criteria pollutants. Primary federal standards are the levels of air quality necessary, with an adequate margin of safety, to protect the public health.

A State Implementation Plan is a document prepared by each state describing existing air quality conditions and measures that will be followed to attain and maintain federal standards. The State Implementation Plan for the State of California is administered by the ARB, which has overall responsibility for statewide air quality maintenance and air pollution prevention. California's State Implementation Plan incorporates individual federal attainment plans for regional air districts—air district prepares their federal attainment plan, which sent to ARB to be approved and incorporated into the California State Implementation Plan. Federal attainment plans include the technical foundation for understanding air quality (e.g., emission inventories and air quality monitoring), control measures and strategies, and enforcement mechanisms. See <http://www.arb.ca.gov/research/aqs/aqs.htm> for additional information on criteria pollutants and air quality standards.

The federal and state ambient air quality standards are summarized in Table 2 and can also be found at <http://www.arb.ca.gov/research/aqs/aqs2.pdf>.

Table 2: Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ¹		National Standards ²		
		Concentrations ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Ozone (O3)	1-Hour	0.09 ppm	Ultraviolet	--	Same as Primary Standard	Ultraviolet Photometry
	8-Hour	0.070 ppm	Photometry	0.070 ppm (147 µg/m³)		
Respirable Particulate Matter (PM10) ⁸	24-Hour	50 µg/m³	Gravimetric or Beta Attenuation	150 µ/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m³		--		
Fine Particulate Matter (PM2.5) ⁸	24-Hour	--	--	35 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m³	Gravimetric or Beta Attenuation	12 µg/m³	15 µg/m³	
Carbon Monoxide (CO)	1-Hour	20 ppm (23 µg/m³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 µg/m³)	--	Non-Dispersive Infrared Photometry (NDIR)
	8-Hour	9.0 ppm (10 µg/m³)		9 ppm (10 µg/m³)	--	
	8-Hour (Lake Tahoe)	6 ppm (7 µg/m³)		--	--	
Nitrogen Dioxide (NO ₂) ⁹	1-Hour	0.18 ppm (339 µg/m³)	Gas Phase Chemiluminescence	100 ppb (188 µg/m³)	--	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (357 µg/m³)		0.053 ppm (100 µg/m³)	Same as Primary Standard	
Sulfur Dioxide (SO ₂) ¹⁰	1-Hour	0.25 ppm (655 µg/m³)	Ultraviolet Fluorescence	75 ppb (196 µg/m³)	--	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3-Hour	--		--	0.5 ppm (1300 mg/m³)	
	24-Hour	0.04 ppm (105 µg/m³)		0.14 ppm (for certain areas) ¹⁰	--	
	Annual Arithmetic Mean	--		0.130ppm (for certain areas) ¹⁰	--	
Lead ^{11,12}	30 Day Average	1.5 µg/m³	Atomic Absorption	--	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Calendar Qtrtr	--		1.5 µg/m³ (for certain areas) ¹²		
	Rolling 3-Month Average	--		0.15 µg/m³		
Visibility Reducing Particles ¹³	8-Hour	See footnote 13	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24-Hour	25 µg/m³	Ion Chromatography			
Hydrogen Sulfide	1-Hour	0.03 ppm (42 µg/m³)	Ultraviolet Fluorescence			
Vinyl Chloride ¹¹	24-Hour	0.01 ppm (26 µg/m³)	Gas Chromatography			

Notes:

- California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM₁₀, PM_{2.5}, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equal or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM_{2.5}, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
- Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
- National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.

8. On December 14, 2012, the national annual PM_{2.5} primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
9. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
10. On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

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

11. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
12. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
13. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

Several pollutants listed in Table 2 are not addressed in this analysis. Analysis of lead is not included in this report because the project is not anticipated to emit lead. Visibility-reducing particles are not explicitly addressed in this analysis because particulate matter is addressed. The project is not expected to generate or be exposed to vinyl chloride because proposed project uses do not utilize the chemical processes that create this pollutant and there are no such uses in the project vicinity. The proposed project is not expected to cause exposure to hydrogen sulfide because it would not generate hydrogen sulfide in any substantial quantity.

2.1.2 South Coast Air Quality Management District

The agency for air pollution control for the South Coast Air Basin (basin) is the South Coast Air Quality Management District (SCAQMD). SCAQMD is responsible for controlling emissions primarily from stationary sources. SCAQMD maintains air quality monitoring stations throughout the basin. SCAQMD, in coordination with the Southern California Association of Governments, is also responsible for developing, updating, and implementing the Air Quality Management Plan (AQMP) for the basin. An AQMP is a plan prepared and implemented by an air pollution district for a county or region designated as nonattainment of the federal and/or California ambient air quality standards. The term nonattainment area is used to refer to an air basin where one or more ambient air quality standards are exceeded.

Every three (3) years the SCAQMD prepares a new AQMP, updating the previous plan and having a 20-year horizon.

On March 23, 2017 CARB approved the 2016 AQMP. The 2016 AQMP is a regional blueprint for achieving the federal air quality standards and healthful air.

The 2016 AQMP includes both stationary and mobile source strategies to ensure that rapidly approaching attainment deadlines are met, that public health is protected to the maximum extent feasible, and that the region is not faced with burdensome sanctions if the Plan is not approved or if the NAAQS are not met on time. As with every AQMP, a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures is updated with the latest data and methods. The most significant air quality challenge in the Basin is to reduce nitrogen oxide (NOx) emissions sufficiently to meet the upcoming ozone standard deadlines. The primary goal of this Air Quality Management Plan is to meet clean air standards and protect public health, including ensuring benefits to environmental justice and disadvantaged communities. Now that the plan has been approved by CARB, it has been forwarded to the U.S. Environmental Protection Agency for its review. If approved by EPA, the plan becomes federally enforceable.

The 2012 AQMP built upon the approaches taken in the 2007 AQMP for the attainment of federal PM and ozone standards, and highlights the significant amount of reductions needed and the need to engage in interagency coordinated planning of mobile sources to meet all of the federal criteria pollutant standards. Compared with the 2007 AQMP, the 2012 AQMP utilized revised emissions inventory projections that use 2008 as the base year. On-road emissions are calculated using CARB EMFAC2021 emission factors and the transportation activity data provided by SCAG from their 2012 Regional Transportation Plan (2012 RTP). Off-road emissions were updated using CARB's 2011 In-Use Off-Road Fleet Inventory Model. Since the 2007 AQMP was finalized new area source categories such as liquid propane gas (LPG) transmission losses, storage tank and pipeline cleaning and degassing, and architectural colorants, were created and included in the emissions inventories. The 2012 AQMP also includes analysis of several additional sources of GHG emissions such as landfills and could also assist in reaching the GHG target goals in the AB32 Scoping Plan.

South Coast Air Quality Management District Rules

The AQMP for the basin establishes a program of rules and regulations administered by SCAQMD to obtain attainment of the state and federal standards. Some of the rules and regulations that apply to this Project include, but are not limited to, the following:

SCAQMD Rule 402 prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

SCAQMD Rule 403 governs emissions of fugitive dust during construction and operation activities. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access

roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Applicable suppression techniques are indicated below and include but are not limited to the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas in active for 10 days or more).
- Water active sites at least three times daily.
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet of freeboard in accordance with the requirements of California Vehicle Code (CVC) section 23114.
- Pave construction access roads at least 100 feet onto the site from the main road.
- Reduce traffic speeds on all unpaved roads to 15 mph or less.
- Suspension of all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.
- Bumper strips or similar best management practices shall be provided where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Replanting disturbed areas as soon as practical.
- During all construction activities, construction contractors shall sweep on-site and off-site streets if silt is carried to adjacent public thoroughfares, to reduce the amount of particulate matter on public streets.

SCAQMD Rule 1113 governs the sale, use, and manufacturing of architectural coating and limits the VOC content in paints and paint solvents. This rule regulates the VOC content of paints available during construction. Therefore, all paints and solvents used during construction and operation of project must comply with Rule 1113.

Idling Diesel Vehicle Trucks – Idling for more than 5 minutes in any one location is prohibited within California borders.

Rule 2702. The SCAQMD adopted Rule 2702 on February 6, 2009, which establishes a voluntary air quality investment program from which SCAQMD can collect funds from parties that desire certified GHG emission reductions, pool those funds, and use them to purchase or fund GHG emission reduction projects within two years, unless extended by the Governing Board. Priority will be given to projects that result in co-benefit emission reductions of GHG emissions and criteria or toxic air pollutants within environmental justice areas. Further, this voluntary program may compete with the cap-and-trade program identified for implementation in CARB's Scoping Plan, or a Federal cap and trade program.

2.1.3 Local

Local jurisdictions, such as the County of Riverside and City of Lake Elsinore, have the authority and responsibility to reduce air pollution through their police power and decision-making authority. Specifically, the County and City are responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The County and City are also responsible for the implementation of transportation control measures as outlined in the 2016 AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals. In accordance with CEQA requirements and the CEQA review process, the County and City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation.

The County and City rely on the expertise of the SCAQMD and utilizes the SCAQMD CEQA Air Quality Handbook as the guidance document for the environmental review of plans and development proposals within its jurisdiction.

County of Riverside General Plan

The Air Quality Element of the County of Riverside General Plan summarizes air quality issues in the Basin, air quality-related plans and programs administered by federal, state, and special purpose agencies, and establishes goals and policies to improve air quality. These goals and policies in the Air Quality Element that relate to the proposed project include:

Multi-jurisdictional Cooperation:

- AQ 1.1 Promote and participate with regional and local agencies, both public and private, to protect and improve air quality.
- AQ 1.2 Support the Southern California Association of Government's (SCAG) Regional Growth Management Plan by developing intergovernmental agreements with appropriate governmental entities such as the Western Riverside Council of Governments (WRCOG), the Coachella Valley Association of Governments (CVAG), sanitation districts, water districts, and those subregional entities identified in the Regional Growth Management Plan.
- AQ 1.3 Participate in the development and update of those regional air quality management plans required under federal and state law, and meet all standards established for clean air in these plans.
- AQ 1.4 Coordinate with the SCAQMD and MDAQMD to ensure that all elements of air quality plans regarding reduction of air pollutant emissions are being enforced.
- AQ 1.5 Establish and implement air quality, land use and circulation measures that improve not only the County's environment but the entire regions.

- AQ 1.6 Establish a level playing field by working with local jurisdictions to simultaneously adopt policies similar to those in this Air Quality Element.
- AQ 1.7 Support legislation which promotes cleaner industry, clean fuel vehicles and more efficient burning engines and fuels.
- AQ 1.8 Support the introduction of federal, state or regional enabling legislation to permit the County to promote inventive air quality programs, which otherwise could not be implemented.
- AQ 1.9 Encourage, publicly recognize and reward innovative approaches that improve air quality.
- AQ 1.10 Work with regional and local agencies to evaluate the feasibility of implementing a system of charges (e.g., pollution charges, user fees, congestion pricing and toll roads) that requires individuals who undertake polluting activities to bear the economic cost of their actions where possible.
- AQ 1.11 Involve environmental groups, the business community, special interests, and the general public in the formulation and implementation of programs that effectively reduce airborne pollutants.

Sensitive Receptors:

- AQ 2.1 The County land use planning efforts shall assure that sensitive receptors are separated and protected from polluting point sources to the greatest extent possible.
- AQ 2.2 Require site plan designs to protect people and land uses sensitive to air pollution through the use of barriers and/or distance from emissions sources when possible.
- AQ 2.3 Encourage the use of pollution control measures such as landscaping, vegetation and other materials, which trap particulate matter or control pollution.

Stationary Pollution Sources:

- AQ 4.1 Encourage the use of building materials/methods which reduce emissions.
- AQ 4.2 Require the use of all feasible efficient heating equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces and boiler units.
- AQ 4.3 Require centrally heated facilities to utilize automated time clocks or occupant sensors to control heating where feasible.
- AQ 4.5 Require stationary pollution sources to minimize the release of toxic pollutants through:

- Design features;
- Operating procedures;
- Preventive maintenance;
- Operator training; and
- Emergency response planning

- AQ 4.6 Require stationary air pollution sources to comply with applicable air district rules and control measures.
- AQ 4.7 To the greatest extent possible, require every project to mitigate any of its anticipated emissions which exceed allowable emissions as established by the SCAQMD, MDAQMD, SOCAB, the Environmental Protection Agency and the California Air Resources Board.
- AQ 4.8 Expand, as appropriate, measures contained in the County's Fugitive Dust Reduction Program for the Coachella Valley to the entire County.
- AQ 4.9 Require compliance with SCAQMD Rules 403 and 403.1, and support appropriate future measures to reduce fugitive dust emanating from construction sites.
- AQ 4.10 Coordinate with the SCAQMD and MDAQMD to create a communications plan to alert those conducting grading operations in the County of first, second, and third stage smog alerts, and when wind speeds exceed 25 miles per hour. During these instances all grading operations should be suspended.

Energy Efficiency and Conservation:

- AQ 5.1 Utilize source reduction, recycling and other appropriate measures to reduce the amount of solid waste disposed of in landfills.
- AQ 5.4 Encourage the incorporation of energy-efficient design elements, including appropriate site orientation and the use of shade and windbreak trees to reduce fuel consumption for heating and cooling.

Particulate Matter:

- AQ 15.1 Identify and monitor sources, enforce existing regulations, and promote stronger controls to reduce particulate matter.

Multi-jurisdictional Cooperation:

- AQ 16.1 Cooperate with local, regional, state and federal jurisdictions to better control particulate matter.

Control Measures:

- AQ 17.1 Reduce particulate matter from agriculture, construction, demolition, debris hauling, street cleaning, utility maintenance, railroad rights-of-way, and off-road vehicles to the extent possible.
- AQ 17.3 Identify and create a control plan for areas within the County prone to wind erosion of soil.
- AQ 17.4 Adopt incentives, regulations and/or procedures to manage paved and unpaved roads and parking lots so they produce the minimum practicable level of particulates.
- AQ 17.5 Adopt incentives and/or procedures to limit dust from agricultural lands and operations, where applicable.
- AQ 17.6 Reduce emissions from building materials and methods that generate excessive pollutants, through incentives and/or regulations.

City of Lake Elsinore General Plan

The City of Lake Elsinore adopted their General Plan in December 2011. The Public Safety and Welfare Element in the General Plan, contains the following air quality-related goals and policies that are applicable to the proposed project:

- Goal 1** Continue to coordinate with the Air Quality Management District and the City's Building Department to reduce the amount of fugitive dust that is emitted into the atmosphere from unpaved areas, parking lots, and construction sites.
- Policy 1.1* Continue to implement requirements identified in the National Pollutant Discharge Elimination System (NPDES).
- Goal 2** Work with regional and state governments to develop effective mitigation measures to improve air quality.
- Policy 2.1* Support the SCAQMD in its development of improved ambient air quality monitoring capabilities and establishment of standards, thresholds, and rules to address, and where necessary mitigate, the air quality impacts of new development.
- Policy 2.2* Support programs that educate the public about regional air quality issues, opportunities and solutions.
- Policy 2.3* Evaluate the purchase of alternative fuel vehicles for official City vehicles.

2.2 Greenhouse Gas Regulatory Setting

2.2.1 International

Many countries around the globe have made an effort to reduce GHGs since climate change is a global issue.

Intergovernmental Panel on Climate Change. In 1988, the United Nations and the World Meteorological Organization established the Intergovernmental Panel on Climate Change to assess the scientific, technical and socio-economic information relevant to understanding the scientific basis of risk of human-induced climate change, its potential impacts, and options for adaptation and mitigation.

United Nations. The United States participates in the United Nations Framework Convention on Climate Change (UNFCCC) (signed on March 21, 1994). Under the Convention, governments gather and share information on greenhouse gas emissions, national policies, and best practices; launch national strategies for addressing greenhouse gas emissions and adapting to expected impacts, including the provision of financial and technological support to developing countries; and cooperate in preparing for adaptation to the impacts of climate change.

The 2014 UN Climate Change Conference in Lima Peru provided a unique opportunity to engage all countries to assess how developed countries are implementing actions to reduce emissions.

Kyoto Protocol. The Kyoto Protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. It has been estimated that if the commitments outlined in the Kyoto Protocol are met, global GHG emissions could be reduced by an estimated 5 percent from 1990 levels during the first commitment period of 2008 – 2012 (UNFCCC 1997). On December 8, 2012, the Doha Amendment to the Kyoto Protocol was adopted. The amendment includes: New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 2013 – 2020; a revised list of greenhouse gases (GHG) to be reported on by Parties in the second commitment period; and Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

2.2.2 National

Greenhouse Gas Endangerment. On December 2, 2009, the EPA announced that GHGs threaten the public health and welfare of the American people. The EPA also states that GHG emissions from on-road vehicles contribute to that threat. The decision was based on *Massachusetts v. EPA* (Supreme Court Case 05-1120) which argued that GHGs are air pollutants covered by the Clean Air Act and that the EPA has authority to regulate those emissions.

Clean Vehicles. Congress first passed the Corporate Average Fuel Economy law in 1975 to increase the fuel economy of cars and light duty trucks. The law has become more stringent over time. On May 19, 2009, President Obama put in motion a new national policy to increase fuel economy for all new cars and trucks sold in the United States. On April 1, 2010, the EPA and the Department of Transportation's

National Highway Safety Administration announced a joint final rule establishing a national program that would reduce greenhouse gas emissions and improve fuel economy for new cars and trucks sold in the United States.

The first phase of the national program would apply to passenger cars, light-duty trucks, and medium-duty passenger vehicles, covering model years 2012 through 2016. They require these vehicles to meet an estimated combined average emissions level of 250 grams of carbon dioxide per mile, equivalent to 35.5 miles per gallon if the automobile industry were to meet this carbon dioxide level solely through fuel economy improvements. Together, these standards would cut carbon dioxide emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012-2016). The second phase of the national program would involve proposing new fuel economy and greenhouse gas standards for model years 2017 – 2025 by September 1, 2011.

On October 25, 2010, the EPA and the U.S. Department of Transportation proposed the first national standards to reduce greenhouse gas emissions and improve fuel efficiency of heavy-duty trucks and buses. For combination tractors, the agencies are proposing engine and vehicle standards that begin in the 2014 model year and achieve up to a 20 percent reduction in carbon dioxide emissions and fuel consumption by the 2018 model year. For heavy-duty pickup trucks and vans, the agencies are proposing separate gasoline and diesel truck standards, which phase in starting in the 2014 model year and achieve up to a 10 percent reduction for gasoline vehicles and 15 percent reduction for diesel vehicles by 2018 model year (12 and 17 percent respectively if accounting for air conditioning leakage). Lastly, for vocational vehicles, the agencies are proposing engine and vehicle standards starting in the 2014 model year which would achieve up to a 10 percent reduction in fuel consumption and carbon dioxide emissions by 2018 model year.

Mandatory Reporting of Greenhouse Gases. On January 1, 2010, the EPA started requiring large emitters of heat-trapping emissions to begin collecting GHG data under a new reporting system. Under the rule, suppliers of fossil fuels or industrial greenhouse gases, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of greenhouse gas emissions are required to submit annual reports to the EPA.

Climate Adaption Plan. The EPA Plan identifies priority actions the Agency will take to incorporate considerations of climate change into its programs, policies, rules and operations to ensure they are effective under future climatic conditions. The following link provides more information on the EPA Plan: <https://www.epa.gov/arc-x/planning-climate-change-adaptation>

2.2.3 California

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

electricity production by fossil fuels results in GHG emissions and energy efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions.

The Energy Commission adopted 2008 Standards on April 23, 2008 and Building Standards Commission approved them for publication on September 11, 2008. These updates became effective on August 1, 2009. 2013 and 2016 standards have been approved and became effective July 1, 2014 and January 1, 2016, respectively.

California Code of Regulations (CCR) Title 24, Part 11. All buildings for which an application for a building permit is submitted on or after January 1, 2020 must follow the 2019 standards.. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas emissions. The following links provide more information on Title 24, Part 11:

<https://www.dgs.ca.gov/BSC/Codes>

https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf

California Green Building Standards. On January 12, 2010, the State Building Standards Commission unanimously adopted updates to the California Green Building Standards Code, which went into effect on January 1, 2011. The Housing and Community Development (HCD) updated CALGreen through the 2015 Triennial Code Adoption Cycle, during the 2016 to 2017 fiscal year. During the 2019-2020 fiscal year, the Department of Housing and Community Development (HCD) updated CALGreen through the 2019 Triennial Code Adoption Cycle.

The Code is a comprehensive and uniform regulatory code for all residential, commercial and school buildings. CCR Title 24, Part 11: California Green Building Standards (Title 24) became effective in 2001 in response to continued efforts to reduce GHG emissions associated with energy consumption. CCR Title 24, Part 11 now require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. One focus of CCR Title 24, Part 11 is water conservation measures, which reduce GHG emissions by reducing electrical consumption associated with pumping and treating water. CCR Title 24, Part 11 has approximately 52 nonresidential mandatory measures and an additional 130 provisions for optional use. Some key mandatory measures for commercial occupancies include specified parking for clean air vehicles, a 20 percent reduction of potable water use within buildings, a 50 percent construction waste diversion from landfills, use of building finish materials that emit low levels of volatile organic compounds, and commissioning for new, nonresidential buildings over 10,000 square feet.

The 2019 CalGreen Code includes the following changes and/or additional regulations:

Single-family homes built with the 2019 standards will use about 7 percent less energy due to energy efficiency measures versus those built under the 2016 standards. Once rooftop solar electricity generation is factored in, homes built under the 2019 standards will use about 53 percent less energy

than those under the 2016 standards. Nonresidential buildings will use about 30 percent less energy due mainly to lighting upgrades¹.

HCD modified the best management practices for stormwater pollution prevention adding Section 5.106.2 for projects that disturb one or more acres of land. This section requires projects that disturb one acre or more of land or less than one acre of land but are part of a larger common plan of development or sale must comply with the post-construction requirement detailed in the applicable National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities issued by the State Water Resources Control Board. The NPDES permits require post-construction runoff (post-project hydrology) to match the preconstruction runoff pre-project hydrology) with installation of post-construction stormwater management measures.

HCD added sections 5.106.4.1.3 and 5.106.4.1.5 in regards to bicycle parking. Section 5.106.4.1.3 requires new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility. In addition, Section 5.106.4.1.5 states that acceptable bicycle parking facility for Sections 5.106.4.1.2 through 5.106.4.1.4 shall be convenient from the street and shall meeting one of the following: (1) covered, lockable enclosures with permanently anchored racks for bicycles; (2) lockable bicycle rooms with permanently anchored racks; or (3) lockable, permanently anchored bicycle lockers.

HCD amended section 5.106.5.3.5 allowing future charging spaces to qualify as designated parking for clean air vehicles.

HCD updated section 5.303.3.3 in regards to showerhead flow rates. This update reduced the flow rate to 1.8 GPM.

HCD amended section 5.304.1 for outdoor potable water use in landscape areas and repealed sections 5.304.2 and 5.304.3. The update requires nonresidential developments to comply with a local water efficient landscape ordinance or the current California Department of Water Resource's' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent. Some updates were also made in regards to the outdoor potable water use in landscape areas for public schools and community colleges.

HCD updated Section 5.504.5.3 in regards to the use of MERV filters in mechanically ventilated buildings. This update changed the filter use from MERV 8 to MERV 13.

¹ https://ww2.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf

The California Green Building Standards Code does not prevent a local jurisdiction from adopting a more stringent code as state law provides methods for local enhancements. The Code recognizes that many jurisdictions have developed existing construction and demolition ordinances, and defers to them as the ruling guidance provided they provide a minimum 50-percent diversion requirement. The code also provides exemptions for areas not served by construction and demolition recycling infrastructure. State building code provides the minimum standard that buildings need to meet in order to be certified for occupancy. Enforcement is generally through the local building official. The following link provides more on CalGreen Building Standards:

<http://www.bsc.ca.gov/Home/CALGreen.aspx>

Executive Order S-3-05. California Governor issued Executive Order S-3-05, GHG Emission, in June 2005, which established the following targets:

- By 2010, California shall reduce greenhouse gas emissions to 2000 levels;
- By 2020, California shall reduce greenhouse gas emissions to 1990 levels.
- By 2050, California shall reduce greenhouse gas emissions to 80 percent below 1990 levels.

The executive order directed the secretary of the California Environmental Protection Agency (CalEPA) to coordinate a multi-agency effort to reduce GHG emissions to the target levels. To comply with the Executive Order, the secretary of CalEPA created the California Climate Action Team (CAT), made up of members from various state agencies and commissions. The team released its first report in March 2006. The report proposed to achieve the targets by building on the voluntary actions of businesses, local governments, and communities and through State incentive and regulatory programs.

Executive Order S-01-07. Executive Order S-1-07 was issued in 2007 and proclaims that the transportation sector is the main source of GHG emissions in the State, since it generates more than 40 percent of the State's GHG emissions. It establishes a goal to reduce the carbon intensity of transportation fuels sold in the State by at least ten percent by 2020. This Order also directs CARB to determine whether this Low Carbon Fuel Standard (LCFS) could be adopted as a discrete early-action measure as part of the effort to meet the mandates in AB 32.

On April 23, 2009 CARB approved the proposed regulation to implement the low carbon fuel standard. The low carbon fuel standard is anticipated to reduce GHG emissions by about 16 MMT per year by 2020. The low carbon fuel standard is designed to provide a framework that uses market mechanisms to spur the steady introduction of lower carbon fuels. The framework establishes performance standards that fuel producers and importers must meet each year beginning in 2011. Separate standards are established for gasoline and diesel fuels and the alternative fuels that can replace each. The standards are "back-loaded", with more reductions required in the last five years, than the first five years. This schedule allows for the development of advanced fuels that are lower in carbon than today's fuels and the market penetration of plug-in hybrid electric vehicles, battery electric vehicles, fuel cell vehicles, and flexible fuel vehicles. It is anticipated that compliance with the low carbon fuel standard will be based on a combination of both lower carbon fuels and more efficient vehicles.

Reformulated gasoline mixed with corn-derived ethanol at ten percent by volume and low sulfur diesel fuel represent the baseline fuels. Lower carbon fuels may be ethanol, biodiesel, renewable diesel, or blends of these fuels with gasoline or diesel as appropriate. Compressed natural gas and liquefied natural gas also may be low carbon fuels. Hydrogen and electricity, when used in fuel cells or electric vehicles are also considered as low carbon fuels for the low carbon fuel standard.

SB 97. Senate Bill 97 (SB 97) was adopted August 2007 and acknowledges that climate change is a prominent environmental issue that requires analysis under CEQA. SB 97 directed the Governor's Office of Planning and Research (OPR), which is part of the State Resource Agency, to prepare, develop, and transmit to CARB guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, by July 1, 2009. The Resources Agency was required to certify and adopt those guidelines by January 1, 2010.

Pursuant to the requirements of SB 97 as stated above, on December 30, 2009 the Natural Resources Agency adopted amendments to the state CEQA guidelines that address GHG emissions. The CEQA Guidelines Amendments changed 14 sections of the CEQA Guidelines and incorporate GHG language throughout the Guidelines. However, no GHG emissions thresholds of significance are provided and no specific mitigation measures are identified. The GHG emission reduction amendments went into effect on March 18, 2010 and are summarized below:

- Climate action plans and other greenhouse gas reduction plans can be used to determine whether a project has significant impacts, based upon its compliance with the plan.
- Local governments are encouraged to quantify the greenhouse gas emissions of proposed projects, noting that they have the freedom to select the models and methodologies that best meet their needs and circumstances. The section also recommends consideration of several qualitative factors that may be used in the determination of significance, such as the extent to which the given project complies with state, regional, or local GHG reduction plans and policies. OPR does not set or dictate specific thresholds of significance. Consistent with existing CEQA Guidelines, OPR encourages local governments to develop and publish their own thresholds of significance for GHG impacts assessment.
- When creating their own thresholds of significance, local governments may consider the thresholds of significance adopted or recommended by other public agencies, or recommended by experts.
- New amendments include guidelines for determining methods to mitigate the effects of greenhouse gas emissions in Appendix F of the CEQA Guidelines.
- OPR is clear to state that "to qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project; general compliance with a plan, by itself, is not mitigation."
- OPR's emphasizes the advantages of analyzing GHG impacts on an institutional, programmatic level. OPR therefore approves tiering of environmental analyses and highlights some benefits of such an approach.
- Environmental impact reports (EIRs) must specifically consider a project's energy use and energy efficiency potential.

AB 32. The California State Legislature enacted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires that greenhouse gases emitted in California be reduced to 1990 levels by the year 2020. “Greenhouse gases” as defined under AB 32 include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. ARB is the state agency charged with monitoring and regulating sources of greenhouse gases. AB 32 states the following:

Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.

The ARB Board approved the 1990 greenhouse gas emissions level of 427 million metric tons of carbon dioxide equivalent (MMTCO₂e) on December 6, 2007 (California Air Resources Board 2007). Therefore, emissions generated in California in 2020 are required to be equal to or less than 427 MMTCO₂e. Emissions in 2020 in a “business as usual” scenario are estimated to be 596 MMTCO₂e.

Under AB 32, the ARB published its Final Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California. Discrete early action measures are currently underway or are enforceable by January 1, 2010. The ARB has 44 early action measures that apply to the transportation, commercial, forestry, agriculture, cement, oil and gas, fire suppression, fuels, education, energy efficiency, electricity, and waste sectors. Of these early action measures, nine are considered discrete early action measures, as they are regulatory and enforceable by January 1, 2010. The ARB estimates that the 44 recommendations are expected to result in reductions of at least 42 MMTCO₂e by 2020, representing approximately 25 percent of the 2020 target.

The ARB’s Climate Change Scoping Plan (Scoping Plan) contains measures designed to reduce the State’s emissions to 1990 levels by the year 2020 (California Air Resources Board 2008). The Scoping Plan identifies recommended measures for multiple greenhouse gas emission sectors and the associated emission reductions needed to achieve the year 2020 emissions target—each sector has a different emission reduction target. Most of the measures target the transportation and electricity sectors. As stated in the Scoping Plan, the key elements of the strategy for achieving the 2020 greenhouse gas target include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
- Achieving a statewide renewables energy mix of 33 percent;
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system;
- Establishing targets for transportation-related greenhouse gas emissions for regions throughout California and pursuing policies and incentives to achieve those targets;

- Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard; and
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State's long-term commitment to AB 32 implementation.

In addition, the Scoping Plan differentiates between "capped" and "uncapped" strategies. "Capped" strategies are subject to the proposed cap-and-trade program. The Scoping Plan states that the inclusion of these emissions within the cap-and-trade program will help ensure that the year 2020 emission targets are met despite some degree of uncertainty in the emission reduction estimates for any individual measure. Implementation of the capped strategies is calculated to achieve a sufficient amount of reductions by 2020 to achieve the emission target contained in AB 32. "Uncapped" strategies that will not be subject to the cap-and-trade emissions caps and requirements are provided as a margin of safety by accounting for additional greenhouse gas emission reductions.⁴

Senate Bill 100. Senate Bill 100 (SB 100) requires 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. SB 100 was adopted September 2018.

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

SB 375. Senate Bill 375 (SB 375) was adopted September 2008 and aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPO) to adopt a sustainable communities strategy (SCS) or alternate planning strategy (APS) that will prescribe land use allocation in that MPOs Regional Transportation Plan (RTP). CARB, in consultation with each MPO, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's sustainable communities strategy or alternate planning strategy for consistency with its assigned targets.

The proposed project is located within the Southern California Association of Governments (SCAG), which has authority to develop the SCS or APS. For the SCAG region, the targets set by CARB are at eight percent below 2005 per capita GHG emissions levels by 2020 and 13 percent below 2005 per

capita GHG emissions levels by 2035. On April 4, 2012, SCAG adopted the 2012-2035 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), which meets the CARB emission reduction requirements. The Housing Element Update is required by the State to be completed within 18 months after RTP/SCS adoption or by October 2013.

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

Assembly Bill 939 and Senate Bill 1374. Assembly Bill 939 (AB 939) requires that each jurisdiction in California to divert at least 50 percent of its waste away from landfills, whether through waste reduction, recycling or other means. Senate Bill 1374 (SB 1374) requires the California Integrated Waste Management Board to adopt a model ordinance by March 1, 2004 suitable for adoption by any local agency to require 50 to 75 percent diversion of construction and demolition of waste materials from landfills.

Executive Order S-13-08. Executive Order S-13-08 indicates that “climate change in California during the next century is expected to shift precipitation patterns, accelerate sea level rise and increase temperatures, thereby posing a serious threat to California’s economy, to the health and welfare of its population and to its natural resources.” Pursuant to the requirements in the order, the 2009 California Climate Adaptation Strategy (California Natural Resource Agency 2009) was adopted, which is the “... first statewide, multi-sector, region-specific, and information-based climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order B-30-15. Executive Order B-30-15, establishing a new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030, was signed by Governor Brown in April 2015.

Executive Order B-29-15. Executive Order B-29-15, mandates a statewide 25% reduction in potable water usage and was signed into law on April 1, 2015.

Executive Order B-37-16. Executive Order B-37-16, continuing the State’s adopted water reduction, was signed into law on May 9, 2016. The water reduction builds off the mandatory 25% reduction called for in EO B-29-15.

2.2.4 South Coast Air Quality Management District

The Project is within the South Coast Air Basin, which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAQMD Regulation XXVII currently includes three rules:

- The purpose of Rule 2700 is to define terms and post global warming potentials.

- The purpose of Rule 2701, SoCal Climate Solutions Exchange, is to establish a voluntary program to encourage, quantify, and certify voluntary, high quality certified greenhouse gas emission reductions in the SCAQMD.
- Rule 2702, Greenhouse Gas Reduction Program, was adopted on February 6, 2009. The purpose of this rule is to create a Greenhouse Gas Reduction Program for greenhouse gas emission reductions in the SCAQMD. The SCAQMD will fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

SCAQMD Threshold Development

The SCAQMD has established recommended significance thresholds for greenhouse gases for local lead agency consideration (“SCAQMD draft local agency threshold”). SCAQMD has published a five-tiered draft GHG threshold which includes a 10,000 metric ton of CO₂e per year for stationary/industrial sources and 3,000 metric tons of CO₂e per year significance threshold for residential/commercial projects (South Coast Air Quality Management District 2010c). Tier 3 is anticipated to be the primary tier by which the SCAQMD will determine significance for projects. The Tier 3 screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects. A 90-percent emission capture rate means that 90 percent of total emissions from all new or modified stationary source projects would be subject to CEQA analysis. The 90-percent capture rate GHG significance screening level in Tier 3 for stationary sources was derived using the SCAQMD’s annual Emissions Reporting Program.

The current draft thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether or not the project is consistent with a greenhouse gas reduction plan. If a project is consistent with a qualifying local greenhouse gas reduction plan, it does not have significant greenhouse gas emissions.
- Tier 3 consists of screening values, which the lead agency can choose but must be consistent. A project’s construction emissions are averaged over 30 years and are added to a project’s operational emissions. If a project’s emissions are under one of the following screening thresholds, then the project is less than significant:
 - All land use types: 3,000 MTCO₂e per year
 - Based on land use types: residential is 3,500 MTCO₂e per year; commercial is 1,400 MTCO₂e per year; and mixed use is 3,000 MTCO₂e per year
- Tier 4 has the following options:
 - Option 1: Reduce emissions from business as usual by a certain percentage; this percentage is currently undefined
 - Option 2: Early implementation of applicable AB 32 Scoping Plan measures
 - Option 3: Year 2020 target for service populations (SP), which includes residents and employees: 4.8 MTCO₂e/SP/year for projects and 6.6 MTCO₂e/SP/year for plans;

- Option 3, 2035 target: 3.0 MTCO₂e/SP/year for projects and 4.1 MTCO₂e/SP/year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

2.2.5 Local

County of Riverside Climate Action Plan

The County of Riverside's Climate Action Plan Update (CAP) was completed in November 2019. The CAP Update describes Riverside County's GHG emissions for the year 2017, projects how these emissions will increase into 2020, 2030, and 2050, and includes strategies to reduce emissions to a level consistent with the State of California's emissions reduction targets. The CAP Update sets a target to reduce community-wide GHG emission emissions by 15 percent from 2008 levels by 2020, 49 percent by 2030, and 83 percent by 2050.

Appendix D of the Riverside County CAP Update also states that project's that do not exceed the CAP's screening threshold of 3,000 MTCO₂e per year are considered to have less than significant GHG emissions and are in compliance with the County's CAP Update. Therefore, to determine whether the project's GHG emissions are significant, this analysis uses the County of Riverside CAP Update screening threshold of 3,000 MTCO₂e per year for all land use types. Projects that do not exceed emissions of 3,000 MTCO₂e per year are also required to include the following efficiency measures:

- Energy efficiency matching or exceeding the Title 24 requirements in effect as of January 2017, and
- Water conservation measures that matches the California Green Building Code in effect as of January 2017.

Projects that exceed emissions of 3,000 MTCO₂e per year are also required to use Screening Tables. Projects that garner at least 100 points will be consistent with the reduction quantities anticipated in the County's CAP Update. Consistent with CEQA Guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions. Those projects that do not garner 100 points using the Screening Tables will need to provide additional analysis to determine the significance of GHG emissions.

City of Lake Elsinore Climate Action Plan

In compliance with State Assembly Bill AB32 and Executive Order S-3-05, the City of Lake Elsinore adopted a Climate Action Plan (CAP) on December 13, 2011. The City's CAP is a long range plan designed to reduce community-wide greenhouse gas (GHG) emissions from activities within the City limits. Specifically, the CAP is designed to:

- Benchmark Lake Elsinore's existing (2008) GHG emissions and projected emissions relative to state-wide emissions targets;

- Establish GHG emissions reduction strategies and measures to reduce the City's proportionate share of emissions to meet the state-wide targets identified in Assembly Bill 32 (AB32), and Executive Order S-3-05;
- Set forth procedures to monitor and verify the effectiveness of the CAP and require amendment if the CAP is not achieving targeted levels of emissions;
- Mitigate Lake Elsinore's GHG emissions impacts (by reducing GHG emissions consistent with the State of California via the California Environmental Quality Act (CEQA) Guidelines, AB32, and Executive Order S-3-05). The CEQA Guidelines encourage the adoption of plans or mitigation programs as a means of comprehensively addressing the cumulative impacts of projects (see CEQA Guidelines, Sections 15064(h)(3) and 15130(c); and,
- Serve as the programmatic tiering document for the purposes of CEQA within the City of Lake Elsinore for GHG emissions, and what applicable projects will be reviewed. If a proposed development project can demonstrate it is consistent with the applicable emissions reduction measures included in the CAP, the programs and standards that would be implemented as a result of the CAP, and the General Plan Update growth projections, the project's environmental review pertaining to GHG impacts may be streamlined as allowed by CEQA Guidelines Sections 15152 and 15183.5.

The CAP is not intended to limit future development or economic growth within Lake Elsinore; rather, by adopting a CAP, the City has established the compliance and performance standards that a project is to meet in order to satisfy State mandates. Discussions of the Project's consistency with the CAP's Greenhouse Gas Reduction Measures are discussed in Section 7.3.

The City of Lake Elsinore's CAP has a GHG emissions target that is specifically intended for use in evaluating the significance of GHG emissions from community-wide emissions. The City selected efficiency-based targets for the years governed by the General Plan to reduce community-wide emissions to 6.6 MT CO₂e per service population per year by 2020 (a 22.3% reduction from the 2008 rate of 8.5 MT CO₂e/SP) and to 4.4 MT CO₂e per service population per year by 2030 (a 48.2% reduction from the 2008 rate of 8.5 MT CO₂e/SP). These efficiency based targets represent the AB 32 and Executive Order S-3-05 targeted emissions levels for 2020 and 2030 on a per service population basis and they were derived by dividing the state-wide AB 32 targeted emissions level for 2020 and statewide Executive Order S-3-05 targeted emissions level for 2030 by the 2020 and 2030 state-wide service population respectively. Therefore, these targets represent the maximum quantity of emissions each resident and employee in the State of California could emit in 2020 and 2030 based on emissions levels necessary to achieve the state-wide AB 32 and Executive Order S-3- 05 GHG emissions reduction goals.

In order to meet the state-wide efficiency metric targets, the CAP must demonstrate that it can reduce community-wide emissions to 6.6 MT CO₂e/SP (or 944,737 MT CO₂e total based on an estimated 2020 service population of 143,142) by 2020 and 4.4 MT CO₂e/SP (or 1,334,243 MT CO₂e based on an estimated 2030 service population of 303,237) by 2030.

Therefore, to determine whether the project's GHG emissions are significant, this analysis uses the County of Riverside CAP Update and SCAQMD draft local agency tier 3 screening threshold of 3,000 MTCO₂e.

The project will be subject to the latest requirements of the California Green Building and Title 24 Energy Efficiency Standards (currently 2022) which would reduce project-related greenhouse gas emissions.

3.0 Setting

3.1 Existing Physical Setting

The project site is located in an unincorporated portion of the County of Riverside within the sphere of influence of the City of Lake Elsinore, which is part of the South Coast Air Basin (SCAB) that includes all of Orange County as well as the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Basin is located on a coastal plain with connecting broad valleys and low hills to the east. Regionally, the South Coast Air Basin is bounded by the Pacific Ocean to the southwest and high mountains to the east forming the inland perimeter.

3.1.1 Local Climate and Meteorology

Dominant airflows provide the driving mechanism for transport and dispersion of air pollution. The mountains surrounding the region form natural horizontal barriers to the dispersion of air contaminants. Air pollution created in the coastal areas and around the Los Angeles area is transported inland until it reaches the mountains where the combination of mountains and inversion layers generally prevent further dispersion. This poor ventilation results in a gradual degradation of air quality from the coastal areas to inland areas. Air stagnation may occur during the early evening and early morning periods of transition between day and nighttime flows. The region also experiences periods of hot, dry winds from the desert, known as Santa Ana winds. If the Santa Ana winds are strong, they can surpass the sea breeze, which blows from the ocean to the land, and carry the suspended dust and pollutants out to the ocean. If the winds are weak, they are opposed by the sea breeze and cause stagnation, resulting in high pollution events.

The annual average temperature varies little throughout much of the basin, ranging from the low to middle 60s, measured in degrees Fahrenheit (°F). With more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas where the project site is located. The majority of the annual rainfall in the basin occurs between November and April. Summer rainfall is minimal and is generally limited to scattered thunderstorms in the coastal regions and slightly heavier showers in the eastern portion of the basin along the coastal side of the mountains. Year-to-year patterns in rainfall are unpredictable because of fluctuations in the weather.

Temperature inversions limit the vertical depth through which pollution can be mixed. Among the most common temperature inversions in the basin are radiation inversions, which form on clear winter nights when cold air off mountains sink to the valley floor while the air aloft over the valley remains warm. These inversions, in conjunction with calm winds, trap pollutants near the source. Other types of temperature inversions that affect the basin include marine, subsidence, and high-pressure inversions.

Summers are often periods of hazy visibility and occasionally unhealthy air. Strong temperature inversions may occur that limit the vertical depth through which air pollution can be dispersed. Air pollutants concentrate because they cannot rise through the inversion layer and disperse. These inversions are more common and persistent during the summer months. Over time, sunlight produces

photochemical reactions within this inversion layer that creates ozone, a particularly harmful air pollutant. Occasionally, strong thermal convections occur which allows the air pollutants to rise high enough to pass over the mountains and ultimately dilute the smog cloudtrap pollutants such as automobile exhaust near their source. While these inversions may lead to air pollution “hot spots” in heavily developed coastal areas of the basin, there is not enough traffic in inland valleys to cause any winter air pollution problems. Despite light wind conditions, especially at night and in the early morning, winter is generally a period of good air quality in the project vicinity.

In the winter, light nocturnal winds result mainly from the drainage of cool air off of the mountains toward the valley floor while the air aloft over the valley remains warm. This forms a type of inversion known as a radiation inversion. Such winds are characterized by stagnation and poor local mixing and trap pollutants such as automobile exhaust near their source. While these inversions may lead to air pollution “hot spots” in heavily developed coastal areas of the basin, there is not enough traffic to cause any winter air pollution problems. Despite light wind conditions, especially at night and in the early morning, winter is generally a period of good air quality in the project vicinity.

The temperature and precipitation levels for the City of Lake Elsinore are in Table 3. Table 3 shows that August is typically the warmest month and December is typically the coolest month. Rainfall in the project area varies considerably in both time and space. Almost all the annual rainfall comes from the fringes of mid-latitude storms from late November to early April, with summers being almost completely dry.

Table 3: Meteorological Summary

Month	Temperature (°F)		Average Precipitation (inches)
	Average High	Average Low	
January	66.0	38.9	2.56
February	67.7	40.9	2.68
March	72.3	43.4	1.77
April	77.7	47.0	0.67
May	83.8	52.5	0.20
June	91.0	56.5	0.05
July	97.7	61.0	0.16
August	98.6	62.5	0.05
September	93.4	58.9	0.17
October	83.4	52.0	0.59
November	70.4	42.1	0.90
December	65.8	38.5	2.11
Annual Average	80.9	49.7	11.9
Notes:			
¹ Source: https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca2805			

3.1.2 Local Air Quality

The SCAQMD has divided the South Coast Air Basin into 38 air-monitoring areas with a designated ambient air monitoring station representative of each area. The project site is located in an

unincorporated portion of the County of Riverside within the sphere of influence of the City of Lake Elsinore in the Lake Elsinore (Area 25). The nearest air monitoring station to the project site is the Lake Elsinore – W Flint Street Station (Lake Elsinore Station). The Lake Elsinore Station is located approximately 1.6 miles southeast of the project site, at 506 W Flint Street, Lake Elsinore; however this location does not provide all ambient weather data. Therefore, additional data was pulled from the SCAQMD historical data for the Lake Elsinore Area (Area 25) for both sulfur dioxide and carbon monoxide to provide the existing levels. Table 4 presents the monitored pollutant levels within the vicinity. However, it should be noted that due to the air monitoring station distance from the project site, recorded air pollution levels at the air monitoring station reflect with varying degrees of accuracy, local air quality conditions at the project site.

Table 4: Local Area Air Quality Levels from the Lake Elsinore Monitoring Stations

Pollutant (Standard) ²	Year		
	2021	2022	2023
Ozone:			
Maximum 1-Hour Concentration (ppm)	0.118	0.121	0.120
Days > CAAQS (0.09 ppm)	18	17	10
Maximum 8-Hour Concentration (ppm)	0.097	0.091	0.103
Days > NAAQS (0.07 ppm)	44	37	31
Days > CAAQS (0.070 ppm)	46	37	35
Carbon Monoxide:			
Maximum 1-Hour Concentration (ppm)	-	-	-
Days > NAAQS (20 ppm)	-	-	-
Maximum 8-Hour Concentration (ppm)	-	-	-
Days > NAAQS (9 ppm)	-	-	-
Nitrogen Dioxide:			
Maximum 1-Hour Concentration (ppm)	0.044	0.037	0.042
Days > NAAQS (0.25 ppm)	0	0	0
Sulfur Dioxide:			
Maximum 1-Hour Concentration (ppm)	-	-	-
Days > CAAQS (0.25 ppm)	-	-	-
Inhalable Particulates (PM10):			
Maximum 24-Hour Concentration (ug/m ³)	90.0	91.8	187.0
Days > NAAQS (150 ug/m ³)	0	0	1
Days > CAAQS (50 ug/m ³)	*	*	*
Annual Average (ug/m ³)	22.4	20.3	21.8
Annual > NAAQS (50 ug/m ³)	No	No	No
Annual > CAAQS (20 ug/m ³)	Yes	Yes	Yes
Ultra-Fine Particulates (PM2.5):			
Maximum 24-Hour Concentration (ug/m ³)	28.3	16.2	19.9
Days > NAAQS (35 ug/m ³)	*	*	*
Annual Average (ug/m ³)	6.9	5.8	5.9
Annual > NAAQS (15 ug/m ³)	No	No	No
Annual > CAAQS (12 ug/m ³)	No	No	No
¹ Source: obtained from https://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year and/or https://www.arb.ca.gov/adam/topfour/topfour1.php			
² CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard; ppm = parts per million			
³ No data available.			

The monitoring data presented in Table 4 shows that ozone and particulate matter (PM₁₀) are the air pollutants of primary concern in the project area, which are detailed below.

Ozone

During the 2021 to 2023 monitoring period, the State 1-hour concentration standard for ozone has been exceeded between 10 and 18 days each year at the Lake Elsinore Station. The State 8-hour ozone standard has been exceeded between 35 and 46 days each year over the past three years at the Lake Elsinore Station. The Federal 8-hour ozone standard has been exceeded between 31 and 44 days each year over the past three years at the Lake Elsinore Station.

Ozone is a secondary pollutant as it is not directly emitted. Ozone is the result of chemical reactions between other pollutants, most importantly hydrocarbons and NO₂, which occur only in the presence of bright sunlight. Pollutants emitted from upwind cities react during transport downwind to produce the oxidant concentrations experienced in the area. Many areas of the SCAQMD contribute to the ozone levels experienced at the monitoring station, with the more significant areas being those directly upwind.

Carbon Monoxide

CO is another important pollutant that is due mainly to motor vehicles. The Elsinore Area did not record an exceedance of the state or federal 1-hour or 8-hour CO standards for the last three years.

Nitrogen Dioxide

The Lake Elsinore Station did not record an exceedance of the State or Federal NO₂ standards for the last three years.

Sulfur Dioxide

The Elsinore Area did not record an exceedance of the State SO₂ standards for the last three years.

Particulate Matter

During the 2021 to 2023 monitoring period, there was insufficient data for the State 24-hour concentration standard for PM₁₀ at the Lake Elsinore Station. Over the same time period, the Federal 24-hour standard for PM₁₀ was exceeded once in 2023 and the Federal annual standard was not exceeded at the Lake Elsinore Station.

During the 2021 to 2023 monitoring period, there was insufficient data for the Federal 24-hour standard for PM_{2.5} at the Lake Elsinore Station.

According to the EPA, some people are much more sensitive than others to breathing fine particles (PM₁₀ and PM_{2.5}). People with influenza, chronic respiratory and cardiovascular diseases, and the elderly may suffer worsening illness and premature death due to breathing these fine particles. People with bronchitis can expect aggravated symptoms from breathing in fine particles. Children may experience decline in lung function due to breathing in PM₁₀ and PM_{2.5}. Other groups considered

sensitive are smokers and people who cannot breathe well through their noses. Exercising athletes are also considered sensitive, because many breathe through their mouths during exercise.

3.1.3 Attainment Status

The EPA and the ARB designate air basins where ambient air quality standards are exceeded as “nonattainment” areas. If standards are met, the area is designated as an “attainment” area. If there is inadequate or inconclusive data to make a definitive attainment designation, they are considered “unclassified.” National nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards. Each standard has a different definition, or ‘form’ of what constitutes attainment, based on specific air quality statistics. For example, the Federal 8-hour CO standard is not to be exceeded more than once per year; therefore, an area is in attainment of the CO standard if no more than one 8-hour ambient air monitoring values exceeds the threshold per year. In contrast, the federal annual PM_{2.5} standard is met if the three-year average of the annual average PM_{2.5} concentration is less than or equal to the standard. Table 5 lists the attainment status for the criteria pollutants in the basin.

Table 5: South Coast Air Basin Attainment Status

Pollutant	Averaging Time	National Standards ¹	Attainment Date ²	California Standards ³
1979 1-Hour Ozone ⁴	1-Hour (0.12 ppm)	Nonattainment (Extreme)	11/15/2010 (Not attained ⁴)	Extreme Nonattainment
1997 8-Hour Ozone ⁵	8-Hour (0.08 ppm)	Nonattainment (Extreme)	6/15/2024	Nonattainment
2008 8-Hour Ozone	8-Hour (0.075 ppm)	Nonattainment (Extreme)	12/31/2032	
2015 8-Hour Ozone	8-Hour (0.070 ppm)	Designations Pending	~2037	
CO	1-Hour (35 ppm) 8-Hour (9 ppm)	Attainment (Maintenance)	6/11/2007 (Attained)	Maintenance
NO ₂ ⁶	1-Hour (100 ppb) Annual (0.053 ppm)	Attainment (Maintenance)	9/22/1998 (Attained)	Attainment
SO ₂ ⁷	1-Hour (75 ppb)	Designations Pending	Pending	Attainment
	24-Hour (0.14 ppm) Annual (0.03 ppm)	Unclassifiable/ Attainment	3/19/1979 (Attained)	
PM ₁₀	24-Hour (150 µg/m ³)	Nonattainment (Serious) ⁸	12/31/2006 (Redesignation request submitted) ⁸	Nonattainment
PM _{2.5}	24-Hour (35 µg/m ³)	Nonattainment	12/31/2006 (Redesignation request submitted) ⁸	Unclassified
Lead	3-Months Rolling (0.15 µg/m ³)	Nonattainment (Partial) ⁹	12/31/2015	Nonattainment (Partial) ⁹

Notes:

¹ Obtained from Draft 2012 AQMP, SCAQMD, 2012. EPA often only declares Nonattainment areas; everywhere else is listed as Unclassified/Attainment or Unclassifiable.

² A design value below the NAAQS for data through the full year or smog season prior to the attainment date is typically required for attainment demonstration.

³ Obtained from <http://www.arb.ca.gov/design/adm/adm.htm>.

⁴ 1-hour O₃ standard (0.13 ppm) was revoked, effective June 15, 2005; however, the Basin has not attained this standard based on 2008-2010 data has some continuing obligations under the former standard.

⁵ 1997 8-hour O₃ standard (0.08 ppm) was reduced (0.075 ppm), effective May 27, 2008; the 1997 O₃ standard and most related implementation rules remain in place until the 1997 standard is revoked by U.S. EPA.

⁶ New NO₂ 1-hour standard, effective August 2, 2010; attainment designations June, 2013; annual NO₂ standard retained.

⁷ The 1971 annual and 24-hour SO₂ standards were revoked, effective August 23, 2010; however, these 1971 standards will remain in effect until one year after U.S. EPA promulgates area designations for the 2010 SO₂ 1-hour standard. Area designations expected in 2012, with SSAB designated Unclassifiable/Attainment.

⁸ Annual PM₁₀ standard was revoked, effective December 18, 2006; redesignation request to Attainment of the 24-hour PM₁₀ standard is pending with U.S. EPA

⁹ Partial Nonattainment designation - Los Angeles County portion of Basin only.

3.2 Greenhouse Gases

Constituent gases of the Earth's atmosphere, called atmospheric greenhouse gases (GHG), play a critical role in the Earth's radiation amount by trapping infrared radiation emitted from the Earth's surface, which otherwise would have escaped to space. Prominent greenhouse gases contributing to this process include carbon dioxide (CO₂), methane (CH₄), ozone, water vapor, nitrous oxide (N₂O), and chlorofluorocarbons (CFCs). This phenomenon, known as the Greenhouse Effect, is responsible for maintaining a habitable climate. Anthropogenic (caused or produced by humans) emissions of these greenhouse gases in excess of natural ambient concentrations are responsible for the enhancement of the Greenhouse Effect and have led to a trend of unnatural warming of the Earth's natural climate, known as global warming or climate change. Emissions of gases that induce global warming are attributable to human activities associated with industrial/manufacturing, agriculture, utilities, transportation, and residential land uses. Transportation is responsible for 41 percent of the State's greenhouse gas emissions, followed by electricity generation. Emissions of CO₂ and nitrous oxide (NO₂) are byproducts of fossil fuel combustion. Methane, a potent greenhouse gas, results from off-gassing associated with agricultural practices and landfills. Sinks of CO₂, where CO₂ is stored outside of the atmosphere, include uptake by vegetation and dissolution into the ocean. Table 6 provides a description of each of the greenhouse gases and their global warming potential.

Additional information is available: <https://www.arb.ca.gov/cc/inventory/data/data.htm>

<Table 6 on next page>

Table 6: Description of Greenhouse Gases

Greenhouse Gas	Description and Physical Properties	Sources
Nitrous oxide	Nitrous oxide (N ₂ O), also known as laughing gas is a colorless gas. It has a lifetime of 114 years. Its global warming potential is 298.	Microbial processes in soil and water, fuel combustion, and industrial processes. In addition to agricultural sources, some industrial processes (nylon production, nitric acid production) also emit N ₂ O.
Methane	Methane (CH ₄) is a flammable gas and is the main component of natural gas. It has a lifetime of 12 years. Its global warming potential is 25.	A natural source of CH ₄ is from the decay of organic matter. Methane is extracted from geological deposits (natural gas fields). Other sources are from the decay of organic material in landfills, fermentation of manure, and cattle farming.
Carbon dioxide	Carbon dioxide (CO ₂) is an odorless, colorless, natural greenhouse gas. Carbon dioxide's global warming potential is 1. The concentration in 2005 was 379 parts per million (ppm), which is an increase of about 1.4 ppm per year since 1960.	Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood.
Chlorofluorocarbons	CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). They are gases formed synthetically by replacing all hydrogen atoms in methane or methane with chlorine and/or fluorine atoms. Global warming potentials range from 3,800 to 8,100.	Chlorofluorocarbons were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. They destroy stratospheric ozone, therefore their production was stopped as required by the Montreal Protocol.
Hydrofluorocarbons	Hydrofluorocarbons (HFCs) are a group of greenhouse gases containing carbon, chlorine, and at least one hydrogen atom. Global warming potentials range from 140 to 11,700.	Hydrofluorocarbons are synthetic manmade chemicals used as a substitute for chlorofluorocarbons in applications such as automobile air conditioners and refrigerants.
Perfluorocarbons	Perfluorocarbons (PFCs) have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above the Earth's surface. They have a lifetime 10,000 to 50,000 years. They have a global warming potential range of 6,200 to 9,500.	Two main sources of perfluorocarbons are primary aluminum production and semiconductor manufacturing.
Sulfur hexafluoride	Sulfur hexafluoride (SF ₆) is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. It has a high global warming potential, 23,900.	This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.
Notes: 1. Sources: Intergovernmental Panel on Climate Change 2014a and Intergovernmental Panel on Climate Change 2014b. https://www.ipcc.ch/publications_and_data/ar4/wg1/en/ch2s2-10-2.html		

4.0 Modeling Parameters and Assumptions

4.1 Construction

Typical emission rates from construction activities were obtained from CalEEMod Version 2022.1.1.29. CalEEMod is a computer model published by the SCAQMD for estimating air pollutant emissions. The CalEEMod program uses the EMFAC2021 computer program to calculate the emission rates specific for the southwestern portion of Riverside County for construction-related employee vehicle trips and the OFFROAD2017 computer program to calculate emission rates for heavy truck operations. EMFAC2021 and OFFROAD2017 are computer programs generated by CARB that calculates composite emission rates for vehicles. Emission rates are reported by the program in grams per trip and grams per mile or grams per running hour. Using CalEEMod, the peak daily air pollutant emissions were calculated and presented below. These emissions represent the highest level of emissions for each of the construction phases in terms of air pollutant emissions.

The analysis assesses the emissions associated with the construction of the proposed project as indicated in Table 1. Per the project applicant, the proposed project is to be operational in 2026; therefore, for modeling purposes, construction is estimated to start no sooner than third quarter of 2025 and end by mid 2026. The phases of the construction activities which have been analyzed below are: 1) site preparation, 2) grading, 3) building, 4) paving, and 5) architectural coating. For details on construction modeling and construction equipment for each phase, please see Appendix A.

The project will be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. Compliance with this rule is achieved through application of standard best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 mph, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph and establishing a permanent, stabilizing ground cover on finished sites. In addition, projects that disturb 50 acres or more of soil or move 5,000 cubic yards of materials per day are required to submit a Fugitive Dust Control Plan or a Large Operation Notification Form to SCAQMD. Based on the size of the Project area (disturbance area of approximately 1.27 acres) and the fact that the project won't export more than 5,000 cubic yards of material a day a Fugitive Dust Control Plan or Large Operation Notification would not be required.

SCAQMD's Rule 403 minimum requirements require that the application of the best available dust control measures are used for all grading operations and include the application of water or other soil stabilizers in sufficient quantity to prevent the generation of visible dust plumes. Compliance with Rule 403 would require the use of water trucks during all phases where earth moving operations would occur. Compliance with Rule 403 is required.

4.2 Operations

Operational or long-term emissions occur over the life of the Project. Both mobile and area sources generate operational emissions. Area source emissions arise from consumer product usage, heaters

that consume natural gas, gasoline-powered landscape equipment, and architectural coatings (painting). Mobile source emissions from motor vehicles are the largest single long-term source of air pollutants from the operation of the Project. Small amounts of emissions would also occur from area sources such as the consumption of natural gas for heating, hearths, from landscaping emissions, and consumer product usage. The operational emissions were estimated using the latest version of CalEEMod.

Mobile Sources

Mobile sources include emissions from the additional vehicle miles generated from the proposed project. The vehicle trips associated with the proposed project are based upon the trip generation rates given in the project-specific traffic impact analysis (TJW Engineering, 2025) which uses the ITE 11th Trip Generation Manual. The scoping agreement shows a trip generation rate of 1.71 trips per thousand square foot per day for warehousing.

The program then applies the emission factors for each trip which is provided by the EMFAC2021 model to determine the vehicular traffic pollutant emissions. The CalEEMod default trip lengths were used in this analysis. Please see CalEEMod output comments sections in Appendix A for details.

Area Sources

Area sources include emissions from consumer products, landscape equipment and architectural coatings. Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers, as well as air compressors, generators, and pumps. As specifics were not known about the landscaping equipment fleet, CalEEMod defaults were used to estimate emissions from landscaping equipment.

Per SCAQMD Rule 1113 as amended on June 3, 2011, the architectural coatings that would be applied after January 1, 2014 will be limited to an average of 50 grams per liter or less and the CalEEMod model default was utilized as the new model takes this rule into account.

Energy Usage

2022.1.1.29 CalEEMod defaults were utilized.

4.3 Localized Construction Analysis

The SCAQMD has published a “Fact Sheet for Applying CalEEMod to Localized Significance Thresholds” (South Coast Air Quality Management District 2011b). CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily disturbance activity possible for each piece of equipment. In order to compare CalEEMod reported emissions against the localized significance threshold lookup tables, the CEQA document should contain in its project design features or its mitigation measures the following parameters:

1. The off-road equipment list (including type of equipment, horsepower, and hours of operation) assumed for the day of construction activity with maximum emissions.
2. The maximum number of acres disturbed on the peak day.
3. Any emission control devices added onto off-road equipment.

4. Specific dust suppression techniques used on the day of construction activity with maximum emissions.

The construction equipment showing the equipment associated with the maximum area of disturbance is shown in Table 7.

Table 7: Construction Equipment Assumptions¹

Activity	Equipment	Number	Acres/8hr-day	Total Acres
Site Preparation	Rubber Tired Dozers	3	0.5	1.5
	Tractors/Loaders/Backhoes	4	0.5	2.0
Total Per Phase				1.5
Grading	Excavators	1	0.5	0.5
	Graders	1	0.5	0.5
	Rubber Tired Dozers	1	0.5	0.5
	Tractors/Loaders/Backhoes	3	0.5	1.5
Total Per Phase				3.0
Notes:				
1. Source: South Coast AQMD, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=2				

As shown in Table 7, the maximum number of acres disturbed in a day would be 3.0 acres during grading.

The local air quality emissions from construction were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold Look-up Tables and the methodology described in Localized Significance Threshold Methodology, prepared by SCAQMD, revised July 2008. The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NO_x, PM₁₀, and PM_{2.5} from the proposed project could result in a significant impact to the local air quality. The emission thresholds were based on the Elsinore source receptor area (SRA 25) and a disturbance of 2 acres per day, to be conservative, at a distance of 50 meters (164 feet). The closest receptors are located 56 meters to the southeast of the site; therefore, to be conservative, the 50 meters threshold was used.

4.4 Localized Operational Analysis

For operational emissions, the screening tables for a disturbance area of 2 acres per day, to be conservative, and a distance of 50 meters were used to determine significance. The tables were compared to the project's onsite operational emissions.

5.0 Thresholds of Significance

5.1 Air Quality Thresholds of Significance

5.1.1 CEQA Guidelines for Air Quality

The CEQA Guidelines define a significant effect on the environment as “a substantial, or potentially substantial, adverse change in the environment.” To determine if a project would have a significant impact on air quality, the type, level, and impact of emissions generated by the project must be evaluated.

The following air quality significance thresholds are contained in Appendix G of the CEQA Guidelines. A significant impact would occur if the project would:

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

While the final determination of whether a project is significant is within the purview of the Lead Agency pursuant to Section 15064(b) of the CEQA Guidelines, SCAQMD recommends that its quantitative air pollution thresholds be used to determine the significance of project emissions. If the Lead Agency finds that the project has the potential to exceed these air pollution thresholds, the project should be considered to have significant air quality impacts. There are daily emission thresholds for construction and operation of a proposed project in the basin.

5.1.2 Regional Significance Thresholds for Construction Emissions

The following CEQA significance thresholds for construction emissions are established for the Basin:

- 75 pounds per day (lbs/day) of VOC
- 100 lbs/day of NO_x
- 550 lbs/day of CO
- 150 lbs/day of PM₁₀
- 55 lbs/day of PM_{2.5}
- 150 lbs/day of SO₂

Projects in the basin with construction-related emissions that exceed any of the emission thresholds are considered to be significant under SCAQMD guidelines.

5.1.3 Regional Significance Thresholds for Operational Emissions

The daily operational emissions significance thresholds for the basin are as follows:

- 55 pounds per day (lbs/day) of VOC
- 55 lbs/day of NO_x
- 550 lbs/day of CO
- 150 lbs/day of PM₁₀
- 55 lbs/day of PM_{2.5}
- 150 lbs/day of SO₂

Local Microscale Concentration Standards The significance of localized project impacts under CEQA depends on whether ambient CO levels in the vicinity of the project are above or below State and federal CO standards. If ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a State or federal standard, project emissions are considered significant if they increase 1-hour CO concentrations by 1.0 ppm or more or 8-hour CO concentrations by 0.45 ppm or more. The following are applicable local emission concentration standards for CO:

- California State 1-hour CO standard of 20.0 ppm
- California State 8-hour CO standard of 9.0 ppm

5.1.4 Thresholds for Localized Significance

Project-related construction air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the South Coast Air Basin. In order to assess local air quality impacts the SCAQMD has developed Localized Significant Thresholds (LSTs) to assess the project-related air emissions in the project vicinity. The SCAQMD has also provided Final Localized Significant Threshold Methodology (LST Methodology), June 2003, which details the methodology to analyze local air emission impacts. The Localized Significant Threshold Methodology found that the primary emissions of concern are NO₂, CO, PM₁₀, and PM_{2.5}.

The emission thresholds were calculated based on the Elsinore source receptor area (SRA 25) and a disturbance of 2 acres per day, to be conservative, at a distance of 50 meters (164 feet), for construction and 2 acres a day, to be conservative, for screening of localized operational emissions.

5.2 Greenhouse Gas Thresholds of Significance

5.2.1 CEQA Guidelines for Greenhouse Gas

CEQA Guidelines define a significant effect on the environment as “a substantial, or potentially substantial, adverse change in the environment.” To determine if a project would have a significant impact on greenhouse gases, the type, level, and impact of emissions generated by the project must be evaluated.

The following greenhouse gas significance thresholds are contained in Appendix G of the CEQA Guidelines, which were amendments adopted into the Guidelines on March 18, 2010, pursuant to SB 97. A significant impact would occur if the project would:

- (a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- (b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

However, despite this, currently neither the CEQA statutes, OPR guidelines, nor the draft proposed changes to the CEQA Guidelines prescribe thresholds of significance or a particular methodology for performing an impact analysis; as with most environmental topics, significance criteria are left to the judgment and discretion of the Lead Agency. As previously discussed (Section 2.2.4 of this report), SCAQMD has drafted interim thresholds. The screening threshold of 3,000 MTCO₂e per year for all land uses was used in this analysis.

6.0 Air Quality Emissions Impact

6.1 Construction Air Quality Emissions Impact

The latest version of CalEEMod was used to estimate the onsite and offsite construction emissions. The emissions incorporate Rule 402 and 403. Rule 402 and 403 (fugitive dust) are not considered mitigation measures as the project by default is required to incorporate these rules during construction.

6.1.1 Regional Construction Emissions

The construction emissions for the project would not exceed the SCAQMD's daily emission thresholds at the regional level as demonstrated in Table 8, and therefore would be considered less than significant.

Table 8: Regional Significance - Construction Emissions (pounds/day)

Activity	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO ₂	PM10	PM2.5
Site Preparation						
On-Site ²	3.31	31.60	30.20	0.05	9.04	5.20
Off-Site ³	0.08	0.08	1.35	0.00	0.23	0.05
Total	3.39	31.68	31.55	0.05	9.27	5.25
Grading						
On-Site ²	1.74	16.30	17.90	0.03	3.49	2.00
Off-Site ³	0.14	4.85	2.33	0.03	1.41	0.45
Total	1.88	21.15	20.23	0.06	4.90	2.45
Building Construction						
On-Site ²	1.13	10.40	13.00	0.02	0.43	0.40
Off-Site ³	0.24	0.95	4.15	0.00	0.85	0.22
Total	1.37	11.35	17.15	0.02	1.28	0.62
Paving						
On-Site ²	1.28	7.12	9.94	0.01	0.32	0.29
Off-Site ³	0.06	0.22	1.13	0.00	0.25	0.06
Total	1.34	7.34	11.07	0.01	0.57	0.35
Architectural Coating						
On-Site ²	58.82	0.86	1.13	0.00	0.02	0.02
Off-Site ³	0.04	0.04	0.73	0.00	0.13	0.03
Total	58.86	0.90	1.86	0.00	0.15	0.05
Total of overlapping phases⁴	61.57	19.59	30.08	0.03	2.00	1.02
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds	No	No	No	No	No	No
Notes: ¹ Source: CalEEMod Version 2022.1.1.29 ² On-site emissions from equipment operated on-site that is not operated on public roads. ³ Off-site emissions from equipment operated on public roads. ⁴ Construction, architectural coatings and paving phases may overlap.						

6.1.2 Localized Construction Emissions

The data provided in Table 9 shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors. Therefore, a less than significant local air quality impact would occur from construction of the proposed project.

Table 9: Localized Significance – Construction

Phase	On-Site Pollutant Emissions (pounds/day) ¹			
	NO _x	CO	PM ₁₀	PM _{2.5}
Site Preparation	31.60	30.20	9.04	5.20
Grading	16.30	17.90	3.49	2.00
Building Construction	10.40	13.00	0.43	0.40
Paving	7.12	9.94	0.32	0.29
Architectural Coating	0.86	1.13	0.02	0.02
Total of overlapping phases	18.38	24.07	0.77	0.71
SCAQMD Threshold for 50 meters (164 feet) or less²	275	1,572	20	6
Exceeds Threshold?	No	No	No	No
Notes: ¹ Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for two acres, to be conservative, in Perris Valley Source Receptor Area (SRA 24). Project will disturb a maximum of 4.0 acres per day (see Table 7). ² The nearest sensitive receptor is located 56 meters southeast; therefore, the 50-meter threshold has been used.				

6.1.3 Odors

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are of short-term in nature and the odor emissions are expected cease upon the drying or hardening of the odor producing materials. Diesel exhaust and VOCs would be emitted during construction of the project, which are objectionable to some; however, emissions would disperse rapidly from the project site and therefore should not reach an objectionable level at the nearest sensitive receptors. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the proposed project.

The SCAQMD recommends that odor impacts be addressed in a qualitative manner. Such an analysis shall determine whether the project would result in excessive nuisance odors, as defined under the California Code of Regulations and Section 41700 of the California Health and Safety Code, and thus would constitute a public nuisance related to air quality.

Potential sources that may emit odors during the on-going operations of the proposed project would include odor emissions from the trash storage areas. Due to the distance of the nearest receptors from the project site and through compliance with SCAQMD's Rule 402 no significant impact related to odors would occur during the on-going operations of the proposed project.

6.1.4 Construction-Related Toxic Air Contaminant Impact

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed project. The Office of Environmental Health Hazard Assessment (OEHHA) has issued the Air Toxic Hot Spots Program Risk Assessment Guidelines and Guidance Manual for the Preparation of Health Risk Assessments, February 2015 to provide a description of the algorithms, recommended exposure variates, cancer and noncancer health values, and the air modeling protocols needed to perform a health risk assessment (HRA) under the Air Toxics Hot Spots Information and Assessment Act of 1987. Hazard identification includes identifying all substances that are evaluated for cancer risk and/or non-cancer acute, 8-hour, and chronic health impacts. In addition, identifying any multi-pathway substances that present a cancer risk or chronic non-cancer hazard via non-inhalation routes of exposure.

Given the relatively limited number of heavy-duty construction equipment and construction schedule, the proposed project would not result in a long-term substantial source of toxic air containment emissions and corresponding individual cancer risk. Furthermore, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any local or regional thresholds. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the proposed project.

6.2 Operational Air Quality Emissions Impact

6.2.1 Regional Operational Emissions

The operations-related criteria air quality impacts created by the proposed project have been analyzed through the use of CalEEMod model. The operating emissions were based on year 2026, which is the anticipated opening year for the project per the project applicant. The summer and winter emissions created by the proposed project's long-term operations were calculated and the highest emissions from either summer or winter are summarized in Table 10.

Table 10: Regional Significance - Unmitigated Operational Emissions (lbs/day)

Activity	Pollutant Emissions (pounds/day) ¹					
	VOC	NOx	CO	SO2	PM10	PM2.5
Area Sources ²	3.80	0.04	5.28	0.00	0.01	0.01
Energy Usage ³	0.03	0.62	0.52	0.00	0.05	0.05
Mobile Sources ⁴	1.00	4.40	12.60	0.06	3.45	0.94
Total Emissions	4.83	5.06	18.40	0.06	3.51	1.00
SCAQMD Thresholds	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Notes: ¹ Source: CalEEMod Version 2022.1.1.29 ² Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment. ³ Energy usage consists of emissions from on-site natural gas usage. ⁴ Mobile sources consist of emissions from vehicles and road dust.						

Table 10 provides the project's unmitigated operational emissions. Table 10 shows that the project does not exceed the SCAQMD daily emission threshold and regional operational emissions are considered to be less than significant.

6.2.2 Localized Operational Emissions

Table 11 shows the calculated emissions for the proposed operational activities compared with appropriate LSTs. The LST analysis only includes on-site sources; however, the CalEEMod software outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions shown in Table 11 include all on-site project-related stationary sources and 10% of the project-related new mobile sources. This percentage is an estimate of the amount of project-related new vehicle traffic that will occur on-site.

Table 11: Localized Significance – Unmitigated Operational Emissions

On-Site Emission Source	On-Site Pollutant Emissions (pounds/day) ¹			
	NOx	CO	PM10	PM2.5
Area Sources ²	0.04	5.28	0.01	0.01
Energy Usage ³	0.62	0.52	0.05	0.05
On-Site Vehicle Emissions ⁴	0.44	1.26	0.35	0.09
Total Emissions	1.10	7.06	0.41	0.15
SCAQMD Threshold for 50 meters (164 feet)⁵	275	1,572	5	2
Exceeds Threshold?	No	No	No	No
Notes: ¹ Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for two acres, to be conservative, in Lake Elsinore Source Receptor Area (SRA 25). ² Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment. ³ Energy usage consists of emissions from generation of electricity and on-site natural gas usage. ⁴ On-site vehicular emissions based on 1/10 of the gross vehicular emissions and road dust. ⁵ The nearest sensitive receptor is located 56 meters southeast; therefore, the 50-meter threshold has been used.				

Table 11 indicates that the local operational emission would not exceed the LST thresholds at the nearest sensitive receptors, located adjacent to the project. Therefore, the project will not result in significant Localized Operational emissions.

6.3 CO Hot Spot Emissions

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with project CO levels to the State and Federal CO standards which were presented in above in Section 5.0.

To determine if the proposed project could cause emission levels in excess of the CO standards discussed above in Section 5.0, a sensitivity analysis is typically conducted to determine the potential for CO "hot spots" at a number of intersections in the general project vicinity. Because of reduced speeds and vehicle queuing, "hot spots" potentially can occur at high traffic volume intersections with a Level of Service E or worse.

Micro-scale air quality emissions have traditionally been analyzed in environmental documents where the air basin was a non-attainment area for CO. However, the SCAQMD has demonstrated in the CO attainment redesignation request to EPA that there are no “hot spots” anywhere in the air basin, even at intersections with much higher volumes, much worse congestion, and much higher background CO levels than anywhere in Riverside County. If the worst-case intersections in the air basin have no “hot spot” potential, any local impacts will be below thresholds.

The traffic impact analysis showed that the project would generate 208 trips per day. The 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan) showed that an intersection which has a daily traffic volume of approximately 100,000 vehicles per day would not violate the CO standard. The volume of traffic at project buildout would be well below 100,000 vehicles and below the necessary volume to even get close to causing a violation of the CO standard. Therefore no CO “hot spot” modeling was performed and no significant long-term air quality impact is anticipated to local air quality with the on-going use of the proposed project.

6.4 Cumulative Regional Air Quality Impacts

Cumulative projects include local development as well as general growth within the project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered, would cover an even larger area. Accordingly, the cumulative analysis for the project’s air quality must be generic by nature.

The project area is out of attainment for both ozone and PM10 particulate matter. Construction and operation of cumulative projects will further degrade the local air quality, as well as the air quality of the South Coast Air Basin. The greatest cumulative impact on the quality of regional air cell will be the incremental addition of pollutants mainly from increased traffic from residential, commercial, and industrial development and the use of heavy equipment and trucks associated with the construction of these projects. Air quality will be temporarily degraded during construction activities that occur separately or simultaneously. However, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact. The project does not exceed any of the thresholds of significance and therefore is considered less than significant.

6.5 Air Quality Compliance

The California Environmental Quality Act (CEQA) requires a discussion of any inconsistencies between a proposed project and applicable General Plans and Regional Plans (CEQA Guidelines Section 15125). The regional plan that applies to the proposed project includes the SCAQMD Air Quality Management Plan (AQMP). Therefore, this section discusses any potential inconsistencies of the proposed project with the AQMP.

The purpose of this discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and discuss whether the proposed project would interfere with the region’s ability to comply with Federal and State air quality standards. If the decision-makers determine that

the proposed project is inconsistent, the lead agency may consider project modifications or inclusion of mitigation to eliminate the inconsistency.

The SCAQMD CEQA Handbook states that "New or amended General Plan Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." Strict consistency with all aspects of the plan is usually not required. A proposed project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

- (1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- (2) Whether the project will exceed the assumptions in the AQMP in 2016 or increments based on the year of project buildout and phase.

Both of these criteria are evaluated in the following sections.

A. Criterion 1 - Increase in the Frequency or Severity of Violations

Based on the air quality modeling analysis contained in this Air Analysis, short-term construction impacts will not result in significant impacts based on the SCAQMD regional and local thresholds of significance. This Air Analysis also found that, long-term operations impacts will not result in significant impacts based on the SCAQMD local and regional thresholds of significance.

Therefore, the proposed project is not projected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the AQMP for the first criterion.

B. Criterion 2 - Exceed Assumptions in the AQMP?

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the proposed project are based on the same forecasts as the AQMP. The 2016-2040 Regional Transportation/Sustainable Communities Strategy, prepared by SCAG, 2016, includes chapters on: the challenges in a changing region, creating a plan for our future, and the road to greater mobility and sustainable growth. These chapters currently respond directly to federal and state requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA. For this project, the County of Riverside and City of Lake Elsinore Land Use Plans define the assumptions that are represented in the AQMP.

The County of Riverside Elsinore Area Plan identifies the land use designation of the site as Business Park. Furthermore, the project site has a current land use classification of Business Professional and the current zoning is Scenic Highway Commercial (C-P-S) according to the City of Lake Elsinore North Central Sphere Specific Plan Land Use Plan. An application for Change of Zone No. 2000009 is in process, which includes a change of zone from Scenic Highway Commercial (C-P-S) to Industrial Park (I-

P). The current zone (C-P-S) allows the proposed uses and the I-P zone will also allow the proposed uses. Therefore, the Change of Zone does not affect the proposed uses or buildings.

The proposed project is to develop the site with two commercial/industrial buildings. Therefore, the proposed project would not result in an inconsistency with the land use designation in either the County or City's General Plans. Therefore, the proposed project is not anticipated to exceed the AQMP assumptions for the project site and is found to be consistent with the AQMP for the second criterion.

Based on the above, the proposed project will not result in an inconsistency with the SCAQMD AQMP. Therefore, a less than significant impact will occur.

7.0 Greenhouse Gas Impact Analysis

7.1 Construction Greenhouse Gas Emissions Impact

The greenhouse gas emissions from project construction equipment and worker vehicles are shown in Table 12. The emissions are from all phases of construction. The total construction emissions amortized over a period of 30 years are estimated at 16.75 metric tons of CO₂e per year. Annual CalEEMod output calculations are provided in Appendix A.

Table 12: Construction Greenhouse Gas Emissions

Activity	Emissions (MTCO ₂ e) ¹		
	Onsite	Offsite	Total
Site Preparation	24.10	1.06	25.16
Grading	26.90	42.81	69.71
Building Construction	252.00	136.30	388.30
Paving	13.80	3.20	17.00
Coating	1.22	1.20	2.42
Total	318.02	184.57	502.59
Averaged over 30 years²	10.60	6.15	16.75
Notes:			
¹ MTCO ₂ e=metric tons of carbon dioxide equivalents (includes carbon dioxide, methane and nitrous oxide).			
² The emissions are averaged over 30 years because the average is added to the operational emissions, pursuant to SCAQMD.			
* CalEEMod output (Appendix A)			

7.2 Operational Greenhouse Gas Emissions Impact

Operational emissions occur over the life of the project. The operational emissions for the project are 1,441.32 metric tons of CO₂e per year as shown in Table 13. These emissions do not exceed the County of Riverside CAP Update and SCAQMD screening threshold of 3,000 metric tons of CO₂e per year. Therefore, the project's GHG emissions are considered to be less than significant.

<Table 13 next page>

Table 13: Opening Year Unmitigated Project-Related Greenhouse Gas Emissions

Category	Greenhouse Gas Emissions (Metric Tons/Year) ¹					
	Bio-CO ₂	NonBio-CO ₂	CO ₂	CH ₄	N ₂ O	CO ₂ e
Area Sources ²	0.00	2.46	2.46	0.00	0.00	2.47
Energy Usage ³	0.00	295.00	295.00	0.02	0.00	296.00
Mobile Sources ⁴	0.00	973.00	973.00	0.03	0.10	1,004.00
Solid Waste ⁵	10.20	0.00	10.20	1.02	0.00	35.70
Water ⁶	8.91	48.00	56.90	0.92	0.02	86.40
Construction ⁷	0.00	16.53	16.53	0.00	0.00	16.75
Total Emissions	19.11	1,334.99	1,354.09	1.99	0.12	1,441.32
County of Riverside CAP and SCAQMD Draft Screening Threshold						3,000
Exceeds Threshold?						No
Notes:						
¹ Source: CalEEMod Version 2022.1.1.29						
² Area sources consist of GHG emissions from consumer products, architectural coatings, and landscape equipment.						
³ Energy usage consist of GHG emissions from electricity and natural gas usage.						
⁴ Mobile sources consist of GHG emissions from vehicles.						
⁵ Solid waste includes the CO ₂ and CH ₄ emissions created from the solid waste placed in landfills.						
⁶ Water includes GHG emissions from electricity used for transport of water and processing of wastewater.						
⁷ Construction GHG emissions based on a 30-year amortization rate.						

7.3 Greenhouse Gas Plan Consistency

The proposed project would have the potential to conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. As stated previously, both the County of Riverside and the City of Lake Elsinore have adopted Climate Action Plans; therefore, the project and its GHG emissions have been compared to the goals of both the County of Riverside CAP Update as well as the City of Lake Elsinore CAP.

Consistency with the County of Riverside CAP Update

Per the County's CAP Update, the County adopted its first CAP in 2015 which set a target to reduce emissions back to 1990 levels by the year 2020 as recommended in the AB 32 Scoping Plan. Furthermore, the goals and supporting measures within the County's CAP Update are proposed to reflect and ensure compliance with changes in the local and State policies and regulations such as SB 32 and California's 2017 Climate Change Scoping Plan. Therefore, compliance with the County's CAP in turn reflects consistency with the goals of the CARB Scoping Plan, Assembly Bill (AB) 32 and Senate Bill (SB) 32.

Appendix D of the Riverside County CAP Update also states that project's that do not exceed the CAP's screening threshold of 3,000 MTCO₂e per year are considered to have less than significant GHG emissions and are in compliance with the County's CAP Update. According to the County's CAP Update, projects that do not exceed emissions of 3,000 MTCO₂e per year are also required to include the following efficiency measures:

- Energy efficiency matching or exceeding the Title 24 requirements in effect as of January 2017, and

- Water conservation measures that matches the California Green Building Code in effect as of January 2017.

As stated above, the GHG emissions generated by the proposed project would not exceed the County of Riverside CAP Update screening threshold of 3,000 metric tons per year of CO₂e.

Consistency with the City of Lake Elsinore CAP

The City of Lake Elsinore adopted the City of Lake Elsinore CAP, on December 13, 2011. The Climate Action Plan provides specific measures to be implemented in new developments to reduce GHG emissions as well as a GHG emissions reduction target based on a community-wide emissions reduction to 6.6 MTCO₂e per service population per year by 2020 and 4.4 MTCO₂e per service population per year by 2030.

Appendix D of the CAP contains a project level worksheet that an applicant may use to demonstrate consistency with the General Plan growth potential and CAP. The following are the criteria for determining consistency with the CAP:

1. Is the project consistent with the General Plan land use designation?

The proposed project site is currently zoned as R-2 Light-Medium Residential, but the project is seeking to rezone as C-M Commercial-Manufacturing in the City of Lake Elsinore North Central Sphere Specific Plan Land Use Plan.

The proposed project is to develop the site with multiple commercial warehouse buildings. Therefore, the proposed project is anticipated to be consistent with the updated zoning and land uses specified in the City of Lake Elsinore's General Plan. Therefore, the project meets this criterion.

2. Is the project consistent with the General Plan population and employment projections for the site, upon which the CAP modeling is based?

The City of Lake Elsinore General Plan's build-out of population, housing and employment have anticipated the development of the Project site as a commercial area with a land use of Business Professional. Therefore, this buildout projection was used in the preparation of the CAP. Therefore, the project meets this criterion.

3. Does the project incorporate the following CAP measures as binding and enforceable components of the project? Until these measures have been formally adopted by the City and incorporated in to applicable codes, the requirements must be incorporated as mitigation measures applicable to the project (CEQA Guidelines, Section 15183.5(b)(2)).

Table 14 provides a list of the reduction measures for new non-residential developments included in CAP Appendix D. Table 14 also provides a project consistency analysis of each measure. Per Table 14, the Project meets this criterion.

Based on the analysis above, the project will be consistent with the goals, policies and implementation programs contained in the adopted City of Lake Elsinore CAP.

Therefore, as the project would comply with the goals of both the County of Riverside CAP Update and the City of Lake Elsinore CAP, the project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

<Table 14, next page>

Table 14: City of Lake Elsinore CAP GHG Reduction Measures for Commercial Development and Project Consistency¹

Local Measure	Measure Description	Project Consistency
T-1.2 Pedestrian Infrastructure	Through the development review process, require the installation of sidewalks along new and reconstructed streets. Also require new subdivisions and large developments to provide sidewalks or paths to internally link all uses where applicable and provide connections to neighborhood activity centers, major destinations, and transit facilities contiguous with the project site; implement through conditions of approval.	Consistent. The proposed project does not include any new or reconstructed streets and sidewalks/pathways are provided within the project site.
T-1.4 Bicycle Infrastructure	Through the development review process, require new development, as applicable, to implement and connect to the network of Class I, II and III bikeways, trails and safety features identified in the General Plan, Bike Lane Master Plan, Trails Master Plan and Western Riverside County Non-Motorized Transportation plan; implement through conditions of approval. The City will also continue to pursue and utilize funding when needed to implement portions of these plans.	Not Applicable. Per the Lake Elsinore General Plan Circulation Element, Figure 2.5 Bikeway Plan there are no bikeways or trails located adjacent to the proposed project site.
T-1.5 Bicycle Parking	Through the development review process, enforce the following short-term and long-term bicycle parking standards for new non-residential development (consistent with 2010 California Green Building Code [CalGreen], Section 5.106.4), and implement through conditions of approval: <i>Short-Term Bicycle Parking:</i> If the project is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitor entrance, readily visible to passers-by, for 5% of visitor motorized vehicle parking capacity, with a minimum of one two-bike capacity rack. <i>Long-Term Bicycle Parking:</i> For buildings with over 10 tenant occupants, provide secure bicycle parking for 5% of tenant-occupied motorized vehicle parking capacity, with a minimum of one space.	Not Applicable. The project is not anticipated to generate visitor traffic and the project will not have more than 10 tenants.
T-2.1 Designated Parking for Fuel-Efficient Vehicles	Amend the Municipal Code to require that new non-residential development designate 10% of total parking spaces for any combination of low-emitting, fuel-efficient and carpool/vanpool vehicles (consistent with CalGreen Tier 1, Sections A5.106.5.1 and A5.106.5.3), and implement through conditions of approval. Parking stalls shall be marked —Clean Air Vehicle.	Consistent. As shown on the project site plan, the project is consistent with Section 17.18.045 of the County of Riverside Municipal Code and Table 5.106.5.3.3 of CalGreen in regards to the number of electric vehicle/vanpool parking spaces required. The site includes a total of 180 parking spaces and nine of those parking spaces are to be electric vehicle charging stations.

E-1.1 Tree Planting	Through the development review process, require new development to plant at minimum one 15-gallon nondeciduous, umbrella-form tree per 30 linear feet of boundary length near buildings, per the Municipal Code. Trees shall be planted in strategic locations around buildings or to shade pavement in parking lots and streets.	Consistent. This measure is implemented by the Departments of Planning, Public Works, and Parks and Recreation through City ordinance, development review process, and conditions of approval. The proposed project elements would be required to comply with the City ordinances and conditions of approval, if applicable.
E-1.2 Cool Roof Requirements	Amend the City Municipal Code to require new non-residential development to use roofing materials having solar reflectance, thermal emittance or Solar Reflectance Index (SRI) consistent with CalGreen Tier 1 values (Table A5.106.11.2.1), and implement through conditions of approval.	Consistent. This measure is implemented by the Departments of Planning and Building through City ordinance, development review process, and conditions of approval. The proposed Project elements would be required to comply with the City ordinances and conditions of approval, if applicable.
E-1.3 Energy Efficient Building Standards	Adopt an ordinance requiring that all new construction exceed the California Energy Code requirements, based on the 2008 Energy Efficiency Standards by 15% (consistent with CalGreen Tier 1), through either the performance based or prescriptive approach described in the California Green Building Code; implement through conditions of approval. Alternately, a solar photovoltaic system and/or solar water heating may be used to assist in meeting all or a portion of the 15% requirement.	Consistent. The California Green Building Standards Code (proposed Part 11, Title 24) was adopted as part of the California Building Standards Code in the CCR. Part 11 establishes voluntary standards, that are mandatory in the 2022 edition of the Code, on planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The proposed project will be subject to these mandatory standards.
E-4.1 Landscaping	Through the development review process, enforce the City's Assembly Bill 1881 Landscaping Ordinance; implement through conditions of approval.	Consistent. AB 1881 Landscaping Ordinance requires that landscaping be water efficient, thereby consuming less energy and reducing emissions. The proposed project elements would be required to comply with these landscape requirements.
E-4.2 Indoor Water Conservation Requirements	Amend the City's Uniform Building Code to require development projects to reduce indoor water consumption by 30% (consistent with CalGreen Tier 1, Section A5.303.2.3.1), and implement through conditions of approval.	Consistent. The proposed project will utilize water fixtures that are sold in California that are required to meet CCR Title 20, Sections 1601 – 1608 that require all water fixtures to be low flow and provide an average water use reduction of 30%.
S-1.4 Construction and Demolition Waste Diversion	Amend the Municipal Code to require development projects to divert, recycle or salvage at least 65% of nonhazardous construction and demolition debris generated at the site by 2020 (consistent with CalGreen Tier 1, Section A5.408.3.1). Require all construction and demolition projects to be accompanied by a waste management plan for the	Consistent. The California Green Building Standards Code (proposed Part 11, Title 24) was adopted as part of the California Building Standards Code in the CCR. Part 11 establishes voluntary standards, that are mandatory in the 2022 edition of the Code. Section 5.408 requires the

	project and a copy of the completed waste management report shall be provided upon completion.	recycling and/or salvaging for reuse of a minimum of 65 percent of the nonhazardous construction and demolition waste. The proposed project will be subject to these mandatory standards.
Notes: ¹ Source: City of Lake Elsinore Climate Action Plan		

8.0 Energy Analysis

Information from the CalEEMod 2022.1.1.29 Daily and Annual Outputs contained in the air quality and greenhouse gas analyses above was utilized for this analysis. The CalEEMod outputs detail project related construction equipment, transportation energy demands, and facility energy demands.

8.1 Construction Energy Demand

8.1.1 Construction Equipment Electricity Usage Estimates

Electrical service will be provided by Southern California Edison (SCE). Based on the 2017 National Construction Estimator, Richard Pray (2017)², the typical power cost per 1,000 square feet of building construction per month is estimated to be \$2.32. The project plans to develop the site with 121,490 square feet of new warehouse space over the course of approximately 14 months.³ Based on Table 14, the total power cost of the on-site electricity usage during the construction of the proposed project is estimated to be approximately \$3,946. As shown in Table 14, the total electricity usage from Project construction related activities is estimated to be approximately 71,745 kWh.⁴

Table 14: Project Construction Power Cost and Electricity Usage

Power Cost (per 1,000 square foot of building per month of construction)	Total Building Size (1,000 Square Foot) ¹	Construction Duration (months)	Total Project Construction Power Cost
\$2.32	121.49	14	\$3,946.00

Cost per kWh	Total Project Construction Electricity Usage (kWh)
\$0.06	71,745

* Assumes the project will be under the GS-1 General Service rate under SCE.

² Pray, Richard. 2017 National Construction Estimator. Carlsbad: Craftsman Book Company, 2017.

³ As stated in the project description, the project involves the demolition of approximately 70,000 square feet of existing residences.

⁴ LADWP's Small Commercial & Multi-Family Service (A-1) is approximately \$0.06 per kWh of electricity Southern California Edison (SCE). Rates & Pricing Choices: General Service/Industrial Rates. https://library.sce.com/content/dam/sce-doclib/public/regulatory/historical/electric/2020/schedules/general-service-&-industrial-rates/ELECTRIC_SCHEDULES_GS-1_2020.pdf

8.1.2 Construction Equipment Fuel Estimates

Using the CalEEMod data input, the project's construction phase would consume electricity and fossil fuels as a single energy demand, that is, once construction is completed their use would cease. CARB's 2017 Emissions Factors Tables show that on average aggregate fuel consumption (gasoline and diesel fuel) would be approximately 18.5 hp-hr-gal.⁵ As presented in Table 15 below, project construction activities would consume an estimated 32,015 gallons of diesel fuel.

Table 15: Construction Equipment Fuel Consumption Estimates

Phase	Number of Days	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor	HP hrs/day	Total Fuel Consumption (gal diesel fuel) ¹
Site Preparation	10	Rubber Tired Dozers	3	8	367	0.4	3523	1904
	10	Tractors/Loaders/Backhoes	4	8	84	0.37	995	538
Grading	30	Excavators	1	8	36	0.38	109	118
	30	Graders	1	8	148	0.41	485	525
	30	Rubber Tired Dozers	1	8	367	0.4	1,174	1,270
	30	Tractors/Loaders/Backhoes	3	8	84	0.37	746	806
Building Construction	300	Cranes	1	7	367	0.29	745	9,262
	300	Forklifts	3	8	82	0.2	394	4,893
	300	Generator Sets	1	8	14	0.74	83	1,030
	300	Tractors/Loaders/Backhoes	3	7	84	0.37	653	8,114
	300	Welders	1	8	46	0.45	166	2,059
Paving	20	Pavers	2	8	81	0.42	544	588
	20	Paving Equipment	2	8	89	0.36	513	554
	20	Rollers	2	8	36	0.38	219	237
Architectural Coating	20	Air Compressors	1	6	37	0.48	107	115
CONSTRUCTION FUEL DEMAND (gallons of diesel fuel)								32,015

Notes:

¹Using Carl Moyer Guidelines Table D-21 Fuel consumption rate factors (bhp-hr/gal) for engines less than 750 hp.
(Source: https://www.arb.ca.gov/msprog/moyer/guidelines/2017gl/2017_gl_appendix_d.pdf)

8.1.3 Construction Worker Fuel Estimates

It is assumed that all construction worker trips are from light duty autos (LDA) along area roadways. With respect to estimated VMT, the construction worker trips would generate an estimated 235,117

⁵ Aggregate fuel consumption rate for all equipment was estimated at 18.5 hp-hr/day (from CARB's 2017 Emissions Factors Tables and fuel consumption rate factors as shown in Table D-21 of the Moyer Guidelines: https://www.arb.ca.gov/msprog/moyer/guidelines/2017gl/2017_gl_appendix_d.pdf).

VMT. Vehicle fuel efficiencies for construction workers were estimated in the air quality and greenhouse gas analysis using information generated using CARB's EMFAC model (see Appendix B for details). Table 16 shows that an estimated 7,600 gallons of fuel would be consumed for construction worker trips.

Table 16: Construction Worker Fuel Consumption Estimates

Phase	Number of Days	Worker Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Site Preparation	10	17.5	18.5	3237.5	30.94	105
Grading	20	15	18.5	5,550	30.94	179
Building Construction	230	51	18.5	217,005	30.94	7,015
Paving	20	15	18.5	5,550	30.94	179
Architectural Coating	20	10.2	18.5	3,774	30.94	122
Total Construction Worker Fuel Consumption						7,600

Notes:

¹Assumptions for the worker trip length and vehicle miles traveled are consistent with CalEEMod 2022.1.1.29 defaults.

8.1.4 Construction Vendor/Hauling Fuel Estimates

Tables 17 and 18 show the estimated fuel consumption for vendor and hauling during building construction and architectural coating. With respect to estimated VMT, the vendor and hauling trips would generate an estimated 71,685 VMT. For the architectural coatings it is assumed that the contractors would be responsible for bringing coatings and equipment with them in their light duty vehicles.⁶ Tables 17 and 18 show that an estimated 9,558 gallons of fuel would be consumed for vendor and hauling trips.

<Table 17, next page>

⁶ Vendors delivering construction material or hauling debris from the site during grading would use medium to heavy duty vehicles with an average fuel consumption of 9.22 mpg for medium heavy-duty trucks and 6.74 mpg for heavy heavy-duty trucks (see Appendix B for details).

Table 17: Construction Vendor Fuel Consumption Estimates (MHD Trucks)¹

Phase	Number of Days	Vendor Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Site Preparation	10	0	10.2	0	8.57	0
Grading	20	0	10.2	0	8.57	0
Building Construction	230	19.9	10.2	46,685	8.57	5,448
Paving	20	5	10.2	1,020	8.57	119
Architectural Coating	20	0	10.2	0	8.57	0
Total Vendor Fuel Consumption						5,567

Notes:

¹ Assumptions for the vendor trip length and vehicle miles traveled are consistent with CalEEMod 2022.1.1.29 defaults.

Table 18: Construction Hauling Fuel Consumption Estimates (HHD Trucks)¹

Phase	Number of Days	Hauling Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Site Preparation	10	0	20	0	6.26	0
Grading	20	62.5	20	25,000	6.26	3,991
Building Construction	230	0	20	0	6.26	0
Paving	20	0	20	0	6.26	0
Architectural Coating	20	0	20	0	6.26	0
Total Construction Hauling Fuel Consumption						3,991

Notes:

¹ Assumptions for the hauling trip length and vehicle miles traveled are consistent with CalEEMod 2020.40 defaults.

8.1.5 Construction Energy Efficiency/Conservation Measures

Construction equipment used over the approximately 14-month construction phase would conform to CARB regulations and California emissions standards and is evidence of related fuel efficiencies. In addition, the CARB Airborne Toxic Control Measure limits idling times of construction vehicles to no more than five minutes, thereby minimizing unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Furthermore, the project has been designed in compliance with California's Energy Efficiency Standards and 2022 CALGreen Standards.

Construction of the proposed warehouse development would require the typical use of energy resources. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

8.2 Operational Energy Demand

Energy consumption in support of or related to project operations would include transportation energy demands (energy consumed by employee and patron vehicles accessing the project site) and facilities energy demands (energy consumed by building operations and site maintenance activities).

8.2.1 Transportation Fuel Consumption

The largest source of operational energy use would be vehicle operation of customers. The site is located in an urbanized area just in close proximity to transit stops. Using the CalEEMod output, an average trip length for all vehicles was assumed to be 21.774 miles. To show a worst-case analysis, as the proposed project is an office project, it was assumed that vehicles would operate 365 days per year. Table 19 shows the worst-case estimated annual fuel consumption for all classes of vehicles from autos to heavy-heavy trucks.⁷ Table 19 shows that an estimated 106,511 gallons of fuel would be consumed per year for the operation of the proposed project.

Table 19: Estimated Vehicle Operations Fuel Consumption

Vehicle Type	Vehicle Mix	Number of Vehicles	Average Trip (miles) ¹	Daily VMT	Average Fuel Economy (mpg)	Total Gallons per Day	Total Annual Fuel Consumption (gallons)
Light Auto	Automobile	75.5	21.774	1,644	30.94	53.15	19,401
Light Truck	Automobile	13.2	21.774	287	25.55	11.24	4,104
Light Truck	Automobile	39.7	21.774	864	25.60	33.75	12,318
Medium Truck	Automobile	27.7	21.774	602	20.47	29.42	10,739
Light Heavy Truck	2-Axle Truck	5.1	21.774	111	16.63	6.69	2,442
Light Heavy Truck 10,000 lbs +	2-Axle Truck	1.4	21.774	30	15.79	1.90	695
Medium Heavy Truck	3-Axle Truck	2.6	21.774	56	8.57	6.52	2,379
Heavy Heavy Truck	4-Axle Truck	42.9	21.774	934	6.26	149.13	54,433
Total		208	--	4,529	--	291.81	--
Total Annual Fuel Consumption							106,511

Notes:

¹ The trip generation assessment, the project is to generate 208 total net new trips after reduction of existing uses. Default CalEEMod vehicle fleet mix utilized.

²Based on the size of the site and relative location, trips were assumed to be local rather than regional.

Trip generation generated by the proposed project are consistent with other similar industrial uses of similar scale and configuration as reflected in the Trip Generation Assessment (TJW Engineering, 2025). That is, the proposed project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips, nor associated excess and wasteful vehicle energy consumption. Therefore, project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

⁷ Average fuel economy based on aggregate mileage calculated in EMFAC 2021 for opening year (2026). See Appendix B for EMFAC output.

8.2.2 Facility Energy Demands (Electricity and Natural Gas)

The annual natural gas and electricity demands were provided per the CalEEMod output and are provided in Table 20.

Table 20: Project Unmitigated Annual Operational Energy Demand Summary¹

Natural Gas Demand	kBTU/year
Unrefrigerated Warehouse	2,319,509
Total	2,319,509
Electricity Demand	kWh/year
Unrefrigerated Warehouse	559,140
Parking Lot	152,253
Total	711,393

Notes:

¹Taken from the CalEEMod 2022.1.1.29 annual output.

As shown in Table 20, the estimated electricity demand for the proposed project is approximately 711,393 kWh per year. In 2022, the non-residential sector of the County of Riverside consumed approximately 8,720 million kWh of electricity.⁸ In addition, the estimated natural gas consumption for the proposed project is approximately 2,319,509 kBTU per year. In 2022, the non-residential sector of the County of Riverside consumed approximately 146.9 million therms of gas, or 14.69 billion kBTU.⁹ Therefore, the increase in both electricity and natural gas demand from the proposed project is insignificant compared to the County's 2022 demand.

8.3 Renewable Energy and Energy Efficiency Plan Consistency

Regarding federal transportation regulations, the project site is located in an already developed area. Access to/from the project site is from existing roads. These roads are already in place so the project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be proposed pursuant to the ISTEA because SCAG is not planning for intermodal facilities in the project area.

Regarding the State's Energy Plan and compliance with Title 24 CCR energy efficiency standards, the applicant is required to comply with the California Green Building Standard Code requirements for energy efficient buildings and appliances as well as utility energy efficiency programs implemented by the SCE and Southern California Gas Company.

Regarding the State's Renewable Energy Portfolio Standards, the project would be required to meet or exceed the energy standards established in the California Green Building Standards Code, Title 24, Part

⁸ California Energy Commission, Electricity Consumption by County. <https://ecdms.energy.ca.gov/elecbycounty.aspx>

⁹ California Energy Commission, Gas Consumption by County. <http://ecdms.energy.ca.gov/gasbycounty.aspx>

11 (CALGreen). CalGreen Standards require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials.

9.0 References

The following references were used in the preparing this analysis.

California Air Pollution Control Officers Association

2009 Health Risk Assessments for Proposed Land Use Projects

California Air Resources Board

2008 Resolution 08-43

2008 Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act

2008 ARB Recommended Interim Risk Management Policy for Inhalation-Based Residential Cancer Risk – Frequently Asked Questions

2008 Climate Change Scoping Plan, a framework for change.

2011 Supplement to the AB 32 Scoping Plan Functional Equivalent Document

2013 Revised Emission Factors for Gasoline Marketing Operations at California Gasoline Dispensing Facilities

2014 First Update to the Climate Change Scoping Plan, Building on the Framework Pursuant to AB32, the California Global Warming Solutions Act of 2006. May.

2018 Historical Air Quality, Top 4 Summary

City of Lake Elsinore

2011 City of Lake Elsinore General Plan. December 13.

2013 City of Lake Elsinore North Central Sphere District

County of Riverside

2015 County of Riverside General Plan. December 8.

2020 Elsinore Area Plan. Revised August 4.

2019 County of Riverside Climate Action Plan Update. November.

Governor's Office of Planning and Research

2008 CEQA and Climate: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review

2009 CEQA Guideline Sections to be Added or Amended

Office of Environmental Health Hazard Assessment

2015 Air Toxics Hot Spots Program Risk Assessment Guidelines

South Coast Air Quality Management District

1993 CEQA Air Quality Handbook

2005 Rule 403 Fugitive Dust

2007 2007 Air Quality Management Plan

2008 Final Localized Significance Threshold Methodology, Revised

2011 Appendix A Calculation Details for CalEEMod

2012 Final 2012 Air Quality Management Plan

2016 Final 2016 Air Quality Management Plan

TJW Engineering Group

2025 Rome Hill Commercial Trip Generation Analysis and VMT Screening, City of Lake Elsinore. January 27.

Appendix A:

CalEEMod Emission Output

Rome Hill Commercial Detailed Report

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8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Rome Hill Commercial
Construction Start Date	6/1/2025
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.50
Precipitation (days)	9.20
Location	18282 Grand Ave, Lake Elsinore, CA 92530, USA
County	Riverside-South Coast
City	Unincorporated
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5521
EDFZ	11
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Unrefrigerated Warehouse-No Rail	121	1000sqft	2.79	121,490	0.00	—	—	—

Parking Lot	180	Space	3.99	0.00	89,525	—	—	—
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1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	58.9	31.7	31.5	0.06	1.37	7.89	9.26	1.26	3.99	5.25	—	7,478	7,478	0.23	0.71	9.96	7,704
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.35	11.4	16.2	0.03	0.44	0.84	1.28	0.41	0.20	0.61	—	3,668	3,668	0.14	0.14	0.11	3,713
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.76	5.19	6.48	0.01	0.20	0.67	0.87	0.19	0.26	0.45	—	1,575	1,575	0.06	0.08	0.77	1,600
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.69	0.95	1.18	< 0.005	0.04	0.12	0.16	0.03	0.05	0.08	—	261	261	0.01	0.01	0.13	265

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
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2025	3.39	31.7	31.5	0.06	1.37	7.89	9.26	1.26	3.99	5.25	—	7,478	7,478	0.23	0.71	9.96	7,704
2026	58.9	10.7	16.8	0.03	0.39	0.84	1.22	0.36	0.20	0.56	—	3,700	3,700	0.14	0.14	4.02	3,748
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.35	11.4	16.2	0.03	0.44	0.84	1.28	0.41	0.20	0.61	—	3,668	3,668	0.14	0.14	0.11	3,713
2026	1.29	10.7	15.9	0.03	0.39	0.84	1.22	0.36	0.20	0.56	—	3,644	3,644	0.12	0.14	0.10	3,688
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.57	5.19	6.48	0.01	0.20	0.67	0.87	0.19	0.26	0.45	—	1,575	1,575	0.06	0.08	0.77	1,600
2026	3.76	4.29	6.41	0.01	0.16	0.32	0.47	0.14	0.08	0.22	—	1,417	1,417	0.05	0.05	0.66	1,434
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.10	0.95	1.18	< 0.005	0.04	0.12	0.16	0.03	0.05	0.08	—	261	261	0.01	0.01	0.13	265
2026	0.69	0.78	1.17	< 0.005	0.03	0.06	0.09	0.03	0.01	0.04	—	235	235	0.01	0.01	0.11	237

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.84	5.07	18.4	0.06	0.13	3.38	3.51	0.12	0.87	0.99	115	8,126	8,241	12.0	0.73	16.9	8,776
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.92	5.26	11.0	0.06	0.12	3.38	3.50	0.12	0.87	0.99	115	7,922	8,037	12.0	0.74	0.44	8,556
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.51	5.34	15.0	0.06	0.13	3.36	3.49	0.12	0.87	0.99	115	7,962	8,078	12.0	0.74	7.30	8,604
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	0.82	0.98	2.74	0.01	0.02	0.61	0.64	0.02	0.16	0.18	19.1	1,318	1,337	1.99	0.12	1.21	1,425
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2.5. Operations Emissions by Sector, Unmitigated

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

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.00	4.40	12.6	0.06	0.07	3.38	3.45	0.07	0.87	0.94	—	6,034	6,034	0.17	0.59	16.9	6,231
Area	3.80	0.04	5.28	< 0.005	0.01	—	0.01	0.01	—	0.01	—	21.7	21.7	< 0.005	< 0.005	—	21.8
Energy	0.03	0.62	0.52	< 0.005	0.05	—	0.05	0.05	—	0.05	—	1,780	1,780	0.13	0.01	—	1,786
Water	—	—	—	—	—	—	—	—	—	—	53.8	290	344	5.54	0.13	—	522
Waste	—	—	—	—	—	—	—	—	—	—	61.5	0.00	61.5	6.15	0.00	—	215
Total	4.84	5.07	18.4	0.06	0.13	3.38	3.51	0.12	0.87	0.99	115	8,126	8,241	12.0	0.73	16.9	8,776
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.95	4.64	10.5	0.06	0.07	3.38	3.45	0.07	0.87	0.94	—	5,852	5,852	0.17	0.59	0.44	6,033
Area	2.94	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.03	0.62	0.52	< 0.005	0.05	—	0.05	0.05	—	0.05	—	1,780	1,780	0.13	0.01	—	1,786
Water	—	—	—	—	—	—	—	—	—	—	53.8	290	344	5.54	0.13	—	522
Waste	—	—	—	—	—	—	—	—	—	—	61.5	0.00	61.5	6.15	0.00	—	215
Total	3.92	5.26	11.0	0.06	0.12	3.38	3.50	0.12	0.87	0.99	115	7,922	8,037	12.0	0.74	0.44	8,556
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.94	4.69	10.9	0.06	0.07	3.36	3.44	0.07	0.87	0.93	—	5,878	5,878	0.17	0.59	7.30	6,066
Area	3.53	0.03	3.62	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	14.9	14.9	< 0.005	< 0.005	—	14.9
Energy	0.03	0.62	0.52	< 0.005	0.05	—	0.05	0.05	—	0.05	—	1,780	1,780	0.13	0.01	—	1,786
Water	—	—	—	—	—	—	—	—	—	—	53.8	290	344	5.54	0.13	—	522
Waste	—	—	—	—	—	—	—	—	—	—	61.5	0.00	61.5	6.15	0.00	—	215

Total	4.51	5.34	15.0	0.06	0.13	3.36	3.49	0.12	0.87	0.99	115	7,962	8,078	12.0	0.74	7.30	8,604
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.17	0.86	1.99	0.01	0.01	0.61	0.63	0.01	0.16	0.17	—	973	973	0.03	0.10	1.21	1,004
Area	0.64	0.01	0.66	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.46	2.46	< 0.005	< 0.005	—	2.47
Energy	0.01	0.11	0.10	< 0.005	0.01	—	0.01	0.01	—	0.01	—	295	295	0.02	< 0.005	—	296
Water	—	—	—	—	—	—	—	—	—	—	8.91	48.0	56.9	0.92	0.02	—	86.4
Waste	—	—	—	—	—	—	—	—	—	—	10.2	0.00	10.2	1.02	0.00	—	35.7
Total	0.82	0.98	2.74	0.01	0.02	0.61	0.64	0.02	0.16	0.18	19.1	1,318	1,337	1.99	0.12	1.21	1,425

3. Construction Emissions Details

3.1. Site Preparation (2025) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.31	31.6	30.2	0.05	1.37	—	1.37	1.26	—	1.26	—	5,295	5,295	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—	—	—	—
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	0.09	0.87	0.83	< 0.005	0.04	—	0.04	0.03	—	0.03	—	145	145	0.01	< 0.005	—	146
Dust From Material Movement	—	—	—	—	—	0.21	0.21	—	0.11	0.11	—	—	—	—	—	—	—
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	0.16	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01	—	24.0	24.0	< 0.005	< 0.005	—	24.1
Dust From Material Movement	—	—	—	—	—	0.04	0.04	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	1.35	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	247	247	0.01	0.01	0.91	250
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	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.29	6.29	< 0.005	< 0.005	0.01	6.38
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	—	1.04	1.04	< 0.005	< 0.005	< 0.005	1.06

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

3.3. Grading (2025) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.74	16.3	17.9	0.03	0.72	—	0.72	0.66	—	0.66	—	2,959	2,959	0.12	0.02	—	2,970
Dust From Material Movement	—	—	—	—	—	2.77	2.77	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.89	0.98	< 0.005	0.04	—	0.04	0.04	—	0.04	—	162	162	0.01	< 0.005	—	163
Dust From Material Movement	—	—	—	—	—	0.15	0.15	—	0.07	0.07	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.16	0.18	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.8	26.8	< 0.005	< 0.005	—	26.9

Dust From Material Movement	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	1.16	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	211	211	0.01	0.01	0.78	215
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	0.07	4.78	1.17	0.03	0.08	1.13	1.21	0.08	0.32	0.40	—	4,307	4,307	0.08	0.68	9.18	4,520
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.8	10.8	< 0.005	< 0.005	0.02	10.9
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	0.06	< 0.005	< 0.005	0.06	0.07	< 0.005	0.02	0.02	—	236	236	< 0.005	0.04	0.22	247
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.79	1.79	< 0.005	< 0.005	< 0.005	1.81
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	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	39.1	39.1	< 0.005	0.01	0.04	41.0

3.5. Building Construction (2025) - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.31	2.88	3.60	0.01	0.12	—	0.12	0.11	—	0.11	—	662	662	0.03	0.01	—	664
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	0.06	0.53	0.66	< 0.005	0.02	—	0.02	0.02	—	0.02	—	110	110	< 0.005	< 0.005	—	110
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	0.23	0.22	3.94	0.00	0.00	0.67	0.67	0.00	0.16	0.16	—	719	719	0.03	0.03	2.64	730
Vendor	0.01	0.67	0.21	< 0.005	0.01	0.17	0.18	0.01	0.05	0.06	—	609	609	0.01	0.09	1.73	639
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.21	0.25	2.98	0.00	0.00	0.67	0.67	0.00	0.16	0.16	—	661	661	0.03	0.03	0.07	669
Vendor	0.01	0.70	0.21	< 0.005	0.01	0.17	0.18	0.01	0.05	0.06	—	610	610	0.01	0.09	0.04	638
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	0.06	0.07	0.87	0.00	0.00	0.18	0.18	0.00	0.04	0.04	—	185	185	0.01	0.01	0.31	187
Vendor	< 0.005	0.19	0.06	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	168	168	< 0.005	0.03	0.21	176
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	0.01	0.01	0.16	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	30.6	30.6	< 0.005	< 0.005	0.05	31.0
Vendor	< 0.005	0.04	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	27.8	27.8	< 0.005	< 0.005	0.03	29.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.38	3.51	4.62	0.01	0.13	—	0.13	0.12	—	0.12	—	854	854	0.03	0.01	—	857
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	0.07	0.64	0.84	< 0.005	0.02	—	0.02	0.02	—	0.02	—	141	141	0.01	< 0.005	—	142
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	0.22	0.20	3.66	0.00	0.00	0.67	0.67	0.00	0.16	0.16	—	704	704	0.03	0.02	2.38	714
Vendor	0.01	0.64	0.20	< 0.005	0.01	0.17	0.18	0.01	0.05	0.06	—	599	599	0.01	0.09	1.64	629
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.20	0.22	2.78	0.00	0.00	0.67	0.67	0.00	0.16	0.16	—	647	647	0.01	0.03	0.06	655
Vendor	0.01	0.67	0.20	< 0.005	0.01	0.17	0.18	0.01	0.05	0.06	—	600	600	0.01	0.09	0.04	628
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	0.07	0.09	1.04	0.00	0.00	0.24	0.24	0.00	0.06	0.06	—	233	233	< 0.005	0.01	0.37	237
Vendor	< 0.005	0.24	0.07	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	214	214	< 0.005	0.03	0.25	224
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	0.01	0.02	0.19	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	38.6	38.6	< 0.005	< 0.005	0.06	39.2
Vendor	< 0.005	0.04	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	35.4	35.4	< 0.005	0.01	0.04	37.0

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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3.9. Paving (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.76	7.12	9.94	0.01	0.32	—	0.32	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.52	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.04	0.39	0.54	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Paving	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Paving	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	1.08	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	207	207	0.01	0.01	0.70	210
Vendor	< 0.005	0.16	0.05	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.01	—	151	151	< 0.005	0.02	0.41	158
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	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.6	10.6	< 0.005	< 0.005	0.02	10.7
Vendor	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	8.25	8.25	< 0.005	< 0.005	0.01	8.64
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	—	1.75	1.75	< 0.005	< 0.005	< 0.005	1.77
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.37	1.37	< 0.005	< 0.005	< 0.005	1.43
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architect ural Coatings	58.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.32	7.32	< 0.005	< 0.005	—	7.34
Architect ural Coatings	3.22	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	—	1.21	1.21	< 0.005	< 0.005	—	1.22
Architect ural Coatings	0.59	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.73	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	141	141	0.01	< 0.005	0.48	143
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	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.18	7.18	< 0.005	< 0.005	0.01	7.28

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	—	1.19	1.19	< 0.005	< 0.005	< 0.005	1.20
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	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

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	815	815	0.05	0.01	—	818
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	222	222	0.01	< 0.005	—	223
Total	—	—	—	—	—	—	—	—	—	—	—	1,037	1,037	0.06	0.01	—	1,041

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	815	815	0.05	0.01	—	818
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	222	222	0.01	< 0.005	—	223
Total	—	—	—	—	—	—	—	—	—	—	—	1,037	1,037	0.06	0.01	—	1,041
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	135	135	0.01	< 0.005	—	135
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	36.7	36.7	< 0.005	< 0.005	—	36.9
Total	—	—	—	—	—	—	—	—	—	—	—	172	172	0.01	< 0.005	—	172

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.03	0.62	0.52	< 0.005	0.05	—	0.05	0.05	—	0.05	—	743	743	0.07	< 0.005	—	745
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.62	0.52	< 0.005	0.05	—	0.05	0.05	—	0.05	—	743	743	0.07	< 0.005	—	745

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.03	0.62	0.52	< 0.005	0.05	—	0.05	0.05	—	0.05	—	743	743	0.07	< 0.005	—	745
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.62	0.52	< 0.005	0.05	—	0.05	0.05	—	0.05	—	743	743	0.07	< 0.005	—	745
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.01	0.11	0.10	< 0.005	0.01	—	0.01	0.01	—	0.01	—	123	123	0.01	< 0.005	—	123
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.01	0.11	0.10	< 0.005	0.01	—	0.01	0.01	—	0.01	—	123	123	0.01	< 0.005	—	123

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	2.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.32	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape Equipment	0.87	0.04	5.28	< 0.005	0.01	—	0.01	0.01	—	0.01	—	21.7	21.7	< 0.005	< 0.005	—	21.8
Total	3.80	0.04	5.28	< 0.005	0.01	—	0.01	0.01	—	0.01	—	21.7	21.7	< 0.005	< 0.005	—	21.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	2.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.32	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	2.94	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.48	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.11	0.01	0.66	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.46	2.46	< 0.005	< 0.005	—	2.47
Total	0.64	0.01	0.66	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.46	2.46	< 0.005	< 0.005	—	2.47

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

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

Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	53.8	279	333	5.54	0.13	—	511
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	11.0	11.0	< 0.005	< 0.005	—	11.0
Total	—	—	—	—	—	—	—	—	—	—	53.8	290	344	5.54	0.13	—	522
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	53.8	279	333	5.54	0.13	—	511
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	11.0	11.0	< 0.005	< 0.005	—	11.0
Total	—	—	—	—	—	—	—	—	—	—	53.8	290	344	5.54	0.13	—	522
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	8.91	46.1	55.1	0.92	0.02	—	84.6
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	1.82	1.82	< 0.005	< 0.005	—	1.82
Total	—	—	—	—	—	—	—	—	—	—	8.91	48.0	56.9	0.92	0.02	—	86.4

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	61.5	0.00	61.5	6.15	0.00	—	215
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	61.5	0.00	61.5	6.15	0.00	—	215
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	61.5	0.00	61.5	6.15	0.00	—	215
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	61.5	0.00	61.5	6.15	0.00	—	215
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	10.2	0.00	10.2	1.02	0.00	—	35.7
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	10.2	0.00	10.2	1.02	0.00	—	35.7

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

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

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

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

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	6/30/2025	7/14/2025	5.00	10.0	—
Grading	Grading	7/15/2025	8/12/2025	5.00	20.0	—
Building Construction	Building Construction	8/13/2025	7/1/2026	5.00	230	—
Paving	Paving	7/2/2026	7/30/2026	5.00	20.0	—
Architectural Coating	Architectural Coating	7/31/2026	8/28/2026	5.00	20.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

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

Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Back hoes	Diesel	Average	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	62.5	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—

Building Construction	Worker	51.0	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	19.9	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	5.00	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	10.2	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	182,235	60,745	10,428

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
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Site Preparation	—	—	15.0	0.00	—
Grading	—	10,000	20.0	0.00	—
Paving	0.00	0.00	0.00	0.00	3.99

5.6.2. Construction Earthmoving Control Strategies

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

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Unrefrigerated Warehouse-No Rail	0.00	0%
Parking Lot	3.99	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

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

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMt/Weekday	VMt/Saturday	VMt/Sunday	VMt/Year
Total all Land Uses	208	208	208	75,920	4,529	4,529	4,529	1,653,090

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	182,235	60,745	10,428

5.10.3. Landscape Equipment

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

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Unrefrigerated Warehouse-No Rail	559,140	532	0.0330	0.0040	2,319,509
Parking Lot	152,253	532	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Unrefrigerated Warehouse-No Rail	28,094,563	0.00
Parking Lot	0.00	1,419,483

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Unrefrigerated Warehouse-No Rail	114	—
Parking Lot	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
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5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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5.16.2. Process Boilers

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

Equipment Type	Fuel Type
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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. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

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	27.9	annual days of extreme heat
Extreme Precipitation	4.25	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	16.6	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 $\frac{3}{4}$ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

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

6.2. Initial Climate Risk Scores

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

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

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

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

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	3	1	1	3
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2

Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

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

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

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

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	76.9
AQ-PM	49.6
AQ-DPM	3.87
Drinking Water	31.7
Lead Risk Housing	73.2
Pesticides	0.00
Toxic Releases	23.3
Traffic	26.9
Effect Indicators	—
CleanUp Sites	2.07
Groundwater	47.4

Haz Waste Facilities/Generators	0.00
Impaired Water Bodies	51.2
Solid Waste	75.7
Sensitive Population	—
Asthma	66.7
Cardio-vascular	98.8
Low Birth Weights	27.9
Socioeconomic Factor Indicators	—
Education	58.9
Housing	88.9
Linguistic	43.3
Poverty	86.1
Unemployment	66.6

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	17.09226229
Employed	8.417810856
Median HI	20.60823816
Education	—
Bachelor's or higher	2.053124599
High school enrollment	100
Preschool enrollment	57.52598486
Transportation	—
Auto Access	83.51084306
Active commuting	21.50648017

Social	—
2-parent households	70.49916592
Voting	15.86038753
Neighborhood	—
Alcohol availability	51.31528295
Park access	58.24457847
Retail density	10.38111125
Supermarket access	2.399589375
Tree canopy	40.97266778
Housing	—
Homeownership	41.48594893
Housing habitability	15.62941101
Low-inc homeowner severe housing cost burden	8.943924034
Low-inc renter severe housing cost burden	8.700115488
Uncrowded housing	41.84524573
Health Outcomes	—
Insured adults	16.52765302
Arthritis	0.0
Asthma ER Admissions	50.4
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	6.2
Cognitively Disabled	12.5
Physically Disabled	49.3

Heart Attack ER Admissions	3.3
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	77.8
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	72.0
SLR Inundation Area	0.0
Children	33.8
Elderly	76.6
English Speaking	51.7
Foreign-born	32.3
Outdoor Workers	10.5
Climate Change Adaptive Capacity	—
Impervious Surface Cover	82.5
Traffic Density	10.5
Traffic Access	23.0
Other Indices	—
Hardship	80.0
Other Decision Support	—
2016 Voting	32.6

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	59.0
Healthy Places Index Score for Project Location (b)	19.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Per site plan, the project is 6.77 acres
Construction: Construction Phases	No demolition required
Operations: Fleet Mix	Adjusted for industrial use

Appendix B:

EMFAC2021 Output

Source: EMFAC2021 (v1.0.2) Emissions Inventory

Region Type: Sub-Area

Region: Riverside (SC)

Calendar Year: 2026

Season: Annual

Vehicle Classification: EMFAC2007 Categories

Units: miles/day for CVMT and EVMT, trips/day for Trips, kWh/day for Energy Consumption, tons/day for Emissions, 1000 gallons/day for Fuel Consumption

Region	Calendar Year	Vehicle Category	Model Year	Speed	Fuel	Total VMT	Fuel Consumption	Mileage
Riverside (SC)	2026	HHDT	Aggregate	Aggregate	Gasoline	269.8155783	0.068469804	6.263701
Riverside (SC)	2026	HHDT	Aggregate	Aggregate	Diesel	1988453.103	317.4311809	
Riverside (SC)	2026	LDA	Aggregate	Aggregate	Gasoline	20338993.18	657.9019755	30.93522
Riverside (SC)	2026	LDA	Aggregate	Aggregate	Diesel	45656.81459	1.04446634	
Riverside (SC)	2026	LDT1	Aggregate	Aggregate	Gasoline	1475770.596	57.77065353	25.54519
Riverside (SC)	2026	LDT1	Aggregate	Aggregate	Diesel	246.3725383	0.009960174	
Riverside (SC)	2026	LDT2	Aggregate	Aggregate	Gasoline	9189016.153	359.2463978	25.60133
Riverside (SC)	2026	LDT2	Aggregate	Aggregate	Diesel	31821.71127	0.923868936	
Riverside (SC)	2026	LHDT1	Aggregate	Aggregate	Gasoline	648258.6134	45.43230342	16.63017
Riverside (SC)	2026	LHDT1	Aggregate	Aggregate	Diesel	538771.2685	25.94580105	
Riverside (SC)	2026	LHDT2	Aggregate	Aggregate	Gasoline	87077.56554	6.894650038	15.7911
Riverside (SC)	2026	LHDT2	Aggregate	Aggregate	Diesel	246178.6334	14.20940258	
Riverside (SC)	2026	MDV	Aggregate	Aggregate	Gasoline	6425602.492	314.7102388	20.46787
Riverside (SC)	2026	MDV	Aggregate	Aggregate	Diesel	96875.32958	3.958815392	
Riverside (SC)	2026	MHDT	Aggregate	Aggregate	Gasoline	49534.83957	9.263997368	8.569708
Riverside (SC)	2026	MHDT	Aggregate	Aggregate	Diesel	577213.7586	63.87135704	