Kimley»Horn

MEMORANDUM

To: Tad Stearn, Kimley-Horn

From: Noemi Wyss AICP, Environmental Planner, Kimley-Horn
Tanay Pradhan, Environmental Analyst, Kimley-Horn

Date: December 20, 2023

Subject: 1055 Commercial Court Project – Air Quality and Greenhouse Gas Emissions Analysis

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1.0 PURPOSE

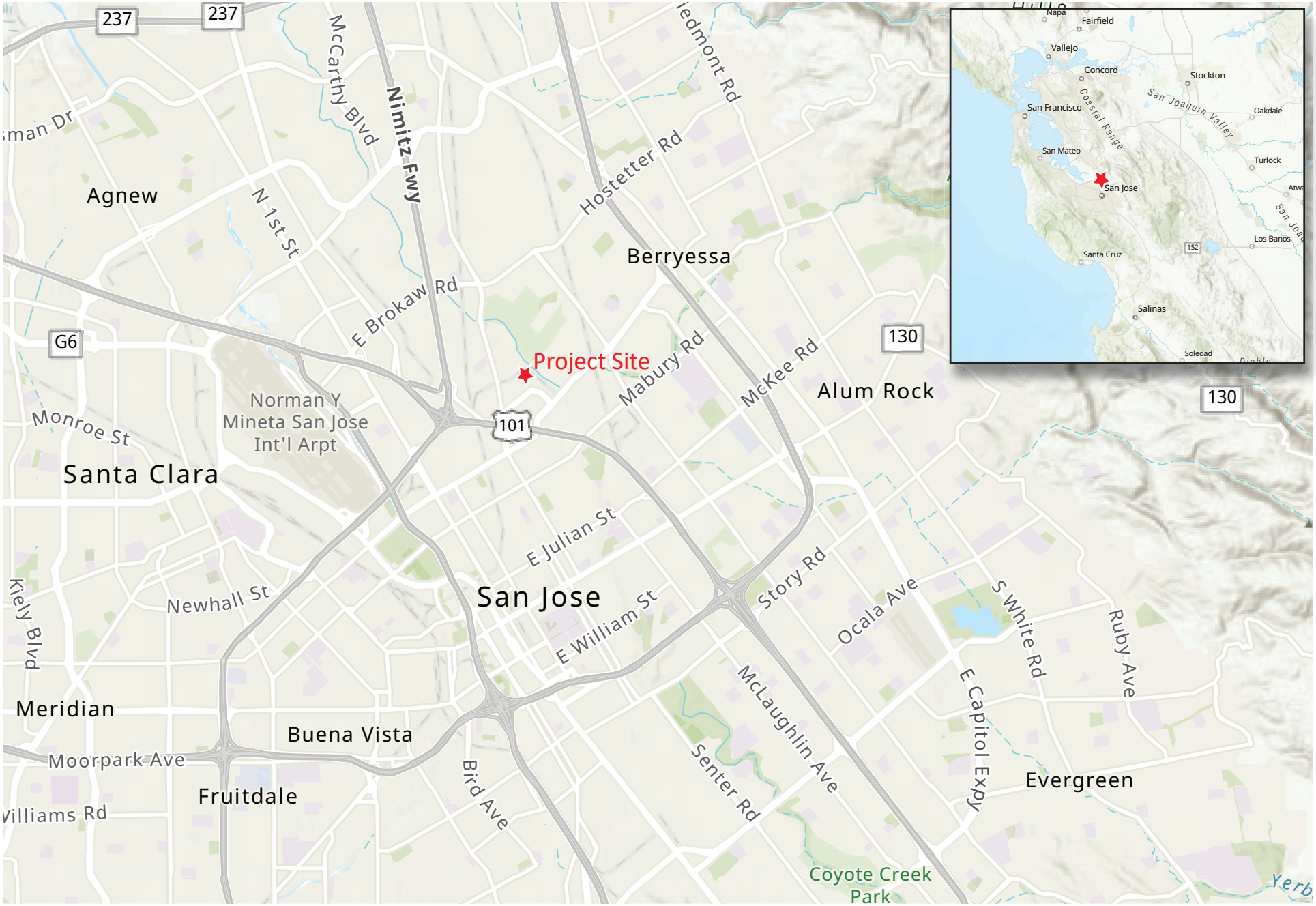
The purpose of this memorandum is to identify the air quality and greenhouse gas (GHG) emissions associated with construction and operations of the proposed 1055 Commercial Court Project (project), located in the City of San José, California.

2.0 PROPOSED PROJECT DESCRIPTION

The project is in the City of José (City) in the northern portion of the City. The project site is located at 1055 Commercial Court. **Figure 1: Regional Location** and **Figure 2: Project Vicinity Map**, depict the project site in a regional and local context. The project site is located approximately 2.5 miles north of downtown San José, in an urbanized area. Surrounding land uses consist of a mix of heavy industrial, business park, residential, and open space (Coyote Creek). The proposed project site includes two existing parcels (Assessor Parcel Numbers 241-10-002 and 241-10-003) on approximately 4.88 gross acres.

The project proposes to demolish approximately 9,150 sf of existing storage buildings and sheds, remove existing cargo containers, and add approximately 193,639 sf of paving to the property. As shown in **Figure 3: Site Plan**, the project would develop a commercial vehicle storage lot which would include parking for private buses, vans, trucks, and/or automobiles, with the associated vehicle maintenance equipment on-site. It is assumed that site operations could occur seven days per week with no late-night operations (12:00 a.m. to 6:00 a.m.). While vehicles would be stored on site 24 hours per day, it is assumed that vehicle drop-off and pick-up in and out of the site would occur during regular daytime hours. As an industrial use with no permanent vertical structures proposed, the number of employees would be the minimum required to manage site operations, estimated at five to ten employees during daytime hours and possibly one to two security employees during other times.

Construction and demolition activities would occur in one phase over a four to six month period. Construction activities are expected to commence in spring or summer 2024.



Source: USGS, 2023

Figure 1: Regional Location

1055 Commercial Court
Technical Studies

Not to scale

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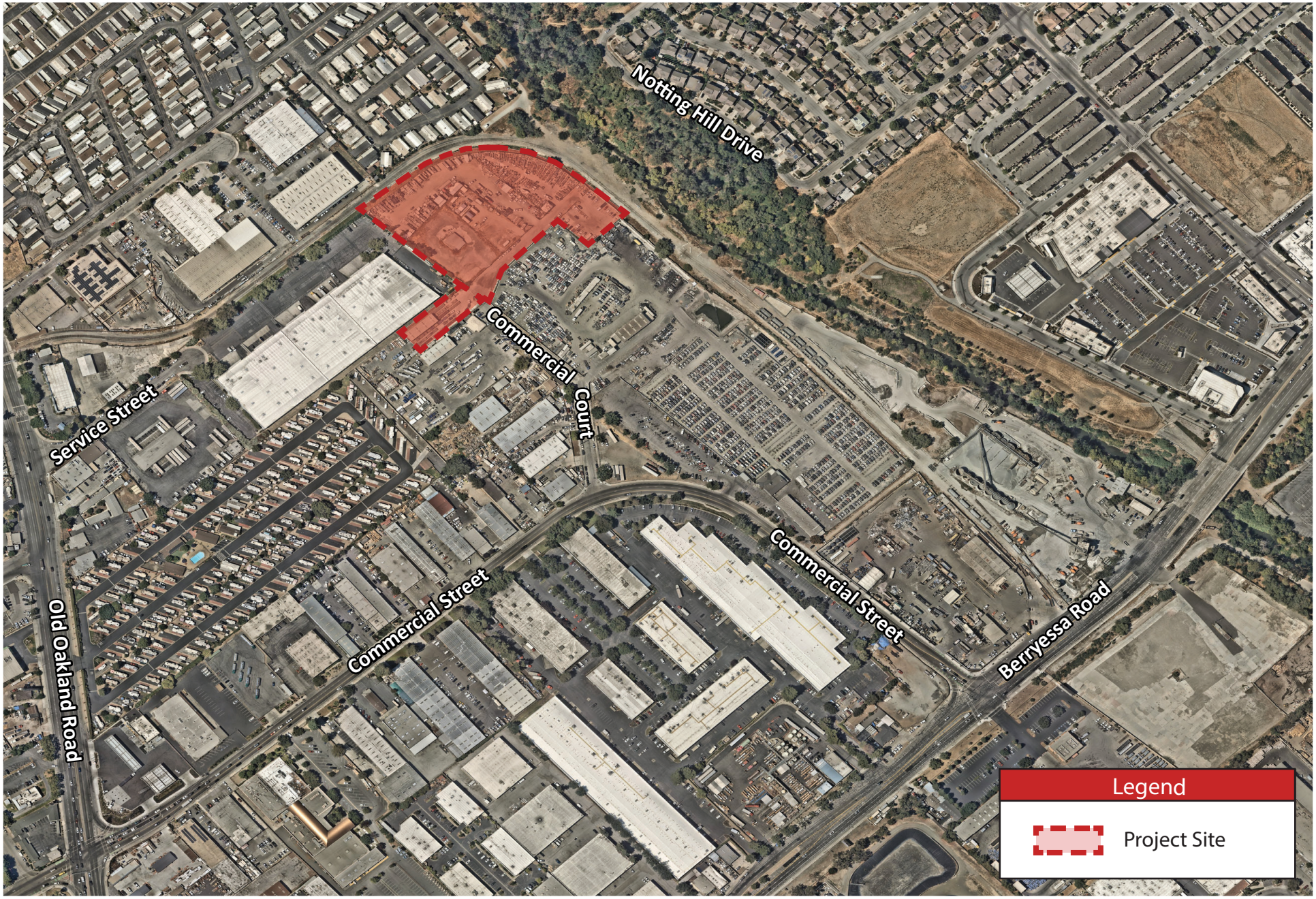

Source: Nearmap, 2023

Figure 2: Project Vicinity Map

1055 Commercial Court
Technical Studies

Not to scale

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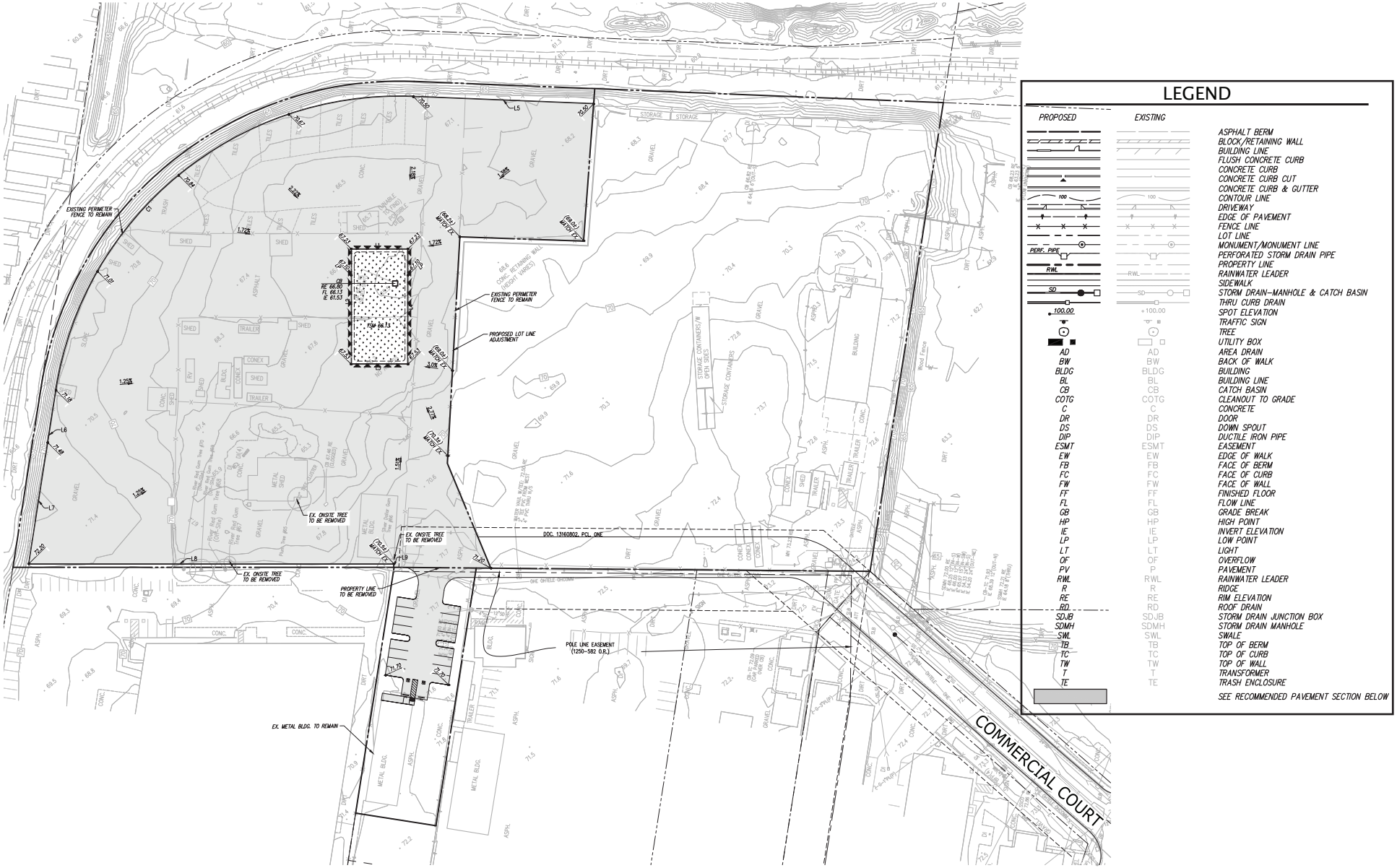

Source: Kier + Wright, 2023

Figure 3: Site Plan

1055 Commercial Court
Technical Studies

Not to scale

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3.0 THRESHOLDS AND SIGNIFICANCE CRITERIA

Based upon the criteria derived from Appendix G of the CEQA Guidelines, a project normally would have a significant effect on the environment if it would:

1. Conflict with or obstruct implementation of the applicable air quality plan,
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard,
3. Expose sensitive receptors to substantial pollutant concentrations, or
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.
5. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
6. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

4.0 IMPACT ANALYSIS

4.1 Air Quality

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

The project site is located in the San Francisco Bay Area Air Basin (Basin) which includes all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara counties, the southern portion of Sonoma County, and the southwestern portion of Solano County. The Bay Area Air Quality Management District (BAAQMD) and the California Air Resources Board (CARB) monitor air quality within the Basin. Air quality plans describe air pollution control strategies and measures to be implemented by a city, county, region, and/or air district. The primary purpose of an air quality plan is to bring an area that does not attain federal and State air quality standards into compliance with the requirements of the federal Clean Air Act and California Clean Air Act. In addition, air quality plans are developed to ensure that an area maintains a healthful level of air quality based on the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS). The Air Quality Management Plan (AQMP) is prepared by the BAAQMD. The AQMP provides policies and control measures that reduce emissions to attain both State and federal ambient air quality standards.

The most recently adopted plan, the Clean Air Plan, in the Basin outlines how the San Francisco area would attain air quality standards, reduce population exposure and protect public health, and reduce GHG emissions. The Clean Air Plan assumptions for projected air emissions and pollutants in the City of San José are based on the General Plan Land Use Designation Map which designates the project site use as “Heavy Industrial”; the project site is zoned “Heavy Industrial.” The HI Zoning District allows for commercial vehicle storage uses, including associated maintenance uses. Thus, the project is consistent with the General Plan land use designation and would not increase the regional population growth or cause changes in vehicle traffic that would obstruct implementation of the Clean Air Plan in the Basin.

As described below, construction and operational air quality emissions generated by the project would not exceed the BAAQMD's emissions thresholds with the implementation of mitigation. Since the project would not exceed these thresholds, the project would not be considered by the BAAQMD to have a significant impact or make a cumulatively considerable contribution of criteria air pollutants, and would not contribute to any non-attainment areas in the Basin.

The proposed project would have approximately 12 employees (up to 10 daytime and up to 2 nighttime). The Association of Bay Area Governments (ABAG) predicts that job opportunities in the City of San José will grow from 387,510 in 2010 to 554,875 by 2040. The project is consistent with the City General Plan, therefore the 12 jobs would be within the ABAG growth projections for the City of (approximately 554,875 jobs by 2040) and would not exceed the ABAG growth projections for the City. As identified in the General Plan FEIR, the City currently has an existing ratio of jobs per resident of 0.8. The General Plan FEIR identified that at full buildout of the General Plan, this ratio would increase to 1.3 jobs per resident. Because the project is consistent with planned land uses for the project site, the project would not exceed the level of population or housing in regional planning efforts and would be consistent with ABAG's projections for the City and with the City's General Plan.

A project would be consistent with the 2017 Clean Air Plan[1] if it would not exceed the growth assumptions in the plan. The primary method of determining consistency with the 2017 Clean Air Plan growth assumptions is consistency with the General Plan land use designations and zoning designations for the site. It should be noted that the Clean Air Plan does not make a specific assumption for development on the site, but bases assumptions on growth in population, travel, and business, based on socioeconomic forecasts. As noted above, the project would not exceed the growth assumptions in the General Plan. Therefore, the growth assumptions in the Clean Air Plan would not be exceeded.

Given that approval of a project would not result in significant and unavoidable air quality impacts after the application of all feasible mitigation, the project is considered consistent with the 2017 Clean Air Plan. In addition, projects are considered consistent with the 2017 Clean Air Plan if they incorporate all applicable and feasible control measures from the 2017 Clean Air Plan and would not disrupt or hinder implementation of any 2017 Clean Air Plan control measures.

The project is consistent with the 2017 Clean Air Plan policies that are applicable to the project site. As discussed in **Table 1: Project Consistency with Applicable Clean Air Plan Control Measures**, the project would comply with City, State, and regional requirements.

[1] Bay Area Air Quality Management District, *Spare the Air - Cool the Climate: A Blueprint for Clean Air and Climate Protection in the Bay Area, Final 2017 Clean Air Plan*, 2017.

Table 1: Project Consistency with Applicable Clean Air Plan Control Measures

Control Measure	Project Consistency
Stationary Source Control Measures	
SS21: New Source Review of Toxic Air Contaminants	**Consistent**. The project would not include uses that would generate new sources of TAC that would significantly impact nearby sensitive receptors.
SS25: Coatings, Solvents, Lubricants, Sealants and Adhesives	**Consistent**. The project would comply with Regulation 8, Rule 3: Architectural Coatings, which would dictate the ROG content of paint available for use during construction (also required per City of San José Environmental Standard Conditions).
SS26: Surface Prep and Cleaning Solvent	
SS29: Asphaltic Concrete	**Consistent**. Paving activities associated with the project would be required to utilize asphalt that does not exceed the BAAQMD emission standards in Regulation 8, Rule 15.
SS31: General Particulate Matter Emissions Limitation	**Consistent**. This control measure is implemented by the BAAQMD through Regulation 6, Rule 1. This Rule Limits the quantity of particulate matter in the atmosphere by controlling emission rates, concentration, visible emissions and opacity. The project would be required to comply with applicable BAAQMD rules.
SS32: Emergency Back-up Generators	**Consistent**. Use of back-up generators by the project is currently not anticipated. However, if emergency generators were to be installed, they would be required to meet the BAAQMD's emissions standards for back-up generators.
SS34: Wood Smoke	**Consistent**. The project would comply with the BAAQMD Regulation 6, Rule 3 and prohibit the construction of wood burning appliances/ fireplaces.
SS36: Particulate Matter from Trackout	**Consistent**. Mud and dirt that may be tracked out onto the nearby public roads during construction activities would be removed promptly by the contractor based on the BAAQMD's requirements.
SS37: Particulate Matter from Asphalt Operations	**Consistent**. Paving activities associated with the project would be required to utilize best management practices to minimize the particulate matter created from the transport and application of road asphalt. There would be no roofing asphalt.
SS38: Fugitive Dust	**Consistent**. Material stockpiling and track out during grading activities as well as smoke and fumes from paving and roofing asphalt operations would be required to utilize best management practices, such as watering exposed surfaces twice a day, covering haul trucks, keeping vehicle speeds on unpaved roads under 15 mph, to minimize the creation of fugitive dust. See City of San José Environmental Standard Conditions for a more detailed list.
SS40: Odors	**Consistent**. The project is a commercial vehicle storage lot development and is not anticipated to generate odors. The project would comply with the BAAQMD Regulation 7 to strengthen odor standards and enhance enforceability.

Control Measure	Project Consistency
Transportation Control Measures	
TR2: Trip Reduction Programs	**Not Applicable**. The project is a commercial vehicle storage lot that would only require approximately 108 commercial vehicle trips per day for storage. Estimated 10-12 employees does not warrant employee-based TDM measures.
TR8: Ridesharing and Last-Mile Connections	
TR9: Bicycle and Pedestrian Access Facilities	**Consistent**. The project is a commercial vehicle storage lot. The project would include the minimum required bicycle facilities as required by Section 20.90.060 of the San José Municipal Code.
TR10: Land Use Strategies	**Not Applicable**. This measure is a BAAQMD funding tool to support implementation of Plan Bay Area and maintain and disseminate information on current climate action plans (CAPs) and other local best practices and collaborate with regional partners to identify innovative funding mechanisms to help local governments address air quality and climate change in their general plans. The project would not conflict with implementation of this measure.
TR13: Parking Policies	**Consistent**. The proposed project is a commercial vehicle storage lot that would remain consistent with San José Parking Policies.
TR22: Construction, Freight and Farming Equipment	**Consistent**. The project would comply through implementation of the BAAQMD standard condition, which requires construction equipment to be properly maintained.
Energy and Climate Control Measures	
EN1: Decarbonize Electricity Generation	**Not Applicable**. The project is an uncovered commercial vehicle storage lot with minimal energy requirements
EN2: Decrease Electricity Demand	
Buildings Control Measures	
BL1: Green Buildings	**Not Applicable.** The project is an uncovered commercial vehicle storage lot. There are no new proposed buildings on-site.
BL2: Decarbonize Buildings	
Natural and Working Lands Control Measures	
NW2: Urban Tree Planting	**Consistent**. The project site is a commercial vehicle storage lot that would meet the tree planting requirements for the City.
Waste Management Control Measures	
WA1: Landfills	**Not Applicable.** The project site is a commercial vehicle storage lot and would not generate a substantial amount of waste.
WA3: Green Waste Diversion	
WA4: Recycling and Waste Reduction	
Water Control Measures	
WR2: Support Water Conservation	**Not Applicable**. The project site is a commercial vehicle storage lot and would not use a substantial amount of water.

Source: BAAQMD, *2017 Clean Air Plan*, 2017.

Compliance with General Plan Policies and applicable State and local law would reduce air quality impacts to a less than significant level. No additional site-specific mitigation measures are required.

Mitigation Measure: Compliance with General Plan Policies and applicable state and local law would reduce air quality impacts to a less than significant level. No additional site-specific mitigation measures are required.

Level of Significance: Less than significant impact.

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

Construction Emissions

Project construction activities would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the project area include ozone (O_3)-precursor pollutants (i.e., reactive organic gases [ROG] and nitrogen oxides [NO_x]) and particulate matter 10 microns in size or less (PM_{10}) and particulate matter 2.5 microns in size or less ($PM_{2.5}$). Construction-generated emissions are short term and temporary, lasting only while construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the BAAQMD's thresholds of significance.

Construction results in the temporary generation of emissions during site preparation, site grading, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water.

The duration of construction activities associated with the project are estimated to last approximately five months. The project's construction-related emissions were calculated using the BAAQMD-approved California Emissions Estimator Model (CalEEMod) computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. project demolition, site preparation, and grading coating are anticipated to begin in winter 2024. Paving and architectural coating was modeled to be completed in mid-2024. The project would demolish existing storage buildings and sheds, and add paving to the property. The project would not result in any new building construction. Architectural coating would begin winter 2024 and end mid-2024. The exact construction timeline is unknown. However, to be conservative, earlier dates and a shorter construction schedule were utilized in the modeling. This approach is conservative given that emissions factors decrease in future years due to regulatory and technological improvements and fleet turnover. See **Appendix A** for additional information regarding the construction assumptions used in this analysis. **Table 2: Maximum Daily Construction Emissions (lbs/day)** displays the maximum daily emissions in pounds per day that are expected to be generated from the construction of the proposed project with the

implementation of Mitigation Measure (MM) HRA-1 in comparison to the daily thresholds established by the BAAQMD.

Table 2: Maximum Daily Construction Emissions (lbs/day)

Construction Year	Pollutant (maximum pounds per day)[1]					
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_x)	Exhaust		Fugitive Dust	
			Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Unmitigated						
2024	4.21	36.01	1.60	1.47	7.34	3.49
Mitigated						
2024	3.46	2.77	0.10	0.10	7.34	3.49
BAAQMD Significance Threshold [2, 3]	*54*	*54*	*82*	*54*	*BMPs*	*BMPs*
Exceed BAAQMD Threshold?	**No**	**No**	**No**	**No**	**N/A**	**N/A**

1. Emissions were calculated using CalEEMod. Mitigated modeling includes the implementation of Tier 4 equipment. Modeling does not include compliance with the BAAQMD's Basic Construction Mitigation Measures Recommended for All Projects. These measures include the following: water exposed surfaces two times daily; cover haul trucks; clean track outs with wet powered vacuum street sweepers; limit speeds on unpaved roads to 15 miles per hour; complete paving as soon as possible after grading; limit idle times to 5 minutes; properly maintain mobile and other construction equipment; and post a publicly visible sign with contact information to register dust complaints and take corrective action within 48 hours.
2. BAAQMD, CEQA Guidelines, updated May 2022.
3. BMPs = Best Management Practices. The BAAQMD recommends the implementation of all Basic Construction Mitigation Measures, whether or not construction-related emissions exceed applicable significance thresholds. Implementation of the City's Standard Permit Conditions would include the Basic Construction Mitigation measures which would mitigate fugitive dust emissions to be less than significant.

Source: Refer to the CalEEMod outputs provided in Appendix A, *Air Quality Modeling Data*.

Fugitive Dust Emissions. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill operations, demolition, and truck travel on unpaved roadways. Dust emissions also vary substantially from day to day, depending on the level of activity, the specific operations, and weather conditions. Fugitive dust emissions may have a substantial, temporary impact on local air quality. Uncontrolled dust from construction can become a nuisance and potential health hazard to those living and working nearby. The BAAQMD does not have quantitative thresholds for fugitive dust. The BAAQMD instead recommends the implementation of all Basic Construction Control Measures, whether or not construction-related emissions exceed applicable significance. The project would implement the San José Standard Permit Conditions, which include the BAAQMD's Basic Construction Control Measures, to control dust at the project site during all phases of construction. These Standard Permit Conditions would be incorporated as conditions of approval and the City would verify that these measures are incorporated on applicable plans and specifications prior to grading permit issuance. Implementation of the City's Standard Permit Conditions ensure that fugitive dust emissions would be less than significant.

Standard Permit Condition

These measures would be placed on the project plan documents prior to the issuance of any grading permits for the proposed project.

i. Water active construction areas at least twice daily or as often as needed to control dust emissions.

ii. Cover trucks hauling soil, sand, and other loose materials and/or ensure that all trucks hauling such materials maintain at least two feet of freeboard.

iii. Remove visible mud or dirt track-out onto adjacent public roads using wet -power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

iv. Enclose, cover, water twice daily or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).

v. Pave new or improved roadways, driveways, and sidewalks as soon as possible.

vi. Lay building pads as soon as possible after grading unless seeding or soil binders are used.

vii. Limit all vehicle speeds on unpaved roads to 15 mph.

viii. Replant vegetation in disturbed areas as quickly as possible.

ix. Install sandbags or other erosion control measures to prevent silt runoff to public roadways.

x. Minimize idling times either by shutting off equipment when not in use, or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Provide clear signage for construction workers at all access points.

xi. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.

xii. Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints.

Construction Equipment and Worker Vehicle Exhaust. Exhaust emission factors for heavy construction equipment are based on the CalEEMod program defaults. Variables factored into estimating the total construction emissions include: level of activity, length of construction period, number of pieces/types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported onsite or offsite. Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the project site, emissions produced on site as the equipment is used, and emissions from trucks transporting materials and workers to and from the site. Emitted pollutants would include ROG, NO_X, PM_{10}, and $PM_{2.5}$. The City's Standard Permit Conditions would be implemented, whether or not construction-related emissions exceed applicable significance thresholds. See the above listed Standard Permit Conditions. As detailed in **Table 2**, Error! Reference source not found.project construction emissions would not exceed the BAAQMD

thresholds and construction emissions would not result in a potentially significant impact. Therefore, construction air quality impacts would be less than significant.

ROG Emissions. In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are O_3 precursors. In accordance with the methodology prescribed by the BAAQMD, the ROG emissions associated with paving have been quantified with CalEEMod. The highest concentration of ROG emissions would be generated from architectural coating beginning in summer 2024 and lasting approximately one month. This phase includes the striping of all paved parking areas and driveways. Paints would be required to comply with the BAAQMD Regulation 8, Rule 3: Architectural Coating. Regulation 8, Rule 3 provides specifications on painting practices and regulates the ROG content of paint.

Summary. As shown in **Table 2**, all criteria pollutant emissions would remain below their respective thresholds. The BAAQMD considers fugitive dust emissions to be potentially significant without implementation of the Construction Control Measures which help control fugitive dust. NO_X emissions are primarily generated by engine combustion in construction equipment, haul trucks, and employee commuting, requiring the use of newer construction equipment with better emissions controls would reduce construction-related NO_X emissions. With implementation of the Standard Permit Condition and MM HRA-1, the proposed project's construction would not worsen ambient air quality, create additional violations of federal and state standards, or delay the Basin's goal for meeting attainment standards. Impacts would be less than significant.

Operational Emissions

Operational emissions for urban developments are typically generated from mobile sources (burning of fossil fuels in cars); energy sources (cooling, heating, and cooking); and area sources (landscape equipment and common consumer products). The project proposes the use of a commercial vehicle storage area which would not generate significant emissions. The project would have some mobile emissions associated with the tenant and employee trips, energy emissions associated with lighting on-site, and area emissions from the infrequent use of consumer products and architectural coating. Project operations would include the use of maintenance equipment. However, maintenance on-site is not anticipated to require heavy-duty repair equipment. Maintenance equipment would be hand-held pieces of equipment that would be used infrequently. There are no other operational emissions are associated with the project and operational emissions would remain below the BAAQMD's operational thresholds. See Appendix A for operational modeling results.

Cumulative Emissions

The Basin is designated nonattainment for O_3, PM_{10}, and $PM_{2.5}$ for State standards and nonattainment for O_3 and $PM_{2.5}$ for federal standards. As discussed above, the project's construction-related and operational emissions would not have the potential to exceed the BAAQMD significance thresholds for criteria pollutants.

Cumulative Construction Impacts. Since these thresholds indicate whether an individual project's emissions have the potential to affect cumulative regional air quality, it can be expected that the project-related construction emissions would not be cumulatively considerable. The BAAQMD recommends Basic Construction Control Measures for all projects whether or not construction-related emissions exceed the thresholds of significance. Compliance with the BAAQMD construction-related mitigation requirements are considered to reduce cumulative impacts at a Basin-wide level. As a result, construction emissions associated with the project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Cumulative Operational Impacts. The BAAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. The BAAQMD developed the operational thresholds of significance based on the level above which a project's individual emissions would result in a cumulatively considerable contribution to the Basin's existing air quality conditions. Therefore, a project that exceeds the BAAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.

As shown in above, the project's construction and operational emissions would not exceed the BAAQMD thresholds. As a result, air quality emissions associated with the project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact with compliance with standard conditions and City policies.

Threshold (c) Expose sensitive receptors to substantial pollutant concentrations.

Sensitive land uses are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. The State CEQA Guidelines indicate that a potentially significant impact could occur if a project would expose sensitive receptors to substantial pollutant concentrations.

Construction Toxic Air Contaminants

Construction-related activities would result in project-generated emissions of DPM from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g. demolition, clearing, grading); paving; application of architectural coatings; on-road truck travel; and other miscellaneous activities. For construction activity, DPM is the primary toxic air contaminant of concern. On-road diesel-powered haul trucks traveling to and from the construction area to deliver materials and equipment are less of a concern because they would not stay on the site for long durations. Diesel exhaust from construction equipment operating at the site poses a health risk to nearby sensitive receptors.

Table 3: Construction Carcinogenic Risk Assessment shows the construction health risk for of the project. Project construction would occur for over a period of approximately four to six months. However, the health risk computation was performed to determine the risk of developing an excess cancer risk calculated on a 3-year exposure scenario, beginning with the third trimester, as recommended by the BAAQMD, and thus is conservative.[2]

As shown in **Table 3**, the unmitigated construction risk at residential and worker receptors would be 36.81 and 2.89 in one million, respectively. Therefore, the maximum unmitigated construction cancer risk at the residential receptor would exceed the BAAQMD threshold of 10 in one million. The project would implement Mitigation Measure (MM) HRA-1 to reduce cancer risk. MM HRA-1 requires the use of construction equipment that would meet CARB Tier 4 Final emissions standards in order to reduce diesel exhaust construction emissions. Implementation of MM HRA-1 would reduce cancer risk from project construction to below the BAAQMD's 10 in one million threshold; refer to **Table 3**. Therefore, the project's cancer risk would not exceed the BAAQMD's 10 in one million threshold and impacts associated with carcinogenic risk would be less than significant.

Table 3: Construction Carcinogenic Risk Assessment

Exposure Scenario	Risk per Million		Exceeds Significance Threshold?
	Cancer Risk[1]	Significance Threshold	
Unmitigated			
Residential Receptors (northwest of site)	36.81	10	Yes
Worker Receptors (southwest of site)	2.89	10	No
Mitigated			
Residential Receptors (northwest of site)	2.07	10	No
Worker Receptors (southwest of site)	0.21	10	No
1. The reported annual pollutant concentration is at the closest maximally exposed individual (MEI) to the project site.			
Source: Refer to the 1055 Commercial Court - Health Risk Assessment Memorandum prepared by Kimley-Horn, October 2023.			

As described above, worst-case construction risk levels based on AERMOD[3] and conservative assumptions would be below the BAAQMD's thresholds for construction with MM HRA-1. Therefore, construction risk levels would be less than significant with implementation of the identified mitigation measure.

Mitigation Measures:

HRA-1 Prior to issuance of any demolition, grading, and/or building permits (whichever occurs earliest), the project applicant shall prepare and submit a construction operations plan that includes specifications of the equipment to be used during construction to the Director of Planning, Building and Code Enforcement or the Director's Designee. The plan shall be

[2] The BAAQMD recommends that the cancer risk be evaluated assuming that the average daily dose for short-term exposure lasts a minimum of three years for projects lasting three years or less (BAAQMD, *BAAQMD Air Toxics NSR Program Health Risk Assessment Guidelines*, December 2016).

[3] AERMOD is a steady-state, multiple-source, Gaussian dispersion model designed for use with emission sources situated in terrain where ground elevations can exceed the stack heights of the emission sources (not a factor in this case).

accompanied by a letter signed by a qualified air quality specialist, verifying that the plan meets the standards set forth below.

- For all construction equipment larger than 25 horsepower operating on the site for more than two days continuously or 20 total hours, shall, at a minimum meet U.S. EPA Tier 4 Final emission standards.
- If Tier 4 Final equipment is not available, all construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA emission standards for Tier 3 engines and include particulate matter (PM) emissions control equivalent to CARB Level 3 verifiable diesel emission control devices that altogether achieve an 85 percent reduction in PM exhaust and 40 percent reduction in NO_X in comparison to uncontrolled equipment.

The construction operations plan prepared by the contractor and reviewed by the air quality specialist shall include the, but not be limited to the following:

- List of activities and estimated timing.
- Equipment that would be used for each activity.
- Manufacturer's specifications for each equipment that provides the emissions level; or the manufacturer's specifications for devices that would be added to each piece of equipment to ensure the emissions level meet the thresholds in the mitigation measure.

The project applicant shall include this requirement in applicable bid documents and require compliance as a condition of contract. A copy of each equipment unit's certified tier specification and CARB or BAAQMD operating permit (if applicable) should be available upon request at the time of mobilization of each applicable unit of equipment. The City shall require periodic reporting and provision of written documentation by contractors to ensure compliance and shall conduct regular inspections to the maximum extent feasible to ensure compliance.

The construction contractor(s) shall maintain equipment maintenance records for the construction portion of the project. All construction equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. Upon request for inspection, construction contractor(s) shall make available all maintenance records for equipment used on site within one business day (either hardcopy or electronic versions).

The significance thresholds for TAC exposure also require an evaluation of non-cancer risk stated in terms of a hazard index. Non-cancer chronic impacts are calculated by dividing the annual average concentration by the REL for that substance. The REL is defined as the concentration at which no adverse non-cancer health effects are anticipated. RELs are designed to protect sensitive individuals within the population. The primary TAC emitted during construction and operations is DPM. According to OEHHA, the REL for DPM is 5 and the target organ is the respiratory system.

Chronic and acute non-carcinogenic impacts are shown in **Table 4: Construction Chronic Hazard Assessment**. A chronic hazard index of 1.0 is considered individually significant. The hazard index is calculated by dividing the chronic exposure by the reference exposure level. The chronic hazard was calculated based on the highest annual average concentration at the maximally exposed individual receptor. It should be noted that there is no acute REL for DPM and acute health risk cannot be calculated. **Table 4** shows that the non-carcinogenic hazards associated with unmitigated and mitigated scenarios would not exceed the acceptable limits of 1.0.

Table 4: Construction Chronic Hazard Assessment

Exposure Scenario	Annual Concentration (µg/m^3)[1]	Chronic Hazard
Unmitigated		
Residential Receptors (west of site)	0.12	0.02
Worker Receptors (southwest of site)	0.09	0.02
BAAQMD Threshold	*N/A*	*1.0*
Threshold Exceeded?	**N/A**	**No**
Mitigated		
Residential Receptors (west of site)	0.01	0.001
Worker Receptors (southwest of site)	0.01	0.001
BAAQMD Threshold	*N/A*	*1.0*
Threshold Exceeded?	**N/A**	**No**
1. The reported pollutant concentration is at the closest receptor (maximally exposed individual). 2. DPM is the primary TAC occurring during construction. There is no acute REL for DPM and acute health risk cannot be calculated.		
Source: Refer to the 1055 Commercial Court - Health Risk Assessment Memorandum prepared by Kimley-Horn, October 2023.		

Operational Toxic Air Contaminants

Operational emissions from the proposed Project would result from mobile sources (i.e., motor vehicle use) and area sources (such as the use of landscape maintenance equipment, consumer products, and architectural coatings). As discussed above, the majority of these emissions would be generated by vehicle travel occurring off-site from diesel and gasoline-powered vehicles trips to and from the Project site. The Project is intended to provide storage for private vehicle fleets, those with buses, vans, trucks, and/or automobiles, and associated vehicle maintenance and mobile fueling. The modeling and analysis results did not identify a substantial generation of TACs from diesel powered vehicles. Light-duty and gasoline-powered vehicles are not substantial sources of TAC emissions (e.g., DPM). Therefore, operational emissions would not be considered a substantial source of TACs and this impact related to operational TAC emissions would be less than significant.

Cumulative Health Impacts

Stationary sources within a 1,000-foot radius of the Project site were reviewed using the BAAQMD's Stationary Source Screening Analysis Tools. There were no stationary sources located within a 1,000-foor

radius of the Project site. **Table 5: Cumulative Operational Health Risk**, provides the emissions from the existing nearby highway, roadway, and rail sources.

Table 5: Cumulative Operational Health Risk

Emissions Sources	$PM_{2.5}$ ($\mu g/m^3$)	Cancer Risk (per million)	Hazard
Major Street Sources	0.03	1.34	0.12
Highway Sources	0.37	18.25	1.48
Railway Services	0.003	1.82	0.012
Cumulative Health Risk Values	**0.40**	**21.41**	**1.61**
BAAQMD Cumulative Threshold	*0.8*	*100*	*10*
Threshold Exceeded?	**No**	**No**	**No**
Source: BAAQMD's Stationary Source Screening Analysis Tools, 2023.			

Cumulative impacts are defined as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. As described above, the Project is 65 feet away from the closest sensitive receptors and would be within the zone of influence as defined by the BAAQMD. Worst-case $PM_{2.5}$ concentrations associated with existing cumulative conditions would not exceed the BAAQMD's thresholds, refer to **Table 5**. The cancer risk and hazard levels would also remain below the BAAQMD cumulative thresholds. Therefore, the project's cumulative impacts will be less than significant.

Mobile Sources

The project would not place sensitive receptors within 1,000-feet of a major roadway (mobile TAC source) which is defined by the BAAQMD as any road that has more than 10,000 daily trips. Additionally, the project's effects to existing vehicle distribution and travel speeds would be nominal as the project would generate 108 daily trips due to vehicles traveling to the site for storage and employee trips. Any changes to vehicle distribution and travel speeds can affect vehicle emissions rates, although these changes would be minimal and would not substantially change criteria pollutant emissions, which are primarily driven by vehicle miles travelled (VMT). The project does not involve the increase of transit trips or routes and would not generate increased emissions from expanded service (e.g., increased bus idling service).

Carbon Monoxide Hotspots

The primary mobile-source criteria pollutant of local concern is carbon monoxide. Concentrations of CO are a direct function of the number of vehicles, length of delay, and traffic flow conditions. Transport of this criteria pollutant is extremely limited; CO disperses rapidly with distance from the source under normal meteorological conditions. Under certain meteorological conditions, however, CO concentrations close to congested intersections that experience high levels of traffic and elevated background concentrations may reach unhealthy levels, affecting nearby sensitive receptors. Areas of high CO concentrations, or "hot spots," are typically associated with intersections that are projected to operate at

unacceptable levels of service during the peak commute hours. CO concentration modeling is therefore typically conducted for intersections that are projected to operate at unacceptable levels of service during peak commute hours.

The Basin is designated as in attainment for carbon monoxide (CO). Emissions and ambient concentrations of CO have decreased dramatically in the Basin with the introduction of the catalytic converter in 1975. No exceedances of the CAAQS or NAAQS for CO have been recorded at nearby monitoring stations since 1991. As a result, the BAAQMD screening criteria notes that CO impacts may be determined to be less than significant if a project would not increase traffic volumes at local intersections to more than 44,000 vehicles per hour, or 24,000 vehicles per hour for locations in heavily urban areas, where "urban canyons" formed by buildings tend to reduce air circulation. Traffic would increase along surrounding roadways during long-term operational activities.

The project would not generate a substantial amount of trips per hour as it is a commercial vehicle storage lot. The project's effects to existing vehicle distribution and travel speeds would be nominal. Based on the average daily traffic (ADT) data provided by the City of San José, there are no intersections with more than 24,000 or 44,000 vehicles per hour by the project site and no intersections that would reach either threshold with project trips.[4] As a result, the project would not have the potential to create a CO hotspot and impacts would be less than significant.

Mitigation Measures: MM HRA-1

Significance Impact: Less than significant with mitigation.

Threshold (d) Create objectionable odors affecting a substantial number of people.

Construction

Construction activities associated with the project may generate detectable odors from heavy duty equipment (i.e., diesel exhaust), as well as from architectural coatings and asphalt off-gassing. Odors generated from the referenced sources are common in the man-made environment and are not known to be substantially offensive to adjacent receptors. Any construction-related odors would be short-term in nature and cease upon project completion. As a result, impacts to existing adjacent land uses from construction-related odors would be short-term in duration and therefore would be less than significant.

Operational

According to the BAAQMD, land uses associated with odor complaints typically include wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants. The project does not include any uses identified by the BAAQMD as being associated with odors. The BAAQMD has established odor screening thresholds for land uses that have the potential to generate substantial odor complaints. The BAAQMD's thresholds for odors are qualitative

[4] City of San José, *Average Daily Traffic GIS Open Data*, 2021.

based on the BAAQMD's Regulation 7, Odorous Substances. This rule places general limitations on odorous substances and specific emission limitations on certain odorous compounds.

The project includes a 193,639 sf commercial vehicle storage lot. This land use is not anticipated to generate substantial adverse odors. None of the above listed uses are located near the project site. Impacts would be less than significant.

Mitigation Measures: Compliance with General Plan Policies and applicable state and local law would reduce impacts associated with odors to a less than significant level. No additional site-specific mitigation measures are required.

Level of Significance: Less than significant.

4.2 Greenhouse Gas Emissions

Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including temperature, wind patterns and precipitation. Global temperatures are moderated by naturally occurring atmospheric gases, including water vapor, carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O), as well as hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These "greenhouse" gases (GHGs) allow solar radiation (sunlight) into the Earth's atmosphere but prevent radiative heat from escaping, thus warming the Earth's atmosphere. GHGs are emitted by both natural processes and human activities. Concentrations of GHG have increased in the atmosphere since the industrial revolution. Human activities that generate GHG emissions include combustion of fossil fuels (CO_2 and N_2O); natural gas generated from landfills, fermentation of manure and cattle farming (CH_4); and industrial processes such as nylon and nitric acid production (N_2O).

GHGs have varying global warming potential (GWP). The GWP is the potential of a gas or aerosol to trap heat in the atmosphere; it is the "cumulative radiative forcing effect of a gas over a specified time horizon resulting from the emission of a unit mass of gas relative to a reference gas." The reference gas for GWP is CO_2; therefore, CO_2 has a GWP factor of 1. The other main GHGs that have been attributed to human activity include CH_4, which has a GWP factor of 28, and N_2O, which has a GWP factor of 265. When accounting for GHGs, all types of GHG emissions are expressed in terms of CO_2 equivalents (CO_2e) and are typically quantified in metric tons (MT) or million metric tons (MMT).

Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, established a State goal of reducing GHG emissions to 1990 levels by the year 2020, which would require a reduction of approximately 173 MMT net CO_2e below "business as usual" emission levels. Senate Bill (SB) 97, a companion bill, directed the California Natural Resources Agency (Resources Agency) to certify and adopt guidelines for the mitigation of GHGs or the effects of GHG emissions. SB 97 was the State Legislature's directive to the Resources Agency to specifically establish that GHG emissions and their impacts are appropriate subjects for CEQA analysis. Executive Order (EO) S-3-05 was enacted in June 2005 and calls for an 80 percent reduction below 1990 levels by 2050. SB 32 was signed into law in 2016 and establishes an interim GHG emission reduction goal for the State to reduce GHG emissions to 40 percent below 1990 levels by the year 2030. The state most recently adopted a net zero GHG emissions goal by 2045, which is reflected in the 2022 Scoping Plan.

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

Short-Term Construction Greenhouse Gas Emissions

Construction of the proposed project would result in minor increases in GHG emissions from on-site equipment and emissions from construction workers' personal vehicle travelling to and from the project construction site. Construction-related GHG emissions vary depending on the level of activity, length of the construction period, specific construction operations, types of equipment, and number of construction workers. Neither the City of San José nor the BAAQMD have an adopted threshold of

significance for construction-related GHG emissions; however, the BAAQMD recommends quantifying emissions and disclosing that GHG emissions would occur during construction. The CalEEMod outputs prepared for the proposed project (refer to **Appendix A**) calculated emissions with project construction to be 146 $MTCO_2e$ for the total construction period (5 months). Because project construction would be a temporary condition (a total of 4 to 6 months) and would not result in a permanent increase in emissions that would interfere with the implementation of state and local regulations to reduce GHG emissions and reach net carbon neutrality by 2045, the temporary increase in emissions would not be cumulatively considerable.

Long-Term Operational Greenhouse Gas Emissions

As mentioned above, the project proposes the use of a commercial vehicle storage area that would not generate significant GHG emissions. The project would have mobile GHG emissions associated with the vehicle trips for storage and movement of parked vehicles, employee trips, and energy GHG emissions associated with lighting and maintenance activities on-site. However, no other operational GHG emissions are associated with the Project.

Energy and mobile sources are targeted by statewide measures such as low carbon fuels, cleaner vehicles, strategies to promote sustainable communities and improved transportation choices that result in reducing VMT, continued implementation of the Renewable Portfolio Standard (the target is now set at 60 percent renewables by 2030), and extension of the Cap and Trade program (requires reductions from industrial sources, energy generation, and fossil fuels). As discussed in GHG Threshold (b), below, the proposed development would be constructed to ensure construction and operational emissions are consistent with the City's General Plan strategies and the 2030 GHG Reduction Strategy. The proposed project, therefore, would be consistent with the City's GHG Reduction and General Plan and would have a less than significant GHG emissions impact.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

Impact GHG-2: Would the Project conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing greenhouse gas emissions?

City of San José Greenhouse Gas Reduction Strategy Compliance Checklist

The City's 2030 Greenhouse Gas Reduction Strategy (GHGRS) outlines the actions the City will undertake to achieve its proportional share of State GHG emission reductions for the interim target year 2030. Individual projects demonstrate their compliance with the GHGRS through the GHGRS Compliance Checklist. The City of San José 2030 GHGRS is a qualified local GHG reduction plan under CEQA, which can be used to determine the significance of GHG emissions from a project (CEQA Guidelines section 15183.5). The BAAQMD also recognizes the use of a Greenhouse Gas Reduction Strategy as a significance threshold for a project's GHG emissions. Therefore, if the project is consistent with the 2030 GHGRS, then the project would result in a less than significant cumulative impact to global climate change in 2030.

Prior to project approval, the applicant is required to complete the GHGRS Compliance Checklist to demonstrate the project's compliance with the City of San José 2030 GHGRS, refer to **Appendix B**. Compliance with the checklist is demonstrated by completing Section A (General Plan Policy Conformance) and Section B (Greenhouse Gas Reduction Strategies). Projects that propose alternative GHG mitigation measures must also complete Section C (Alternative Project Measures and Additional GHG Reductions). The proposed project does not include any alternative measures.

As discussed above, the project would comply with the City's applicable construction and operational standards. Project construction and demolition waste would be diverted to exceed City requirements and least 75 percent of construction and demolition waste and 100 percent of metal would be recycled. The proposed project would also be compliant with the State's Model Water Efficient Landscape Ordinance and the City's Water-Efficient Landscape Ordinance (Chapter 15.11 of the San José Municipal Code). The project would include the minimum required area of landscaped shrubs and ground cover vegetation in the parking areas. The vegetation includes shading trees and drought tolerant plants which would shade surrounding surfaces, deflect radiation from the sun, and release moisture in the atmosphere to help mitigate the urban heat island effect and reduce water usage.

Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183.5(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the GHGRS. As described above, the project would comply with the 2030 GHG Reduction Strategy (refer to Appendix B for further detail). Therefore, the project would be consistent with a qualified local GHG reduction plan under CEQA Guidelines section 15183.5. GHG emissions caused by long-term operation of the proposed would not be cumulatively considerable.

2022 CARB Scoping Plan

As previously noted, the 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The transportation, electricity, and industrial sectors are the largest GHG contributors in the State. The 2022 Scoping Plan plans to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks). Additional GHG reductions are achieved through decarbonizing the electricity and industrial sectors.

Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II; and implementing the Advanced Clean Fleets regulation to deploy zero-electric vehicle buses and trucks. Additional transportation policies include the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The 2022 Scoping Plan would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the

Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology.

The project would implement the City's Standard Permit Conditions during construction. For example, a few of the construction measures include enforcing idling time restrictions on construction vehicles, use of added exhaust muffling and filtering devices, replant vegetation in disturbed areas as quickly as possible, and posting a publicly visible sign with the telephone number and person at the lead agency to contact regarding dust complaints.

The 2022 Scoping Plan states that local CAPs that address the State's largest sources of emissions and prioritize transportation electrification, VMT reduction, and building decarbonization, contribute to the alignment between local climate action and the State's climate goals. As indicated above, the proposed project would be consistent with the 2030 GHGRS. Further, project's GHG emissions associated with energy and mobile sources would be further reduced by the 2022 Scoping Plan measures described above. It should be noted that the City has no control over vehicle emissions, however, these emissions would decline in the future due to Statewide measures discussed above, as well as cleaner technology and fleet turnover.

The project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan.

Plan Bay Area

The project would be consistent with the overall goals of Plan Bay Area 2050 to provide housing, healthy and safe communities, and climate protection with an overall goal to reduce VMT. As noted above, the project would develop the project site with climate protection and uses consistent with the General Plan. The project would add some additional employment and trips related to vehicle storage but such trips are anticipated by Plan Bay Area. Further, the Plan Bay Area seeks to decrease vehicle per capita emissions to 20 percent below 2005 levels by 2035. Achievement of the decrease in vehicle per capita emissions is conducted by regional planning efforts through the Metropolitan Transportation Commission (MTC) and other agencies with regard to land use and transportation decision making; for which the project's land use is consistent. The project would not obstruct any of the goals and strategies outlined in Plan Bay Area 2050. Thus, implementation of the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and this impact would be less than significant.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

5.0 REFERENCES

1. Bay Area Air Quality Management District, *CEQA Air Quality Guidelines,* 2022.
2. Bay Area Air Quality Management District, *Spare the Air - Cool the Climate: A Blueprint for Clean Air and Climate Protection in the Bay Area, Final 2017 Clean Air Plan*, 2017.
3. Bay Area Air Quality Management District, *Stationary Source Screening Analysis Tools*, 2022.
4. California Air Resources Board, *2022 Scoping Plan for Achieving Carbon Neutrality*, 2022.
5. City of San José, *Average Daily Traffic GIS Open Data*, 2021.
6. City of San José, *Envision San José 2040 General Plan*, 2011.
7. City of San José, *2030 Greenhouse Gas Reduction Strategy*, 2020.
8. State of California, *California Code of Regulations*, 2022.

Appendix A

Air Quality and GHG Data

1055 Commercial Court v2 w Tier 4 12.7.23 Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	1055 Commercial Court v2 w Tier 4 12.7.23
Construction Start Date	2/1/2024
Operational Year	2024
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.00
Precipitation (days)	1.60
Location	37.3708, -121.88784
County	Santa Clara
City	San Jose
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1808
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.21

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

Parking Lot	4.88	Acre	4.88	0.00	0.00	0.00	—	—

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.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.40	3.46	2.77	18.8	0.03	0.07	7.35	7.41	0.06	3.49	3.55	—	3,630	3,630	0.17	0.12	1.73	3,670
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.64	0.56	7.50	29.0	0.05	0.10	19.8	19.9	0.10	10.1	10.2	—	5,744	5,744	0.32	0.39	0.14	5,868
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.10	0.28	0.87	4.23	0.01	0.02	1.20	1.22	0.01	0.53	0.55	—	871	871	0.04	0.03	0.21	882
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.02	0.05	0.16	0.77	< 0.005	< 0.005	0.22	0.22	< 0.005	0.10	0.10	—	144	144	0.01	0.01	0.04	146

2.2. Construction Emissions by Year, Unmitigated

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

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

Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.40	3.46	2.77	18.8	0.03	0.07	7.35	7.41	0.06	3.49	3.55	—	3,630	3,630	0.17	0.12	1.73	3,670
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.64	0.56	7.50	29.0	0.05	0.10	19.8	19.9	0.10	10.1	10.2	—	5,744	5,744	0.32	0.39	0.14	5,868
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.10	0.28	0.87	4.23	0.01	0.02	1.20	1.22	0.01	0.53	0.55	—	871	871	0.04	0.03	0.21	882
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.02	0.05	0.16	0.77	< 0.005	< 0.005	0.22	0.22	< 0.005	0.10	0.10	—	144	144	0.01	0.01	0.04	146

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.45	0.14	5.16	2.68	0.03	0.05	0.85	0.90	0.05	0.23	0.28	0.00	3,570	3,570	0.34	0.56	7.25	3,751
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.44	0.13	5.43	2.72	0.03	0.05	0.85	0.90	0.05	0.23	0.28	0.00	3,573	3,573	0.34	0.56	0.19	3,747
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.44	0.14	5.33	2.70	0.03	0.05	0.85	0.90	0.05	0.23	0.28	0.00	3,571	3,571	0.34	0.56	3.13	3,749
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.08	0.03	0.97	0.49	0.01	0.01	0.15	0.16	0.01	0.04	0.05	0.00	591	591	0.06	0.09	0.52	621

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.45	0.11	5.16	2.68	0.03	0.05	0.85	0.90	0.05	0.23	0.28	—	3,466	3,466	0.33	0.55	7.25	3,646
Area	0.00	0.03	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	104	104	0.02	< 0.005	—	105
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	0.45	0.14	5.16	2.68	0.03	0.05	0.85	0.90	0.05	0.23	0.28	0.00	3,570	3,570	0.34	0.56	7.25	3,751
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.44	0.10	5.43	2.72	0.03	0.05	0.85	0.90	0.05	0.23	0.28	—	3,469	3,469	0.33	0.55	0.19	3,642
Area	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	104	104	0.02	< 0.005	—	105
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	0.44	0.13	5.43	2.72	0.03	0.05	0.85	0.90	0.05	0.23	0.28	0.00	3,573	3,573	0.34	0.56	0.19	3,747
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.44	0.10	5.33	2.70	0.03	0.05	0.85	0.90	0.05	0.23	0.28	—	3,467	3,467	0.33	0.55	3.13	3,644
Area	0.00	0.03	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	104	104	0.02	< 0.005	—	105
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	0.44	0.14	5.33	2.70	0.03	0.05	0.85	0.90	0.05	0.23	0.28	0.00	3,571	3,571	0.34	0.56	3.13	3,749

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.08	0.02	0.97	0.49	0.01	0.01	0.15	0.16	0.01	0.04	0.05	—	574	574	0.05	0.09	0.52	603
Area	0.00	0.01	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	17.2	17.2	< 0.005	< 0.005	—	17.4
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	0.08	0.03	0.97	0.49	0.01	0.01	0.15	0.16	0.01	0.04	0.05	0.00	591	591	0.06	0.09	0.52	621

3. Construction Emissions Details

3.1. Demolition (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.36	0.36	4.51	18.2	0.03	0.06	—	0.06	0.06	—	0.06	—	3,425	3,425	0.14	0.03	—	3,437
Demolition	—	—	—	—	—	—	2.64	2.64	—	0.40	0.40	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.25	1.00	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	188	188	0.01	< 0.005	—	188

Demolitio	—	—	—	—	—	—	0.14	0.14	—	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.05	0.18	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	31.1	31.1	< 0.005	< 0.005	—	31.2
Demolitio n	—	—	—	—	—	—	0.03	0.03	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.57	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	121	121	< 0.005	0.01	0.01	123
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.23	0.04	2.94	1.34	0.01	0.04	0.56	0.60	0.03	0.15	0.18	—	2,198	2,198	0.18	0.35	0.12	2,308
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.73	6.73	< 0.005	< 0.005	0.01	6.83
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	< 0.005	0.16	0.07	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	120	120	0.01	0.02	0.11	127
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.11	1.11	< 0.005	< 0.005	< 0.005	1.13
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	19.9	19.9	< 0.005	< 0.005	0.02	20.9

3.3. Site Preparation (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.50	0.50	2.59	28.3	0.05	0.10	—	0.10	0.10	—	0.10	—	5,296	5,296	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.08	0.85	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	160	160	0.01	< 0.005	—	160
Dust From Material Movement	—	—	—	—	—	—	0.59	0.59	—	0.30	0.30	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.16	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	26.4	26.4	< 0.005	< 0.005	—	26.5

Dust From Material Movement	—	—	—	—	—	—	0.11	0.11	—	0.06	0.06	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.06	0.66	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	142	142	< 0.005	0.01	0.02	144
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.32	4.32	< 0.005	< 0.005	0.01	4.38
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	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.71	0.71	< 0.005	< 0.005	< 0.005	0.73
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2024) - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.29	0.29	2.04	17.8	0.03	0.06	—	0.06	0.06	—	0.06	—	2,958	2,958	0.12	0.02	—	2,969
Dust From Material Movement	—	—	—	—	—	—	7.09	7.09	—	3.43	3.43	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.11	0.97	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	162	162	0.01	< 0.005	—	163
Dust From Material Movement	—	—	—	—	—	—	0.39	0.39	—	0.19	0.19	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.18	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	26.8	26.8	< 0.005	< 0.005	—	26.9
Dust From Material Movement	—	—	—	—	—	—	0.07	0.07	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.04	0.66	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	131	131	< 0.005	< 0.005	0.56	133
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.06	0.01	0.69	0.33	< 0.005	0.01	0.14	0.15	0.01	0.04	0.04	—	540	540	0.04	0.09	1.17	568
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.73	6.73	< 0.005	< 0.005	0.01	6.83
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	29.6	29.6	< 0.005	< 0.005	0.03	31.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.11	1.11	< 0.005	< 0.005	< 0.005	1.13
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	4.90	4.90	< 0.005	< 0.005	< 0.005	5.15

3.7. Paving (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.13	1.51	8.87	0.01	0.02	—	0.02	0.02	—	0.02	—	1,351	1,351	0.05	0.01	—	1,355
Paving	—	0.28	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.19	1.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	167	167	0.01	< 0.005	—	167
Paving	—	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.20	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	27.6	27.6	< 0.005	< 0.005	—	27.7
Paving	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.05	0.88	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	175	175	< 0.005	0.01	0.75	178
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	20.2	20.2	< 0.005	< 0.005	0.04	20.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.34	3.34	< 0.005	< 0.005	0.01	3.39
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Architectural Coating (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.65	0.96	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	2.96	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.04	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.32	7.32	< 0.005	< 0.005	—	7.34
Architectural Coatings	—	0.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.21	1.21	< 0.005	< 0.005	—	1.22
Architectural Coatings	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.45	0.11	5.16	2.68	0.03	0.05	0.85	0.90	0.05	0.23	0.28	—	3,466	3,466	0.33	0.55	7.25	3,646
Total	0.45	0.11	5.16	2.68	0.03	0.05	0.85	0.90	0.05	0.23	0.28	—	3,466	3,466	0.33	0.55	7.25	3,646
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.44	0.10	5.43	2.72	0.03	0.05	0.85	0.90	0.05	0.23	0.28	—	3,469	3,469	0.33	0.55	0.19	3,642
Total	0.44	0.10	5.43	2.72	0.03	0.05	0.85	0.90	0.05	0.23	0.28	—	3,469	3,469	0.33	0.55	0.19	3,642
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.08	0.02	0.97	0.49	0.01	0.01	0.15	0.16	0.01	0.04	0.05	—	574	574	0.05	0.09	0.52	603
Total	0.08	0.02	0.97	0.49	0.01	0.01	0.15	0.16	0.01	0.04	0.05	—	574	574	0.05	0.09	0.52	603

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	104	104	0.02	< 0.005	—	105
Total	—	—	—	—	—	—	—	—	—	—	—	—	104	104	0.02	< 0.005	—	105
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	104	104	0.02	< 0.005	—	105
Total	—	—	—	—	—	—	—	—	—	—	—	—	104	104	0.02	< 0.005	—	105
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	17.2	17.2	< 0.005	< 0.005	—	17.4
Total	—	—	—	—	—	—	—	—	—	—	—	—	17.2	17.2	< 0.005	< 0.005	—	17.4

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

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

Total	0.00	0.00	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	TOG	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	—	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.03	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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coatings	—	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.01	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

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

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

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

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

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

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	2/1/2024	2/28/2024	5.00	20.0	—
Site Preparation	Site Preparation	03/01/2024	3/15/2024	5.00	11.0	—
Grading	Grading	4/01/2024	4/26/2024	5.00	20.0	—
Paving	Paving	4/29/2024	6/30/2024	5.00	45.0	—

Architectural Coating	Architectural Coating	6/1/2024	6/30/2024	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
Demolition	Concrete/Industrial Saws	Diesel	Tier 4 Final	1.00	8.00	33.0	0.73
Demolition	Rubber Tired Dozers	Diesel	Tier 4 Final	2.00	8.00	367	0.40
Demolition	Excavators	Diesel	Tier 4 Final	3.00	8.00	36.0	0.38
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	4.00	8.00	84.0	0.37
Site Preparation	Rubber Tired Dozers	Diesel	Tier 4 Final	3.00	8.00	367	0.40
Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	3.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Tier 4 Final	1.00	8.00	36.0	0.38
Paving	Cement and Mortar Mixers	Diesel	Tier 4 Final	2.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Tier 4 Final	1.00	8.00	81.0	0.42
Paving	Rollers	Diesel	Tier 4 Final	2.00	6.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	8.00	84.0	0.37
Paving	Paving Equipment	Diesel	Tier 4 Final	2.00	6.00	89.0	0.36
Architectural Coating	Air Compressors	Diesel	Tier 4 Final	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	11.7	LDA,LDT1,LDT2
Demolition	Vendor	—	8.40	HHDT,MHDT
Demolition	Hauling	30.1	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	11.7	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.40	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	7.40	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	20.0	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	0.00	11.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.40	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	0.00	0.00	12,754

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	2,405	—
Site Preparation	—	—	16.5	0.00	—
Grading	1,182	0.00	16.5	0.00	—
Paving	0.00	0.00	0.00	0.00	4.88

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Parking Lot	4.88	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	204	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
Parking Lot	108	108	108	39,420	921	921	921	336,237

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	0.00	0.00	12,754

5.10.3. Landscape Equipment

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

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Parking Lot	186,214	204	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)
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Parking Lot	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

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

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

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

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

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

5.16.2. Process Boilers

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

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

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

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	11.6	annual days of extreme heat
Extreme Precipitation	2.55	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	1	0	0	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	N/A	N/A	N/A	N/A
Extreme Precipitation	1	1	1	2
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	20.8
AQ-PM	33.7
AQ-DPM	90.5
Drinking Water	22.7
Lead Risk Housing	52.7
Pesticides	4.97
Toxic Releases	39.5
Traffic	94.3
Effect Indicators	—
CleanUp Sites	99.7
Groundwater	96.7
Haz Waste Facilities/Generators	99.9
Impaired Water Bodies	33.2
Solid Waste	99.8
Sensitive Population	—
Asthma	36.1
Cardio-vascular	28.1
Low Birth Weights	71.8
Socioeconomic Factor Indicators	—
Education	78.6
Housing	46.0
Linguistic	95.7
Poverty	59.5
Unemployment	79.0

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	30.65571667
Employed	42.62799949
Median HI	41.21647632
Education	—
Bachelor's or higher	37.80315668
High school enrollment	100
Preschool enrollment	26.36981907
Transportation	—
Auto Access	63.41588605
Active commuting	52.12370076
Social	—
2-parent households	66.32875658
Voting	56.76889516
Neighborhood	—
Alcohol availability	49.76260747
Park access	42.06339022
Retail density	93.49416143
Supermarket access	13.64044655
Tree canopy	20.72372642
Housing	—
Homeownership	85.58963172
Housing habitability	33.37610676
Low-inc homeowner severe housing cost burden	23.26446811

Low-inc renter severe housing cost burden	24.5989991
Uncrowded housing	27.15257282
Health Outcomes	—
Insured adults	43.71872193
Arthritis	71.8
Asthma ER Admissions	59.0
High Blood Pressure	68.0
Cancer (excluding skin)	74.5
Asthma	65.7
Coronary Heart Disease	72.1
Chronic Obstructive Pulmonary Disease	56.7
Diagnosed Diabetes	43.0
Life Expectancy at Birth	55.0
Cognitively Disabled	20.1
Physically Disabled	32.1
Heart Attack ER Admissions	56.2
Mental Health Not Good	50.5
Chronic Kidney Disease	73.0
Obesity	78.7
Pedestrian Injuries	90.1
Physical Health Not Good	49.1
Stroke	64.5
Health Risk Behaviors	—
Binge Drinking	93.9
Current Smoker	45.1
No Leisure Time for Physical Activity	33.6
Climate Change Exposures	—

Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	25.4
Elderly	69.3
English Speaking	4.5
Foreign-born	96.8
Outdoor Workers	70.7
Climate Change Adaptive Capacity	—
Impervious Surface Cover	5.6
Traffic Density	88.4
Traffic Access	87.4
Other Indices	—
Hardship	67.9
Other Decision Support	—
2016 Voting	43.9

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	80.0
Healthy Places Index Score for Project Location (b)	42.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
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
Construction: Construction Phases	Per Construction Questionnaire
Construction: Dust From Material Movement	Per Construction Questionnaire
Operations: Vehicle Data	Assuming 108 Truck trips per day for Project Operations
Construction: Off-Road Equipment	Tier 4 Mitigation
Operations: Fleet Mix	Assuming 100 percent Heavy Duty Trucks Trips as a conservative estimate.

Appendix B

2030 Greenhouse Gas Reduction Strategy Checklist

CITY OF SAN JOSE
CAPITAL OF SILICON VALLEY

DEPARTMENT OF PLANNING, BUILDING AND CODE ENFORCEMENT

Purpose of the Compliance Checklist

In 2020, the City adopted a Greenhouse Gas Reduction Strategy (GHGRS) that outlines the actions the City will undertake to achieve its proportional share of State greenhouse gas (GHG) emission reductions for the interim target year 2030. The purpose of the Greenhouse Gas Reduction Strategy Compliance Checklist (Checklist) is to:

- Implement GHG reduction strategies from the 2030 GHGRS to new development projects.
- Provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to the California Environmental Quality Act (CEQA).

The 2030 GHGRS presents the City's comprehensive path to reduce GHG emissions to achieve the 2030 reduction target, based on SB 32, BAAQMD, and OPR. Additionally, the 2030 GHGRS leverages other important City plans and policies; including the General Plan, Climate Smart San José, and the City Municipal Code in identifying reductions strategies that achieve the City's target. CEQA Guidelines Section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of greenhouse gases. Accordingly, the City of San José's 2030 GHGRS represents San José's qualified climate action plan in compliance with CEQA.

As described in the 2030 GHGRS, these GHG reductions will occur through a combination of City initiatives in various plans and policies and will provide reductions from both existing and new developments. This Compliance Checklist specifically applies to proposed discretionary projects that require environmental review pursuant to CEQA. Therefore, the Checklist is a critical implementation tool in the City's overall strategy to reduce GHG emissions. Implementation of applicable reduction actions in new development projects will help the City achieve incremental reductions toward its target. Per the 2030 GHGRS, the City will monitor strategy implementation and make updates, as necessary, to maintain an appropriate trajectory to the 2030 GHG target.

Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the GHGRS.

Instructions for Compliance Checklist

Applicants shall complete the following sections to demonstrate conformance with the City of San José 2030 Greenhouse Gas Reduction Strategy for the proposed project. All projects must complete Section A. General Plan Policy Conformance and Section B. Greenhouse Gas Reduction Strategies. Projects that propose alternative GHG mitigation measures must also complete Section C. Alternative Project Measures and Additional GHG Reductions.

A. General Plan Policy Compliance

Projects need to demonstrate consistency with the Envision San José 2040 General Plan's relevant policies for Land Use & Design, Transportation, Green Building, and Water Conservation, enumerated in Table A. All applicants shall complete the following steps.

1. Complete Table A, Item #1 to demonstrate the project's consistency with the General Plan Land Use and Circulation Diagram.

2. Complete Table A, Items #2 through #4 to demonstrate the project's consistency with General Plan policies[1] related to green building; pedestrian, bicycle & transit site design; and water conservation and urban forestry, as applicable. For each policy listed, mark the relevant yes/no check boxes to indicate project consistency, and provide a qualitative description of how the policy is implemented in the proposed project or why the policy is not applicable to the proposed project. Qualitative descriptions can be included in Table A or provided as separate attachments. This explanation will provide the basis for analysis in the CEQA document.

B. Greenhouse Gas Reduction Strategies

Table B identifies the GHGRS strategies and recommended consistency options. Projects need to demonstrate consistency with the GHGRS reduction strategies listed in Table B or document why the strategies are not applicable or are infeasible. The corresponding GHGRS strategies are indicated in the table to provide additional context, with the full text of the strategies preceding Table B.

Residential projects must complete Table B, Part 1 and 2; Non-residential projects must complete Table B, Part 2 only. All applicants shall complete the following steps for Table B.

1. Review the project consistency options described in the column titled 'GHGRS Strategy and Consistency Options'.
2. Use the check boxes in the column titled "Project Conformance" to indicate if the strategy is 'Proposed', 'Not Applicable', 'Not Feasible', or if there is an 'Alternative Measure Proposed'.

[1]The lists in items # 2-4 do not represent all General Plan policies but allow projects to demonstrate consistency and achievement of policies that are related to quantified reduction estimates in the 2030 GHGRS.

3. Provide a qualitative analysis of the proposed project's compliance with the GHGRS strategies in the column titled "Description of Project Measure". This will be the basis for CEQA analysis to demonstrate compliance with the 2030 GHGRS and by extension, with SB
   32. The qualitative analysis should provide:

   a. A description of which consistency options are included as part of the proposed project, or

   b. A description of why the strategy is not applicable to the proposed project, or

   c. A description of why the consistency options are infeasible. If applicants select 'Not Feasible' or 'Alternative Measure Proposed', they must complete Table C to document what alternative project measures will be implemented to achieve a similar level of greenhouse gas reduction and how those reduction estimates were calculated.

C. Alternative Project Measures and Additional GHG Reductions

Projects that propose alternative GHG mitigation measures to those identified in Table B or propose to include additional GHG mitigation measures beyond those described in Tables A and B, shall provide a summary explanation of the proposed measures and demonstrate efficiency or greenhouse gas reductions achievable though the proposed measures. Documentation for these alternative or additional project measures shall be documented in Table C. Any applicants who select 'Not Feasible' or 'Alternative Measure Proposed' in Table B must complete the following steps for Table C.

1. In the column titled "Description of Proposed Measure" provide a qualitative description of what measure will be implemented, why it is proposed, and how it will reduce GHG emissions.

2. In the column titled "Description of GHG Reduction Estimate" demonstrate how the alternative project measure would achieve the same or greater level of greenhouse gas reductions as the GHGRS strategy it replaces. Documentation or calculation files can be attached separately.

3. In the column titled "Proposed Measure Implementation" identify how the measure will be implemented: incorporated as part of the project design or as an additional measure that is not part of the project (e.g., purchase of carbon offsets).

Compliance Checklist

Evaluation of Project Conformance with the 2030 Greenhouse Gas Reduction Strategy

Table A: General Plan Consistency

Development Type: ☐ Commercial ☐ Residential ☐ Office ☒ Other: Commercial Vehicle Storage

1) Consistency with the Land Use/Transportation Diagram (Land Use and Density)	Yes	No
Is the proposed Project consistent with the Land Use/Transportation Diagram?	☒	☐
If not, and the proposed project includes a General Plan Amendment, does the proposed amendment decrease GHG emissions (in absolute terms or per capita, per employee, per service population) below the level assumed in the GHGRS based on the existing planned land use? (The project could have a higher density, mix of uses, or other features that would reduce GHG emissions compared to the planned land use).[2]	☐	☐
If not, would the proposed project and the General Plan Amendment increase GHG emissions (in absolute terms or per capita, per employee, per service population)? Project is not consistent with GHGRS and further modeling will be required to determine if additional mitigation measures are necessary.	☐	☐

Response documentation:

The proposed 1055 Commercial Court Project (Project) is consistent with the Land Use/Transportation Diagram and would not require a General Plan Amendment. The Project is currently designated as Heavy Industrial (HI) by the San José 2040 General Plan[3]*. HI allows for a range of storage uses, including materials storage and vehicle/equipment storage. The HI Zoning District allows for similar operations. Thus, Commercial Vehicle Storage uses are permitted in the HI district and the Project would not require a General Plan Amendment. Additionally, as a "small industrial infill project" with less than 30,000 square feet of gross floor area, the project meets the City's screening criteria and should therefore be exempt from both transportation and VMT Analysis. Commercial vehicle storage could include parking for private vehicle fleets, including those with buses, vans, trucks, and/or automobiles, and associated vehicle maintenance and mobile fueling.*

[2] For example, a General Plan Amendment to change use from single-family residential to multi-family residential or a General Plan Amendment to change the use from regional-serving commercial to mixed-use urban in a transit-served area might reduce travel demand, and therefore GHG emissions from mobile sources.

[3] City of San Jose. (2023). *San José 2040 General Plan.* Retrieved at: https://csj.maps.arcgis.com/apps/instant/lookup/index.html?appid=ef685f767b484eb6bcfc70f8fb651ef6. Accessed September 2023.

2) Implementation of Green Building Measures	Yes	No
***MS-2.2**: Encourage maximized use of on-site generation of renewable energy for all new and existing buildings.*	☐	☐
Not applicable	☒	☐
Describe how the project is consistent or why the measure is not applicable. *The Project proposes the construction of an uncovered parking lot/commercial vehicle storage facility, as opposed to the construction of a new or existing building or structure. Thus, Policy MS-2.2 of the Compliance Checklist is not applicable.*		
***MS-2.3**: Encourage consideration of solar orientation, including building placement, landscaping, design and construction techniques for new construction to minimize energy consumption.*	☐	☐
Not applicable	☒	☐
Describe how the project is consistent or why the measure is not applicable. *The Project proposes the construction of an uncovered parking lot/commercial vehicle storage facility, as opposed to any buildings or structures. Thus, Policy MS-2.3 of the Compliance Checklist is not applicable.*		
***MS-2.7**: Encourage the installation of solar panels or other clean energy power generation sources over parking areas.*	☐	☐
Not applicable	☒	☐
Describe how the project is consistent or why the measure is not applicable. *The Project proposes the construction of an uncovered parking lot/commercial vehicle storage facility, which would not include or encourage the installation of solar panels or other clean energy power generation. Thus, Policy MS-2.7 of the Compliance Checklist is not applicable.*		
***MS-2.11**: Require new development to incorporate green building practices, including those required by the Green Building Ordinance. Specifically, target reduced energy use through construction techniques (e.g., design of building envelopes and systems to maximize energy performance), through architectural design (e.g., design to maximize cross ventilation and interior daylight) and through site design techniques (e.g., orienting buildings on sites to maximize the effectiveness of passive solar design).*	☐	☐
Not applicable	☒	☐
Describe how the project is consistent or why the measure is not applicable. *The Project proposes the construction of an uncovered parking lot/commercial vehicle storage facility, which would not incorporate green building practices. Thus, Policy MS-2.11 of the Compliance Checklist is not applicable.*		
***MS-16.2**: Promote neighborhood-based distributed clean/renewable energy generation to improve local energy security and to reduce the amount of energy wasted in transmitting electricity over long distances.*	☐	☐
Not applicable	☒	☐
Describe how the project is consistent or why the measure is not applicable. *The Project proposes the construction of an uncovered parking lot/commercial vehicle storage facility, which would not impact the promotion of neighborhood-based distributed clean/renewable energy generation. Thus, Policy MS-2.16 of the Compliance Checklist is not applicable.*		

3) Pedestrian, Bicycle & Transit Site Design Measures	**Yes**	**No**
***CD-2.1**: Promote the Circulation Goals and Policies in the Envision San José 2040 General Plan. Create streets that promote pedestrian and bicycle transportation by following applicable goals and policies in the Circulation section of the Envision San José 2040 General Plan.*	☐	☐
a) Design the street network for its safe shared use by pedestrians, bicyclists, and vehicles. Include elements that increase driver awareness.	☐	☐
b) Create a comfortable and safe pedestrian environment by implementing wider sidewalks, shade structures, attractive street furniture, street trees, reduced traffic speeds, pedestrian-oriented lighting, mid-block pedestrian crossings, pedestrian-activated crossing lights, bulb-outs and curb extensions at intersections, and on-street parking that buffers pedestrians from vehicles.	☐	☐
c) Consider support for reduced parking requirements, alternative parking arrangements, and Transportation Demand Management strategies to reduce area dedicated to parking and increase area dedicated to employment, housing, parks, public art, or other amenities. Encourage de-coupled parking to ensure that the value and cost of parking are considered in real estate and business transactions.	☐	☐
Not applicable	☒	☐
Describe how the project is consistent or why the measure is not applicable. *The Project proposes the construction of an uncovered parking lot/commercial vehicle storage facility, which would not impact public streets or sidewalks. Thus, Policy MS-2.16 of the Compliance Checklist is not applicable.*		
***CD-2.5**: Integrate Green Building Goals and Policies of the Envision San José 2040 General Plan into site design to create healthful environments. Consider factors such as shaded parking areas, pedestrian connections, minimization of impervious surfaces, incorporation of stormwater treatment measures, appropriate building orientations, etc.*	☒	☐
Not applicable	☐	☐
Describe how the project is consistent or why the measure is not applicable. *The proposed Project would comply to integrate Green Building Goals and Policies in the Envision San Jose 2040 General Plan into site design to create healthful environments. The Project would include 6,300 feet of landscaping that incorporates drought-tolerant plants. In addition, stormwater measures include the implementation of impervious surfaces, and the Project would comply with all applicable stormwater regulations.*		
***CD-2.11**: Within the Downtown and Urban Village Overlay areas, consistent with the minimum density requirements of the pertaining Land Use/Transportation Diagram designation, avoid the construction of surface parking lots except as an interim use, so that long-term development of the site will result in a cohesive urban form. In these areas, whenever possible, use structured parking, rather than surface parking, to fulfill parking requirements. Encourage the incorporation of alternative uses, such as parks, above parking structures.*	☐	☒
Not Applicable	☒	☐
Describe how the project is consistent or why the measure is not applicable. *The proposed Project is not located in the Downtown and Urban Village Overlay areas. Thus, Policy CD-2.11 of the Compliance Checklist is not applicable.*		
***CD-3.2**: Prioritize pedestrian and bicycle connections to transit, community facilities (including schools), commercial areas, and other areas serving daily needs. Ensure that the design of new facilities can accommodate significant anticipated future increases in bicycle and pedestrian activity.*	☐	☐
Not applicable	☒	☐

Describe how the project is consistent or why the measure is not applicable. *The Project proposes the construction of a parking lot/commercial vehicle storage facility and is located in an industrial zoning area. Thus, Policy CD-3.2 of the Compliance Checklist is not applicable.*		
***CD-3.4**: Encourage pedestrian cross-access connections between adjacent properties and require pedestrian and bicycle connections to streets and other public spaces, with particular attention and priority given to providing convenient access to transit facilities. Provide pedestrian and vehicular connections with cross-access easements within and between new and existing developments to encourage walking and minimize interruptions by parking areas and curb cuts.*	☐	☐
Not applicable	☒	☐
Describe how the project is consistent or why the measure is not applicable. *The Project proposes the construction of a parking lot/commercial vehicle storage facility and is located in an industrial zoning area, which would not impact streets and sidewalks for pedestrians. Thus, Policy CD-3.4 of the Compliance Checklist is not applicable.*		
***LU-3.5**: Balance the need for parking to support a thriving Downtown with the need to minimize the impacts of parking upon a vibrant pedestrian and transit oriented urban environment. Provide for the needs of bicyclists and pedestrians, including adequate bicycle parking areas and design measures to promote bicyclist and pedestrian safety.*	☐	☐
Not applicable	☒	☐
Describe how the project is consistent or why the measure is not applicable. *The project is not located in the Downtown area. Thus, Policy LU-3.5 is not applicable.*		
***TR-2.8:** Require new development to provide on-site facilities such as bicycle storage and showers, provide connections to existing and planned facilities, dedicate land to expand existing facilities or provide new facilities such as sidewalks and/or bicycle lanes/paths, or share in the cost of improvements.*	☐	☐
Not applicable	☒	☐
Describe how the project is consistent or why the measure is not applicable. *The Project does provide on-site facilities and would include one bike parking spot. Thus, the Project is consistent with Policy TR-2.8.*		
***TR-7.1:** Require large employers to develop TDM programs to reduce the vehicle trips and vehicle miles generated by their employees through the use of shuttles, provision for car-sharing, bicycle sharing, carpool, parking strategies, transit incentives and other measures.*	☐	☐
Not applicable	☒	☐
Describe how the project is consistent or why the measure is not applicable. *The Project is a "small industrial infill project" with less than 30,000 square feet of gross floor area and would not be a larger employer. Thus, Policy TR-7.1 of the Compliance Checklist is not applicable.*		
***TR-8.5:** Promote participation in car share programs to minimize the need for parking spaces in new and existing development.*	☒	☐
Not applicable	☐	☐
Describe how the project is consistent or why the measure is not applicable. *The Project proposes the construction of a parking lot/commercial vehicle storage facility that includes a total of 18 stalls. Sixteen (16) standard stalls would be implemented, along with one (1) accessible auto stall, and one (1) accessible van stall.*		

4) Water Conservation and Urban Forestry Measures	**Yes**	**No**
***MS-3.1**: Require water-efficient landscaping, which conforms to the State's Model Water Efficient Landscape Ordinance, for all new commercial, institutional, industrial and*	☒	☐

developer-installed residential development unless for recreation needs or other area functions.		
Not applicable	☐	☐
Describe how the project is consistent or why the measure is not applicable. *The proposed Project would comply with the State's Model Water Efficient Landscape Ordinance and the City's Water-Efficient Landscape Ordinance (Chapter 15.11 of the San José Municipal Code). Project landscaping would include all water efficient landscaping.*		
***MS-3.2**: Promote the use of green building technology or techniques that can help reduce the depletion of the City's potable water supply, as building codes permit. For example, promote the use of captured rainwater, graywater, or recycled water as the preferred source for non-potable water needs such as irrigation consistent with Building Codes or other regulations.*	☐	☐
Not applicable	☐	☐
Describe how the project is consistent or why the measure is not applicable. *The Project proposes the construction of an uncovered parking lot/commercial parking storage and requires minimal water usage. Thus, Policy MS-3.2 of the Compliance Checklist is not applicable.*		
***MS-19.4**: Require the use of recycled water wherever feasible and cost-effective to serve existing and new development.*	☒	☐
Not applicable	☐	☐
Describe how the project is consistent or why the measure is not applicable. *As mentioned above, the Project includes minimal water usage. Additionally, the City provides recycled water in the vicinity of the Project site, therefore the Project would use recycled water.*		
***MS-21.3**: Ensure that San José's Community Forest is comprised of species that have low water requirements and are well adapted to its Mediterranean climate. Select and plant diverse species to prevent monocultures that are vulnerable to pest invasions. Furthermore, consider the appropriate placement of tree species and their lifespan to ensure the perpetuation of the Community Forest.*	☒	☐
Not applicable	☐	☐
Describe how the project is consistent or why the measure is not applicable. *The Project would comply with City landscaping requirements through plan check and design review processes. This would include water-efficient landscaping, pest resistance, and diversity requirements.*		
***MS-26.1**: As a condition of new development, require the planting and maintenance of both street trees and trees on private property to achieve a level of tree coverage in compliance with and that implements City laws, policies or guidelines.*	☒	☐
Not applicable	☐	☐
Describe how the project is consistent or why the measure is not applicable. *The Project would comply with City landscaping requirement including planting of site and street trees, and payment of applicable tree removal fees.*		
***ER-8.7**: Encourage stormwater reuse for beneficial uses in existing infrastructure and future development through the installation of rain barrels, cisterns, or other water storage and reuse facilities.*	☒	☐
Not applicable	☐	☐

Describe how the project is consistent or why the measure is not applicable.

The Municipal Regional Permit (MRP) allows development projects to use infiltration, evapotranspiration, harvesting and use, or biotreatment to treat full water quality design flow or volume of stormwater runoff, as specified in MRP Provision C.3.d. Project applicants are no longer required to evaluate the feasibility of infiltration of rainwater harvesting and use before proceeding to biotreatment. If a project applicant desires to use rainwater harvesting systems to meet LID treatment requirements, there must be sufficient demand on the project site to use the water quality design volume, i.e., 80% of the average annual rainfall runoff, from the collection area. Appendix I from SCVURPPP provides guidance on how to estimate the required landscaping or toilet flushing demand to meet C.3.d requirements. If the project appears to have sufficient demand for captured rainwater, Appendix I provides guidance on sizing the cistern (or other storage facility) to achieve the appropriate combination of drawdown time and cistern volume. The Project would comply with all MRP requirements and incorporate measures to minimize stormwater runoff.

GHGRS Strategies

GHGRS #1: The City will implement the San José Clean Energy program to provide residents and businesses access to cleaner energy at competitive rates.

GHGRS #2: The City will implement its building reach code ordinance (adopted September 2019) and its prohibition of natural gas infrastructure ordinance (adopted October 2019) to guide the city's new construction toward zero net carbon (ZNC) buildings.

GHGRS #3: The City will expand development of rooftop solar energy through the provision of technical assistance and supportive financial incentives to make progress toward the Climate Smart San José goal of becoming a one-gigawatt solar city.

GHGRS #4: The City will support a transition to building decarbonization through increased efficiency improvements in the existing building stock and reduced use of natural gas appliances and equipment.

GHGRS #5: As an expansion to Climate Smart San José, the City will update its Zero Waste Strategic Plan and reassess zero waste strategies. Throughout the development of the update, the City will continue to divert 90 percent of waste away from landfills through source reduction, recycling, food recovery and composting, and other strategies.

GHGRS #6: The City will continue to be a partner in the Caltrain Modernization Project to enhance local transit opportunities while simultaneously improving the city's air quality.

GHGRS #7: The City will expand its water conservation efforts to achieve and sustain long-term per capita reductions that ensure a reliable water supply with a changing climate, through regional partnerships, sustainable landscape designs, green infrastructure, and water-efficient technology and systems.

Table B: 2030 Greenhouse Gas Reduction Strategy Compliance

GHGRS Strategy and Consistency Options	Description of Project Measure	Project Conformance
PART 1: RESIDENTIAL PROJECTS ONLY		
Zero Net Carbon Residential Construction 1. Achieve/exceed the City's Reach Code, and 2. Exclude natural gas infrastructure in new construction, or 3. Install on-site renewable energy systems or participate in a community solar program to offset 100% of the project's estimated energy demand, or 4. Participate in San José Clean Energy at the Total Green level (i.e., 100% carbon-free electricity) for electricity accounts associated with the project until which time SJCE achieves 100% carbon-free electricity for all accounts. **Supports Strategies:** GHGRS #1, GHGRS #2, GHGRS #3	**Not Applicable.** The project would not include residential uses. Therefore, this strategy is not applicable to the project.	☐Proposed ☒Not Applicable ☐Not Feasible* ☐Alternative Measure Proposed **The 2030 GHGRS assumed this strategy would be feasible for 50% of residential units constructed between 2020 and 2030.*
PART 2: RESIDENTIAL AND NON-RESIDENTIAL PROJECTS		
Renewable Energy Development 1. Install solar panels, solar hot water, or other clean energy power generation sources on development sites, or 2. Participate in community solar programs to support development of renewable energy in the community, or 3. Participate in San José Clean Energy at the Total Green level (i.e., 100% carbon-free electricity) for electricity accounts associated with the project. **Supports Strategies**: GHGRS #1, GHGRS #3	**Not Applicable.** The project is a parking lot/commercial vehicle storage facility and would require minimal electricity demand. Therefore, this strategy is not applicable to the project.	☐See Part 1 (Residential projects only) ☐Proposed ☒Not Applicable ☐Not Feasible ☐Alternative Measure Proposed

Building Retrofits – Natural Gas[4] This strategy only applies to projects that include a retrofit of an existing building. If the proposed project does not include a retrofit, select "Not Applicable" in the Project Conformance column. 1. Replace an existing natural gas appliance with an electric alternative (e.g., space heater, water heater, clothes dryer), or 2. Replace an existing natural gas appliance with a high-efficiency model **Supports Strategies:** GHGRS #4	**Not Applicable.** The project would not include a retrofit of an existing building. Therefore, this strategy is not applicable to the project.	☐Proposed ☒Not Applicable ☐Not Feasible ☐Alternative Measure Proposed
Zero Waste Goal 1. Provide space for organic waste (e.g., food scraps, yard waste) collection containers, and/or 2. Exceed the City's construction & demolition waste diversion requirement. **Supports Strategies:** GHGRS #5	**Consistent.** The proposed project would have construction and demolition waste diverted to meet City requirements.	☒Proposed ☐Not Applicable ☐Not Feasible ☐Alternative Measure Proposed
Caltrain Modernization 1. For projects located within ½ mile of a Caltrain station, establish a program through which to provide project tenants and/or residents with free or reduced Caltrain passes or 2. Develop a program that provides project tenants and/or residents with options to reduce their vehicle miles traveled (e.g., a TDM program), which could include transit passes, bike lockers and showers, or other strategies to reduce project related VMT. **Supports Strategies:** GHGRS #6	**Not Applicable.** The proposed project is not located within ½ mile of a Caltrain station. Therefore, this strategy is not applicable to the project. In addition, as a "small industrial infill project" with less than 30,000 square feet of gross floor area, the project meets the City's screening criteria and should therefore be exempt from both a transportation and VMT analysis. Additionally, the project proposes vehicle storage that encourages rideshare and includes private vehicle fleets, including those with buses, vans, trucks, and/or automobiles, and associated vehicle maintenance and mobile fueling to reduce VMT.	☐Proposed ☒Not Applicable ☐Not Feasible ☐Alterative Measure Proposed

[4] GHGRS Strategy #4 applies to existing building retrofits and not to new construction; Strategy #2 applies to new construction to reduce natural gas related GHG emissions.

Water Conservation 1. Install high-efficiency appliances/fixtures to reduce water use, and/or include water-sensitive landscape design, and/or 2. Provide access to reclaimed water for outdoor water use on the project site. **Supports Strategies:** GHGRS #7	**Proposed**. The proposed project would implement design measures to minimize impervious surface area and source control measures The project would include low flow appliances and fixtures. The project would also comply with the City's Water-Efficient Landscape Ordinance (Chapter 15.11 of the San José Municipal Code) and landscape irrigation would connect to existing recycled water pipelines on site.	☒Proposed ☐Not Applicable ☐Not Feasible ☐Alternative Measure Proposed