PALM SPRINGS FULFILLMENT CENTER

FINAL EIR

SCH #2023080091

Applicant:

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Montecito, CA 93108

Lead Agency:

CITY OF PALM SPRINGS
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Chapter 1.0 Introduction

1.1 Purpose

The City of Palm Springs, as the "Lead Agency" under the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000, et seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000, et seq.) is responsible for preparing the Draft Environmental Impact Report (Draft EIR) and Final Environmental Impact Report (Final EIR) for the proposed Palm Springs Fulfillment Center ("project"). The City of Palm Springs prepared this EIR to evaluate the potential environmental impacts associated with the construction and operation of the proposed project.

The Final EIR includes the Draft EIR, written comments received during the public comment period, responses to those comments, and changes or errata to the Draft EIR.

1.2 Organization of Final EIR

The Final EIR has been prepared in conformance with CEQA, the CEQA Guidelines, and the City of Palm Springs's rules to implement CEQA to evaluate the potential environmental impacts associated with the implementation of the proposed project, that is anticipated to begin development in 2025. The CEQA Guidelines require the City to prepare an EIR for any project that includes a request for approval of discretionary actions that may result in significant effects on the environment. Upon preliminary review, the City determined that since the project may have significant effects on the environment, a Draft EIR would be prepared and circulated for public review. A Draft EIR was prepared and circulated, and following requests by the City's Planning Commission described below, changes were made and a Recirculated Draft EIR was made available for public review.

This Final EIR was prepared pursuant to Section 15089 of the CEQA Guidelines and incorporates the May 2024 Draft EIR and the August 2024 Recirculated Draft EIR by reference; comments received during both 45-day public comment periods; written responses to comments; and corresponding revisions to the text of the Recirculated Draft EIR.

Pursuant to Section 15132 of the CEQA Guidelines, this Final EIR includes the following components:

Chapter 1.0 Introduction

This Chapter provides an introduction of the environmental process.

Chapter 2.0 Comment Letters and Response to Comments

This Chapter provides a list of persons, organizations, and public agencies that provided comments on the Draft and Recirculated Draft EIR during both 45-day public review periods.

Chapter 3.0 Revisions to the Draft EIR

This Chapter provides clarification and makes necessary corrections to specific information in the Recirculated Draft EIR.

Chapter 4.0 Mitigation Monitoring and Reporting Program

This Chapter provides the project's Mitigation Monitoring and Reporting Program (MMRP), which identifies mitigation measures, timing, responsibility for mitigation implementation, and levels of significance after mitigation.

The Draft EIR, Recirculated Draft EIR and Final EIR were all made available for public review at the City of Palm Springs Planning Department, the Palm Springs Library, and on the City's website.

1.3 Draft and Recirculated Draft EIR Public Review Periods

The Draft EIR was released for public comment on April 30, 2024. The document was sent to the California State Clearinghouse, public agencies, and individuals who had expressed an interest or requested to receive the Draft EIR. In addition, a Notice of Completion/Notice of Availability was published in the Desert Sun. The Notice of Completion/Notice of Availability was also sent to the Riverside County Clerk. Copies of the Draft EIR were made available at the locations listed above.

The public comment period for the Draft EIR ended on June 17, 2024. During the public review period, the City received a total of 9 comments in the form of letters and emails. In addition, during a Planning Commission Meeting on May 22, 2024, the Commission requested that a fourth alternative be analyzed for the purpose of comparing the fulfillment use to a warehouse use. The Commission also requested additional analysis of the project's impact to scenic vistas from the Interstate 10 freeway. The City added to the analysis of a fourth alternative in **Chapter 7.0, *Alternatives*,** and additional visual simulations were prepared and analyzed in **Section 4.1, *Aesthetics***. The Recirculated Draft EIR was released for public review August 26, 2024. The public review period ended on October 9, 2024. The City received an additional 4 letters during the recirculation period.

1.4 Certification of the EIR and Project Selection Process

In order to certify the Final EIR, CEQA Guidelines Section 15090 prescribes that the City must find that:

a) The Final EIR has been completed in compliance with CEQA;
b) The Final EIR was presented to the decision-making body and that the decision-making body reviewed and considered the information contained in the Final EIR; and
c) The Final EIR reflects the Lead Agency's independent judgement and analysis.

If the Lead Agency certifies the Final EIR, it can then consider approving the project, in whole or in part.

1.5 Consideration of Recirculation

CEQA Guidelines Section 15088.5 requires a Lead Agency to recirculate a revised EIR only if significant new information is identified following the release of the Draft EIR. As stated in the discussion above, the DEIR circulated from April 30, 2024, to June 17, 2024, and a Recirculated Draft EIR was available for public review from August 26 to October 9, 2024.

The City then completed the Response to Comments as part of this Final EIR, has responded to all the comments received, and made minor changes to the EIR, as provided in Chapter 3 of this document, to clarify information in the EIR to address these comments. However, these changes consist of only corrections to an air quality table (Table 4.2-4) and clarifications regarding the water supply in the Mission Springs Water District

The City has evaluated the information contained in this Final EIR as well as other information in the record and has determined that no significant new information has been added to the EIR after public notice was given of the availability of the Recirculated Draft EIR for public review. Therefore, CEQA does not require the recirculation of the EIR.

Chapter 2.0 Responses to Comments

2.1 Purpose

CEQA and the CEQA Guidelines provide that written comments received during the public review period for a draft EIR must be responded to in writing. Section 15088(b) of the CEQA Guidelines provides that the written response can be either in a printed copy or in an electronic format. The responses to comments must provide reasonable, good faith analyses regarding all significant environmental issues raised in the EIR comments. The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (*i.e.,* responses to general comments may be general). Moreover, responses to comments submitted by another public agency must be provided to the commenting agency at least 10 days before certification of the Final EIR. When such comments from a sister agency disclose new or conflicting data or opinions that raise concern that the agency may not have fully evaluated the project and its alternatives, the lead agency must pay particular care to respond with good faith, reasoned analysis. However, comments that are only objections to the merits of the project itself may be addressed briefly, as they do not relate to a specific environmental concern.

This chapter provides the comments made on the Palm Springs Fulfillment Center Draft EIR, and responses to those comments. This chapter includes copies of the comment letters received by the City of Palm Springs regarding the Draft EIR. Each comment letter is numbered for reference and the individual comments in each letter are identified by a letter (i.e., "a", "b", etc.).

Draft EIR Public Review Period – April 30 to June 17, 2024

The DEIR was originally released for public comment from April 30, 2024 to June 17, 2024. The City received a total of 9 comment letters, including 7 from public agencies and other organizations, and 2 from local area residents. **Table 2-1, *Comment Letters Received on the Palm Springs Fulfillment Center Draft EIR***, provides a list of all comment letters received, including the ID number assigned to each comment letter, the date it was received, and commenter's name.

Table 2-1
Comment Letters Received on the Palm Springs Fulfillment Center Draft EIR

Public Agencies			
Letter ID	**Date**	**Agency**	**Commenter**
1	May 8, 2024	Palm Springs	Rick Minjares
2	June 5, 2024	CDFW	Jacob Skaggs
3	June 14, 2024	AQMD	Sam Wang

4	June 24, 2024	CDFW	Kim Freeburn
Non-Governmental Agencies			
5	May 15, 2024	CARE CA	Sheila Sannadan
6	June 11, 2024	Golden State Environmental Justice Alliance	Gary Ho
7	June 13, 2024	Committee to Stop Giant Warehouse Blight	Amy Minteer
8	June 14, 2024	Advocates for the Environment	Dean Wallraff
Area Residents			
Letter ID	**Date**	**Commenter**	
9	May 19, 2024	Peter Moruzzi	

Recirculated Draft EIR Public Review Period – August 26 to October 9, 2024

During a Planning Commission Meeting on May 22, 2024, the Commission requested that a fourth alternative be analyzed in the DEIR for the purpose of comparing the fulfillment use to a warehouse use. The Commission also requested additional analysis of the project's impact to scenic vistas from the Interstate 10 freeway. The City determined that the addition of this information to the DEIR resulted in a need to recirculate the document, consistent with CEQA Guidelines Section 15073.5. The Recirculated DEIR therefore contained a fourth alternative which analyzes a traditional warehouse use in **Chapter 7.0, *Alternatives***, and additional visual simulations analyzed in **Section 4.1, *Aesthetics***. Minor alterations were made to **Chapters 1, 2** and **3** of the DEIR to explain the purpose of recirculation. All other sections of the document remained identical to the original DEIR.

The recirculated DEIR was released for public comment from August 26 to October 9, 2024. The City received a total of 4 comment letters, 2 from public agencies, and 2 from other organizations. **Table 2-2, *Comment Letters Received on the Palm Springs Fulfillment Center Recirculated DEIR***, provides a list of all comment letters received, including the ID number assigned to each comment letter, the date it was received, and commenter's name.

Table 2-2
Comment Letters Received on the Palm Springs Fulfillment Center Recirculated DEIR

Public Agencies			
Letter ID	**Date**	**Agency**	**Commenter**
10	September 24, 2024	MSWD	Eric Weck
11	October 9, 2024	AQMD	Sam Wang
Non-Governmental Agencies			
12	September 27, 2024	Committee to Stop Giant Warehouse Blight	Amy Minteer
13	October 8, 2024	Golden State Environmental Justice Alliance	Gary Ho

2.2 Public Agency & Area Residents Comment Letters & Responses

Public Agencies

Comment Letter No. 1: Palm Springs Engineering

Date: May 8, 2024
Name: Rick Minjares
Affiliation: City of Palm Springs
Address: 3200 E Tahquitz Canyon Way
Palm Springs, CA 92262

Comment 1-a:

Below are some comments I have:

- Chapter 4.9 Hydrology –
    - 4.9-1 & 4.9-8 - There are references to the Palm Springs MDP, the Palm Springs MDP does not include the project area. Although there is a Desert Hot Springs MDP which includes the project area, unsure if the DHS MDP has been adopted.

Response 1-a:

As stated on page 4.9-8 of the DEIR, the project site is located to the north and outside the Palm Springs Master Drainage Plan but is subject to the on-site retention requirements. The project is subject to the on-site retention requirements for incremental increase in runoff. The project will also comply with the Whitewater River Watershed Municipal Separate Storm Sewer System. The Whitewater River Region MS4 Permit applies to an area of approximately 367 square miles, which generally corresponds to the urbanized portions of the watershed in the Coachella Valley. The MS4 Permit compliance programs are administered by Riverside County Flood Control and Water Conservation District (RCFC&WCD), CVWD, and the incorporated Coachella Valley cities, including Palm Springs.

Comment 1-b:

- 4.9-14 – references to the project meeting or proposing to meet the LID site design criteria, is the project really eligible for LID?

Response 1-b:

According to the State Water Resources Control Board (SWRCB), Low Impact Development (LID) is a sustainable practice that benefits water supply and contributes to water quality protection. LID uses site design and storm water management to maintain the site's pre-development runoff rates and volumes. The goal of LID is to mimic a site's predevelopment hydrology by using design techniques that infiltrate, filter, store, evaporate, and detain runoff close to the source of rainfall.

The project Water Quality Management Plan (WQMP) addresses post construction stormwater runoff quantity and quality requirements by implementing proposed storm drain and infiltration facilities with a mandated operation and maintenance program to meet the LID Site Design criteria. Retention

facilities will consist of surface basin and underground systems. The basin facilities will be stabilized with approved landscaping. The use of stormwater retention facilities in conformance with local retention requirements meets 100 percent of the LID and Site Design measurable requirements under the MS4 permit.

Comment Letter No. 2: California Department of Fish and Wildlife (CDFW)

Name: Jacob Skaggs, Senior Environmental Scientist Specialist
Date: June 5, 2024
Affiliation: CDFW
Address: 3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764

Comment 2-a:

CDFW is preparing a comments on the draft EIR for the Palm Springs Fulfillment Center (SCH# 2023080091). Would the City of Palm Springs agree to provide CDFW with a time extension, from Monday, 6/17 to Monday, 6/24 to submit comments? Our workloads have been very full and we would appreciate any additional time to finalize our comments.

Response 2-a:

The City thanks the CDFW for participating in the review of the Draft EIR. The City granted CDFW the extension. CDFW's letter is included as Comment Letter 3.

Comment Letter No. 3: South Coast Air Quality Management District (SCAQMD)

Name: Sam Wang, Program Supervisor
Date: June 14, 2024
Affiliation: AQMD
Address: 21865 Copley Drive
Diamond Bar, CA 9765-4178

Comment 3-a:

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Palm Springs is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of construction and operation of a warehouse facility on approximately 38 acres of vacant and undeveloped land within the City of Palm Springs in Riverside County. Approximately 16.70 of these acres would be dedicated to construction of a 739,360 square-foot (s.f.) building. Specifically, the 739,360 s.f. building would be developed with: 1) 727,360 s.f. of building space for industrial warehousing use; 2) 12,000 s.f. of building space for office use; and 3) 110 truck loading docks. The Proposed Project is expected to generate 1,574 vehicle trips per day (787 vehicles inbound plus 787 vehicles outbound), which includes 280 truck trips (140 trucks inbound plus 140 trucks outbound). The Proposed Project is also expected to operate 24 hours/day, seven days/week. South Coast AQMD staff reviewed aerial photographs and found that the nearest sensitive receptor, a private residence, is located approximately 1,450 feet northeast of the Proposed Project site (64050 18th Ave, Palm Springs, 92258) and the nearest off-site worker is located approximately 81 feet south of the Proposed Project site. The Interstate 10 freeway on and off ramps are also located approximately 2,000 feet south of the Proposed Project site. For analyzing air quality impacts, construction is anticipated to occur in one phase, commence in January 2024, and be completed by April 2025 (lasting approximately 15 months). The Proposed Project is located on the northwest corner of Indian Canyon Drive and 19th Avenue.

Response 3-a:

The City thanks the AQMD for participating in the review of the Draft EIR. In this comment, AQMD summarizes the project. The comment did not raise any questions or concerns with the Draft EIR, and no further response is warranted.

Comment 3-b:

South Coast AQMD Staff's Comments

Use of South Coast AQMD's Mass Rate Localized Significance Threshold (LST) Look-Up Table to Analyze the Proposed Project's Operational Localized Air Quality Impact is not Consistent with Guidance for the LST Methodology

The Proposed Project covers approximately 38 acres. The Lead Agency uses South Coast AQMD's Mass Rate LST Look-up Table for five acres as a screening tool to determine if the Proposed Project's operational daily emissions of NOx, CO, PM10 and PM2.5 could result in a significant impact to local air quality. South Coast AQMD staff, however, developed the LST methodology for proposed projects that are less than or equal to five acres. For projects that are greater than five acres in size, South Coast AQMD recommends lead agencies perform project-specific dispersion modeling to determine operational localized air quality impacts. Staff therefore recommends the Lead Agency to: 1) perform project-specific air dispersion modeling for the Proposed Project's operational phase emissions to determine localized air quality impacts; and 2) include the results in the Final EIR.

Response 3-b:

SCAQMD's LST Methodology identifies dispersion modeling as a recommendation rather than a requirement. The *Final Localized Significance Threshold Methodology* by SCAMQD describes LSTs as being voluntary and as representing "the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area (page 1). The mass rate LSTs are estimated using an air dispersion model (page 2-10). Emissions were assumed to be uniformly distributed across a flat proposed project site over an eight-hour workday. Screening procedures are by design conservative, that is, the predicted impacts tend to overestimate the actual impacts. If the predicted impacts are acceptable using the LST approach presented here, then a more detailed evaluation is not necessary." (page 4-1). [1]

The suggested use of project project-specific dispersion modeling is not necessary to support the DEIR's conclusions. The DEIR analysis used a conservative approach that compared the unmitigated project-related emissions levels from the entire project, in the respective pollutant category, against the applicable LST threshold for SRA 30. Without mitigation, the project's construction and operational LSTs were less than significant. Neither does the commenter provide substantial evidence of a significant impact being possible for the proposed project. Therefore, additional modeling is not warranted based on the reasoning provided in the LST Methodology.

Comment 3-c:

Warehouse Cold Storage Land Use and the Associated Emissions from Transport Refrigeration Units (TRU)

[1] Final Localized Significance Threshold Methodology: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/pm-2-5-significance-thresholds-and-calculation-methodology

The project description in the Draft EIR does not specify whether the Proposed Project intends to include cold storage usage. Cold storage warehouses utilize more trucks and trailers equipped with TRUs than warehouses without cold storage. The small diesel engines that are commonly used to provide power to TRUs generate large quantities of diesel exhaust emissions while operating. As a result, it is recommended that the Lead Agency revise the project description in the Final EIR to clarify and explicitly state whether cold storage facilities are part of the Proposed Project and, if applicable, provide an estimate of the number of TRU trucks and trailers associated with the operation of this warehouse. If there are potential uses for TRUs, the Lead Agency is recommended to revise the calculations in the Final EIR to quantify the emissions from the TRUs in addition to the operational truck emissions.

Response 3-c:

A tenant for the industrial project has not been determined at this time. Therefore, specific activities cannot be described. However, it is assumed that the project will be unrefrigerated. Should the tenant who ultimately occupies the site include a refrigeration component, the City, as Lead Agency, would determine whether additional CEQA analysis of air quality impacts was necessary, and if so, prepare supplemental CEQA analysis. To undertake analysis of refrigeration and TRUs now would be speculative and is therefore not required under CEQA.

Comment 3-d:

Inconsistencies and Incorrect Information in Emission Calculations

Potential Underestimation of Construction and Operational Emissions Due to Imprecise Assumptions for Truck Trip Lengths

Appendix C.1 of the Draft EIR explains that the emissions from trucks for the operational air quality impact analysis were based, in part, on the assumption that the average daily truck trip length is 40 miles for 4+-axle heavy-heavy-duty trucks (HHDT), 15.3 miles for 2-axle trucks, and 14.2 miles for 3-axle trucks. The appendix then states that a weighted average trip length of 34.51 miles (based on a traffic study conducted for the Proposed Project) was used. The Proposed Project site, however, is located approximately 110 miles away from the Ports of Long Beach and Los Angeles (Ports), which means that the air quality analysis underestimated the emissions from trucks traveling from the Ports to the Proposed Project site. For this reason, the Lead Agency is recommended to revise the calculations in the Final EIR by taking a project-specific approach to the vehicle trip length. Staff recommends the Lead Agency apply more conservative trip lengths, such as designating 110 miles for Port-related trips.

The CalEEMod output files of Appendix C.1 also show that for vendor truck trips during the construction phase, the miles per trip is set to 10 miles. There is a high probability that the distance from the City of Palm Springs to cities where vendors may be located is greater than 10 miles. For example, west of the Proposed Project site, the City of Banning is approximately 18 miles away. Given

the location of the City of Palm Springs in relation to other cities where vendors may be located, the construction phase air quality analysis may have underestimated the vendor emissions from trucks. For this reason, the Lead Agency is recommended to revise the calculations in the Final EIR by taking a project-specific approach to the vendor vehicle trip length. Staff recommends the Lead Agency apply more conservative trip lengths. Tailoring these parameters and assumptions to be based on project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project.

Response 3-d:

The DEIR's use of 34.51 miles as the weighted average trip length for the project is consistent with the SCAQMD recommendations and associated literature provided in SCAQMD's implementation of Rule 2305 (Warehouse Indirect Source Rule - Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program), adopted in 2021. The Air Quality Impact Analysis (AQIA) calculated the average trip length for heavy trucks by vehicle class based on WAIRE documentation. A weighted average was taken based on the vehicle type percentage in the proposed project specific Traffic Impact Assessment.

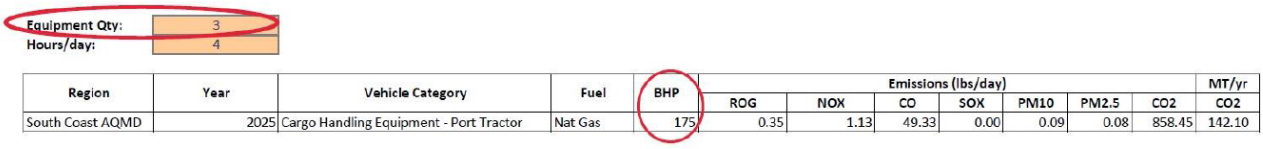
CEQA calls for disclosure of the projects anticipated truck trips based on a likely truck trip destination. The reasoning provided in the WAIRE Technical Report indicates that trucks visiting a given facility may involve varying arrangements and operating profiles. As an example, provided in the WAIRE Technical Report, "one truck may travel 30 miles on the inbound trip, and only two miles on the outbound trip." The WAIRE also acknowledges that one truck may be loaded with goods from multiple warehouses, such that determining what portion of the trip is attributed to each portion of the operation would be impractical. As a result, the weighted average recommended in the WAIRE methodology represents a practical estimation of calculating likely truck trip lengths associated with the project. Using the distance between the project and the nearest ports would double-count the operating arrangements, trips, and lengths that have already been attributed to facilities interfacing with the project.

The vendor truck trip length of 10 miles, in its radius form from the project site, encompasses or intersects four of the Coachella Valley's 9 incorporated cities, including Palm Springs, Desert Hot Springs, Cathedral City and northern portion of Rancho Mirage. Therefore, this distance captures a considerable portion of the Coachella Valley area that would be suitable for this level of analysis. The commenter's assertion that vendor trips would not originate within 10 miles is speculation and unsupported by substantial evidence. The Coachella Valley includes a substantial construction industry, including sand and gravel mining, supply houses for tilt up concrete, and a range of suppliers for plumbing, electrical and other trades. The commenter's assumption that there is "a high probability" that vendors will not originate within 10 miles of the site is not supported by facts. No change in the DEIR is required.

Comment 3-e:

Potential Underestimation of Operational Emissions Due to Inconsistencies in Parameters used to Model Emissions from On-site Cargo Handling Equipment

Page 33 of Appendix C.1 states that during the operational phase of the Proposed Project four port tractors (200 horsepower, fueled with natural gas) will be utilized and each port tractor will operate up to 4 hours per day, 365 days a year. Appendix 3.1 of Appendix C.1, CalEEMod Emissions Model Outputs, then shows, however, that the Port Tractor Emissions were only modeled for three port tractors rated at 175 brake horsepower (BHP). See Figure 1 below.



Equipment Qty:	3
Hours/day:	4

Region	Year	Vehicle Category	Fuel	BHP	Emissions (lbs/day)							MT/yr
					ROG	NOX	CO	SOX	PM10	PM2.5	CO2	CO2
South Coast AQMD	2025	Cargo Handling Equipment - Port Tractor	Nat Gas	175	0.35	1.13	49.33	0.00	0.09	0.08	858.45	142.10

Figure 1. Screenshot of Appendix C.1, N Indian Canyon/19th Ave High-Cube Warehouse, Air Quality Impact Analysis, PDF page 158 of 195

This inconsistency raises questions about the accuracy of the modeled emission estimates for the on-site cargo handling equipment. The Lead Agency is recommended to revisit these calculations and update the Final EIR accordingly with the appropriate corrections.

Response 3-e:

The DEIR and AQIA provided a conservative calculation of on-site cargo handling equipment operating 4 hours a day, which is twice the average operation of 2 hours estimated by CARB's Technology Assessment. The updates to the underlying AQIA modeling may have resulted in an inconsistency in the input of equipment quantity (3 versus 4) for this particular source. Based on the conservative criteria, adding a fourth tractor would increase operational ROG emissions by 0.117 pounds per day; NOX emissions by 0.377 pounds per day; CO emissions by 16.443 pounds per day; PM10 emissions by 0.030 pounds per day; and PM2.5 emissions by 0.027 pounds per day. SOx emissions would be virtually zero or unquantifiable. Compared to the project-wide operational emissions, the addition of a fourth tractor would represent an increase less than or equal to one percent for ROG, NOx, SOx, PM10 and PM2.5. The increase in CO emissions would be approximately 7.6 percent. Since the operating hours are conservative in relation to the average operation, this minor inconsistency in the equipment information and associated BHP would not constitute an underestimation of the actual emissions from this particular source, and would not significantly impact the emissions conclusions or cause the project to have significant impacts as a result.

Comment 3-f:

Potential Underestimation of VOC Construction Emissions Due to Incorrect Input of s.f. for Construction Architectural Coatings

The Proposed Project's estimated maximum regional daily emissions for VOC during the construction phase is 73.90 lbs./day, 1.1 lbs. below South Coast AQMD's CEQA VOC mass daily emissions construction threshold of 75 lbs./day. Staff is concerned that the Proposed Project's construction VOC emissions may have been underestimated.

Architectural coating area is one of the model inputs that CalEEMod uses to calculate a project's VOC emissions. Per CalEEMod Version 2022.1.1.24, "The coated area for non-residential buildings is 2.7 times the non-residential floor square footage, of which 75% is interior surface and 25% is exterior surface." The Draft EIR states that the Proposed Project building will have a ground floor area of 727,360 s.f. According to CalEEMod then, if floor square footage = **727,360 s.f.**, then the

- total coated area for this non-residential building should be
  727, 360 s.f. *2.7 = **1,963,872 s. f.**
- coated interior surface should be
  1,963,872 s. f. *.75 = **1,472,904**
- and the coated exterior surface should be
  1,963,872 s. f. *.25 = **490,968**

However, the Proposed Project's CalEEMod s.f. input for Construction Architectural Coatings shows a reduced square footage:

- coated interior surface:
  1,109,040 s.f.
- coated exterior surface:
  369,680 s.f.

Which means the VOC emissions for the Proposed Project have been calculated, in part, using a floor square footage of only = 547,674 s.f. [(1,109,040 + 369,680)/2.7]. **See Figure 2 below.**


Construction
Architectural Coatings

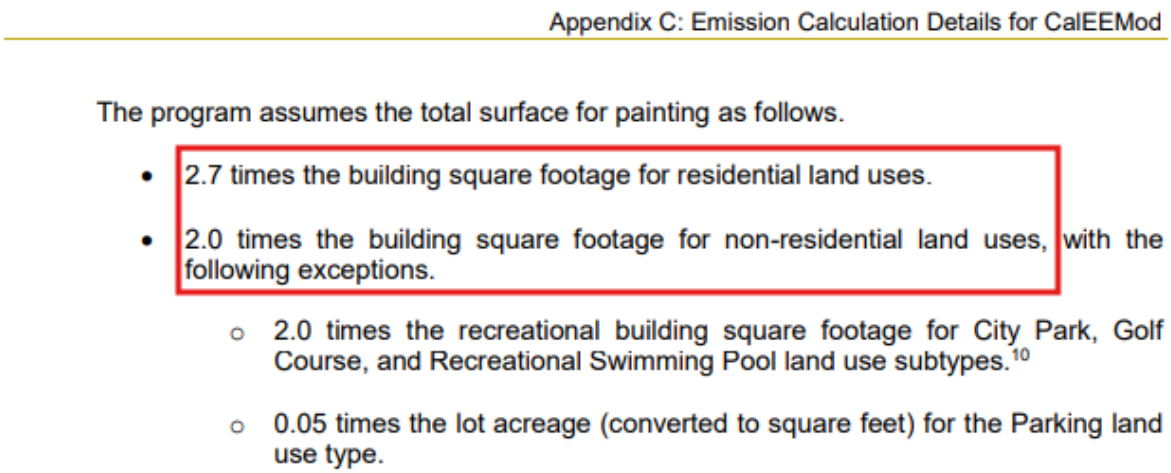
		VOC Content (g/L) by Building and Surface Type					Coated Area (sqft)			
Phase Name	Phase Type	Residential Interior VOC	Non Residential Interior VOC	Residential Exterior VOC	Non Residential Exterior VOC	VOC for Parking Paint	Residential Interior Area	Non Residential Interior Area	Residential Exterior Area	Non Residential Exterior Area
Architectural Coating (modified)	Architectural Coating	50	50	50	50	100	0	1,109,040	0	369,680

Figure 2. Screenshot of Proposed Project CalEEMod input file[19]

This inconsistency in floor square footage raises questions about the accuracy of the modeled emission estimates for the Proposed Project's VOC construction emissions. The Lead Agency is recommended to revisit these calculations and update the Final EIR accordingly with the appropriate corrections.

Response 3-f:

SCAQMD has misinterpreted the emission factors and ratios made available in Appendix C (Emission Calculation Details for CalEEMod) of the User Guide for CalEEMod Version 2022.1. Section 4.8 (Architectural Coatings Screen) in that document indicates that the assumption of total surface for painting at the proportion of 2.7 times the building square footage is for "residential land uses", while the factor for non-residential uses is 2.0.



Appendix C: Emission Calculation Details for CalEEMod

The program assumes the total surface for painting as follows.

- 2.7 times the building square footage for residential land uses.
- 2.0 times the building square footage for non-residential land uses, with the following exceptions.
    - 2.0 times the recreational building square footage for City Park, Golf Course, and Recreational Swimming Pool land use subtypes.[10]
    - 0.05 times the lot acreage (converted to square feet) for the Parking land use type.

The AQIA and associated CalEEMod calculations relied on a building area of 739,360 square feet, which is accurate and consistent with the combined 727,360 square feet of ground floor warehouse area and 12,000 square feet of second-floor office space. The output of non-residential interior and exterior area coated is a product of the software based on the accurately entered building dimensions (land use). Using the correct ratio of 2.0, the total building area input is consistent with the factors applicable to non-residential projects, as displayed below:

Building Area: 739,360 S.F.

Total Coated Area Factor: 2.0

Total coated area for this non-residential building is:

739,360 S.F. *2.0 = **1,478,720 S.F.**

The coated interior surface is:

1,478,720 S.F. *.75 = **1,109,040 S.F.**

The coated exterior surface is:

1,478,720 S.F. *.25 = **369,680 S.F.**

Therefore, the estimation of non-residential interior coated area of 1,109,040 S.F. and non-residential exterior coated area of 369,680 S.F. is consistent with the applicable factors. There is no indication that VOCs are underestimated since the CalEEMod inputs are consistent with the proposed project,

and the associated coated area is a result of the software calculations versus potentially outdated factors from South Coast AQMD's 1993 CEQA Air Quality Handbook cited by the commenter.

Comment 3-g:

> Particulate Matter (PM) Quantities in pounds/day (lbs./day) in Draft EIR and Appendix C.1 inconsistent with PM quantities shown in Technical Files

According to the Draft EIR and its accompanying Air Quality Impact Analysis appendix, the peak operational PM emissions are 14.72 lbs./day for PM10 and 3.67 lbs./day for PM2.5. But these PM emissions do not match the emissions shown in the CalEEMod technical files provided to Staff (technical data files provided to Staff upon request, e-mail communication with Glenn Mlaker, May 14, 2024). In the CalEEMod technical data files provided to staff, the peak operational PM10 emissions are calculated to be 33.61 lbs./day and 9.12 lbs./day for PM2.5. This difference between what is shown to have been calculated in the CalEEMod technical files versus what is presented in the Draft EIR and Appendix C.1 needs to be addressed and the Final EIR revised accordingly.

Response 3-g:

CalEEMod software is hosted on the internet (versus desktop-based software) and is subject to routine adjustments, some of which involve minor adjustments in emissions factors and resulting calculations. The mentioned differences in PM10 and PM2.5 emissions totals do not affect the project's ability to meet the respective operational thresholds. The DEIR summary of peak operational emissions of PM10 and PM2.5 are inconsistent with the CalEEMod technical data. SCAQMD is correct in identifying that the peak operational emissions are 33.61 lbs./day for PM10 and 9.12 lbs./day for PM2.5. As shown below, after accounting for the on-site equipment source, the emission totals are slightly higher for the Summer and Winter scenarios, but remain below the thresholds established by SCAQMD. The inadvertent error is hereby acknowledged and rectified. The EIR is hereby amended as follows (also see Chapter 3.0, below which lists the changes to the EIR):

Revised Table 4.2-4 Summary of Peak Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer (Smog Season)						
Mobile Source	6.97	35.10	134.00	0.54	~~14.30~~33.60	~~3.24~~9.08
Area Source	22.20	0.27	32.20	< 0.005	~~0.04~~0.06	~~0.06~~0.04
Energy Source	0.21	3.79	3.18	0.02	~~0.29~~0.00	~~0.29~~0.00
On-Site Equipment Source	0.35	1.13	49.33	0.00	0.09	0.08
Total Maximum Daily Emissions	**29.73**	**40.29**	**218.71**	**0.56**	**33.75~~14.72~~**	**9.2~~3.670~~**
SCAQMD Regional Threshold	55	55	550	150	150	55

Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Mobile Source	5.99	38.00	85.00	0.51	~~14.30~~29.1	~~3.24~~7.88
Area Source	16.90	0.00	0.00	0.00	~~0.00~~0.03	~~0.00~~0.02
Energy Source	0.21	3.79	3.18	0.02	~~0.29~~0.00	~~0.29~~0.00
On-Site Equipment Source	0.35	1.13	49.33	0.00	0.09	0.08
Total Maximum Daily Emissions	**23.45**	**42.92**	**137.51**	**0.53**	**29.22~~14.68~~**	**7.98~~3.61~~**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Although the noted values are higher than those disclosed in the DEIR, these emission levels are still below the applicable thresholds. Specifically, the SCAQMD operational emission threshold for PM10 is 150 lbs./day and 55 lbs./day for PM2.5, while the project emissions will be 33.75 lbs./day for PM10 in the Summer and 29.22 lbs./day for the Winter. For PM2.5, the emissions will be 9.20 lbs./day in the Summer and 7.98 lbs./day in the Winter. Therefore, this adjustment will not exceed thresholds, and impacts remain less than significant, consistent with the findings of the DEIR.

Comment 3-h:

Incorrect AERMOD Modeling Parameters used in the Health Risk Assessment (HRA)

South Coast AQMD staff's review of the construction and operation HRA modeling files noted that the Urban dispersion coefficient and Elevated modeling parameters were used in the Control Pathway in the AERMOD model. Staff reviewed aerial photographs and found that the Proposed Project Site, however, is in a rural area and that the terrain is generally flat.

The Lead Agency is therefore recommended to: 1) re-run the construction and operational HRAs to utilize the Rural dispersion coefficient and Flat modeling parameters to determine the health risk impacts to the sensitive receptors and off-site workers; and 2) include the results in the Final EIR.

Response 3-h:

The commenter's opinion is noted. However, the HRA's AERMOD parameters used a dispersion coefficient and terrain that are appropriate to the project's location and setting, as explained below.

The selection of rural or urban dispersion coefficients in an AERMOD application calls for a preliminary assessment of land use composition within a radius of 3-kilometers (1.86 miles). Based on such methodology, if light industrial, heavy industrial, commercial or residential uses account for more than 50 percent of the land uses within this radius, the urban dispersion model is applicable. The project's surroundings within a 3-kilometer radius are a combination of undeveloped and developed land conditions with a range of industrial and commercial land use designations that are greater than

50 percent. Therefore, the urban dispersion is applicable to the project setting to adequately account for the land use designations that may be developed during the life of the project.

The AERMOD modeling parameters used the "elevated" terrain approach among the three available options (flat and complex being the other two options) to properly account for the gradual elevation changes in the project vicinity. The elevated terrain option in AERMOD called for properly identifying the site source's coordinates and base elevation using geographic information system parameters. In this case, the approximate base elevation of the site source is entered as 237.890 meters (780 feet) above sea level, consistent with the site's conditions. Since the site surroundings have a gradual descent in elevation toward the south and southeast, the elevation difference between the site and the downwind potential receptor areas (at the outer portion of the study area) is approximately 65 feet, where the elevation is 218.00 meters (715 feet) above sea level. Based on this elevation difference occurring over a gentle gradient, the elevated option is most appropriate for this project setting than flat or complex terrain. A flat terrain option would not be able to adequately model the gradual elevation changes observable in the site vicinity and therefore would not be suitable for this project. The complex terrain option also would not be representative of the gradual elevation descent in the project vicinity. The analysis was conducted correctly, and no change to the DEIR is required.

Comment 3-i:

South Coast AQMD Air Permits and Role as a Responsible Agency

The Draft EIR states that South Coast AQMD permits to construct and operate stationary sources may be needed. If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, etc., air permits from South Coast AQMD will be required and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits.

Response 3-i:

The analysis requested by the commenter is included in the DEIR.

Construction Emissions:

As summarized on Page 4.2-17 of the DEIR from the AQIA supporting information, the construction-related calculations from various stationary and portable emission sources were accounted for in the analysis. Analyzed construction equipment includes "rubber-tired dozers, crawler tractors, excavators, graders, scrapers, cranes, forklifts, generator sets, tractors/loaders/backhoes, welders, pavers, paving equipment, rollers, and air compressors at various quantities based on the stage of construction and operating total of eight (8) hours per day." In addition, as a standard requirement, portable engines and other types of equipment that may be utilized at the project during construction must be registered through CARB's Statewide Portable Equipment Registration Program (PERP) or permitted through SCAQMD. This requirement applies to portable diesel-powered internal combustion engines over 50 horsepower (hp) and portable equipment units. Examples of such equipment include power generators, pumps, cranes, welders, and compressors. Equipment registration through SCAQMD or PERP involves an application process and renewal cycle. Such registration applies to the equipment operator, rather than the project. Therefore, the DEIR has adequately factored construction related emission sources and the project would not impede portable equipment operators from complying with the equipment registration requirements, as applicable.

Operational Emissions:

At this time, the tenant for the project is not determined. Therefore, it is unknown if new stationary and portable equipment would be used at the project site. Page 4.2-17 of the DEIR discloses that the operation of gas-powered cargo handling equipment at a conservative rate of 4 hours per day for 365 days of the year has been included in the analysis. Additional equipment to be installed by future operators would be subject through the standard permit registration process involved with SCAQMD Rule 201 (Permit to Construct) and Rule 202 (Permit to Operate), which is designed to evaluate specific portable and stationary equipment. Therefore, the DEIR has addressed operational stationary sources, and permitting requirements will be implemented as a standard requirement. Finally, the DEIR correctly states, at page 3-17, that SCAQMD is considered a Responsible Agency for the proposed Project. No change to the DEIR is required.

Comment 3-j:

<u>Conclusion</u>

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please

provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Response 3-j:

The City thanks AQMD for their comments and will provide AQMD with a written response to comments at least 10 days prior to certifying the Final EIR, per their request. In addition, Responses 3-a through 3-I provide detailed responses to the commenter's concerns, including justification for the analysis conducted in the DEIR based on substantial evidence.

Comment Letter No. 4: California Department of Fish and Wildlife (CDFW)

Name: Heather A. Pert, Senior Environmental Scientist (Supervisor)
Date: August 13, 2021
Affiliation: California Department of Fish and Wildlife (CDFW)
Address: 3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764

Comment 4-a:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Environmental Impact Report (DEIR) from the City of Palm Springs (City) for the Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

Response 4-a:

The City thanks CDFW for participating in the review of the Draft EIR.

Comment 4-b:

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Id., § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on Projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

Response 4-b:

This introductory comment describing the role of CDFW role as a trustee or responsible agency does not identify a specific concern or question regarding the content of the Draft EIR. No further response is required.

Comment 4-c:

PROJECT DESCRIPTION SUMMARY

Proponent: PS Canyon Development, LLC

Objective: The proposed Project includes to develop an industrial building on approximately 38 acres on the northwest corner of Indian Canyon Drive and 19th Avenue, in the City of Palm Springs. The Project proposes a two-story industrial building with associated improvements such as paved parking spaces and drive aisles, a detention basin, and three gated access points. The two-story facility has a proposed building area of 739,360 square feet. Additionally, the proposed Project will connect to existing offsite infrastructure to provide electricity, natural gas, water, and sewer services to the Project along Indian Canyon Drive and 19th Avenue.

For security purposes, the Project will provide nighttime lighting to safely illuminate the parking areas, entrances, signs, and walkways. According to the photometric plan, Project light fixtures will consist of downward-oriented post-mounted and wall-mounted fixtures located throughout the Project. The wall-mounted fixtures will provide lighting for building entryways, sidewalks, and general exterior lighting. The post-mounted fixtures are proposed to be located in the parking lot areas and along the paved driveways. The downward-oriented fixtures are designed to not only provide light on the Project site, but also to reduce the amount of light emitted towards adjacent properties.

The Project will include approximately 4.15 acres of landscaped and retention areas, including one landscaped retention basin located along the southern boundary, and trees, shrubs, and accents proposed along the Project's eastern and southern sides. Landscaping will include drought-tolerant trees (24-inch boxes), 12-foot palms, and ground covers (15-gallon) typically found in the region, such as willow acacia, desert museum palo verde, thornless honey mesquite, and date palm. Shrubs and accent plantings proposed for the Project include outback sunrise emu bush, new gold lantana, Lindheimer's muhly, firecracker plant, various agave, cactus, yucca, and aloe. Fractured rock, and decomposed granite will provide ground cover. Exterior irrigation will use drip or micro-spray applicators.

Location: The proposed Project is situated on the northwest corner of Indian Canyon Drive and 19th Avenue in the City of Palm Springs, approximately 0.32 miles north of the Interstate 10 freeway in the City's industrial land use district. The Project is surrounded by vacant land to the north, wind energy facilities to the west, 19th Avenue and existing commercial to the south, and Indian Canyon Drive and industrial uses to the east, within the City of Desert Hot Springs's jurisdiction. The location of the

Project can be described as a portion of Section 15, Township 3 South, Range 4 East, San Bernardino Meridian, and at Latitude 33°54'44" N, Longitude 116°32'50" W. Accessor's Parcel Number: 666-032-018.

Timeframe: The DEIR indicates that Project construction will occur in one phase. The construction activities include site preparation, grading, building construction, paving, and architectural coating. Construction is anticipated to begin in January 2025 and will last through April 2026.

Response 4-c:

This comment provides a summary of the project and does not identify a specific concern or question regarding the content of the Draft EIR. No further response to this comment is required.

Comment 4-d:

CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (i.e., biological resources). CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. The DEIR has not adequately identified and disclosed the Project's impacts (i.e., direct, indirect, and cumulative) on biological resources and whether those impacts are reduced to less than significant.

CDFW's comments and recommendations on the DEIR are explained in greater detail below and summarized here. CDFW is concerned that the DEIR does not adequately identify or mitigate the Project's significant, or potentially significant, impacts to biological resources. CDFW also concludes that the DEIR lacks sufficient information to facilitate a meaningful review by CDFW, including a complete and accurate assessment of biological resources on the Project site. CDFW requests that additional information and analyses be added to a revised DEIR, along with avoidance, minimization, and mitigation measures that avoid or reduce impacts to less than significant.

Response 4-d:

The DEIR adequately discloses the project's potentially significant impacts on biological resources, includes a complete and stable project description, provides mitigation measures to reduce biological impacts to less than significant levels, and complies with CEQA's requirements. Specific responses to the general comments are provided individually below in Responses 4-e through 4-n.

Comment 4-e:

<u>Existing Environmental Setting</u>

Compliance with CEQA is predicated on a complete and accurate description of the environmental setting that may be affected by the proposed Project. CDFW is concerned that the assessment of the existing environmental setting has not been adequately analyzed in the DEIR. CDFW is concerned that

without a complete and accurate description of the existing environmental setting, the DEIR may provide an incomplete analysis of Project-related environmental impacts.

The DEIR lacks a complete assessment of biological resources within the Project site and surrounding area specifically as it relates to special-status plants and natural communities. A complete and accurate assessment of the environmental setting and Project-related impacts to special status plants and natural communities is needed to both identify appropriate avoidance, minimization, and mitigation measures and demonstrate that these measures reduce Project impacts to less than significant.

Response 4-e:

The commenter's opinion is noted, but provides generalized statements that are not supported by specific facts. CEQA Guidelines Section 15124 provides that an EIR is required to include a general description of the project's technical, economic, and environmental characteristics. CEQA Guidelines Section 15124 further provides that the description of the project in an EIR need not provide detail beyond that needed for evaluation and review of the project's environmental impact. In this case, a detailed description of the site's location and setting is provided on page 3-1 through 3-4, and also in Section 4.3, Biological Resources, at page 4.3-2 through 4.3-3.

The project site has been seriously compromised due to the presence of intense human activities in the surrounding area. As described in the Biological Report (Appendix D in the DEIR), Indian Canyon Drive is a busy four-lane thoroughfare that makes up the entire eastern boundary of the site. A paved roadway, 19th Avenue, forms the southern boundary site, wind farms and residential units are within a half-mile of the project site's northern boundary. The site itself has been affected by off-road vehicles (see Figures 6 and 7 in Appendix D in the DEIR).

Additionally, the project biologist conducted general field surveys within the project site on November 18, 19, 20, 27, 28, 30, and December 2, 3, and 4, 2022. Night surveys were conducted on the evenings of November 18, 21, and 22. Survey dates were in the fall when perennial plant species and resident bird and mammal species could be found. Most ephemeral plant species, however, bloom in spring and would not be in evidence in November and December (DEIR page 4.3-8). The surveys were conducted to determine the likelihood of the occurrence of special-status species not covered under the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP). Animal surveys were conducted simultaneously with plant surveys. In addition, twenty live animal traps (which capture animals unharmed) for large and small mammals were set within the project site for twenty-four-hour periods on November 21 and 22, 2022. Conclusions derived from those surveys showed that no special-status plant species or natural communities occur or would occur on the project site. It was determined in the project-specific biological report that there is no evidence or records that any plant species considered sensitive occurs within the project site boundaries (DEIR pages 4.3-8 through 4.3-13). The biological report concluded that any species that might occur on the project site is either a covered species under the CVMSHCP or not listed (or a candidate for listing) by

either the state or federal governments (DEIR page 4.3-9 through 4.3-13). Responses to individual concerns are provided below.

Comment 4-f:

Mitigation Measures

CEQA requires that a DEIR include mitigation measures to avoid or reduce significant impacts. CDFW is concerned that the mitigation measures proposed in the DEIR are not adequate to avoid or reduce impacts to biological resources to below a level of significance. To support the City in ensuring that Project impacts to biological resources are reduced to less than significant, CDFW recommends adding mitigation measures for special-status plants, assessment of wildlife, artificial nighttime lighting, CDFW's Lake and Streambed Alteration Program, and salvage of sand-dependent Covered Species, as well as revising the mitigation measures for nesting birds and burrowing owl.

Response 4-f:

The commenter's opinion is noted but overbroad. Individual responses to these concerns are provided below.

Comment 4-g:

1) Assessment of Biological Resources

Page 12 of the Project's Biological Resources Assessment, dated December 20, 2022 (Biological Assessment), lists several rare annual plant species including, but not limited to, ribbed cryptantha (Johnstonella costata; California Rare Plan Rank (CRPR 4:3)), flat-seeded spurge (Chamaesyce platysperma; CRPR 1B.2), white-bracted spineflower (Chorizanthe xanti var. leucotheca; CRPR 1B.2), and slender cottonheads (Nemacaulis denudate gracilis; CRPR 2B.2), which "could conceivably occur on the project site." According to page 10 of the Project's Biological Assessment, "Field surveys for plant and animal species were initiated on November 18, 2022. Daytime field surveys were conducted on November 18, 19, 20, 27, 28, 30 December 2, 3, 4, 2022. Night surveys were conducted on November 18, 21, and 22, 2022." Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a Project is critical to the assessment of environmental impacts, that special emphasis should be placed on environmental resources that are rare or unique to the region, and that significant environmental impacts of the proposed Project are adequately investigated and discussed.

Because surveys for special-status plant species were conducted outside of the typical bloom period for the rare plant species listed above, it is uncertain if any individuals or significant populations of these species exist within the large 38-acre Project site. Surveys implemented using recommended protocols and conducted during the appropriate time(s) of the year is an important step in adequately disclosing potential impacts to special-status native plants and sensitive natural communities. CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and

Sensitive Natural Communities2 provides the following guidance on timing and number of visits: "Conduct botanical field surveys in the field at the times of year when plants will be both evident and identifiable. Usually this is during flowering or fruiting. Space botanical field survey visits throughout the growing season to accurately determine what plants exist in the Project area. This usually involves multiple visits to the Project area (e.g., in early, mid, and late-season) to capture the floristic diversity at a level necessary to determine if special status plants are present.3 The timing and number of visits necessary to determine if special status plants are present is determined by geographic location, the natural communities present, and the weather patterns of the year(s) in which botanical field surveys are conducted." The findings of appropriate botanical field surveys for special-status native plants and sensitive natural communities are important in informing appropriate avoidance, minimization, and mitigation measures and supporting the City in demonstrating that Project impacts are reduced to less than significant. CDFW recommends that the City include in a revised DEIR the results of a recent and thorough floristic-based assessment of special-status plants and natural communities performed by a qualified biologist and following CDFW's Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018 or most recent version). Based on findings from a recent floristic-based assessment, CDFW recommends that the DEIR is revised to include an analysis of direct, indirect, and cumulative impacts to biological resources and identification of appropriate avoidance, minimization, and mitigation measures.

CDFW also recommends that City add the following mitigation measure in bold to a revised DEIR:

Mitigation Measure BIO-[A]: Special-Status Plants

Prior to Project construction activities, a thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (see https://wildlife.ca.gov/Conservation/Plants) shall be performed by a qualified biologist. Should any state-listed plant species (excluding CVMSHCP Covered Species) be present in the Project area, the Project proponent shall obtain appropriate CESA authorization for those species prior to the start of Project activities. Should any species of native plants designated as rare, threatened, or endangered by state law (excluding CVMSHCP Covered Species) be present in the Project area, on-site or off-site habitat restoration (whichever is applicable) and/or enhancement and preservation should be evaluated and discussed in detail. Where habitat preservation is not available on-site, off-site land acquisition, management, and preservation should be evaluated.

Response 4-g:

As stated in the project-specific biological study (pages 12 through 17) and on pages 4.3-9 through 4.3-13 of the DEIR, no federally listed or candidate species for listing were found or are expected within the site boundaries because they were either not detected during the survey, or no records of their presence has been recorded at or near the project site. In addition, no state-listed or candidate

species were found or are expected within the site boundaries for the same reason. The California Natural Diversity Database shows no listed or candidate species in or within one mile of the project site. Further, the commenter provides no substantial evidence that any of the species they address do occur on the site. Though the surveys were conducted outside the ideal field survey period (spring), most plant species leave remains of their presence in the form of seeds, fruits, or other dried plant parts. For example, species of *Cryptantha* leave nutlets on the soil surface, and members of the genus *Astragalus* shed dried fruits. No living or dried remains of any listed or candidate species were found during the surveys.

The biological report mentions a handful of species the State and federal governments do not officially list. The State bestows a special status upon these plants because they seem rare, and their distributions are poorly known. Any one of the species could conceivably occur on-site, but in the project biologist's experience such a presence is extremely unlikely, nor does the commenter provide any evidence that if they were to occur on the site, their loss would result in the elimination of a substantial population necessary to the species' long term survival. In determining whether additional botanical surveys would be productive, one must consider that the site is in a desert environment where annual rainfall is highly variable, drought rates are increasing due to a changing climate, and the diversity of native species in the region is declining. Difficult-to-find ephemeral plant species, such as those mentioned in CDFW's letter, do not appear every year. Instead, they can be expected to germinate only in those years when precipitation is at or above the long-term normal. Based on precipitation records over the past twenty years, it could easily take ten years before conditions would be suitable for the appearance of any of the species, assuming they were present. CEQA does not require repeated surveys year after year in search of elusive species. Given this reality, along with the absence of any findings or records on or within one mile of the project site and the already degraded site environment, additional plant surveys are highly unlikely to yield any useful information. The DEIR correctly analyzed the potential for sensitive plants on the project site, and no change to the EIR is required.

Comment 4-h:

CDFW generally considers biological field assessments for wildlife to be valid for a one-year period. CDFW is also concerned that the field assessments conducted in November and December 2022 were not conducted at the appropriate time of year to detect all special-status wildlife species. In addition, species-specific protocol-level surveys were not performed for the detection of special-status species. CDFW is concerned about the potential for special-status species to occur on or near the Project site, including, but not limited to, desert tortoise (Gopherus agassizii; State Endangered; Federally Threatened; CVMSHCP Covered Species), desert kit fox (Vulpes macrotis; protected as a fur-bearing mammal under Title 14 of California Code of Regulations (Chap. 5, §460)), American badger (Taxidea taxus; Species of Special Concern), and Palm Springs pocket mouse (Perognathus longimembris bangsi; Species of Special Concern; CVMSHCP Covered Species). Special-status species may also move

into the Project site between the time of field surveys and start of Project construction activities. CDFW recommends that the DEIR is revised to include the findings of recent focused protocol-level surveys for special-status species that may occupy the Project site. CDFW recommends that the City add the following mitigation measure to a revised DEIR:

Mitigation Measure BIO-[B]: Assessment of Wildlife

Prior to Project construction activities, a complete and recent inventory of threatened, endangered, and other sensitive wildlife species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511), will be completed. Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.

Pursuant to the CEQA Guidelines, section 15097(f), CDFW has prepared a draft mitigation monitoring and reporting program (MMRP) in Attachment 1 for revised MM BIO-1 and MM BIO-2, as well as CDFW-recommended MM BIO-[A], MM BIO-[B], MM BIO-[C], MM BIO-[D], and MM BIO-[E].

Response 4-h:

First, it must be noted that desert tortoise and Palm Springs pocket mouse are covered species under the CVMSHCP, and would be covered by the payment of the development fee required by the City. The biological report, on pages 15 and 17, and DEIR, at pages 4.3-11 and 4.3-12 correctly identifies that during the intensive field surveys, no observations or evidence indicated that the desert tortoise, desert kit fox, or American badger were present on or near the site. Kit foxes are extirpated in the Coachella Valley, and badgers do not hibernate and are active year-round and, therefore, would be detected if present. Desert tortoises would be in hibernation when the field surveys were conducted. However, their burrows are conspicuous and would have easily been found if present. No tortoise burrows were found.

Additionally, no records exist of these species occurring within one mile of the project site. Despite the ability of these species to move long distances, it is highly unlikely they would have taken up residence on the site since the initial field surveys in November of 2022, nor does the commenter

provide evidence that such a migration has or could occur. The severe disturbances on and around the project area would dissuade these species from traversing the site, much less taking up residence.

The Palm Springs pocket mouse was not found during the biological surveys conducted on the project site. Additionally, it is a covered species under the Coachella Valley Multiple Species Habitat Conservation Plan. The Plan provides for habitat acquisition for this species through the mitigation fees the project proponent must pay. Therefore, no other requirements regarding this species are warranted.

As summarized above, no special status species are expected to occur on the site, due to lack of habitat, lack of presence within one mile or more, and lack of evidence of presence or sign on the project site during site surveys. Therefore, on the basis of substantial evidence, the DEIR correctly identified that the site does not have the potential to host these species, and no further mitigation is required.

Comment 4-i:

2) Nesting Birds

It is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.).

Permittees of the CVMSHCP must ensure that Covered Activities within their jurisdictions—both inside and outside Conservation Areas—do not take, possess, or needlessly destroy the nest or eggs of nesting birds. Per Section 3.5.6 of the California Department of Fish and Wildlife (CDFW) Natural Community Conservation Plan (NCCP) Permit #2835-2008-001-06 for the CVMSHCP, "take outside of Conservation Areas will be consistent with sections 3503 and 3503.5 of the Fish and Game Code." Per Section 13.2 of the CVMSHCP Implementing Agreement, County and Cities' obligations include, but are not limited to, taking "all necessary and appropriate actions, following applicable land use permit enforcement procedures and practices, to enforce the terms of project approvals for public and private projects, including compliance with the MSHCP, the Permits and this Agreement."

Page 5-5 of the DEIR indicates that "nesting birds and burrowing owls have the potential to occur given the site conditions and vegetation found on the site." The DEIR includes Mitigation Measure

BIO-1 for nesting birds, which indicates that "for any grading or other site disturbance or tree or vegetation removal occurring during the nesting season between February 1st and August 31st, a qualified biologist shall conduct at least one nesting bird survey". CDFW considers the Mitigation Measure BIO-1 to be insufficient in scope and timing to reduce impacts to nesting birds to a level less than significant. CDFW is concerned about impacts to nesting birds including loss of nesting/foraging habitat and potential take from ground-disturbing activities and construction. Conducting work outside the peak nesting season is an important avoidance and minimization measure. CDFW also recommends the completion of nesting bird surveys regardless of the time of year to ensure that impacts to nesting birds are avoided. The timing of the nesting season varies greatly depending on several factors, such as bird species, weather conditions in any given year, and long-term climate changes (e.g., drought, warming, etc.). In response to warming, birds have been reported to breed earlier, thereby reducing temperatures that nests are exposed to during breeding and tracking shifts in availability of resources (Socolar et al., 20174). CDFW staff have observed that climate change conditions may result in nesting bird season occurring earlier and later in the year than historical nesting season dates. CDFW recommends that disturbance of occupied nests of migratory birds and raptors within the Project site and surrounding area be avoided any time birds are nesting on-site. CDFW therefore recommends the completion of nesting bird surveys regardless of the time of year to ensure compliance with all applicable laws pertaining to nesting and migratory birds.

Although the DEIR includes Mitigation Measure BIO-2 for nesting birds, CDFW considers the measure insufficient to scope and timing to reduce impacts to a level less than significant. CDFW recommends that the City revise Mitigation Measure BIO-2 with the following additions in **bold** and removals in ~~strikethrough~~:

Mitigation Measure BIO-2: Nesting Birds

Regardless of the time of year, nesting bird surveys shall be performed by a qualified avian biologist no more than 3 days prior to vegetation removal or ground-disturbing activities. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Construction activities may not occur inside the established buffers, which shall remain on-site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit

signs of disturbance. ~~For any grading or other site disturbance or tree or vegetation removal occurring during the nesting season between February 1st and August 31st, a qualified biologist shall conduct at least one nesting bird survey, and more if deemed necessary by the consulting biologist, 24 hours prior to initiation of project-related ground disturbing activities. If nesting birds are present, no work shall be permitted near the nest until the young birds have fledged. While there is no established protocol for nest avoidance, when consulted, the CDFW generally recommends avoidance buffers of about 500 feet for birds-of-prey, and 100 – 300 feet for songbirds.~~

Response 4-i:

As described in the DEIR, page 4.3-14, the property contains shrubs and trees which could host nesting birds, including birds covered by the MBTA. The commenter implies that the nesting season cited in the DEIR may not be accurate, but does not provide an alternative, other than nesting surveys at any time of year. The City's responsibility, as cited in the DEIR, is to comply with the MBTA, which is a nesting-specific requirement, the provisions included in mitigation measure BIO-2 address this requirement, and the DEIR assures that MBTA covered species will be protected during their nesting season. Further, since mitigation measure BIO-1 requires pre-construction surveys for burrowing owl, regardless of time of year, the project biologist will be on-site and would observe other nesting birds during any time of year, should they occur. Therefore, BIO-2 is sufficient to assure that nesting birds will not be impacted by the proposed project, and no change to the DEIR is required.

Comment 4-j:

3) Burrowing Owl

Burrowing owls are a California Species of Special Concern. Take of individual burrowing owls and their nests is defined by Fish and Game Code section 86, and prohibited by sections 3503, 3503.5, and 3513. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.). Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill."

Permittees of the CVMSHCP must ensure that Covered Activities within their jurisdictions—both inside and outside Conservation Areas—do not result in the take of the burrowing owl individuals, nests, or eggs. Per Section 3.5.6 of the California Department of Fish and Wildlife (CDFW) Natural Community Conservation Plan (NCCP) Permit #2835-2008-001-06 for the CVMSHCP, "take outside of Conservation Areas will be consistent with sections 3503 and 3503.5 of the Fish and Game Code." Adding further clarification, Section 3.5.6 of CDFW's NCCP Permit indicates that "following all laws applicable to migratory birds (discussed below), the pairs or individuals will not be Taken, just the land around and including the burrows", and "the HCP/NCCP does not authorize Take of nests and eggs as prohibited by Fish and Game Code sections 3503 and 3503.5 and therefore avoidance

measures will have to be undertaken for all projects which have breeding burrowing owls present." An activity that results in the take of burrowing owl individuals, nests, or eggs would be unlawful and would not be a Covered Activity under the CVMSHCP. Per Section 13.2 of the CVMSHCP Implementing Agreement, County and Cities' obligations include, but are not limited to, taking "all necessary and appropriate actions, following applicable land use permit enforcement procedures and practices, to enforce the terms of project approvals for public and private projects, including compliance with the MSHCP, the Permits and this Agreement." The City has an obligation under the CVMSHCP to ensure the Project does not result in the take of burrowing owl individuals, nests, and eggs.

Page 4.3-12 of the DEIR states that "a burrowing owl was observed five times during the field surveys and one active burrow with one owl was found within the site boundaries. The entire site is considered suitable burrowing owl habitat with friable soil and rodent burrows that could be expanded in size by the owls." The Project site contains suitable habitat for burrowing owl and burrowing owls have been identified onsite.

Although the DEIR includes Mitigation Measure BIO-1 for burrowing owl, CDFW considers the measure to be insufficient in scope and timing to reduce impacts to a level less than significant. CDFW recommends that the City revise Mitigation Measure BIO-1 with the following additions in **bold** and removals in ~~strikethrough~~:

Mitigation Measure BIO-1: Burrowing Owl Surveys

Suitable burrowing owl habitat has been confirmed on the site; therefore, focused burrowing owl surveys shall be conducted by a qualified biologist according to the Staff Report on Burrowing Owl Mitigation prior to vegetation removal or ground-disturbing activities. If burrowing owls are detected during the focused surveys, the qualified biologist and Project proponent shall begin coordination with CDFW and USFWS immediately, and shall prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval prior to commencing Project activities. The Burrowing Owl Plan shall describe proposed avoidance, minimization, mitigation, and monitoring actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures. If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe minimization and relocation actions that will be implemented. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take. If impacts to occupied burrows cannot be avoided, information shall be provided regarding adjacent or nearby suitable habitat available to owls along with proposed relocation actions. The Project proponent shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval.

Preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the Staff Report on Burrowing Owl Mitigation (2012 or most recent version). Preconstruction surveys should be performed by a qualified biologist following the recommendations and guidelines provided in the Staff Report on Burrowing Owl Mitigation. If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and prepare a Burrowing Owl Plan that shall be submitted to CDFW and USFWS for review and approval prior to commencing Project activities. ~~Per the 2012, California Department of Fish and Wildlife (CDFW) Staff Report on Burrowing Owl Mitigation, a burrowing owl clearance survey shall be performed by a qualified biologist 14 to 30 days prior to any site disturbance (grubbing, grading, and construction). The pre-construction survey is required to use accepted protocol (CDFW Staff Report). A final clearance survey must be conducted 24 hours prior to ground disturbance. If owls are found to be present during the breeding season (February 15 through September 15), a qualified biologist will prepare a plan and submit it to CDFW for review and approval prior to establishing a buffer area (a no disturbance zone) around the active burrow. When it is determined that all young owls have permanently left the burrow (fledged), the buffer area may be abandoned, and the adult owls captured and relocated, if approved under the plan. If the presence of any burrowing owl is confirmed in preconstruction surveys, regardless of season, a qualified biologist shall prepare a plan for avoidance or relocation and submit it to the CDFW for review and approval. No construction activity shall be permitted until the measures contained in the approved plan have been completed.~~

Response 4-j:

At the time of its writing, the DEIR correctly states that the burrowing owl is considered a special status species (page 4.3-11 of the DEIR) and is protected by the MBTA (page 4.3-15 of DEIR). As stated on page 4.3-12 of the DEIR, burrowing owls were observed within the project boundaries and one active burrow was found. There is therefore no need for focused surveys for the species as stated in the first part of the suggested mitigation measure, since presence has been confirmed and is assumed. As correctly stated in BIO-1, on page 4.3-12 and 4.3-16 of the DEIR, pre-construction surveys are required, and if the owl remains on site, or others are present, consistent with the Staff Report on Burrowing Owl, the commenter's protocol document for treatment of the species, a plan shall be prepared and submitted "to CDFW for review and approval" prior to any disturbance on the property. The mitigation measure also includes performance standards, including assuring that any young have fledged, establishing buffers biological monitoring and other means which would be developed in the plan, to assure protection of the species when approved by CDFW. Mitigation measure BIO-1, therefore, assures that the project's potential impacts to burrowing owl will be mitigated to less than significant levels, and no change to the DEIR is required. After the close of the comment period on the DEIR, the California Fish and Game Commission announced its intention to protect burrowing owl under CESA. The Commission is currently conducting analysis to determine whether the species

should be listed. That investigation is expected to take about a year. In the interim, State law requires that the species be treated as though it were listed. Therefore, based on the requirements of CESA, should the project proceed to construction at any time, the applicant will be required to secure an Incidental Take Permit from CDFW prior to any disturbance of the site at any time of year if the species is present on the site. This requirement of law supersedes any mitigation measure. As a requirement of law, it is not necessary under CEQA to include it as mitigation, and the DEIR does not require amendment. Furthermore, as both mitigation measure BIO-1 and the Commission's action result in the protection of any burrowing owl on the site, this action does not represent substantial new information which would require recirculation.

Comment 4-k:

4) Artificial Nighttime Lighting

The proposed Project will result in new sources of artificial nighttime lighting, including lighting for safety and security (page 4.1-27 of the DEIR). The Project is located adjacent to open-space areas to the north and west of the Project site—areas that provide suitable nesting, roosting, foraging, and refugia habitat for birds, migratory birds that fly at night, bats, and other nocturnal and crepuscular wildlife. The Project's proposed artificial nighttime lighting has the potential to significantly and adversely affect wildlife in the open-space areas adjacent to the Project site. Artificial lighting alters ecological processes including, but not limited to, the temporal niches of species; the repair and recovery of physiological function; the measurement of time through interference with the detection of circadian and lunar and seasonal cycles; the detection of resources and natural enemies; and navigation.5 Many species use photoperiod cues for communication (e.g., bird song6), determining when to begin foraging,7behavioral thermoregulation,8 and migration.9 Phototaxis, a phenomenon that results in attraction and movement towards light, can disorient, entrap, and temporarily blind wildlife species that experience it.

Page 4.1-27 of the DEIR indicates, "For security purposes, the project will provide nighttime lighting to safely illuminate the parking areas, entrances, signs, and walkways. According to the photometric plan, project light fixtures will consist of downward-oriented post-mounted and wall-mounted fixtures located throughout the project. The wall-mounted fixtures will provide lighting for building entryways, sidewalks, and general exterior lighting. The post-mounted fixtures are proposed to be located in the parking lot areas and along the paved driveways. The downward-oriented fixtures are designed to not only provide light on the project site, but also to reduce the amount of light emitted towards adjacent properties." While these plans for shielding artificial lighting support the Project in limiting lighting impacts to biological resources within areas surrounding the Project site, CDFW considers these measures insufficient in scope and timing to reduce impacts to a level less than significant. To support the City in avoiding or reducing impacts of artificial nighttime lighting on biological resources to less than significant, CDFW recommends the City add the following mitigation measure to a revised DEIR:

Mitigation Measure BIO-[C]: Artificial Nighttime Lighting

Throughout construction and the lifetime operations of the Project, the City of Palm Springs and Project proponent shall eliminate all nonessential lighting throughout the Project area and avoid or limit the use of artificial light at night during the hours of dawn and dusk when many wildlife species are most active. The City of Palm Springs and Project proponent shall ensure that all lighting for the Project is fully shielded, cast downward and directed away from surrounding open-space and agricultural areas, reduced in intensity to the greatest extent possible, and does not result in lighting trespass including glare into surrounding areas or upward into the night sky (see the International Dark-Sky Association standards at http://darksky.org/). The City of Palm Springs and Project proponent shall ensure use of LED lighting with a correlated color temperature of 3,000 Kelvins or less, proper disposal of hazardous waste, and recycling of lighting that contains toxic compounds with a qualified recycler.

Response 4-k:

The commenter's opinion about artificial lighting is noted. It is also noted that the site is not, contrary to the commenter's statement, adjacent to open space. The site is adjacent to vacant, developable lands within the City, and also adjacent to two existing major roadways which currently impact the site with traffic lighting. The DEIR, Section 4.1, *Aesthetics*, addresses lighting for both the construction and operation of the project. In order to ensure that lighting would not create a significant impact, the project would be required to follow all City standards and codes.

As described on page 4.1-28 of the DEIR, in order to determine the impact of the proposed light fixtures at the project site, a project-specific photometric plan was generated by Commercial Lighting Industries (Appendix B of the DEIR). Per the photometric plan, the project will emit a maximum of 3.8 foot-candles at the eastern building frontage along Indian Canyon Drive. Per the photometric plan, the light fixtures along the northern property boundary will emit a maximum of 2.1 foot-candles. Along Indian Canyon Drive and 19th Avenue, the project will contribute a maximum of 2.9 foot-candles and 2.2 foot-candles, respectively, per the photometric plan. Finally, light fixtures situated along the western project boundary will emit a maximum of 2.8 foot-candles. The maximum foot-candles emitted from the light fixtures occur in areas closest to the fixtures. The foot-candles decrease as the distance from the fixed light source increases. At the property boundary, the foot-candles are decreased to less than 1 foot-candle.

The project would also be required to follow the City of Palm Springs Municipal Code *Section 93.21.00, Outdoor Lighting Standards.* The regulations in this section are intended to maintain ambient lighting levels as low as possible in order to maintain dark skies. Due to the requirements of City codes and standards, the Draft EIR correctly concluded that impacts associated with light fixtures are reduced to less than significant levels.

The DEIR determined that there would be less than significant impacts regarding light produced by the project, and since lighting would be shielded and cast downward so as to reduce impacts to adjacent properties, light level will not impact off-site species. The DEIR is correctly written and no additional mitigation measure is required.

Comment 4-l:

5) Lake and Streambed Alteration Program

Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following: divert or obstruct the natural flow of any river, stream, or lake; change the bed, channel, or bank of any river, stream, or lake; use material from any river, stream, or lake; or deposit or dispose of material into any river, stream, or lake. Note that "any river, stream, or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow.

Page 4.3-3 of the DEIR indicates that “no blue-line stream corridors (streams or dry washes) occur in the project area.” Based on review of historical aerial imagery using Google Earth Pro, ephemeral streams traverse the western half of the proposed Project area. Evidence of erosion and scour, slopes and depressions, and stream-aligned vegetation are visible and evident in historical imagery particularly on the western half of the Project site. To ensure that impacts to streams and associated fish and wildlife are reduced to a level less than significant, CDFW recommends that the City add the following mitigation measure to a revised DEIR:

Mitigation Measure BIO-[D]: CDFW Lake and Streambed Alteration Program

Prior to construction, the Project Sponsor shall obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, or the Project Sponsor shall obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.

Response 4-l:

It appears that the commenter may have incorrectly interpreted the existing meandering dirt paths and roads on the property as evidence of natural drainage patterns. Section 4.3, *Biological Resources,* of the DEIR describes the presence of informal north-south-trending dirt paths traversing west, center and east portions of the project site (page 4.3-2). The north-south orientation of these paths, combined with their meandering pattern, may have been incorrectly interpreted as evidence of drainage patterns, since they were identified through the use of Google Earth Pro imagery, which does not provide detailed views in close proximity to the site. The project’s 38 acres would be

expected to experience sheet flow and associated erosion in response to rain events, which results in disturbances to the natural crust formed on local sands. When sand is disturbed in this manner, both wind and water will cause the sands to erode, and may be the condition the commenter is seeing. This wind-driven process may increase the appearance of erosion or depressions. The project biologist did not identify any bed or bank on the site, and found no streams or springs (Appendix D). As a result, neither mitigation nor permitting by CDFW is required, and no change to the DEIR is necessary.

Comment 4-m:

6) Coachella Valley Multiple Species Habitat Conservation Plan

Salvage of Sand-Dependent Covered Species

Section 6.6.1 of the CVMSHCP (Obligations of Local Permittees) states that within and outside Conservation Areas "on parcels approved for Development, the Permittees shall encourage the opportunity to salvage Covered sand-dependent species in accordance with the Implementation Manual." Page 17 of the Project's Biological Assessment indicates that "one mammalian species that was detected (burrows) and contained within the California Department of Fish & Game Special Animals List is the Palm Springs ground squirrel (Spermophilus tereticaudus chlorus)." To be consistent with the CVMSHCP, CDFW recommends that the City include in a revised DEIR the following mitigation measure:

Mitigation Measure BIO-[E]: Salvage of Sand-Dependent Covered Species

Prior to vegetation removal or ground-disturbing activities, the City of Palm Springs will collaborate with the Coachella Valley Conservation Commission to plan and implement a salvage of sand-dependent Covered Species within the Project site.

Response 4-m:

The collection of sand-dependent species is not required under the CVMSHP, nor is it recommended by the project biologist. As described in the DEIR (pages 4.3-2 and 4.3-9 and 4.9-10), the site is impacted and has low habitat value for native species. The DEIR is therefore correctly written, and no additional mitigation is required.

Habitat acquisition for the Palm Springs ground squirrel is covered in the CVMSHCP. The project's payment of the LDMF mitigates this impact. With the payment of the LDMF, the project is consistent with the CVMSHCP.

Comment 4-n:

7) Landscaping

Page 3-7 of the DEIR indicates that the "project landscape will include drought-tolerant trees (24-inch boxes), 12-foot palms, and ground covers (15-gallon) typically found in the region, such as willow

acacia, desert museum palo verde, thornless honey mesquite, and date palm. Shrubs and accent plantings proposed for the project include outback sunrise emu bush, new gold lantana, Lindheimer's muhly, firecracker plant, various agave, cactus, yucca, and aloe. Fractured rock, and decomposed granite will provide ground cover. Exterior irrigation will use drip or micro-spray applicators." CDFW recommends incorporation of water-wise concepts in any Project landscape design plans. In particular, CDFW recommends xeriscaping with locally native California species and installing water-efficient and targeted irrigation systems (such as drip irrigation). Native plants support butterflies, birds, reptiles, amphibians, small mammals, bees, and other pollinators that evolved with those plants. More information on native plants suitable for the Project location and nearby nurseries is available at Calscape: https://calscape.org/. Local water agencies/cities and resource conservation cities in your area may be able to provide information on plant nurseries that carry locally native species, and some facilities display drought-tolerant locally native species demonstration gardens. Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website: https://saveourwater.com/. CDFW also recommends that the DEIR include recommendations regarding landscaping from Section 4.0 of the CVMSHCP "Table 4-112: Coachella Valley Native Plants Recommended for Landscaping" (pp. 4-180 to 4-182; https://cvmshcp.org/plan-documents/).

Response 4-n:

As described in the DEIR, page 4.1-24, the proposed landscape includes low water use and low maintenance plantings. The project's Landscape Plan (shown on page 3-10 of the DEIR) lists multiple drought tolerant, flowering plants that will support local pollinator species. Additionally, as stated in Section 4.15, *Utilities,* in the DEIR, the project would abide by the Mission Springs Water District Efficient Landscaping Guidelines (Landscape Guidelines). The intent of the Landscape Guidelines is to promote water conservation through climate appropriate plant material and efficient irrigation practices and comply with the State of California's Water Conservation in Landscaping Act. Additionally, the project would be required to follow the Uniform Building Code (Chapter 18.52) which establishes landscape regulations to enhance the appearance of the community, establish buffers between abutting land uses and public rights-of-way, reduce heat and glare, control soil erosion, provide for the conservation and safeguard of water resources and ensure compliance with all state-mandated water conservation regulations through the efficient use of water and appropriate use of plant materials, and ensure the ongoing maintenance of landscape areas. The DEIR clearly demonstrates that water efficient landscaping will be utilized, and no further discussion is necessary.

Comment 4-o:

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental

environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

Response 4-o:

The City thanks the Department for this information and will continue to encourage project biologists to comply with reporting requirements under PRC 21003(e).

Comment 4-p:

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

Response 4-p:

The project applicant shall pay the environmental document filing fee upon filing the Notice of Determination.

Comment 4-q:

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts to biological resources. CDFW concludes that the DEIR does not adequately identify or mitigate the Project's significant, or potentially significant, impacts to biological resources. CDFW also concludes that the DEIR lacks sufficient information for a meaningful review of impacts to biological resources, including a thorough floristic-based assessment of special-status plants and natural communities. The CEQA Guidelines indicate that recirculation is required when insufficient information in the DEIR precludes a meaningful review (§ 15088.5). CDFW recommends that a revised DEIR, including a complete assessment of biological resources (floristic-based assessment of special-status plants and natural communities) be recirculated for public comment. CDFW also recommends that revised and additional mitigation measures and analysis as described in this letter be added to a revised DEIR.

CDFW personnel are available for consultation regarding biological resources and strategies to avoid and minimize impacts. Questions regarding this letter or further coordination should be directed to Jacob Skaggs, Senior Environmental Scientist Specialist, at jacob.skaggs@wildlife.ca.gov.

Response 4-q:

The City thanks CDFW for their participation in the CEQA process. As described in Responses 4-a through 4-n above, the DEIR correctly assesses impacts to biological resources, and incorporates mitigation measures which will assure that these impacts will be reduced to less than significant levels

Public Comments – Non-Governmental Agencies

Comment Letter No. 5: CARE CA

Name: Sheila Sannadan
Date: May 15, 2024
Affiliation: CARE CA
Address: 601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Comment 5-a:

We are writing on behalf of Californians Allied for a Responsible Economy ("CARE CA") to request mailed notice of the availability of any environmental review document, prepared pursuant to the California Environmental Quality Act, related to the Palm Springs Fulfillment Center Project (SCH No. 2023080091; Case No. 34361) ("Project"), proposed by PS Canyon Development LLC ("Applicant"), as well as a copy of the environmental review document when it is made available for public review.

The Project proposes to construct a two-story, 739,360-square-foot (SF) high cube warehouse with offices and associated infrastructures on approximately 38 acres in the City of Palm Springs, Riverside County, California. The proposed warehouse contains a footprint of 739,360 SF allotted to warehouse uses and 12,000 SF for offices on the second floor. The Project site is located on the Northwest Corner of Indian Canyon Drive and 19th Avenue and comprises of Assessor's Parcel Number 666-320-018.

Response 5-a:

The City will notify CARE CA of any environmental review document, per their request. Since this comment does not identify any specific concerns, no additional response is required.

Comment 5-b:

We also request mailed notice of any and all hearings and/or actions related to the Project. These requests are made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108, 21152, and 21167(f) and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

Please send the above requested items by email and U.S. Mail to our South San Francisco Office as follows:

U.S. Mail
Sheila M. Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email
ssannadan@adamsbroadwell.com

If you have any questions, please call me at (650) 589-1660 or email me at ssannadan@adamsbroadwell.com. Thank you for your assistance with this matter.

Response 5-b:

The City will notify CARE CA of any and all hearings and/or actions related to the project, per their request. Since this comment does not identify any specific concerns, no additional response is required.

Comment Letter No. 6: Golden State Environmental Justice Alliance

Name: Gary Ho
Date: June 11, 2024
Affiliation: Golden State Environmental Justice Alliance
Address: 707 Wilshire Boulevard, Suite 4880
Los Angeles, CA 90017

Comment 6-a:

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Palm Springs Fulfillment Center Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

Response 6-a:

The City will notify the Golden State Environmental Justice Alliance of environmental documents, public notices, public hearings, and notice of determination related to the project, per their request. Since this comment does not identify any specific concerns, no additional response is required.

Comment 6-b:

1.0 Summary

The project proposes the construction and operation of a new cross-dock fulfillment center warehouse building totaling 739,360 square feet. The building includes 727,360 square feet of ground floor warehouse area and 12,000 square feet of 2nd floor office space. The building proposes 110 truck/trailer loading dock doors distributed on the north and south sides of the building. The site includes 430 passenger car parking spaces and 306 truck/trailer parking spaces, which are designed in a tandem configuration within the truck/trailer loading dock courts on both the north and south sides of the building.

Response 6-b:

This comment summarizes the project. Since this comment does not identify any specific concerns, no additional response is required.

Comment 6-c:

3.0 Project Description

The EIR does not include a floor plan, detailed building elevations, or a detailed grading plan. The basic components of a Planning Application include a detailed site plan, floor plan, conceptual grading plan, written narrative, and detailed elevations. Additionally, an application for a Major Development Permit requires submittal of a "site plan; preliminary grading plan; floor plans; building elevations; roof plan; landscape plan; material and color selections; lighting plan; signage plan; and other plans or exhibits required by the Director (Section 94.04.01(B) and 94.04.01(C)(1)(b) of the Palm Springs Municipal Code)." The grading plan provided in Exhibit 3-6 has been edited for public review. For example, it does not include a section drawings or the earthwork quantity notes. Providing the complete grading plan and earthwork quantity notes is vital as the EIR states that, "the AQIA analysis assumed balanced earthwork conditions for the grading stage," but there is no method for the public to verify this statement. Verification of the import/export materials is vital as it directly informs the quantity of necessary truck hauling trips due to soil import/export during the grading phase of construction. There are also no building elevations provided to verify building height, paint colors, or materials. A revised EIR must be prepared to include wholly accurate and adequate detailed project site plan, floor plan, grading plan, elevations, and project narrative for public review.

Response 6-c:

The commenter's opinion is noted. However, the DEIR includes a detailed project description (page 3-5 through 3-16) which includes building height, circulation plans, a grading plan (Exhibit 3-6) and the location of all project features and components. The commenter's opinion regarding the need for import or export is noted, but is not supported by substantial evidence. The AQIA correctly reports that the grading will balance, and the grading plan has not been edited. As regards building elevations and colors, the DEIR includes elevations and materials in Exhibits 4.1-11 and 4.1-12.

The preliminary grading design evaluated the proposed project improvements against the site conditions and soil factors to identify the potential earthwork activities and to conclude that the proposed cut and fill conditions will be balanced on-site. Preliminary engineering factors supporting this conclusion include subsidence, shrinkage, areas of earthwork cut, areas of earthwork fill, and areas of over excavation within the project extent of approximately 40 acres. The preliminary engineering finding of a balanced earthwork condition was utilized in the AQIA.

Detailed section drawings or final earthwork calculations are not required for this project because the site is relatively flat. Providing section drawings or earthwork quantity notes is a subjective choice made by the Lead Agency. The City did not find it necessary for a flat site, such as the project's.

Comment 6-d:

4.2 Air Quality, 4.5 Energy Resources, and 4.7 Greenhouse Gas Emissions

The EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. According to CalEnviroScreen 4.01, CalEPAs screening tool that ranks each census tract in the state for pollution and socioeconomic

vulnerability, the proposed projects census tract (6065044522) is highly burdened by pollution. The surrounding community bears the impact of multiple sources of pollution and is more polluted than average on several pollution indicator measured by CalEnviroScreen. For example, the project census tract ranks in the 91st percentile for ozone burden and 60th percentile for traffic burden. These environmental factors are attributed to heavy truck activity in the area. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure. Exhaust fumes contain toxic chemicals that can damage DNA, cause cancer, make breathing difficult, and cause low weight and premature births.

The census tract also ranks in the 55th percentile for solid waste facility impacts. Solid waste facilities can expose people to hazardous chemicals, release toxic gases into the air (even after these facilities are closed), and chemicals can leach into soil around the facility and pose a health risk to nearby populations.

Further, the projects census tract is a diverse community including 45% Hispanic, 3% African-American, and 1% Asian-American residents, whom are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 74% of the census tract over age 25 has not attained a high school diploma, which is an indication that they may lack health insurance or access to medical care. The community also has a high rate of poverty, meaning 95% of the households in the census tract have a total income before taxes that is less than the poverty level. Income can affect health when people cannot afford healthy living and working conditions, nutritious food and necessary medical care5. Poor communities are often located in areas with high levels of pollution6. Poverty can cause stress that weakens the immune system and causes people to become ill from pollution. Living in poverty is also an indication that residents may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 59th percentile for incidence of cardiovascular disease and 51st percentile for incidence of asthma. The community also has a high rate of linguistic isolation, meaning 49% of the census tract speaks little to no English and faces further inequities as a result.

The State of California lists three approved compliance modeling softwares8 for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The CalEEMod modeling does not comply with the 2022 Building Energy Efficiency Standards and under-reports the projects significant Energy impacts and fuel consumption to the public and decision makers. Since the EIR did not accurately or adequately model the energy impacts in compliance with Title 24, it cannot conclude the project will generate less than significant impacts and a finding of significance must be made. A revised EIR with modeling using one of the approved software types must be prepared and circulated for public review in order to adequately analyze the projects significant environmental impacts. This is vital as the EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not an approved software.

Response 6-d:

The commenter's opinion regarding environmental justice is noted. However, CEQA does not require the analysis of pollutant concentrations beyond those included in air quality analysis. A project-specific Air Quality Impact Analysis (AQIA) was prepared for the project to evaluate the potential air quality associated with construction and operation of the project. A project-specific Health Risk Assessment (HRA) was also prepared to evaluate the potential health risk impacts to sensitive receptors (residents) and adjacent workers from potential exposure of Toxic Air Contaminants (TACs), including diesel particulate matter (DPM), associated with the project (see Section 4.2, *Air Quality*, and Appendix C.1 and C.2 in the DEIR). Both the AQIA and HRA were conducted by the technical experts at Urban Crossroads, Inc.

The AQIA relied on the most current version of the California Emissions Estimator Model™ (CalEEMod) Version 2022, which serves as an adopted platform established by the South Coast Air Quality Management District, the agency with expertise and jurisdiction over air emissions in the City and region, to quantify construction emissions and operational emissions from land development projects. The software is designed to calculate criteria pollutants and greenhouse gas emissions using widely accepted methodologies from project-specific and accepted default data inputs. Sources of these methodologies and default data include, but are not limited to, the United States Environmental Protection Agency (USEPA) AP-42 emission factors, CARB vehicle emission models, studies commissioned by California agencies such as the California Energy Commission (CEC) and CalRecycle. The AQIA also utilized the EPA-approved summer, winter, and annual Emissions Factors Model (EMFAC)2021 in order to derive vehicle emissions associated with project operational activities, which vary by season. EMFAC2021 is an approved mathematical model that was developed to calculate emission rates, fuel consumption, VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources.

The HRA was prepared in accordance with the Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis and comprises all relevant and appropriate procedures presented by the United States Environmental Protection Agency (U.S. EPA), California EPA and SCAQMD. Cancer risk is expressed in terms of expected incremental incidence per million population. The SCAQMD has established an incidence rate of ten (10) persons per million as the maximum acceptable incremental cancer risk due to TAC exposure from a project such as the proposed project. This threshold serves to determine whether or not a given project has a potentially significant development-specific and cumulatively considerable impact.

The emissions calculations for the construction HRA component are based on an assumed mix of construction equipment and hauling activity. Construction related DPM emissions are expected to occur primarily as a function of the operation of heavy-duty construction equipment for 339 total working days of construction activity.

Operational on-site and off-site truck activity DPM emissions were calculated using emission factors for particulate matter less than 10µm in diameter (PM10) generated with the 2021 version of the EMFAC model developed by the CARB. EMFAC 2021 is commonly used by the ARB to project changes in future emissions from onroad mobile sources. The vehicle DPM exhaust emissions were calculated for idling and running exhaust emissions. The model incorporates regional motor vehicle data, information and estimates regarding the distribution of vehicle miles traveled (VMT) by speed, and number of starts per day. The analysis accounted for idling (on-site loading/unloading and truck gate), on-site vehicle movement (driving and maneuvering) within the development, and off-site vehicle movement. The model assumes that Light-Heavy-Duty Trucks would comprise 59.8% diesel, Medium-Heavy-Duty Trucks would be 91.6% diesel, and Heavy-Heavy-Duty Trucks would be 95.1% diesel.

The DEIR correctly analyzed air emissions, includes localized emissions and health risks, and disclosed impacts in a thorough analysis containing on pages 4.2-24 through 4.2-34.

Comment 6-e:

4.11 Population and Housing

The EIR does not provide a quantified analysis of the construction workforce generated by the proposed project. A revised EIR must be prepared that includes an analysis of the construction jobs generated by the project. Additionally, a revised EIR must also provide demographic and geographic information on the location of qualified workers (for both project operations and construction) to fill these positions in order to provide an accurate environmental analysis.

The EIR utilizes uncertain language and does not provide any meaningful analysis or supporting evidence to substantiate the conclusion that there will be no significant impacts to population and housing. For example, the EIR states that "a high percentage of City residents and neighboring cities' residents commute outside of the City they reside in for work. For both Desert Hot Springs and Cathedral City, 89% of working residents commute for work." Since the EIR relies upon the entire workforce of the Coachella Valley region, the project would contribute to the increasing percentages of area residents that commute outside of their residence City for work. The EIR has not provided any analysis or meaningful evidence that the unemployed workforce in Palm Springs is qualified for or interested in work in the industrial sector. A revised EIR must be provided to include this information for analysis in order to provide an adequate and accurate environmental analysis.

SCAGs Connect SoCal Demographics and Growth Forecast notes that the City will add 10,600 jobs between 2016 - 2045. Based on the EIR's calculation of 718 jobs, the project represents 6.7% of the City's job growth over 29 years. A single project accounting for this amount of the projected employment growth over 29 years represents a significant amount of growth. The EIR has not provided a cumulative analysis discussion of projects approved since 2016 and projects in the pipeline" to determine if the project will exceed SCAG s employment growth forecast or the City's

General Plan growth projections. A revised EIR must be provided to include this information for analysis in order to provide an adequate and accurate environmental analysis.

Response 6-e:

The commenter's opinion is noted, but it is unclear how they believe that the composition, location or number of employees would impact the analysis in the EIR. The project uses standard assumptions of construction jobs generated by the project. Typically, construction workers, whether they are from the City or commute from outside the City, will only be temporary, since construction will not likely occur for more than a year. The DEIR also includes analysis of projected growth from the region's expert in growth planning, SCAG, to identify growth potential.

Moreover, the project is located in an area designated for industrial uses. The project does not propose a change in use from the current designation. The project site has been included in the cumulative growth analysis provided in the Palm Springs General Plan and SCAG's growth forecasts, which are based on land use designations established by the City. This analysis is provided in Section 4.11, *Population and Housing,* on pages 4.11-6 through 4.11-8 and Chapter 5 on pages 5-6 to 5-9 in the DEIR. The DEIR adequately analyzes project employment and its impacts on growth in the City and region.

Comment 6-f:

4.13 Transportation

The EIR and Appendix L: Traffic Study incorrectly model the project's average daily trip generation. Table 4.13-7 Trip Generation Summary – Actual Vehicles within Appendix L states that the source for modeling is the "TUMF High-Cube Warehouse Trip Generation Study. Prepared by WSP, January 2019. AM/PM peak hour (in/out) splits are estimated from ITE (High-Cube Transload & Short-Term Storage Warehouse)." The proposed project is clearly described as a Fulfillment Center and must be modeled as such. The EIR must be revised to accurately model the proposed project's ADT generation in accordance with the Project Description by fully modeling and analyzing the project as a Fulfillment Center (ITE Land Use Code 155).

Response 6-f:

The purpose of the WSP 2019 study was to gather enough data to develop reliable trip generation rates for warehousing facilities for use in traffic impact studies in the Inland Empire. The Traffic Analysis (TA) used traffic rates from the High-Cube Warehouse Study (January 29, 2019) which estimates 2.89 trips per 1000 square feet of gross floor area. ITE Code 155 High-Cube fulfillment center warehouse estimates 1.37 trips per 1,000 square feet of gross floor area. The methodology in the 2019 study provides a more conservative analysis which means that a higher trip generation is considered compared to ITE Code 155 (as well as any other warehouses identified by ITE). The DEIR therefore contains a conservative traffic analysis, and does not need to be revised.

The purpose of the Traffic Analysis (TA) is to evaluate the potential circulation system deficiencies that may result from the development of the proposed project. The TA was prepared in accordance with the Palm Springs TIA Guidelines.

CEQA does not require that the end user of the project be disclosed. (*Joshua Tree Downtown Bus. Alliance v County of San Bernardino* (2016) 1 Cal.App.5th 677). Presently, the project's end user is not known, and to assume an end user would be speculative. As described on page 3-7 of the DEIR, historically, the "sort" label for high-cube warehouses has been associated with operations involving high employment levels for sorting packages for small vehicle deliveries. Conversely, the "non-sort" label typically applies to non-fulfillment or highly automated fulfillment operations, which are less labor-intensive. For the proposed project, operations at the high-cube warehouse facility are not expected to focus on sort operations with high employment concentrations. Instead, the project will be developed consistent with, and pursuant to, today's standards of normal high cube warehouse operations that moderate employee intensity by incorporating reasonable means of mechanical sorting in support of possible fulfillment capabilities.

Comment 6-g:

Table 1-3: Existing Plus Ambient Plus Project Plus Cumulative (2024) Fair Share Calculations within Appendix L concludes the following intersections require improvements to address the deficiencies per the City s thresholds:

1. Intersection #2: Indian Canyon Dr. / 19th Av.

Table 1-3 in Appendix L provides a list of fair-share calculations for improvements that will allegedly mitigate significant and unavoidable impacts to the intersection to less than significant levels. It must be noted that the impacts to intersection #2 are located in the City of Desert Hot Springs. Any improvements planned/constructed or in-lieu fees/fair share fees paid for City of Desert Hot Springs facilities are beyond the control/scope of the lead agency. An assessment of fees is appropriate when linked to a specific mitigation program. (Anderson First Coalition v. City of Anderson (2005) 130 Cal.App.4th 1173, Save our Peninsula Comm. v. Monterey County Bd. Of Supers. (2001) 87 Cal.App.4th 99, 141.) Payment of fees is not sufficient where there is no evidence mitigation will actually result. (Gray v. County of Madera (2008) 167 Cal.App.4th 1099,1122.) The assessment of fees here is not adequate as there is no evidence mitigation will actually result. The improvements required are not part of an existing DIF/TUMF program and therefore are not planned to occur at all or by any certain date, whether by the City of Plan Springs or City of Desert Hot Springs. Any improvements recommended or fees paid to mitigate impacts for City of Desert Hot Springs facilities are beyond the control of the lead agency and evidence that these improvements will be completed or approved by Caltrans has not been provided. A revised EIR must be prepared to include the LOS analysis as cumulatively considerable significant impact as the project conflicts with Transportation Impact Threshold A and Land Use and Planning Impact Threshold B because it is not consistent with the following General Plan Policy:

1. CR2.1: Maintain Level of Service D or better for the City s circulation network, as measured using in season" peak hour conditions.

Response 6-g:

As described in the DEIR Traffic Section 4.13, Page 4.13-7, Senate Bill (SB) 743, adopted in 2013 and codified in Public Resources Code Section 21099, amended CEQA to state that automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion shall not be considered a significant environmental impact. Pursuant to the CEQA Guidelines, the applicable metric for transportation impacts is generally Vehicle Miles Traveled (VMT.)

The western half of Intersection #2 at Indian Canyon Drive and 19th Avenue is located in Palm Springs, the eastern half is located in Desert Hot Springs. According to personal communication with Travis Clark, Community Development Director of the City of Desert Hot Springs on 10/28/2024, Project Viento (located approximately 0.50 mile east of the proposed project at the southeast corner of 19th Avenue and Calle De Los Romos) has received approval of the Signal Plans submitted for the traffic signal at the intersection of Indian Canyon Drive and 19th Avenue. The signal is required to be operational before the opening of the facility, which is currently under construction. According to the Project Viento Offsite Street Improvements Notice of Intent (NOI) for WDID 733C403647, the estimated completion date is August 22, 2025.

Therefore, the traffic signal will be operational prior to the completion of the proposed project. This intersection is projected to operate at LOS F with or without the project, and payment of fair share fees is consistent and feasible mitigation. The project is consistent with Policy 1. CR2.1.

Comment 6-h:

Further, the EIR has underreported the quantity VMT generated by the proposed project operations. The operational nature of industrial/warehouse uses involves high rates of truck/trailer/delivery van VMT due to traveling from large import hubs to regional distribution centers to smaller industrial parks and then to their final delivery destinations. Once employees arrive at work at the proposed project, they will conduct their jobs by driving delivery vans across the region as part of the daily operations as a fulfillment center, which will drastically increase project-generated VMT. The project's truck/trailer and delivery van activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. The project's total operational VMT generated is further inconsistent with the significance threshold and legislative intent of SB 743 to reduce greenhouse gas emissions by reducing VMT. A revised EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer and delivery van activity.

Response 6-h:

City Guidelines identify RIVTAM or Riverside County Model (RIVCOM), once available, as the appropriate tool for conducting VMT analysis for land use projects in the City of Palm Springs. RIVCOM was released in June 2020 and is currently at version 3.5. RIVCOM considers interaction between different land uses based on socio-economic data such as population, households, and employment.

Trip generation for Trucks are estimated utilizing categories including Commercial Vehicles, Single Unit Trucks and Multi-Unit Trucks. Truck trip generation is calculated utilizing specific employment variables based on the High Cube Warehouse land use. Section 4.13, *Transportation*, Page 4.13-18, Table 4.13-7 includes the estimated mix of 2 to 4-Axle Trucks and 5+ Axle Trucks as recommended in the methodology of the High-Cube Warehouse Study (January 29, 2019).

The best available source for high-cube fulfillment center use would be the trip-generation statistics published in the WSP Study, which was commissioned by the Western Riverside Council of Governments (WRCOG) in support of the Transportation Uniform Mitigation Fee (TUMF) update in the County of Riverside. The WSP trip generation rates were published in January 2019 and are based on data collected at 11 local high-cube fulfillment center sites located throughout Southern California (specifically Riverside County and San Bernardino County). The truck percentages were further broken down by axle type per the WSP recommended truck mix: 2-4-Axle = 44.1%; 5+-Axle = 55.9%. The VMT analysis calculated the Project Vehicle Miles Traveled per Employee at 59.77 daily for Baseline conditions and 52.24 daily for Cumulative conditions, and indicated a significant VMT impact for the project (see Table 3 of the TIA). With explicit consideration of commercial truck activity, this finding of a significant VMT impact would remain.

The screening analysis of the VMT indicates that the proposed project is not within ½ mile of an existing "major transit stop" or an existing stop along a "high-quality transit corridor" so that information was not factored into the VMT analysis. As noted in the DEIR page 4.13-27, transit services are not yet available in the project area.

Mitigation Measure TRA-1, requires a VMT Reduction Program. This program would include a ridesharing program, however associated reductions are not anticipated to result in project VMT reductions to less than significant levels. Utilizing the maximum reductions available, a 12.4% reduction would result in a Baseline VMT per SP of 52.38 and a Cumulative VMT per SP of 45.76. Both numbers would continue to exceed the City threshold of 34.52 VMT per SP for both baseline and cumulative conditions. The future occupant of the project will be required to implement these measures; however, significant impacts are still anticipated. The analysis in the DEIR was conducted using established credible sources, and the findings as a result are correct. No change to the DEIR is required.

Comment 6-i:

The EIR has not adequately analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; or

the project's potential to result in inadequate emergency access. There are no exhibits adequately depicting the onsite turning radius available for trucks maneuvering throughout the site. Exhibit 3-3: Site Plan depicts truck/trailer parking stalls located in a tandem configuration adjacent to the truck/trailer loading dock courts on both sides of the building. These parking stalls may be in use at any time and further restrict truck/trailer movement, including increasing truck idling times as tandem parked trucks require additional time to maneuver, which will also result in increased queuing duration and associated need for increased queuing area for trucks/trailers. The EIR has not provided any exhibits demonstrating that there is sufficient backup space for trucks/trailers to utilize these spaces. A revised EIR must be prepared to include a finding of significance due to these significant and unavoidable impacts.

Response 6-i:

The commenter is incorrect. A technical site plan has been submitted with project entitlements. Drive aisles for trucks are 40 feet wide and the main truck access point has a 40 feet wide entry lane and a separate a 40 feet wide exit lane. The loading dock areas have drive aisles of 71 feet with an additional 60 feet of paved area adjacent to loading docks/building to provide a total of 131 feet of paved area between the loading docks and truck parking. These widths satisfy City standards and will be further reviewed at the final design stage. The minimum turn radius on the site plan is 25 feet on the inner radius and 43 feet on the outer radius. According to Municipal Code Section 8.04.510 California Fire Code - Additions, Amendments and Deletions, item **38) 503.4 Turning radius**: Fire access road turns and corners shall be designed with a minimum inner radius of 25 feet and an outer radius of 43 feet. Item **41) 503.2.10 Width.** Fire apparatus access roads shall have a minimum unobstructed width of 26 feet in the immediate vicinity of any building or portion of building more than 30 feet in height. Drive aisle width and turning radii on the site plan conform with the City's Fire Code and will therefore allow adequate Fire Engine and Truck access and circulation.

Comment 6-j:

There are also no exhibits depicting emergency vehicle access. Notably, the EIR states that, "City staff, including Police and Fire Department staff, would review site plans and provide conditions of approval that are specific to the provision of emergency access," and that, "all roadway design shall be reviewed and approved by the City and Fire Department," which is deferred mitigation to after the CEQA public review process. This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation, deferred mitigation, and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents. The EIR must be revised with this analysis in order to provide an adequate and accurate environmental analysis.

Response 6-j:

The commenter is incorrect. A technical site plan was included in the entitlement package which is reviewed as part of the project approvals. Plans for final design will be required for development of the project and will be reviewed and approved prior to project construction. As indicated in Response 6-I, the Palm Springs Fire Code dictates roadway and access design standards that will be imposed on the project as conditions of approval, and the project site plan conforms to those standards.

Comment 6-k:

Additionally, the EIR has not provided any analysis of the available horizontal and vertical sight distance at the intersection of the project driveways and adjacent streets. Sight distance is the continuous length of street ahead visible to the driver. At unsignalized intersections, corner sight distance must provide a substantially clear line of sight between the driver of the vehicle waiting on the minor road (driveway) and the driver of an approaching vehicle. A revised EIR must be prepared with this analysis based on the American Association of State Highway and Transportation Officials (AASHTO) Stopping Sight Distance requirements.

Response 6-k:

The City of Palm Springs Public Works and Engineering Department, Sight Distance Requirements at Driveways and Intersections, Design Standard 203, dictates appropriate sight distances including horizontal and vertical limitations based on roadway speeds. This is a standard condition of approval that will be imposed on the project. The commenter provides no substantial evidence that the project does not meet this standard, only speculation, which does not warrant additional analysis.

Comment 6-l:

5.3 Significant Irreversible Environmental Changes and 5.4 Growth Inducing Impacts

The EIR relies upon erroneous Energy modeling to determine that the project will meet sustainability requirements. As noted above, the EIR did not model the project's energy consumption in compliance with Title 24 modeling software. The EIR must be revised to include a finding of significance due to the an inaccurate and erroneous analysis regarding the project's Air Quality, Greenhouse Gas, and Energy impacts, including those significant and unavoidable cumulatively considerable GHG impacts.

The EIR does not adequately discuss or and analyze the commitment of resources is not consistent with regional and local growth forecasts. As noted below, the project represents a significant amount of building area growth in the City and a significant amount of the City's employment growth over 29 years. The EIR must also include a cumulative analysis discussion here to demonstrate the impact of the proposed project in a cumulative setting, including the associated cumulative impacts of the project's significant and unavoidable cumulatively considerable GHG and Transportation (VMT) impacts.

The EIR does not provide any analysis here regarding the buildout conditions of the City's General Plan. Table 2-2: Nonresidential Land Buildout Estimates in the Updated Land Use Element states that

the City estimates 11,638,620 square feet of industrial development to occur during the City's buildout. The EIR must be revised to provide the horizon year of the City's adopted General Plan and cumulative development since adoption of the General Plan to ensure that the proposed project is within the General Pl's analysis, particularly since the project EIR tiers from the General Plan EIR. The proposed project's 739,360 square feet of industrial building area accounts for 6.3% of the General Plan Industrial land buildout attributed to a single project. The EIR has not provided any analysis of this information and whether the proposed project in combination with cumulative development exceeds the projected buildout scenario. A revised EIR must be prepared to include this analysis in order to provide an adequate and accurate environmental document.

SCAG s Connect SoCal Demographics and Growth Forecast10 notes that the City will add 10,600 jobs between 2016 - 2045. Based on the EIR's calculation of 718 jobs, the project represents 6.7% of the City's job growth over 29 years. A single project accounting for this amount of the projected employment growth over 29 years represents a significant amount of growth. The EIR has not provided a cumulative analysis discussion of projects approved since 2016 and projects in the pipeline" to determine if the project will exceed SCAG s employment growth forecast or the City's General Plan growth projections. A revised EIR must be provided to include this information for analysis in order to provide an adequate and accurate environmental analysis.

Response 6-l:

As it relates to the use of the CalEEMod model for air quality and greenhouse gas analysis, see response 6-d above. That modeling correctly found that air emission impacts would be less than significant and that GHG emissions would be significant and unavoidable.

See Response 6-e regarding the analysis of growth. Further, Section 5.4 of the DEIR, pages 5-6 through 5-9, describes the potential for growth inducement associated with the project, including the jobs created by the project. Section 4.11, *Population and Housing*, includes a comprehensive analysis of the growth projected by SCAG, and how the project's potential for jobs and housing creation is well within the projections established by SCAG.

Cumulative impacts are addressed in each analysis in Section 4 of the DEIR, and include an analysis of the cumulative impacts associated with GHG and VMT. The DEIR fully discloses that these impacts will be significant and unavoidable.

The project site is designated and zoned for industrial use. It is being developed to zoning ordinance standards. It does not constitute a significant portion of the industrial development projected in the General Plan, nor has the City changed land use designations on this site or others to substantially increase the development of industrial projects in the City. The commenter's assumptions that the industrial capacity in the City is being exceeded are unsupported supposition, and supposition is not allowed under CEQA.

Comment 6-m:

6.6 Effects Found to Have No Impact: Land Use and Planning

Table 1-3: Existing Plus Ambient Plus Project Plus Cumulative (2024) Fair Share Calculations within Appendix L concludes the following intersections require improvements to address the deficiencies per the City's thresholds:

2. Intersection #2: Indian Canyon Dr. / 19th Av.

Table 1-3 in Appendix L provides a list of fair-share calculations for improvements that will allegedly mitigate significant and unavoidable impacts to the intersection to less than significant levels. It must be noted that the impacts to intersection #2 are located in the City of Desert Hot Springs. Any improvements planned/constructed or in-lieu fees/fair share fees paid for City of Desert Hot Springs facilities are beyond the control/scope of the lead agency. An assessment of fees is appropriate when linked to a specific mitigation program. (Anderson First Coalition v. City of Anderson (2005) 130 Cal.App.4th 1173, Save our Peninsula Comm. v. Monterey County Bd. Of Supers. (2001) 87 Cal.App.4th 99, 141.) Payment of fees is not sufficient where there is no evidence mitigation will actually result. (Gray v. County of Madera (2008) 167 Cal.App.4th 1099,1122.) The assessment of fees here is not adequate as there is no evidence mitigation will actually result. The improvements required are not part of an existing DIF/TUMF program and therefore are not planned to occur at all or by any certain date, whether by the City of Plan Springs or City of Desert Hot Springs. Any improvements recommended or fees paid to mitigate impacts for City of Desert Hot Springs facilities are beyond the control of the lead agency and evidence that these improvements will be completed or approved by Caltrans has not been provided. A revised EIR must be prepared to include the LOS analysis as cumulatively considerable significant impact as the project conflicts with Transportation Impact Threshold A and Land Use and Planning Impact Threshold B because it is not consistent with the following General Plan Policy:

1. CR2.1: Maintain Level of Service D or better for the City s circulation network, as measured using in season" peak hour conditions.

Response 6-m:

See Response 6-g.

Comment 6-n:

The EIR does not provide a consistency analysis with all land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The project has significant potential to conflict with many of these items, including but not limited to the following from the General Plan:

1. Goal LU1: Establish a balanced pattern of land uses that complements the pattern and character of existing uses, offers opportunities for the intensification of key targeted sites, minimizes adverse environmental impacts, and has positive economic results.

2. LU12.6 Require that loading and outdoor storage areas for commercial and industrial uses be screened from public streets and freeway views.

3. LU12.7 Promote the development of high-quality building design, including attractive fenestration, articulated façades, clearly defined entrances, varied colors and materials, varied building sizes and configurations, and varied roof heights during project review and approval.

4. GOAL CD21: It is a goal of the City of Palm Springs to create convenient, attractive, and well designed industrial and business parks.

5. CD21.1 Strengthen the image of business park areas through entry monument signage, distinctive landscaping, and complementary architectural design elements.

6. CD21.2 Encourage clean and distinctive industrial/office buildings with clearly visible entrances.

7. CD21.3 Avoid the use of long, blank walls by breaking them up with vertical and horizontal façade articulation achieved through stamping, colors, materials, modulation, and landscaping.

8. CD21.4 Use screening techniques, such as landscaping, walls, and berms, to minimize views of surface parking, storage and service areas.

9. GOAL AQ4 Reduce vehicular emissions.

10. GOAL AQ3 Protect people and land uses that are sensitive to air contaminants from sources of air pollution to the greatest extent possible.

11. AQ3.1 Discourage the development of land uses and the application of land use practices that contribute significantly to the degradation of air quality.

A revised EIR must be prepared to provide a consistency analysis with all of the most updated versions of the General Plan objectives, goals, policies, and strategies. The EIR must also be revised to remove misleading and erroneous consistency analysis. For example, the EIR concludes the project is consistent with "LU3.3 Ensure operation of industrial uses is unobtrusive to surrounding areas and prohibit the development of manufacturing uses that operate in a manner or use materials that may impose a danger on adjacent uses or are harmful to the environment," because "surrounding properties include industrial and commercial businesses. The EIR does not acknowledge that the project will result in significant and unavoidable cumulatively considerable GHG and VMT impacts, which will directly impact surrounding residents and communities beyond the immediate vicinity. A finding of significance must be made due to the inconsistency with this policy.

Response 6-n:

As stated in Chapter 6.0, *Effects Found to Have No Impact*, of the DEIR, an Initial Study was prepared for the project, which analyzed the project's potential environmental impacts, utilizing the Appendix G of the 2023 CEQA Guidelines. During the Initial Study analysis, the discussion of Land Use and Planning was found to have No Impact because the proposed project is compliant with the designated land use and zoning categories. Therefore, it was concluded that the project is not expected to cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (threshold b).

Although a full consistency analysis is not required due to the project's consistency with the land use and planning policies, plans, or regulations, a brief analysis is provided below, and addresses the General Plan goals and policies outlined by the commenter:

The project is consistent with LU1 because the industrial project is located in an area designated for industrial uses, therefore, complementing the pattern of uses, as intended by the City of Palm Springs. The project also offers opportunities for the intensification of the industrial area, and would result in positive economic results by providing tax revenue for the City.

The project is consistent with LU12.6 because the loading areas are proposed on the northern and southern sides of the building, perpendicular to Indian Canyon Drive, and the project would screen the loading areas with fencing consisting of wrought iron or tubular steel, which will obscure visibility from 19th Avenue. The project does not propose outdoor storage areas.

The project is consistent with LU12.7. See Section 4.1, *Aesthetics*, for building simulations and material boards. The project proposes various colors and articulated facades.

The project is consistent with Goal CD21, and policies CD21.1, 21.2, 21.3, and 21.4 because the project proposes a convenient, attractive, and well-designed industrial property. It is convenient because it is located close to the Interstate 10 freeway and trucks would be able to access the property easily. It is also well-designed utilizing City-established setbacks, various colors and façade articulation in design. See Exhibit 3-4, in Chapter 3.0, *Project Description*, for the landscape plan, which includes a variety of plants and trees to be located along the southern and eastern boundaries, along the existing rights-of-way. The trees and proposed fencing will act to screen the building from public viewsheds. Also see Section 4.1, *Aesthetics*, of the DEIR for discussion of the proposed landscaping, building setbacks, and design features.

As it relates to Goal AQ4 and the policies under AQ4, the project proposes a VMT reduction program, as implemented as Mitigation Measure TRA-1, that includes the following reduction measures: (1) Implement a ridesharing program, (2) preferential parking for rideshares, (3) opportunities for telecommuting, (4) alternative work hour programs, and (5) on-site bicycle racks and associated facilities. The proposed measures would result in the following range of reductions: (1) a ridesharing program and provide preferential parking for rideshares: 0-8%; (2) opportunities for telecommuting/

alternative work hour programs: Not Quantified; and (3) on-site bicycle racks, lockers, and shower rooms: 0-4.4%. All of these measures serve to improve air quality in the region.

The project is consistent with Goal AQ3 and policy AQ3.1 and LU3.3 because the project is proposed in an area that is designated for industrial uses, away from sensitive receptors (such as residential, schools, hospitals, etc.). See Section 4.2, *Air Quality*, for an analysis of the project-specific Health Risk Assessment (HRA), prepared on April 4, 2023, which evaluates the potential health risk impacts to sensitive receptors (residents) and adjacent workers from potential exposure of Toxic Air Contaminants (TACs), including diesel particulate matter (DPM), associated with the project. Discussion c) of Section 4.2 (pages 4.2-26 through 4.2-34) determined that sensitive receptors would not be exposed to substantial pollutant concentrations as a result of project construction and operational activities because the project activities will not exceed NOx, CO, PM10, PM2.5, or DPM emission thresholds established by SCAQMD. Therefore, impacts would be less than significant and consistent with these goals and policies (see pages 4.2-26 to 4.2-34 of the DEIR).

Comment 6-o:

The EIR provides misleading information regarding the buildout conditions of the City's General Plan. The EIR states that, "Table 2-2, Nonresidential Land Buildout Estimates, in the Updated Land Use Element states that the City estimates 11,638,620 square feet of industrial development to occur during the City's buildout" and concludes that the because the project is less than the total quantity of buildout area, the project will result in less than significant impacts. The EIR must be revised to provide the horizon year of the City's adopted General Plan and cumulative development since adoption of the General Plan to ensure that the proposed project is within the General Plan EIR's analysis, particularly since the project EIR tiers from the General Plan EIR. The proposed project's 739,360 square feet of industrial building area accounts for 6.3% of the General Plan Industrial land buildout attributed to a single project. The EIR has not provided any analysis of this information and whether the proposed project in combination with cumulative development exceeds the projected buildout scenario. A revised EIR must be prepared to include this analysis in order to provide an adequate and accurate environmental document.

Response 6-o:

See Response 6-l.

Comment 6-p:

The EIR excludes a consistency analysis with SCAG's 2020-2045 Connect SoCal RTP/SCS. Due to errors in modeling and modeling without supporting evidence (as noted throughout this comment letter and attachments) and the EIR's conclusion the project will have significant and unavoidable cumulatively considerable Greenhouse Gas Emissions and Transportation (VMT) impacts, the proposed project is directly inconsistent with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing

climate. A revised EIR must be prepared to include a finding of significance due to these inconsistencies with SCAG's 2020-2045 Connect SoCal RTP/SCS.

Response 6-p:

As described in Response 6-n, the Initial Study found that there would be no impact associated with land use and regional plans, and that no discussion of this issue area was necessary in the DEIR. Since the project is consistent with the General Plan and regional plans, and since it provides jobs for the City's future population, it also provides support for the RTP/SCS. Therefore, the analysis of SCAG RTP/SCS policies was not required in the DEIR. In order to directly address the commenter's comment, however, a consistency analysis is provided below. The project is consistent with the applicable RTP/SCS goals.

Goal	Consistency Analysis
RTP/SCS G1: *Encourage regional economic prosperity and global competitiveness.*	**Not applicable but consistent:** This goal pertains to the development of the Regional Transportation Plan itself and is not a project-specific policy, as it relates to encouraging regional economic prosperity and global competitiveness. Nonetheless, the project can be considered consistent with this policy in that the project will provide 739,360 square feet of industrial use. The development of the industrial facility will provide jobs in the surrounding area and warehousing/sort/non-sort facilities allow for the transport of consumer products. The project's location in proximity to a regional transportation system (i.e., Interstate 10) is ideal for truck access. Therefore, the project will provide jobs and a use that encourages economic prosperity and competitiveness.
RTP/SCS G2: *Improve mobility, accessibility, reliability, and travel safety for all people and goods.*	**Consistent:** Access to the site will occur on the existing rights-of-way, Indian Canyon Drive and 19th Avenue. The project will construct Indian Canyon Drive from the project's northern boundary to 19th Avenue at its ultimate half-section width as a major thoroughfare, with a minimum pavement width of 76 feet in compliance with the applicable City standards. The project will provide a minimum of 35 feet curb return radius. Additionally, the project will construct 19th Avenue from the project's western boundary to Indian Canyon Drive at its ultimate half-section width as a secondary thoroughfare, with a minimum pavement width of 64 feet in compliance with the applicable City standards. The proposed project includes pedestrian and bicycle facilities distributed throughout the proposed development. Sidewalks and bike lanes will be provided along Indian Canyon Drive. A sidewalk will be provided along 19th Avenue adjacent to the project site. The existing conditions of sidewalk and bicycle systems are fragmented. Project improvements will add to the existing sidewalk and bicycle system in the area. As the area builds out, future projects will be required to construct General Plan improvements to sidewalks and bicycle facilities and will provide future connectivity to the surrounding area including Palm Springs and Desert Hot Springs for project users. See Section 4.13, *Transportation,* for further discussion of the existing and proposed transportation system.
RTP/SCS G3: *Enhance the preservation, security, and resilience of the regional transportation system.*	**Consistent**. This goal is primarily directed towards SCAG and has limited applicability to individual development projects. The project proposes improvements to the surrounding roadway systems. See Section 4.13, *Transportation,* for further discussion of project improvements to the transportation system. Overall, the project would not conflict with the security and resilience of the regional transportation system.

RTP/SCS G4: *Increase person and goods movement and travel choices within the transportation system.*	**Consistent**: See consistency analysis discussion for Goal 2. The project would permit up to 7,390,360 square feet of industrial uses for warehouse/sort/non-sort facilities. Development of the project site would increase people through employment opportunities. The project's industrial component will increase the movement of goods through the regional transportation system (i.e., I-10), which is in proximity to the project (approximately 0.3 miles south). See Section 4.13, *Transportation,* for further discussion of the existing and proposed transportation system.
RTP/SCS G5: *Reduce greenhouse gas emissions and improve air quality.*	**Consistent**: The project incorporates project design features aimed at reducing VMT, GHG, and criteria air pollutant emissions. Combined with mitigation measures, these measures will work toward attainment of the approved Air Quality Management Plan applicable in the South Coast AQMD jurisdiction. See Section 4.3, *Air Quality,* Section 4.9, *Greenhouse Gas Emissions,* and Section 4.16, *Transportation.*
RTP/SCS G6: *Support healthy and equitable communities.*	**Consistent:** The project protects the environment and health of residents by locating the project away from sensitive receptors. The project is located in an area designated for industrial uses. The project will provide employment opportunities and will be accessible due to its proximity to the Interstate 10 freeway. Additionally, as stated under Goal 2, the proposed project includes pedestrian and bicycle facilities distributed throughout the proposed development. Sidewalks and bike lanes will be provided along Indian Canyon Drive. A sidewalk will be provided along 19th Avenue adjacent to the project site. See Section 4.13, *Transportation*, for further discussion of the proposed transportation system.
RTP/SCS G7: *Adapt to a changing climate and support an integrated regional development pattern and transportation network.*	**Not applicable but consistent**: This goal is primarily directed towards SCAG as it relates to adapting to a changing climate and supporting an integrated regional development pattern and transportation network, and therefore has limited applicability to individual development projects. Taking place in a site that has previously been approved for industrial development, the project is not of a scale or nature that would conflict with the SCAG region's assumptions for development patterns or transportation network.
RTP/SCS G8: *Leverage new transportation technologies and data-driven solutions that result in more efficient travel.*	**Not applicable**: This policy about new technologies is directed toward SCAG and does not apply to individual development projects. The adoption of transportation technologies, primarily pertaining to electric vehicles or emission reductions, will be a function of state and federal requirements to which businesses and residents will be required to adapt as applicable.
RTP/SCS G9: *Encourage development of diverse housing types in areas that are supported by multiple transportation options.*	**Not applicable**: The project does not include housing. The project is located in an area that is designated for industrial uses.
RTP/SCS G10: *Promote conservation of natural and agricultural lands and*	**Not applicable:** As stated in Chapter 6.0, Effects Found to Have No Impact, the project property is located on land classified as "Other Land" by the California Farmland Mapping and Monitoring Program (FMMP). Other Land is defined as land not included in any other mapping category (i.e., Prime Farmland, Farmland of Statewide or Local Importance, Unique Farmland, or Urban and Built-Up Land). The current land condition includes scattered desert vegetation consisting of both native and nonnative vegetation commonly found in areas of

restoration of habitats.	human disturbance. The project site is located in an area designated for industrial developments, per the Palm Springs General Plan. Agricultural operations have not occurred onsite. Therefore, SCAG's goal of conserving natural and agricultural land and the restoration of habitats is not applicable to the project. The undeveloped project site is not located in an area designated for the conservation of natural habitats. As stated on page 4.3-13 of the DEIR, the project's vacant and undeveloped condition may provide suitable habitat for wildlife species, however, the project's adjacency to the busy Indian Canyon Drive roadway and existing industrial and commercial businesses do not present ideal conditions for wildlife corridors or native wildlife nursery sites.

Comment Letter No. 7: Committee to Stop Giant Warehouse Blight

Date: June 13, 2024
Name: Amy Minteer
Affiliation: Committee to Stop Giant Warehouse Blight
Address:

Comment 7-a:

On behalf of the Committee to Stop Giant Warehouse Blight ("Committee"), we provide these comments on the draft environmental impact report ("DEIR") for the proposed Palm Springs Fulfillment Center at Indian Canyon Drive and 19th Avenue. Committee is an unincorporated association of Palm Springs area residents concerned with the adverse impacts that are imposed on communities by the development of massive warehouse projects. Such impacts can be witnessed elsewhere throughout the Inland Empire due to the proliferation of similar warehouse projects, resulting in numerous negative impacts with questionable benefits for the surrounding communities.

The proposed Palm Springs Fulfillment Center includes development of a two-story, 739,360-square-foot structure for industrial warehouse use (the "Project"). The DEIR identifies the Project as a "high cube warehouse with fulfillment capabilities" and states the hours of operation will be 24/7. The DEIR acknowledges the Project would have significant and unavoidable greenhouse gas emissions impacts and vehicle miles traveled impacts.

Response 7-a:

This comment explains who the Committee to Stop Giant Warehouse Blight is and summarizes the Committee's opinions on warehouse projects. Since the commenter does not indicate any specific concerns, no response is required.

Comment 7-b:

The DEIR for the first massive warehouse development in Palm Springs is substantively inadequate. The DEIR fails to include an adequate project description, which impedes the analysis of the Project's impacts and a comparison of the Project to alternatives. The DEIR also fails to address previously unanalyzed aesthetic impacts, fails to consider inconsistencies with relevant land use policies, and fails to support assumptions relied upon in assessing greenhouse gas emissions. Further, the Project as proposed cannot be approved under the California Environmental Quality Act ("CEQA") because there are feasible and less impactful project alternatives available.

Response 7-b:

The comment and its assertions are noted but over-broad. Specific responses to individual issues are provided below.

Comment 7-c:

I. The EIR's Analysis of the Project Description is Inadequate

Every EIR must set forth a project description that is sufficient to allow an adequate evaluation and review of the project's environmental impacts. (CEQA Guidelines, §15124.) "An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." (County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 192 93; accord San Joaquin Raptor/Wildlife Reserve Center v. County of Stanislaus (1994) 27 Cal.App.4th 713, 730.) "[O]nly through an accurate view of the project may the public and interested parties and public agencies balance the proposed project's benefits against its environmental cost, consider appropriate mitigation measures, assess the advantages of terminating the proposal and properly weigh other alternatives." (City of Santee v. County of San Diego (1989) 214 Cal.App.3d 1438, 1454.)

Here, the DEIR fails to provide adequate information and documentation to support environmental review. The DEIR refers to the Project as a "high cube warehouse with fulfillment capabilities." (DEIR p. 3-5.) This does not provide specific enough information regarding how this site will be used as solely warehouse uses function very differently than fulfillment centers. Warehouses store products, often for a specific company, to be used at a later date. In contrast, fulfillment centers house products for only a brief period of time, as a stopping point on the way to their final destination. As such, fulfillment centers have a higher volume of truck traffic.

The DEIR also does not address whether the Project will provide storage for refrigerated products. Such products require faster and more frequent deliveries, which also increases the volume of truck trips. The volume of truck trips greatly affects the level of greenhouse gas emissions and vehicle miles traveled associated with the Project, thus the DEIR must include detailed and finite information on what types of uses will be included in the Project or condition it to prohibit certain uses.

Response 7-c:

A tenant for the project has not been identified. As stated in Response 6-f above, CEQA does not require that the end user of the project be disclosed. *Joshua Tree Downtown Bus. Alliance v County of San Bernardino* (2016) 1 Cal.App.5th 677. Presently, the project's end user is not known, and to assume an end user would be speculative. The Project Description provided on pages 3-5 through 3-10 of the DEIR is thorough and complete. The term 'high cube warehouse' was specifically used, as it is well defined as a facility which handles and distributes materials, as opposed to other types of warehousing. The description further explains, on page 3-7, the differences between these types of facilities, and how, for the proposed project, operations are not expected to focus on sort operations with high employment concentrations. Instead, the project will be developed consistent with, and pursuant to, today's standards of normal high cube warehouse operations that moderate employee intensity by incorporating reasonable means of mechanical sorting in support of possible fulfillment capabilities.

The DEIR does not address refrigerated storage because no refrigerated storage is proposed or contemplated. The project description is not required to disclose items that do not relate to the project, and the lack of a description of cold storage is not an omission or error.

Comment 7-d:

Additionally, as discussed below regarding alternatives to the project, the type of facility, and whether it is for a specific entity, can greatly influence whether and how much tax income the City could expect from the Project. Since tax benefits have been the City's stated reason for encouraging warehouse use within the City limits, information regarding the financial impacts of the Project must be assessed to allow for an accurate comparison of alternatives.

Response 7-d:

The tax revenue generated by the proposed project is not a CEQA issue. Moreover, the proposed industrial building is consistent with the general plan land use and zoning designations that exist onsite.

Comment 7-e:

Similarly, the City has cited jobs created by warehouses as a basis for allowing such projects. The DEIR identifies that warehouses that are "sort" facilities typically have a higher volume of employees, as opposed to "non-sort" facilities that can be highly automated and thus provide a much lower level of employment opportunities. (DEIR p. 3-7.) The DEIR does not address the level of automation that would be included in the Project and instead just states today it is common to have a balance of operations. The DEIR must address the specifics of the use of the facility in order to accurately assess the number of employees for the Project. This is relevant to both the impact analysis and the City's assessment of alternatives to the Project, particularly for a project such as this that admittedly has significant and unavoidable impacts.

Response 7-e:

As stated in Response 7-c, above, a tenant for the project has not been identified, and as stated in Response 6-f above, CEQA does not require that the end user of the project be disclosed. Presently, the project's end user is not known, and to assume an end user would be speculative. The number of employees is based on the Riverside County Model (RIVCOM), a study released in 2020, as utilized in the VMT Evaluation (Appendix L.2 of the DEIR). Also see Responses 6-e and 6-l.

Comment 7-f:

II. The DEIR's Analysis of Impacts is Inadequate.

A. The City Cannot Rely on an Unanalyzed Ordinance to Eliminate Consideration of Aesthetic Impacts.

The DEIR disingenuously claims that because the Project complies with the height, size and setback requirements contained in Palm Springs Municipal Code section 92.17.1.03, it would not have an adverse impact to visual character in a non-urbanized area. (DEIR p. 4.1-23.) This claim fails to recognize that the ordinance adopting section 92.17.1.03, Ordinance No. 2056, was adopted without any environmental review. At the time Ordinance No. 2056 was adopted in January 2022, the City found the ordinance was not subject to CEQA because the ordinance itself would not result in a direct or reasonably foreseeable indirect physical change in the environment. In making this finding, the City also identified that impacts associated with all individual projects would be assessed during CEQA for each project.

The City cannot piecemeal the approval of warehouse development with significant aesthetic impacts in a sparsely developed area of the City in a manner that leaves those impacts unanalyzed. CEQA prohibits the City from evading analysis of the increased warehouse height, its blockage of mountain views by the two-story structure, and the impact on the visual character of the desert landscape. As noted in comments by Committee member Peter Moruzzi, views of the expansive desert that characterize the Coachella Valley will be decimated by this Project and similar projects it will likely induce. The City did not previously analyze, disclose and mitigate or avoid these impacts and thus must do so now to comply with CEQA.

Response 7-f:

As stated on page 4.1-22 of the DEIR, per California Code of Regulations, Section 15387, an "urbanized area" is a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile. The City of Palm Springs had a population of 47,427 people in 2020, according to the General Plan Housing Element (2023). The City's population increases to over 75,000 people during winter. Therefore, the City, and project site, are located in an urbanized area. Existing industrial and commercial businesses are located south of the project. Areas north and west of the project are vacant. Properties east of the project, within the City of Desert Hot Springs' jurisdiction, are currently being developed for industrial use.

Although the project is compliant with the height, size, and setback requirements established in Palm Springs Municipal Code 92.17.1.03, the DEIR provides an in-depth analysis on the project's impact on aesthetic resources in Section 4.1, *Aesthetics*. The analysis evaluates the project's impact to existing public views on streets surrounding the project (i.e., Indian Canyon Drive and 19th Avenue), as well as surrounding properties to the north, south, east and west. Exhibits 4.1-1 through 4.1-10 of the DEIR illustrate the existing conditions from these areas. As established on page 4.1-6, scenic vistas in the area include the mountains surrounding the Coachella Valley, however, existing structures and manmade infrastructure currently result in interrupted views of the scenic vistas. As determined in Section 4.1 of the DEIR, development of the project would partially obstruct the views of the surrounding mountains, however, building setbacks reduce the scale of the building by placing it

further away from the property line. See pages 4.1-6 through 4.1-22 for the analysis of the project's aesthetic impact on the surrounding area. Analysis of warehouse height, and its impact to mountain views are included on these pages from the surrounding streets and the surrounding properties.

Additionally, the City prepared visual simulations from the Indian Canyon Drive and Coachillin Way intersection (northeast of the project), and the Indian Canyon Drive and 20th Avenue intersection (south of the site near the I-10 interchange) in the Recirculated DEIR. These were included in the DEIR, on which the commenter also commented. The Indian Canyon Drive and 20th Avenue visual simulation (Exhibit 4.1-6 of the DEIR), clearly shows that the proposed building would be visible and would obstruct the baseline views of the San Jacinto Mountains, and some mid-range views of the San Jacinto Mountains. However, peak views of the Mountains are visible. Further, Exhibit 4.1-7, depicts the view to the north from the Indian Canyon Drive and 20th Avenue intersection (near the I-10 interchange), approximately 0.25 miles south of the project. This visual simulation clearly shows that the existing surrounding conditions include a gas station, restaurant, motel, industrial and commercial buildings, and existing landscaping and electric power poles and traffic signals. As shown in Exhibit 4.1-7, the project building is somewhat visible in the distance. However, it does not dominate, and does not affect the views of the surrounding scenic vistas to the north (i.e., the San Gorgonio Mountains and Little San Bernardino Mountains). The proposed building blends in with the existing buildings in this area and does not result in incompatible building height or mass. See pages 4.1-13 to -16 and Exhibits 4.1-6 and 4.1-7 of the DEIR for additional analysis of the project's impacts from the visual simulations generated. The inclusion of the visual simulations in the DEIR confirms the findings in the DEIR that that proposed project would result in less than significant impacts to scenic vistas because mid-range and peak views will remain visible.

Comment 7-g:

The DEIR also inaccurately claims that the Project proposes a typical industrial use in this area of the City. (DEIR p. 4.1-29.) This Project would be the first warehouse project and the only two-story industrial development in this area of the City, creating the first of its kind impacts on the surrounding desert landscape. This impact must be analyzed.

Response 7-g:

The project is located in an area designated for industrial uses, and adjacent to industrial uses to the east. The purpose of the General Plan, and Land Use and Zoning Maps, is to designate areas for specific land use types, and control and guide development throughout the City. The project is proposed in an area where other industrial uses are developed and proposed, and the impacts of the project to that area, the City and the region are analyzed throughout the DEIR.

Comment 7-h:

B. The DEIR Fails to Analyze Riverside County General Plan Policies Regarding Eligible Scenic Highways.

Interstate 10 has been officially recognized as an Eligible Scenic Highway by the County of Riverside in its General Plan Circulation Element and in the Western Coachella Valley Area Plan. (Riverside Co. General Plan Circulation Element Fig C-8; Western Coachella Valley Area Plan Fig. 9.) The DEIR's analysis of aesthetic impacts disregards the designation of Interstate 10 as an Eligible Scenic Highway by the County because this highway is not "officially designated." (DEIR p. 4.1-3.) However, the DEIR fails to recognize the County of Riverside General Plan policies apply to Eligible Scenic Highways. The DEIR must evaluate whether the Project would be inconsistent with the following General Plan Circulation Element and Land Element Policies that apply to Eligible Scenic Highways:

- LU 14.3 Ensure that the design and appearance of new landscaping, structures, equipment, signs, or grading within Designated and Eligible State and County scenic highway corridors are compatible with the surrounding scenic setting or environment.
- C 19.1 Preserve scenic routes that have exceptional or unique visual features in accordance with Caltrans' Scenic Highways Plan.

Additionally, the Western Coachella Valley Area Plan ("WCVAP"), which is an extension of the County's General Plan, establishes that:

> The scenic beauty of the Western Coachella Valley is often enjoyed while traveling on its highways. Several of these routes within the region have been designated or identified as scenic highways for inclusion in the State Scenic Highways program. Moreover, scenic highways play an important role in encouraging the growth of recreation and tourism--both important aspects of the Riverside County economy. Scenic Highways designations recognize this value and place restrictions on adjacent development to help protect this resource for future generations. The location of scenic highways in the Western Coachella Valley area is shown in Figure 9, Scenic Highways.

(WCVAP p. 67.) Figure 9 identifies Interstate 10 east of State Route 62 as a scenic highway. The following WCVAP policy applies to such scenic highways:

- WCVAP 19.1 Protect the scenic highways in the Western Coachella Valley from change that would diminish the aesthetic value of adjacent properties in accordance with policies in the Scenic Corridors sections of the Land Use, Multipurpose Open Space, and Circulation Elements.

The DEIR must also evaluate consistency with this policy but does not.

Response 7-h:

The project is not located adjacent to or near either a designated or eligible scenic highway. The commenter's assertion that the project would have significant impacts on a scenic highway's viewshed is speculative and not based on substantial evidence. On the contrary, as described on page

6-1 of the DEIR, the project would not be seen from I-10 or State Route 62, since it is located more than 0.32 miles and 3 miles from these roadways, respectively. The project would not result in impacts to these roadways, and as a result a discussion of impacts to scenic roadways was excluded from the DEIR in the Initial Study/Notice of Preparation. This is explained on page 6-1 of the DEIR. Additionally, existing buildings and infrastructure block the view of the project site. During a Planning Commission meeting for the project, the Commission requested additional visual simulations from Indian Canyon Drive. As a result, the City prepared visual simulations from the Indian Canyon Drive and Coachillin Way intersection (northeast of the project), and the Indian Canyon Drive and 20th Avenue intersection (south of the site near the I-10 interchange). These were included in the DEIR, on which the commenter also commented. The Indian Canyon Drive and 20th Avenue visual simulation provides a visual of the project with existing conditions. See pages 4.1-13 to -16 and Exhibits 4.1-6 and 4.1-7 of the DEIR for additional analysis of the project's impacts from the visual simulations generated. As illustrated in the DEIR exhibits listed above, from Indian Canyon Drive and 20th Avenue (near the I-10 interchange), the project building is somewhat visible in the distance; however, it does not substantially impact the views of the surrounding scenic vistas at this location (page 4.1-13 of the DEIR). Therefore, the project would not diminish the aesthetic value of the scenic highways or corridors (Interstate 10 or State Route 62). Thus, the policies are not applicable to the proposed project. Also see Response 7-f.

Comment 7-i:

C. The DEIR Fails to Include Necessary Mitigation to Support its GHG Emission Assumptions.

The DEIR's analysis of greenhouse gas ("GHG") emissions relies on an assumption there will be a maximum of 280 truck trips to the warehouse facility per day. (DEIR p. 4.7-12.) However, as discussed above, there is inadequate information regarding the type of warehouse facility this Project will be, whether it will include refrigeration, and other inadequacies in the project description that prevent reliance on this truck trip level in the analysis of GHG emissions.

Moreover, the DEIR fails to include mitigation limiting daily truck trips to the facility to this level, thus 280 truck trips is not a reliable assumption for the DEIR's analysis. The South Coast Air Quality Management District provided scoping comments that if the Project is found to have significant emissions impacts, mitigation should be included to limit the daily number of trucks allowed at the proposed Project to the levels analyzed in the DEIR. (DEIR App. A.) The DEIR failed to include this recommendation from an expert agency.

Response 7-i:

The traffic analysis was based on the project-specific traffic impact analysis, prepared by the traffic experts at Urban Crossroads, Inc. The traffic analysis correctly analyzed high cube warehouse operations and calculated trip generation based on professionally established coefficients from the WSP study (January 29, 2019) which represent current Inland Empire trip generation for high cube

warehouses used in EIRs for warehouse projects throughout the region. See Response 6-c regarding refrigeration and the project description.

Also see response 6-f and 6-h. The Traffic Analysis (TA) used trip generation rates of 2.89 trips per 1000 square feet of gross floor area. The methodology in the 2019 study provides a more conservative analysis consistent with actual conditions in the region. Therefore, the truck rate used in the GHG analysis was correctly undertaken as it relates to truck trips.

Comment 7-j:

While the DEIR assumes that GHG emission impacts will be significant and unavoidable, "[a]n adequate description of adverse environmental effects is necessary to inform the critical discussion of mitigation measures and project alternatives at the core of the EIR." (Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, 519.) Simply assuming a significant adverse impact without adequate analysis that allows for consideration of all impacts and mitigation for those impacts was found by the California Supreme Court to be inadequate. (Id. at 519-522.)

Response 7-j:

As regards the SCAQMD Air Quality recommendation:

if the Project is found to have significant emissions impacts, mitigation should be included to limit the daily number of trucks allowed at the proposed Project to the levels analyzed in the DEIR

Compliance with the Project Description analyzed in the DEIR is required by CEQA. The SCAQMD comment is in regard to Criteria Pollutants such as NOx, not Greenhouse Gases. The DEIR did take into account their comments, which were that IF impacts were found to be significant, the DEIR should include mitigation measures. As described on pages 4.2-25 through 4.2-26 of the DEIR, air emissions associated with construction and operation of the project will not exceed SCAQMD thresholds, and impacts will be less than significant. As a result, no mitigation measures are required, and the DEIR did implement the SCAQMD's recommendation correctly.

Pertaining to GHG impacts, pages 4.7-11 through 4.7-14 of the DEIR provided an adequate description of the construction and operational emission quantities, sources and factors to support the findings. Table 4.7-2 (Project GHG Emissions) on page 4.7-13 of the DEIR summarized the total GHG emission levels attributed to construction and operation of the proposed project. Table 4.7-3 (CAP Consistency - Commercial/Industrial Land Use) on page 4.7-15 of the DEIR provided the points attained in relation to the Riverside County CAP Update, and mitigation measure GHG-1 requires compliance with the County CAP's point system. Therefore, the EIR has required implementation of all feasible mitigation measures, but still correctly concludes that impacts will be significant and unavoidable.

Comment 7-k:

III. The Project's Significant and Adverse Impacts Require the City to Carefully Consider Alternatives.

Just as the EIR is the "heart of CEQA", the alternatives analysis is the "core of the EIR." (CEQA Guidelines, §15003(a); Laurel Heights Improvement Assn. v. Regents (1988) 47 Cal.3d 376, 392; Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal 3d 553, 564.) Preparation of an adequate EIR with a reasonable range of alternatives and accurate comparative analysis of those alternatives is crucial to CEQA's substantive mandate to "prevent significant avoidable damage to the environment" when alternatives or mitigation measures are feasible. (CEQA Guidelines, §15002(a)(3).)

This is because CEQA prohibits approval of a project with significant adverse environmental impacts when there are feasible alternatives or mitigation measures that would "avoid or substantially lessen" the project's significant effects. (Pub. Resources Code § 21002; City of Marina v. Board of Trustees of California State University (2006) 39 Cal.4th 341, 350.) More specifically, CEQA states:

> Pursuant to the policy stated in Sections 21002 and 21002.1, no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless . . .:
>
> (a). . . (3) Specific economic, legal, social, technological, or other considerations . . . make infeasible the mitigation measures or alternatives identified in the environmental impact report.

(Pub. Resources Code, §21081.) It is settled law that:

> CEQA contains substantive provisions with which agencies must comply. The most important ... is the provision requiring agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.

(Sierra Club v. Gilroy City Council (1990) 222 Cal.App.3d 30, 41, italics added.)

An alternative need only avoid or substantially lessen any one of a project's significant impacts to be considered environmentally superior. (CEQA Guidelines, §15021, subd. (a)(2).) The finding that "[t]here is no feasible way to lessen or avoid the significant effect..." of a project must be supported by substantial evidence. (CEQA Guidelines, §§15043, 15093, subd. (b).) An alternative must be "truly infeasible" for its rejection to be legally valid under CEQA. (City of Marina, supra, 39 Cal.4th 341, 369.) CEQA defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors." (Pub. Resources Code § 21061.1.)

Here, the Project would have significant and unavoidable adverse GHG emissions and vehicle miles traveled ("VMT") impacts. Thus, a thorough consideration of alternatives that would reduce these impacts must be included in the DEIR, and if such alternatives are feasible, the City cannot approve the Project as proposed.

Response 7-k:

The comment is noted, but provides only an explanation of the requirements for alternatives analysis under CEQA, and does not require further response.

Comment 7-l:

A. The City Cannot Approve the Proposed Project Because Alternative 2 is a Feasible Less Impactful Alternative.

CEQA prohibits approval of a project with significant adverse environmental impacts when there are feasible alternatives or mitigation measures that would "avoid or substantially lessen" the project's significant effects. (Pub. Resources Code § 21002; City of Marina v. Board of Trustees of California State University (2006) 39 Cal.4th 341, 350.) The DEIR includes Alternative 2, a reduced intensity of development alternative. Under Alternative 2, the project would be limited to a maximum of 369,680 square feet. Due to the reduced intensity of development, this alternative would eliminate the Project's significant and unavoidable GHG emission impacts and VMT impacts. (DEIR pp. 7-44, 7-46.) In fact, all impacts would be reduced to less than significant levels under Alternative 2. As such, Alternative 2 is environmentally superior alternative.

Alternative 2 is also feasible as it would meet all project objectives. (DEIR p. 7-44.) An alternative must be "truly infeasible" for its rejection to be legally valid under CEQA. (City of Marina, supra, 39 Cal.4th 341, 369.) "Feasible" is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Resources Code, §21061.1.) Reasonable alternatives are feasible and must "attain most of the basic objectives" of the Project. (Pub. Resources Code, §21061.1; Guidelines, §15126.6(a), emphasis added.) The definition does not require the agreement of the project applicant.

It is well settled that "[i]f there are feasible alternatives … that would accomplish most of the objectives of a project and substantially lessen the significant environmental effects of a project subject to CEQA, the project may not be approved without incorporating those measures." (Center for Biological Diversity, Inc. v. FPL Group, Inc. (2008) 166 Cal.App.4th 1349, 1370, fn 19, citation to Pub. Resources Code §§ 21000(g), 21002, Guidelines § 15091.) Alternatives are not required to meet all project objectives, and in reality, it "is virtually a given that the alternatives to a project will not attain all of the project's objectives." (Watsonville Pilots Ass'n v. City of Watsonville (2010) 183 Cal.App.4th 1059, 1087.) Thus, that Alternative 2 would meet the project objectives to a lesser degree than the proposed Project is not a valid basis for rejecting this environmentally superior alternative.

Response 7-l:

The commenter is correct that Alternative 2 would result in reduced impacts compared to the proposed project. However, the commenter is incorrect that the City must approve Alternative 2. CEQA requires that "public agencies should not approve projects as proposed if there are feasible

alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects," and "that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof" (Section 21002 of CEQA Guidelines).

As analyzed in Chapter 7.0, *Alternatives,* Alternative 2, the Reduced Project Alternative, would result in reduced environmental impacts because it reduces the size of the building by half. Alternative 2 was determined to be the environmentally superior alternative, because it reduces environmental impacts and meets all of the objectives proposed for the project, however, due to the reduced building size, it does so to a lesser degree (page 7-62 of the DEIR). The reduced building size would lead to inefficient economic use of the property and the impacts would be slightly reduced but still equivalent to the project (pages 7-13 through 7-25 of the DEIR). As stated in Chapter 7.0, Alternative 2 would result in significant and unavoidable GHG and VMT impacts, as would the proposed project. The DEIR correctly analyzed all the project alternatives, and provides the Planning Commission and the public with all the information to allow them to make an informed decision.

Per Section 15121(a) of the CEQA Guidelines, an EIR is an informational document which will inform public agency decision makers and the public of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. Therefore, Alternative 2 will be considered by the Planning Commission, along with the project.

Comment 7-m:

B. The DEIR's Analysis of Alternative 3 Relies on Unsupported Assumptions.

Alternative 3 provides for development of the Project site with an industrial business park. The DEIR's alternatives analysis failed to meet the City's duty to meaningfully consider alternatives to the environmentally damaging proposed Project in its consideration of Alternative 3. (Laurel Heights I, supra, 47 Cal.3d at 400.) This is because the DEIR has defined this alternative to fail in violation of CEQA's requirement that an EIR analyze alternatives that would avoid or substantially lessen a project's significant and unavoidable impacts. (CEQA Guidelines, §15126.6, subd. (a).)

Instead of following CEQA's requirements, the DEIR defines Alternative 3 to include increased development and more intensive use than the proposed Project. In contrast to the limited information provided regarding the Project's operations (see Section I), the DEIR very specifically defines every use to be included within Alternative 3. Alternative 3 would include: a 182,000-square-foot storage facility; a 26,000-square-foot vehicle storage and rental facility (i.e., Uhaul); two 26,000-square-foot manufacturing buildings (i.e., stone cutting, lighting and wiring); two 26,000-square-foot buildings for equipment sales; and two 274,000-square-foot wholesale, warehouse, distribution,

fulfillment, and import/export centers. (DEIR p. 7-26.) Due to this significant increase in intensity of use and size of development, Alternative 3 would have more significant impacts than the proposed Project. (DEIR p. 7-46.)

To comply with CEQA's requirement to assess project alternatives that would lessen impacts, the EIR must analyze a revised Alternative 3 that includes an industrial business park with a reduction in the intensity of uses. The DEIR acknowledges that an industrial business park would meet the project objectives, making it a feasible alternative. With the impacts reduced after this alternative is revised, the EIR must then address whether Alternative 3 would also be an environmentally superior alternative, further preventing approval of the Project as proposed.

Response 7-m:

According to Section 15126.6 of the CEQA Guidelines, the EIR shall describe a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. The commenter asserts that this alternative should have analyzed a less intense project, to assure that impacts would be reduced, but provides no substantiation for what that project might be.

Alternative 3 was developed because of its consistency with the zone in which it occurs, which would represent feasible land uses. The distribution and type of uses were established and then the analysis conducted, as it should be to comply with CEQA. To assume that an alternative's land uses would be more or less impactful prior to conducting the analysis is not logical or possible. Alternative 3 provides an option that would feasibly attain most of the basic objectives of the project. Additionally, Alternative 3 analyzes a potential project that could be considered at the 38-acre project area, based on the allowed uses within industrial land use designations as determined by the City. The project is located in an area designated for industrial land use and manufacturing zone. The manufacturing zoning designation in which the project is located, allows for this wide-range of uses, as outlined in Section 92.17.1.01, *Uses Permitted,* of the Palm Spring Municipal Code. Thus, an industrial business park could be considered. However, although Alternative 3 would attain most of the basic objectives, after an analysis was completed for the alternative, it was determined that Alternative 3 would not lessen impacts compared to the proposed project. The analysis was conducted correctly, and the conclusion arrived at after careful consideration of impacts.

Comment 7-n:

C. Any Claimed Project Benefits Must Be Supported by Substantial Evidence.

CEQA Guidelines section 15093, subdivision (b) requires that when a lead agency approves a project that would result in significant, unavoidable impacts, "the agency shall state in writing the specific reasons to support its action" in a statement of overriding considerations. These project benefits are in addition to the required finding of no feasible alternatives to substantial lessen a project's

significant adverse impacts discussed above. CEQA also requires substantial evidence in the record support the claimed benefits to justify proceeding with a project despite its adverse impacts. (Public Resources Code, §21081; CEQA Guidelines, §15093, subds. (b), (c).) "[A]n unsupported claim that the project will confer general benefits" is insufficient to override a project's significant impacts. (Woodward Park Homeowners Assn., Inc. v. City of Fresno (2007) 150 Cal.App.4th 683, 717.) "[A] statement of overriding considerations, like an EIR, must make a good-faith effort to inform the public;" the "statement's purposes are undermined if its conclusions are based on misrepresentations…or it misleads the reader about the relative magnitude of the impacts and benefits..." (Id. at 718.)

Here, if the City attempts to move forward approving the proposed Project with its significant impacts, despite the existence of feasible less impactful alternatives, it will need to adopt a statement of overriding considerations. Based on previous statements made by the City, it appears the benefits the City might consider would include tax revenue to the City that would be generated by the Project and jobs created by the Project. As set forth in Section I, the DEIR lacks adequate information to support either such benefit because it does not clearly define the Project. Variations in the use of this warehouse development could result in greatly varied financial and employment incentives for the City.

The City must prepare a detailed analysis of the tax implications for the City with each type of warehouse use to have adequate information to support any decision it makes. Further, the City must also assess the Project's workforce requirements under each use, whether solely warehouse, or as a fulfillment center, and also the level of automation, which greatly impacts the amount of jobs created. Without such detailed analysis, the City would lack the substantial evidence required to override the Project's significant and unavoidable impacts. This information is also required to allow the City to accurately compare alternatives to the proposed Project.

Response 7-n:

The commenter is correct, since the project would result in significant and unavoidable impacts, the City is required to prepare a Statement of Overriding Considerations if it were to certify the EIR and approve the project.

Pursuant to Section 21081(a)(3) of the Public Resources Code and Section 15091(a)(3) of the State CEQA Guidelines, the City of Palm Springs may find that, for each of the significant effects, changes or alterations have been required in, or incorporated into, the project which mitigate or avoid these significant effects on the environment to the maximum extent feasible. The City may find that for each of the significant effects, specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities, make infeasible the mitigation measures or alternatives identified in the Draft/Final EIR. Those factors will be addressed by the Planning Commission when it considers the project, including the findings and Statement of Overriding considerations.

Comment 7-o:

Conclusion

For all of the reasons set forth herein, Committee finds the DEIR to be inadequate. If this Project does move forward as proposed, which we urge the City not to allow, a revised DEIR must be recirculated. Additional financial and job-creation analysis is also required prior to consideration of this Project by the City.

Further, we request that you inform us of any future Project notices pursuant to Public Resources Code section 21092.2 and applicable Municipal Code requirements. We also request that you retain all Project related documents including correspondence and email communications as required by CEQA. (Golden Door Properties, LLC v. Superior Court of San Diego County (2020) 52 Cal.App.5th 837 [agency "must retain writings"].)

Thank you for your consideration of these comments.

Response 7-o:

The comment concludes the commenter's letter. The City will inform the Committee of future project notices, per their request.

Comment Letter No. 8: Advocates for the Environment

Date: June 14, 2024
Name: Dean Wallraff
Affiliation: Advocates for the Environment
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Comment 8-a:

Advocates for the Environment submits the comments in this letter regarding the Draft Environmental Impact Report (DEIR) for the Palm Springs Fulfillment Center Project (Project). The Project Site is located near 19th Avenue and Indian Canyon Drive in the City of Palm Springs (City). The Project proposes to develop the 38-acre Project Site by constructing a 739,360 square foot two-story fulfillment center. We have reviewed the DEIR prepared in April 2024 and submit comments regarding the sufficiency of the DEIR's Greenhouse-Gas (GHG) analysis under the California Environmental Quality Act (CEQA).

Response 8-a:

The commenter describes the project and states that they have concerns regarding GHGs and the analysis of GHG in the DEIR. Responses to Comments 8-b through 8-f (below) address the specific GHG concerns.

Comment 8-b:

The City Should Require the Project to be Net-Zero

Given the current regulatory context and technological advancements, a net-zero significance threshold is feasible and extensively supportable. GHG emissions from buildings, including indirect emissions from offsite generation of electricity, direct emissions produced onsite, and from construction with cement and steel, amounted to 21% of global GHG emissions in 2019. (IPCC Sixth Assessment Report, Climate Change 2022, WGIII, Mitigation of Climate Change, p. 9-4.) This is a considerable portion of global GHG emissions. It is much more affordable to construct new building projects to be net-zero than to obtain the same level of GHG reductions by expensively retrofitting older buildings to comply with climate change regulations. Climate damages will keep increasing until we reach net zero GHG emissions, and there is a California state policy requiring the state to be net zero by 2045. It therefore is economically unsound to construct new buildings that are not net-zero.

Environmental groups have achieved tremendous outcomes by litigation under CEQA. Two of the largest mixed-use development projects in the history of California, Newhall Ranch (now FivePoint Valencia), and Centennial (part of Tejon Ranch) decided to move forward as net-zero communities after losing CEQA lawsuits to environmental groups. The ability for these large projects to become

net-zero indicates that it is achievable, even for large-scale developments. The Applicant for this Project should do the same.

We urge the City to adopt net-zero as the GHG significance threshold for this project. This threshold is well-supported by plans for the reduction of GHG emissions in California, and particularly the CARB Climate Change Scoping Plans. The CARB 2017 Scoping Plan states that "achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development." (CARB 2017 Scoping Plan, p. 101.) Additionally, the CARB 2022 Scoping Plan reaffirms the necessity of a net zero target by expressing: "it is clear that California must transition away from fossil fuels to zero-emission technologies with all possible speed … in order to meet our GHG and air quality targets." (CARB 2022 Scoping Plan, p. 184.) CARB further encourages a net-zero threshold in its strategies for local actions in Appendix D to the 2022 Scoping Plan. (CARB 2022 Scoping Plan, Appendix D p. 24-26.)

Moving this Project forward as a net-zero project would not only be the right thing for the City to do, but also would also help protect the City and the Applicant from CEQA GHG litigation.

Response 8-b:

The commenter's recommendation for the City to adopt a net-zero threshold for the project is noted. An agency is entitled to discretion with respect to thresholds of significance used in an EIR. The same is true with respect to GHG analyses, and an agency has discretion when determining the significance of a project's GHG emissions. The City's currently approved CAP does not provide criteria to evaluate proposed private development. Therefore, use of the County's CAP to demonstrate consistency with statewide GHG reduction goals (such as SB 32 and the CARB Scoping Plan) is appropriate for this project, as it reflects the regional analysis undertaken by Riverside County in developing the screening methodology and associated tables. The DEIR, at pages 4.7-13 through 4.7-17, contains a comprehensive analysis of the GHG reduction measures that can be implemented for the proposed project, and requires that the project implement the County's reduction strategy in Mitigation Measure GHG-1.

Achieving statewide carbon neutrality is a complicated endeavor, requiring reductions from various sources, including energy generation and mobile sources, which are beyond the regulatory scope of the proposed project and must be implemented at the state level. The commenter has not provided substantial evidence of why a net zero threshold is appropriate for the proposed project or why the Draft EIR's thresholds are inappropriate. Table 4.7-3 in the DEIR (page 4.7-15) provides the measures to be implemented at the project, consistent with the Riverside County CAP for commercial/industrial land uses. These measures include enhanced wall insulation, enhanced window insulation, enhanced duct insulation, improved efficiency HVAC, high-efficiency water heaters, efficient lighting, water-efficient toilets, urinals, faucets, and irrigation systems. As stated on page 4.5-21 of the DEIR, the proposed project will be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the California Title 24 energy efficiency standards.

Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building, as described under Regulatory Setting above. Title 24 standards are widely regarded as the most advanced energy efficiency standards, and would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation.

Additionally, as discussed on page 4.7-16 of the DEIR, 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. Some of the current transportation sector policies the project will comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, 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, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. As such, the project would be consistent with the 2022 Scoping Plan. See Section 4.7, *Greenhouse Gas Emissions,* of the DEIR for discussion.

Neither the City, County, or SCAQMD have adopted such a net-zero policy or threshold for land development projects. A majority of operational GHG emissions are attributed to mobile sources. It is not feasible to entirely mitigate mobile-source emissions within the current regulatory framework and technological capabilities. The project applicant proposes feasible building efficiency measures represented in Table 4.7-3 (CAP Consistency), DEIR page 4.7-15, demonstrating compliance with the applicable County's CAP Update methodology (screening point attainment) designed to work in concert with statewide regulations and actions toward reducing those impacts. As previously stated, the City of Palm Springs has agreed on the project's use of the Riverside County CAP standard for determining GHG impacts (DEIR page 4.7-9). Future statewide programs and emissions regulations may help achieve higher levels of reductions in mobile-source emissions, but additional mitigation measures specific to mobile sources are not feasible or enforceable to mitigate in a manner that would result in less than significant impacts or achieve a net-zero condition.

Comment 8-c:

GHG Mitigation is Insufficient under CEQA

The calculated project-related emissions amount to 9,438.47 metric tons of carbon dioxide equivalent (MTCO2e) per year (DEIR, p. 4.7-13). The City adopted a significance threshold based on Appendix G of the CEQA Guidelines. Based on this threshold, City concluded the Project would have significant GHG emissions. To reduce this identified significant GHG impact, the GHG Analysis offered GHG Mitigation Measure (MM) 1. (DEIR, p. 4.7-18.)

The DEIR did not provide evidence that there was no further feasible mitigation, stating the following: "CAP consistency would not lower the calculated GHG emission estimates from construction and operational mobile sources. Operational mobile sources represent approximately 83 percent of the project's total annual GHG emissions, which are not reduced by the building efficiency measures under the CAP screening Table methodology. Therefore, the project will have a significant and unavoidable impact on GHG emissions." (DEIR, p. 4.7-18.) The City did not provide any rationale why, in this instance, existing regulations and the adopted mitigation measures would be the only feasible mitigation for this Project. Despite the availability of other GHG mitigation measures, the DEIR declared that the Project's mitigated emissions were unavoidable. However, because this conclusion is not supported by substantial evidence, the DEIR should have included more mitigation to reduce the Project's GHG emissions to the extent required by CEQA.

Response 8-c:

The comment is noted, however the commenter does not provide any description of the feasible mitigation measures he asserts are possible for this project. The DEIR, on the other hand, in Table 4.7-3, *CAP Consistency – Commercial/Industrial Land Use*, demonstrates that feasible measures are available to reduce the project's impacts pertaining to building envelope, indoor space efficiencies, building efficiency, clean energy, water efficiency, and clean energy measures.

Based on the CAP methodology, the proposed project's ability to achieve a total of 274 points would comply with the screening table point value criteria and would be roughly equivalent to a reduction of approximately 8.8228 MTCO2e per 1,000 square feet of building area, which is approximately 2.74 times greater than the target reduction of 3.22 MTCO2e per 1,000 square feet of building area required by the Plan. These reductions are attributed to various building efficiency features attainable by the project and summarized in Table 4.7-3 of the DEIR. Examples of these features are insulation, windows, roof thermal emittance, air infiltration, heating/cooling distribution system, space heating/cooling equipment, artificial lighting, appliances, water fixture efficiency (toilets, faucets), and water efficient irrigation systems. The reductions do not extend to construction-related or operational mobile sources. Of the project's net total GHG emissions of 9,438.47 MTCO2e/yr., approximately 1,173.53 MTCO2e/yr. are attributed to area, energy, water usage, and waste sources. Therefore, the GHG reductions attained by implementation of GHG-1 would be able to off-set such area, energy, water usage, and waste sources from the project.

The purpose of the Screening Tables and associated point system has been to provide guidance in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated into development projects. The analysis, methodology, and significance determination (thresholds) are based upon the County of Riverside CAP Update, which includes GHG emission inventory updates; the 2020, 2030, and 2050 emission reduction targets; and the reduction measures to reach the targets.

Implementation of Mitigation Measure GHG-1 will involve a final accounting of the CAP points to demonstrate compliance with the County standard. However, as it stands, the current proposed mitigation and methodology is consistent with the County's CAP Update.

Comment 8-d:

It is Unclear How Much Mitigation will be Provided by MM-GHG-1

MM-GHG-1 is a mitigation measure based on the County of Riverside's Climate Action Plan (CAP). MM-GHG-1 requires that projects garner at least 100 points from the County's screening table.

The CAP is not directly applicable to the Project. It analyzes GHG emissions and provides climate guidance only for the unincorporated areas of the County of Riverside. Palm Springs is an incorporated city. The County developed the GHG inventories, strategies for reducing emissions, baselines, and methodologies set forth in the CAP based on data from the unincorporated areas of the County. There is no evidence showing that they are applicable to projects within incorporated cities like Palm Springs.

The CAP estimates that implementation of the reduction measures listed in the CAP screening tables will reduce GHG emissions by 0.0322 MTCO2e per point per thousand square feet of commercial/industrial building area. (CAP at p. D-3.) But, because this figure is derived from data pertaining to the unincorporated areas of the County, there is no evidence that it would be correct for projects in areas not evaluated in the CAP, such as the City of Palm Springs.

It certainly appears that the features listed in DEIR Table 4.7-3 will reduce GHG emissions, but the EIR provides no information that could be used to reliably estimate the quantity of these emissions reductions.

Response 8-d:

As stated on page 4.7-8 and 4.7-9 in the DEIR, the City's currently approved CAP, developed in 2013 does not provide criteria applicable for the proposed development. Therefore, the City determined that the appropriate threshold for GHG reduction was the use of the methodology of County of Riverside Climate Action Plan Update.

Moreover, as discussed on pages 4.7-14 to 4.7-16, the project will result in approximately 9,438.47 MTCO2e/yr; the proposed project would exceed the County's screening threshold of 3,000 MTCO2e/yr. Thus, the project would have the potential to result in a cumulatively considerable impact with respect to GHG emissions. Since the project exceeds the 3,000 MTCO2e/yr threshold, the project's impacts would be significant unless mitigated. As described in Mitigation Measure GHG-1, the project is required to demonstrate compliance with the County's CAP Screening Tables and achieve a minimum of 100 points as identified in the CAP. For reference, an industrial (or commercial) project garnering 100 points would achieve a reduction of approximately 3.22 MTCO2e per 1,000

square feet of building area, as determined by multiplying the reduction of 0.0322 MTCO2e per point by the 100-point total.

A preliminary analysis of the project's consistency demonstrates that feasible measures are available to reduce the project's impacts pertaining to building envelope, indoor space efficiencies, building efficiency, clean energy, water efficiency, and clean energy measures (see Table 4.7-3 on page 4.7-15 in the DEIR).

The project would achieve a total of 274 points by implementing the measures listed in Table 4.7-3. This would be equivalent to a reduction of approximately 8.8228 MTCO2e per 1,000 square feet of building area, which is approximately 2.74 times greater than the target reduction of 3.22 MTCO2e per 1,000 square feet of building area required by the County CAP. As disclosed in on page 4.7-16 of the DEIR, because the project plans do not provide the level of specificity that allow the completion of the screening tables, Mitigation Measure GHG-1 is provided to assure that final project plans are analyzed and demonstrate compliance with the County standard. The CAP Update methodology inherently ties a GHG reduction factor for every point that is achieved by a project, but the total point attainment in relation to the 100-point screening level is the measure of compliance, not the associated GHG reductions. Since the project's point total sufficiently exceeds the 100-point total, an additional calculation of the associated reductions is not necessary or applicable to this analysis.

Page 4.7-16 of the DEIR provides the quantifies GHG reductions per 1,000 square feet of building area achieved to reach 274 points. The methodology that has been developed for the CAP Update, on which the GHG analysis relies, provides the reliability to estimate and support the quantity of GHG emissions reductions that can be achieved by this method. The project's consistency with the CAP Update is mostly attributed to building efficiency and the associated GHG reductions. The analysis discloses that the CAP's measures would have a limited reduction to the short-term construction or operational mobile sources, which represent approximately 85 percent of the project's total annual GHG emissions. Therefore, the GHG analysis conservatively considers that the project's impacts would be significant and unavoidable while still providing the adequate information consisting of the applicable point attainment, associated efficiency, and GHG reductions.

Comment 8-e:

Infeasibility Finding Lacks Substantial Evidence

The conclusion that the Project will not be able to achieve any mitigation beyond the mitigation from MM-GHG-1 is not supported by substantial evidence. The DEIR should have proposed more mitigation measures to be applied to the maximum-feasible extent in order to justify the conclusion that the Project's GHG impact would be unavoidable due to the lack of feasibility of further mitigation. While the proposed mitigation measures are a good start, the City did not demonstrate that these actions would represent the maximum feasible mitigation to support a finding that the Project's impact would be significant and unavoidable.

CEQA requires that the lead agency identifies specific reasons for infeasibility of further mitigation when concluding significant and unavoidable impact. The City did not attempt to specify any infeasible mitigation measures when concluding that the Project's GHG impact would be unavoidable, nor did it provide any reasoning that the identified mitigation measures represent the maximum feasible mitigation.

Thus, the DEIR does not provide substantial evidence or reasoning to support the lack of further mitigation given the unavoidable impact conclusion; there are other readily available mitigation measures, especially considering that 85% of the Project's GHG impact originates from mobile emissions which the mitigation measures were not focused on reducing. (DEIR, p. 4.7-16.)

The City could require the Applicant to enter into an agreement for a zero-emission heavy-duty truck fleet to the extent feasible and as soon as practicable. Additionally, the City could mandate the production or purchase of clean power for the electricity usage of the heavy-duty electric vehicle charging stations. Therefore, the conclusion that the project's impact is significant and unavoidable lacks substantial evidence, given the feasibility of further mitigation.

Response 8-e:

See Response 8-c for discussion of the significant impacts regarding GHG and mitigation. The comment asserts that additional mitigation measures are available, but provides no factual support for that statement. The two measures mentioned by the commenter are addressed through current State requirements, including requirements for electric truck fleets by 2040. This technology is not currently available, and therefore infeasible.

Comment 8-f:

The Project's GHG Impacts Must be Fully Mitigated

CEQA requires that the Project include fair-share mitigation for all significant cumulative impacts. (Napa Citizens for Honest Gov't v. Napa County Board of Supervisors (2001) 91 Cal.App.4th 342, 364.) Here, this means mitigation of the full extent of the Project's GHG impacts.

The amount of GHG emissions that comprises the Project's fair share is clear. The reasonable lifespan this Project is approximately 30 years as indicated by the amortization of construction emissions. (DEIR, p. 4.7-11.) The DEIR estimates the Project's annual GHG emissions at 9,438.47 MTCO2e. Therefore, the Project would likely contribute 283,154.1 MTCO2e during its entire lifespan.1 This would be a good starting point from which to subtract the effect of additional nonoffset mitigation measures, before implementing offset purchases.

Despite MM-GHG-1 proposing the installation of charging stations in garages/parking areas, no evidence was presented to suggest that it would be infeasible to install more charging stations. The table indicates that 176 points would be allocated to the installation of charging stations. (DEIR, p. 4.7-15.) According to the County of Riversides 2019 CAP screening tables, eight points are awarded

per electric vehicle charging station (CAP, Appendix D, p. 19.) This amounts to a mere twenty-two2 charging stations, which is only a small fraction of the Project's 736 loading docks, it is feasible to install more truck charging stations. Furthermore, while the project proposes the installation of 110 docks, there is no mention of the installation of truck charging stations, nor any evidence that such installation would be infeasible. Truck charging stations should be installed.

In addition, the City can choose to further reduce energy usage by installing more solar panels beyond which have already been incorporated by existing mitigation measures, aiming to generate not just 30 percent, but 100 percent of the project's power needs.

Even after implementing on-site emissions reductions to the maximum feasible extent, the City could also require the Applicant to purchase offsets to the extent necessary to mitigate the Project's emissions to the fair share extent.

Overall, there are options available to mitigate emissions to the full extent of project emissions.

Response 8-f:

The comment is noted, but is not supported by substantial evidence. The commenter does not provide any facts to support their statement that options are available to mitigate all project emissions. The DEIR includes a thorough analysis of the mitigation measures available for the project, and implements these measures through GHG-1. As stated on page 4.5-21 of the DEIR, the proposed project will be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the California Title 24 energy efficiency standards. Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building, as described under Regulatory Setting above. Title 24 standards are widely regarded as the most advanced energy efficiency standards, would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation.

As indicated in Table 4.7-3 in Section 4.7, the project would implement enhanced roof, window, and duct insulation; efficient HVAC, water heater and lighting; Energy Star appliances; photovoltaic facilities to provide 30 percent of power needs; water efficient landscaping, irrigation, toilets and faucets; and installing electrical vehicle charging stations. The reductions do not extend to construction-related or operational mobile sources. Of the project's net total GHG emissions of 9,438.47 MTCO2e/yr., approximately 1,173.53 MTCO2e/yr. are attributed to area, energy, water usage, and waste sources. Therefore, the GHG reductions attained by the screening table point value system would be able to off-set such area, energy, water usage, and waste sources from the project. Since these measures do not extend to operational mobile sources, impacts to GHG remain potentially significant.

The project will be subject to the statewide regulations and targets regulated under CARB aimed at reducing mobile emissions to improve air quality and combat climate change. Among these

regulations, the Advanced Clean Trucks (ACT) Regulation requires manufacturers to sell an increasing percentage of zero-emission trucks. This mandates a shift towards electric and hydrogen fuel cell vehicles, with a target for all new trucks sold in California to be zero-emission by 2040. The integration of electric truck fleets within warehouse operations ensures a direct reduction in emissions from logistics and goods movement.

Comment 8-g:

Conclusion

The DEIR fails to require all feasible mitigation, despite concluding that the significant GHG impact will be unavoidable. The lead agency has not met its burden of showing that such measures are infeasible, and therefore the DEIR should be amended to reflect all feasible mitigation to the fair-share extent. Please put me on the interest list to receive updates about the progress of this Project. We make this request under Public Resources Code, section 21092.2.

Response 8-g:

This comment summarizes the concerns of the Advocates for the Environment presented in Comments 8-c through 8-f. See Responses 8-c through 8-f for comprehensive responses.

Public Comments – Area Residents

Comment Letter No. 9: Peter Moruzzi

Date: May 19, 2024
Affiliation: Area Resident

Comment 9-a:

Having reviewed the Draft Environmental Impact Report (DEIR) I have serious concerns about the proposed project.

Appalling visual blight now characterizes Riverside County cities such as Moreno Valley and Redlands due to the uncontrolled proliferation of massive distribution warehouses. See LA Times article link and second article link.

The proposed two-story warehouse project in north Palm Springs is almost 740,000 square feet in size and 50 feet in height, rivalling the largest warehouses in Riverside County. If the City approves this project, its location just 0.32 miles north of Interstate 10 will dominate the expansive northeast desert view that motorists first see when entering the Coachella Valley on I-10 from the west.

Yet, the DEIR dismisses possible impacts to scenic views under the 4.1 Aesthetics section by focusing on views as observed solely from roads directly adjacent to the project site. However, there is no analysis of the negative impact of desert views to the tens of thousands of cars driving along Interstate 10 looking north towards the mountains. How is it possible that a massive 739,360 square foot, 50 foot tall building will have "no substantial adverse effect on a scenic vista"? Pg 4.1-8

Pg 4.1.1 Aesthetic Value and Quality

"The evaluation of scenic vistas takes into consideration the physical compatibility of proposed projects in relation to land uses, transportation corridors, or other vantage points, where the enjoyment of unique vistas may exist, such as residential areas or scenic roads."

Pg 4.1-8 Aesthetics. Potential Impacts on the Environment. "Unobstructed views of the Little San Bernardino Mountains to the north, and Santa Rosa Mountains to the south will remain visible, due to the orientation of the project along Indian Canyon Drive. Therefore, impacts will be less than significant."

Pg 4.1.3 "According to the Riverside County Western Coachella Valley Area Plan, the Interstate 10 freeway is a County Eligible Scenic Highway but is not officially designated." The fact of it not being "officially" designated should not be dismissed as insignificant.

In order for you as commissioners to make a careful evaluation of aesthetic impacts I strongly recommend that you request the preparation of simulated perspective views of the proposed warehouse within the surrounding desert from various motorist viewpoints when heading east and west along Interstate 10.

The City of Palm Springs should not be complicit in the desecration of our beautiful desert by approving such a monstrous building for fleeting financial gain regardless of whether other desert cities succumb to such short term thinking.

We must not sacrifice our open desert areas and views for short term financial gain.

This is what a 700,000 square foot warehouse looks like:

700,000 square feet of industrial developed by

Response 9-a:

The project will not be seen from I-10 due to its distance from the freeway (0.32 miles). Additionally, existing building and infrastructure block the view of the project site. During a Planning Commission meeting for the project, the Commission requested additional visual simulations from Indian Canyon Drive. Therefore, the client provided visual simulations from the Indian Canyon Drive and Coachillin Way intersection (northeast of the project), and the Indian Canyon Drive and 20th Avenue intersection (south of the site near the I-10 interchange). The Indian Canyon Drive and 20th Avenue visual simulation provides a visual of the project with existing conditions. See pages 4.1-13 to -16 and Exhibits 4.1-6 and 4.1-7 for additional analysis of the project's impacts from the visual simulations generated. Also see Response 7-h.

Public Comments – During Recirculation: Public Agency

Comment Letter No. 10: Mission Springs Water District (MSWD)

Name: Eric Weck
Date: September 24, 2024
Affiliation: MSWD
Address: 66575 Second Street
Desert Hot Springs, CA 92240

Comment 10-a:

Mission Springs Water District (MSWD) appreciates the opportunity to review the Recirculated Draft Environmental Impact Report (RDEIR) for the Palm Springs Fulfillment Center.

It is our understanding that the proposed Project would develop a two-story 739,360 square foot (SF) industrial building fulfillment center with offices, and associated infrastructure (paved driveways and parking, landscaping, three gated access points, retention area, and perimeter fencing). The entire Project is planned to be constructed within one phase, with 727,360 SF of building area dedicated to warehouse uses and 12,000 SF of building area dedicated to office use. The Project is located in the City of Palm Springs within MSWD's water and wastewater collection service area, located along Indian Canyon Drive (the Project's eastern boundary) and 19th Avenue (the Project's southern boundary).

Response 10-a:

The City thanks the MSWD for participating in the review of the DEIR. In this comment, MSWD summarizes the project including size, use, and location. Since the comment did not raise any questions or concerns with the Draft EIR, no further response is warranted.

Comment 10-b:

MSWD offers the same comments on the RDEIR as it offered on the DEIR that was published in April 2024 of this year, as the Notice of Availability indicates that Chapter 4 of the RDEIR was not modified, and this is the only chapter that MSWD had comments on, and further has reviewed the revised chapters in the RDEIR and has no comments on the changes that were made as part of the Recirculation. Thus, MSWD offers following comments on the RDEIR and supporting technical studies that have been prepared for the Project:

Response 10-b:

In this comment MSWD acknowledges that the DEIR was recirculated and provides comments based on the recirculated DEIR. The comments and responses are presented in Comment and Responses 10-c through 10-e.

Comment 10-c:

- Page 4.9-4 Groundwater Resources: The last paragraph says "Water service to the Project site is provided by Mission Springs Water District (MSWD), which relies on well sites and groundwater resources from the Mission Creek Subbasin." However, on page 4.15-1 Domestic Water Service, the following is stated: "MSWD currently receives 100 percent of its water supply from groundwater produced from subbasins within the Coachella Valley Groundwater Basin, which underlies the District's water service area. MSWD primarily produces groundwater from the Mission Creek Subbasin via eight active wells. To a lesser extent, the District also produces groundwater from the Indio Subbasin (including the Garnet Hill Subarea) via three active wells; and the San Gorgonio Pass Subbasin via two active wells." — The statement on Page 4.9-4 Groundwater Resources should be corrected to reflect that MSWD does not receive 100% of its supply from the Mission Creek Subbasin. The statement on Page 4.15-1, is correct, as this appears to have been extracted from the 2020 Coachella Valley Regional Urban Water Management Plan.

Response 10-c:

The DEIR will be updated to state that MSWD does not receive 100 percent of its supply form the Mission Creek Subbasin. The language on page 4.9-4 will be amended to read:

"Water service to the project site is provided by Mission Springs Water District (MSWD), which relies on well sites and groundwater resources from the Mission Creek Subbasin and the Indio Subbasin (including the Garnet Hill Subarea). The project site is located within the Planning Area of the Mission Creek Subbasin Alternative Update, completed in November of 2021 in compliance with the Sustainable Groundwater Management Act (SGMA)."

See Chapter 3.0, Revisions to the DEIR, for this update.

Comment 10-d:

- Page 4.9-4 to 4.9-5: The EIR lists that the Project is located within the Planning Area of the Mission Creek Subbasin Alternative Update, completed in November of 2021 in compliance with SGMA, but in the analysis provided under issue (e) under Subchapter 4.9, references the Indio Subbasin Sustainable Groundwater Management Plan. The environmental setting of this Subchapter (Hydrology & Water Quality) does not discuss the terms of, nor outline either of these Plans as a basis from which to measure impacts. The analysis provided under issue (e) on Page 4.9-20, states that, because the WSA/WSV determined that there will be sufficient water supplies to meet the demands of the proposed Project, and future demands of the Project, plus all forecasted demands in the next 20 years, the Project would not conflict with the applicable sustainable groundwater management plan. As the Indio Subbasin Sustainable Groundwater Management Plan (SGMP) is only mentioned once in the body of the RDEIR, and the Mission Creek Subbasin Alternative Update is not referenced at all in the analysis presented under issue (e), under Subchapter 4.9, MSWD believes that further analysis should

be presented in the Final EIR to confirm that the Project would not conflict with these groundwater sustainability plans. As the Project will receive water from MSWD, which pumps groundwater from both the Indio and Mission Creek Subbasins, each of these plans should be outlined, and the Project impacts should detail why the provisions of these plans would not be violated as a result of Project implementation. MSWD understands that the findings of the WSA/WSV demonstrate that there will be sufficient water supplies to meet the demands of the proposed Project, but the City should provide an analytical link from this fact to compliance or lack of conflict with the two SGMPs to ensure that this impact issue has been fully substantiated.

Response 10-d:

The DEIR discloses that although the project site is underlain by the Garnet Hill Subarea of the Indio Subbasin, water services by MSWD to the site are sourced from the Mission Creek Subbasin. Although groundwater basins are approximately mapped, the northern limit of the Garnet Hill Subarea and Indio Subbasin is located approximately 800 feet north of the project boundary, beyond which is the Mission Creek Subbasin. The findings for item (e) will be updated to acknowledge references to the Mission Creek Subbasin. Page 4.9-20 of the DEIR will be amended to read:

"Project implementation is not expected to conflict with the Mission Creek Subbasin Alternative Update from the aspect of on-site stormwater capture, retention, and source controls for groundwater quality."

Section 6.7 of the WSA/WSV (Appendix M of the DEIR) provides project-specific conservation measures established to assure the most efficient use of water resources. The measures are as follows:

1. To the greatest extent practicable, native plant materials and other drought-tolerant plants shall be used in all non-turf areas of Project landscaping. Turf and other water-intensive landscaped areas shall be kept to the minimum necessary and consistent with the functional and aesthetic needs of the Project, while providing soil stability to resist erosion.

2. The landscaping and irrigation plans and irrigation system shall comply with all City ordinances and MSWD's Water Efficient Landscaping Guidelines relating to water efficiency, and irrigation shall be an automatic system with an irrigation timer and two drop or bubbler heads per tree to produce deep root irrigation.

3. In the event recycled water becomes available to the Project, the potential use of tertiary treated water will be reviewed to determine feasibility of its use for on-site landscaped areas to reduce the use of groundwater for irrigation.

The DEIR relies on the scope of the approved WSA/WSV, including the associated verification procedures to support the findings.

Comment 10-e:

MSWD appreciate the opportunity to comment on this RDEIR. Should you have any other questions or require additional information, please contact me by phone at 760.329.6448 ext. 122 or via email at eweck@mswd.org.

Response 10-e:

This comment concludes MSWD's letter. No further response is required.

Comment Letter No. 11: South Coast Air Quality Management District (SCAQMD)

Name: Sam Wang, Program Supervisor
Date: October 9, 2024
Affiliation: AQMD
Address: 21865 Copley Drive
Diamond Bar, CA 9765-4178

Comment 11-a:

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Palm Springs is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff (Staff) has provided a brief summary of the project information and prepared the following comments.

South Coast AQMD Staff's Summary of Project Information in the RDEIR

The Draft Environmental Impact Report (DEIR) for the Proposed Project was released in April of 2024 with a public comment period of April 30, 2024, to June 17, 2024. South Coast AQMD submitted a comment letter on the DEIR on June 14, 2024. The DEIR was recirculated in August of 2024 because the City of Palm Springs Planning Commission requested:

- a fourth alternative be analyzed in the DEIR for the purpose of comparing the fulfillment use to a warehouse use, and
- additional analysis of the Proposed Project's impact to scenic vistas from the Interstate 10 freeway.

Staff reviewed the RDEIR and found that the air quality analysis for the Proposed Project remains the same as in the DEIR. Staff therefore focused their review and this comment letter on the RDEIR's newly added fourth alternative. Staff also request that the Lead Agency reply to both this comment letter and the June 14, 2024, comment letter.

Response 11-a:

The City thanks the AQMD for participating in the review of the Draft EIR. Responses to the commenter's June 14, 2024 letter are provided above, under letter 3. Responses to comments provided on October 9th are provided below.

Comment 11-b:

South Coast AQMD Staff's Comments

Clarification Needed for Operational Emissions from Trucks in Alternative 4

Based on the RDEIR, the Proposed Project's fourth alternative consists of developing the site as a distribution center/conventional warehouse as opposed to a fulfillment center. The warehouse building, number of parking spaces, site access, and landscaping will be the same as the Proposed Project. Additionally, the RDEIR states that:

- under Alternative 4 the, '…amount of truck trips would be reduced with the warehousing use compared to the fulfillment center use based on the difference in truck types between the two scenarios.',
- 'In general, the proposed project would include a higher percentage of larger trucks with a higher axle count (5 axle) than Alternative 4…', and
- for potential health risks during the operation phase of Alternative 4, 'Since truck intensity is expected to be lower under this alternative, operational DPM [diesel particulate matter] and TAC [toxic air contaminants] emissions from diesel-fueled truck activities would be lower in terms of health risk impacts.'

Staff reviewed Appendix N of the RDEIR, Project Alternatives Memo, and notes that although Alternative 4 has less overall vehicle trips (1,264 total) than the Proposed Project (1,574 total), Alternative 4 has more truck trips (407 total) than the Proposed Project (280 total). See figures 1 and 2.

TABLE 1: PROPOSED PROJECT TRIP GENERATION SUMMARY
ACTUAL VEHICLES

Proposed Project Trip Generation Rates (Actual Vehicles)

Land Use	ITE LU Code	Quantity[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
High-Cube Warehouse[2]	--	739.360 TSF	0.094	0.028	0.122	0.046	0.119	0.165	2.129
		Passenger Cars	0.079	0.024	0.103	0.040	0.104	0.144	1.750
		2 to 4-Axle Trucks	0.006	0.002	0.008	0.003	0.008	0.011	0.162
		5+-Axle Trucks	0.008	0.003	0.011	0.003	0.007	0.010	0.217

Proposed Project Trip Generation Results (Actual Vehicles)

Land Use	ITE LU Code	Quantity[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
High-Cube Warehouse	--	739.360 TSF							
- Passenger Cars			58	18	76	30	77	107	1,294
- Truck Trips									
2 to 4-Axle Trucks			*4*	*1*	*5*	*2*	*6*	*8*	*120*
5+-Axle Trucks			*6*	*2*	*8*	*2*	*5*	*7*	*160*
- Net Truck Trips (Actual Vehicles)			10	3	13	4	11	15	280
PROPOSED PROJECT TOTAL TRIPS (ACTUAL VEHICLES)[3]			68	21	89	34	88	122	1,574

[1] TSF = Thousand Square Feet

[2] Source: *TUMF High-Cube Warehouse Trip Generation Study*. Prepared by WSP, January 2019.
AM/PM peak hour (in/out) splits are estimated from ITE 154 (High-Cube Transload & Short-Term Storage Warehouse)

[3] Proposed Project Total Trips (Actual Vehicles) = Passenger Cars + Net Truck Trips (Actual Trucks).

Figure 1. Screenshot of Appendix N, Project Alternative Memo, Table 1, p. 7

TABLE 7: ALTERNATIVE 4, WAREHOUSING PROJECT TRIP GENERATION SUMMARY
ACTUAL VEHICLES

Alternative 4 Project Trip Generation Rates (Actual Vehicles)

Land Use	ITE LU Code	Quantity[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Warehousing[2,3,4]	150	739.360 TSF	0.130	0.040	0.170	0.050	0.130	0.180	1.710
Passenger Cars (69.2% AM, 78.3% PM, 67.8% Daily)			0.090	0.028	0.118	0.039	0.102	0.141	1.159
2-Axle Trucks (5.10% AM, 3.70% PM, 5.40% Daily)			0.007	0.002	0.009	0.002	0.005	0.007	0.092
3-Axle Trucks (6.40% AM, 4.60% PM, 6.70% Daily)			0.008	0.002	0.011	0.002	0.006	0.008	0.114
4-Axle+ Trucks (19.30% AM, 13.40% PM, 20.10% Daily)			0.025	0.008	0.033	0.007	0.018	0.024	0.345

Alternative 4 Project Trip Generation Results (Actual Vehicles)

Land Use	ITE LU Code	Quantity[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Warehousing	150	739.360 TSF							
- Passenger Cars			67	21	88	29	75	104	857
Truck Trips (2-axle):			5	1	6	1	3	4	68
Truck Trips (3-axle):			6	2	8	2	4	6	84
Truck Trips (4+-axle):			19	6	25	5	13	18	255
- Net Truck Trips (Actual Vehicles)			30	9	39	8	20	28	407
ALTERNATIVE 4 PROJECT TOTAL TRIPS (ACTUAL VEHICLES)[5]			97	30	127	37	95	132	1,264

[1] TSF = Thousand Square Feet
[2] Vehicle Mix Source: Institute of Transportation Engineers (ITE), Trip Generation Handbook, Third Edition (September 2017).
[3] Vehicle Mix Source: Institute of Transportation Engineers (ITE), High-Cube Warehouse Vehicle Trip Generation Analysis (October 2016).
[4] Truck Mix Source: SCAQMD Warehouse Truck Trip Study Data Results and Usage (2014).
Normalized % - Without Cold Storage: 16.7% 2-Axle trucks, 20.7% 3-Axle trucks, 62.6% 4-Axle trucks
[5] Alternative 4 Project Total (Actual Vehicles) = Passenger Cars + Net Truck Trips (Actual Trucks).

Figure 2. Screenshot of Appendix N, Project Alternative Memo, Table 7, p. 10

Alternative 4 thus results in 127 additional diesel-fueled truck trips than the Proposed Project. 255 of the total Alternative 4 truck trips are allotted to 4+ axle trucks (which includes 5+ axle trucks). 160 of the Proposed Project's total truck trips are allotted to 5+ axle trucks. It is unclear: 1) how many fewer 5+ axle truck trips are expected in Alternative 4 when compared to the Proposed Project; and 2) how the conclusion was reached that the potential health risks during the operation phase of Alternative 4 would be lower than that of the Proposed Project. Staff therefore recommends that the Lead Agency: 1) include further analysis and information to support the claim that the potential health risks during the operation phase of Alternative 4 would be lower than that of the Proposed Project; and 2) update the Final EIR accordingly.

Response 11-b:

As stated on page 10 (Tables 7 and 8) of the North Indian Canyon and 19th Avenue High-Cube Warehouse Project Alternatives Memo (Appendix N), the Alternative 4 scenario assumes that no 5+ axle truck trips would be operated under this land use, compared to 160 daily trips of 5+ axle trucks estimated for the proposed project and summarized on page 7 of the Alternatives Memo. The truck trip configuration factored into the Project Alternatives Memo is based on the vehicle mix sourced from the Institute of Transportation Engineers (ITE) – Trip Generation Handbook and the County of Riverside TIA & VMT Guidelines (December 2020) as it pertains to the types of operations. The High-Cube Warehouse operations associated with the proposed project account for local and long-distance goods movement and therefore include a wider range of vehicle classifications with the respective truck axle configurations (2 to 5+ axles). Under Alternative 4, the total net truck trips are distributed among a narrower range truck classifications (2 to 4-axles) based on the nature of the truck operations and type of local movement. Trucks with 5 or more axles are considered Class 9,

corresponding to super-heavy duty or special-duty purposes for long-distance movement and have a gross vehicle weight rating (GVWR) exceeding 60,000 pounds. As stated on page pages 7 through 11 of the Alternatives Memo, 5+ axle trucks are not part of the truck mix because Alternative 4 has a narrower scope operations compared to the proposed project. The elimination of Class 9 trucks from the operations under Alternative 4 would result in lower emissions from the elimination of this source and associated GVWR. Therefore, the conclusion that the potential health risks during the operation phase of Alternative 4 would be lower than that of the proposed project is based on lower number of total trips under Alternative 4 (310 trips lower) and the elimination of truck trips with 5 axles or greater.

Comment 11-c:

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Response 11-c:

The City thanks AQMD for their comments and will provide AQMD with a written response to comments at least 10 days prior to certifying the Final EIR. This comment concludes AQMD's letter.

Public Comments – During Recirculation: Non-Governmental Agency

Comment Letter No. 12: Committee to Stop Giant Warehouse Blight

Date: September 27, 2024
Name: Amy Minteer
Affiliation: Committee to Stop Giant Warehouse Blight
Address: 2200 Pacific Coast Highway, Suite 318
Hermosa Beach, CA 90254

Comment 12-a:

On behalf of the Committee to Stop Giant Warehouse Blight ("Committee"), we hereby resubmit Committee's June 13, 2024 comments on the draft environmental impact report ("DEIR") for the proposed Palm Springs Fulfillment Center at Indian Canyon Drive and 19th Avenue. The revised DEIR fails to address the issues identified in these comments and we request the City respond to each of these comments in the final EIR as required by CEQA.

Thank you for your consideration of these comments.

Response 12-a:

In this comment, the commenter explains that they are resubmitting their letter sent June 13, 2024 (during the first public review period). The commenter claims that the Recirculated DEIR does not address the issues listed by the Committee. Since the commenter does not indicate any specific concerns, no additional response is required.

The balance of the comment letter is a duplication of the commenter's June 13th letter. The June 13, 2024 letter is provided above as letter 7. All comments and responses to that letter have been addressed in that section of this document.

Comment Letter No. 13: Golden State Environmental Justice Alliance

Name: Gary Ho
Date: October 8, 2024
Affiliation: Golden State Environmental Justice Alliance
Address: 707 Wilshire Boulevard, Suite 4880
Los Angeles, CA 90017

Comment 13-a:

Thank you for the opportunity to comment on the Recirculated Environmental Impact Report (EIR) for the proposed Palm Springs Fulfillment Center Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

Response 13-a:

See Response 6-a. The City will continue to notify the Golden State Environmental Justice Alliance of environmental documents, public notices, public hearings, and notice of determination related to the project, per their request. Since this comment does not identify any specific concerns, no additional response is required.

Comment 13-b:

1.0 Summary

The project proposes the construction and operation of a new cross-dock fulfillment center warehouse building totaling 739,360 square feet. The building includes 727,360 square feet of ground floor warehouse area and 12,000 square feet of 2nd floor office space. The building proposes 110 truck/trailer loading dock doors distributed on the north and south sides of the building. The site includes 430 passenger car parking spaces and 306 truck/trailer parking spaces, which are designed in a tandem configuration within the truck/trailer loading dock courts on both the north and south sides of the building.

Response 13-b:

See Response 6-b.

Comment 13-c:

3.0 Project Description

The Recirculated EIR does not include a floor plan, detailed building elevations, or a detailed grading plan. The basic components of a Planning Application include a detailed site plan, floor plan, conceptual grading plan, written narrative, and detailed elevations. Additionally, an application for a Major Development Permit requires submittal of a "site plan; preliminary grading plan; floor plans; building elevations; roof plan; landscape plan; material and color selections; lighting plan; signage plan; and other plans or exhibits required by the Director (Section 94.04.01(B) and 94.04.01(C)(1)(b) of the Palm Springs Municipal Code)." The building elevations provided in Exhibits 4.1-13 and 4.1-14 do not include the overall height of the building. The grading plan provided in Exhibit 3-6 has been edited for public review. For example, it does not include section drawings or the earthwork quantity notes. Providing the complete grading plan and earthwork quantity notes is vital as the Recirculated EIR states that, "the AQIA analysis assumed balanced earthwork conditions for the grading stage," but there is no method for the public to verify this statement. Verification of the import/export materials is vital as it directly informs the quantity of necessary truck hauling trips due to soil import/export during the grading phase of construction. There are also no building elevations provided to verify building height, paint colors, or materials. A revised EIR must be prepared to include wholly accurate and adequate detailed project site plan, floor plan, grading plan, elevations, and project narrative for public review.

Response 13-c:

See Response 6-c.

Comment 13-d:

Further, the Recirculated EIR has not complied with CEQA Guidelines Section 15088.5: Recirculation of an EIR Prior to Certification. CEQA Guidelines Section 15088.5 (f) states that "The lead agency shall evaluate and respond to comments as provided in Section 15088. Recirculating an EIR can result in the lead agency receiving more than one set of comments from reviewers. The following are two ways in which the lead agency may identify the set of comments to which it will respond. This dual approach avoids confusion over whether the lead agency must respond to comments which are duplicates or which are no longer pertinent due to revisions to the EIR. In no case shall the lead agency fail to respond to pertinent comments on significant environmental issues." No portion of the Recirculated EIR, NOA, or NOC discuss that comments were received on the Draft EIR or provides information on which set of comments the lead agency will respond to.

CEQA Guidelines Section 15088.5 (f)(1) requires that, "When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and, in such cases, need not respond to those comments received during the earlier circulation period. The lead agency shall advise reviewers, either in the text of the revised EIR or by an attachment to the revised EIR, that although part of the administrative record, the previous comments do not require a written response in the final EIR, and that new comments must be

submitted for the revised EIR. The lead agency need only respond to those comments submitted in response to the recirculated revised EIR."

The Recirculated EIR has recirculated the entirety of the document. The administrative record of the Recirculated EIR has not provided any information regarding whether new comments are required by those who submitted comments during the earlier circulation period. Due to this noncompliance with CEQA Guidelines Section 15088.5 (f) and CEQA Guidelines Section 15088.5 (f)(1), the Recirculated EIR must be revised and recirculated to include a statement within the administrative record advising reviewers whether or not the previous comments do not require a written response in the final EIR, and if new comments must be submitted for the revised EIR.

Response 13-d:

The City has responded to comments received for both the DEIR and the Recirculated DEIR in this document for all commenters. The commenter's letter of June 11, 2024 is addressed under letter 6 above. Responses to the commenter's current letter are provided below. The City did not indicate in any part of the record that it did not intend to respond to comments on the DEIR. The DEIR clearly stated that comments would be accepted during the public review period and provided contact information for comments. Letters 10 through 13 were received and have been included in this comprehensive response to comments.

Comment 13-e:

4.2 Air Quality, 4.5 Energy Resources, and 4.7 Greenhouse Gas Emissions

The Recirculated EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. According to CalEnviroScreen 4.0, CalEPAs screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed projects census tract (6065044522) is highly burdened by pollution. The surrounding community bears the impact of multiple sources of pollution and is more polluted than average on several pollution indicator measured by CalEnviroScreen. For example, the project census tract ranks in the 91st percentile for ozone burden and 60th percentile for traffic burden. These environmental factors are attributed to heavy truck activity in the area. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure. Exhaust fumes contain toxic chemicals that can damage DNA, cause cancer, make breathing difficult, and cause low weight and premature births.

The census tract also ranks in the 55th percentile for solid waste facility impacts. Solid waste facilities can expose people to hazardous chemicals, release toxic gases into the air (even after these facilities are closed), and chemicals can leach into soil around the facility and pose a health risk to nearby populations.

Further, the projects census tract is a diverse community including 45% Hispanic, 3% African-American, and 1% Asian-American residents, whom are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 74% of the census tract over age 25 has not attained a high school diploma, which is an indication that they may lack health insurance or access to medical care. The community also has a high rate of poverty, meaning 95% of the households in the census tract have a total income before taxes that is less than the poverty level. Income can affect health when people cannot afford healthy living and working conditions, nutritious food and necessary medical care. Poor communities are often located in areas with high levels of pollution. Poverty can cause stress that weakens the immune system and causes people to become ill from pollution. Living in poverty is also an indication that residents may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 59th percentile for incidence of cardiovascular disease and 51st percentile for incidence of asthma. The community also has a high rate of linguistic isolation, meaning 49% of the census tract speaks little to no English and faces further inequities as a result.

The State of California lists three approved compliance modeling softwares for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The CalEEMod modeling does not comply with the 2022 Building Energy Efficiency Standards and under-reports the projects significant Energy impacts and fuel consumption to the public and decision makers. Since the Recirculated EIR did not accurately or adequately model the energy impacts in compliance with Title 24, it cannot conclude the project will generate less than significant impacts and a finding of significance must be made. A revised EIR with modeling using one of the approved software types must be prepared and circulated for public review in order to adequately analyze the projects significant environmental impacts. This is vital as the Recirculated EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not an approved software.

Response 13-e:

See response 6-d. The Recirculated DEIR made no changes to air quality, energy resources, or greenhouse gas emission discussions.

Comment 13-f:

4.11 Population and Housing

The Recirculated EIR does not provide a quantified analysis of the construction workforce generated by the proposed project. A revised EIR must be prepared that includes an analysis of the construction jobs generated by the project. Additionally, a revised EIR must also provide demographic and geographic information on the location of qualified workers (for both project operations and construction) to fill these positions in order to provide an accurate environmental analysis.

The Recirculated EIR utilizes uncertain language and does not provide any meaningful analysis or supporting evidence to substantiate the conclusion that there will be no significant impacts to

population and housing. For example, the Recirculated EIR states that, "a high percentage of City residents and neighboring cities' residents commute outside of the City they reside in for work. For both Desert Hot Springs and Cathedral City, 89% of working residents commute for work." Since the Recirculated EIR relies upon the entire workforce of the Coachella Valley region, the project would contribute to the increasing percentages of area residents that commute outside of their residence City for work. The Recirculated EIR has not provided any analysis or meaningful evidence that the unemployed workforce in Palm Springs is qualified for or interested in work in the industrial sector. A revised EIR must be provided to include this information for analysis in order to provide an adequate and accurate environmental analysis.

SCAG's Connect SoCal Demographics and Growth Forecast notes that the City will add 10,600 jobs between 2016 - 2045. Based on the Recirculated EIR's calculation of 718 jobs, the project represents 6.7% of the City's job growth over 29 years. A single project accounting for this amount of the projected employment growth over 29 years represents a significant amount of growth. The Recirculated EIR has not provided a cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" to determine if the project will exceed SCAG's employment growth forecast or the City's General Plan growth projections. A revised EIR must be provided to include this information for analysis in order to provide an adequate and accurate environmental analysis.

Response 13-f:

See response 6-e.The Recirculated DEIR made no changes to population and housing discussions.

Comment 13-g:

4.13 Transportation

The Recirculated EIR and Appendix L: Traffic Study incorrectly model the project's average daily trip generation. Table 4.13-7 Trip Generation Summary – Actual Vehicles within Appendix L states that the source for modeling is the "TUMF High-Cube Warehouse Trip Generation Study. Prepared by WSP, January 2019. AM/PM peak hour (in/out) splits are estimated from ITE (High-Cube Transload & Short-Term Storage Warehouse)." The proposed project is clearly described as a Fulfillment Center and must be modeled as such. The Recirculated EIR must be revised to accurately model the proposed project's ADT generation in accordance with the Project Description by fully modeling and analyzing the project as a Fulfillment Center (ITE Land Use Code 155).

Response 13-g:

See response 6-f. The Recirculated DEIR made no changes to traffic discussions.

Comment 13-h:

Table 1-3: Existing Plus Ambient Plus Project Plus Cumulative (2024) Fair Share Calculations within Appendix L concludes the following intersections require improvements to address the deficiencies per the City s thresholds:

1. Intersection #2: Indian Canyon Dr. / 19th Av.

Table 1-3 in Appendix L provides a list of fair-share calculations for improvements that will allegedly mitigate significant and unavoidable impacts to the intersection to less than significant levels. It must be noted that the impacts to intersection #2 are located in the City of Desert Hot Springs. Any improvements planned/constructed or in-lieu fees/fair share fees paid for City of Desert Hot Springs facilities are beyond the control/scope of the lead agency. An assessment of fees is appropriate when linked to a specific mitigation program. (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, *Save our Peninsula Comm. v. Monterey County Bd. Of Supers.* (2001) 87 Cal.App.4th 99, 141.) Payment of fees is not sufficient where there is no evidence mitigation will actually result. (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099,1122.) The assessment of fees here is not adequate as there is no evidence mitigation will actually result. The improvements required are not part of an existing DIF/TUMF program and therefore are not planned to occur at all or by any certain date, whether by the City of Plan Springs or City of Desert Hot Springs. Any improvements recommended or fees paid to mitigate impacts for City of Desert Hot Springs facilities are beyond the control of the lead agency and evidence that these improvements will be completed or approved by Caltrans has not been provided. A revised EIR must be prepared to include the LOS analysis as cumulatively considerable significant impact as the project conflicts with Transportation Impact Threshold A and Land Use and Planning Impact Threshold B because it is not consistent with the following General Plan Policy:

1. CR2.1: Maintain Level of Service D or better for the City s circulation network, as measured using in season" peak hour conditions.

Response 13-h:

See response 6-g. The Recirculated DEIR made no changes to traffic discussions.

Comment 13-i:

Further, the Recirculated EIR has underreported the quantity VMT generated by the proposed project operations. The operational nature of industrial/warehouse uses involves high rates of truck/trailer/delivery van VMT due to traveling from large import hubs to regional distribution centers to smaller industrial parks and then to their final delivery destinations. Once employees arrive at work at the proposed project, they will conduct their jobs by driving delivery vans across the region as part of the daily operations as a fulfillment center, which will drastically increase project-generated VMT. The project's truck/trailer and delivery van activity is unable to utilize public transit or active

transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. The project's total operational VMT generated is further inconsistent with the significance threshold and legislative intent of SB 743 to reduce greenhouse gas emissions by reducing VMT. A revised EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer and delivery van activity.

Response 13-i:

See response 6-h. The Recirculated DEIR made no changes to traffic discussions.

Comment 13-j:

The Recirculated EIR has not adequately analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; or the project's potential to result in inadequate emergency access. There are no exhibits adequately depicting the onsite turning radius available for trucks maneuvering throughout the site. Exhibit 3-3: Site Plan depicts truck/trailer parking stalls located in a tandem configuration adjacent to the truck/trailer loading dock courts on both sides of the building. These parking stalls may be in use at any time and further restrict truck/trailer movement, including increasing truck idling times as tandem parked trucks require additional time to maneuver, which will also result in increased queuing duration and associated need for increased queuing area for trucks/trailers. The Recirculated EIR has not provided any exhibits demonstrating that there is sufficient backup space for trucks/trailers to utilize these spaces. A revised EIR must be prepared to include a finding of significance due to these significant and unavoidable impacts.

Response 13-j:

See response 6-i. The Recirculated DEIR made no changes to traffic discussions.

Comment 13-k:

There are also no exhibits depicting emergency vehicle access. Notably, the Recirculated EIR states that, "City staff, including Police and Fire Department staff, would review site plans and provide conditions of approval that are specific to the provision of emergency access," and that, "all roadway design shall be reviewed and approved by the City and Fire Department," which is deferred mitigation to after the CEQA public review process. This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation, deferred mitigation, and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents. The Recirculated EIR must be revised with this analysis in order to provide an adequate and accurate environmental analysis.

Response 13-k:

See response 6-j. The Recirculated DEIR made no changes to traffic discussions.

Comment 13-l:

Additionally, the Recirculated EIR has not provided any analysis of the available horizontal and vertical sight distance at the intersection of the project driveways and adjacent streets. Sight distance is the continuous length of street ahead visible to the driver. At unsignalized intersections, corner sight distance must provide a substantially clear line of sight between the driver of the vehicle waiting on the minor road (driveway) and the driver of an approaching vehicle. A revised EIR must be prepared with this analysis based on the American Association of State Highway and Transportation Officials (AASHTO) Stopping Sight Distance requirements.

Response 13-l:

See response 6-k. The Recirculated DEIR made no changes to traffic discussions.

Comment 13-m:

5.3 Significant Irreversible Environmental Changes and 5.4 Growth Inducing Impacts

The Recirculated EIR relies upon erroneous Energy modeling to determine that the project will meet sustainability requirements. As noted above, the Recirculated EIR did not model the project's energy consumption in compliance with Title 24 modeling software. The Recirculated EIR must be revised to include a finding of significance due to the an inaccurate and erroneous analysis regarding the project's Air Quality, Greenhouse Gas, and Energy impacts, including those significant and unavoidable cumulatively considerable GHG impacts.

The Recirculated EIR does not adequately discuss or and analyze the commitment of resources is not consistent with regional and local growth forecasts. As noted below, the project represents a significant amount of building area growth in the City and a significant amount of the City's employment growth over 29 years. The Recirculated EIR must also include a cumulative analysis discussion here to demonstrate the impact of the proposed project in a cumulative setting, including the associated cumulative impacts of the project's significant and unavoidable cumulatively considerable GHG and Transportation (VMT) impacts.

The Recirculated EIR does not provide any analysis here regarding the buildout conditions of the City's General Plan. Table 2-2: Nonresidential Land Buildout Estimates in the Updated Land Use Element states that the City estimates 11,638,620 square feet of industrial development to occur during the City's buildout. The Recirculated EIR must be revised to provide the horizon year of the City's adopted General Plan and cumulative development since adoption of the General Plan to ensure that the proposed project is within the General Pl's analysis, particularly since the project EIR tiers from the General Plan EIR. The proposed project's 739,360 square feet of industrial building area accounts for

6.3% of the General Plan Industrial land buildout attributed to a single project. The Recirculated EIR has not provided any analysis of this information and whether the proposed project in combination with cumulative development exceeds the projected buildout scenario. A revised EIR must be prepared to include this analysis in order to provide an adequate and accurate environmental document.

SCAG's Connect SoCal Demographics and Growth Forecast notes that the City will add 10,600 jobs between 2016 - 2045. Based on the Recirculated EIR's calculation of 718 jobs, the project represents 6.7% of the City's job growth over 29 years. A single project accounting for this amount of the projected employment growth over 29 years represents a significant amount of growth. The Recirculated EIR has not provided a cumulative analysis discussion of projects approved since 2016 and projects in the pipeline" to determine if the project will exceed SCAG s employment growth forecast or the City's General Plan growth projections. A revised EIR must be provided to include this information for analysis in order to provide an adequate and accurate environmental analysis.

Response 13-m:

See response 6-e and 6-l. The Recirculated DEIR made no changes to modeling, growth projections, or job estimates.

Comment 13-n:

6.6 Effects Found to Have No Impact: Land Use and Planning

Table 1-3: Existing Plus Ambient Plus Project Plus Cumulative (2024) Fair Share Calculations within Appendix L concludes the following intersections require improvements to address the deficiencies per the City's thresholds:

2. Intersection #2: Indian Canyon Dr. / 19th Av.

Table 1-3 in Appendix L provides a list of fair-share calculations for improvements that will allegedly mitigate significant and unavoidable impacts to the intersection to less than significant levels. It must be noted that the impacts to intersection #2 are located in the City of Desert Hot Springs. Any improvements planned/constructed or in-lieu fees/fair share fees paid for City of Desert Hot Springs facilities are beyond the control/scope of the lead agency. An assessment of fees is appropriate when linked to a specific mitigation program. (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, *Save our Peninsula Comm. v. Monterey County Bd. Of Supers.* (2001) 87 Cal.App.4th 99, 141.) Payment of fees is not sufficient where there is no evidence mitigation will actually result. (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099,1122.) The assessment of fees here is not adequate as there is no evidence mitigation will actually result. The improvements required are not part of an existing DIF/TUMF program and therefore are not planned to occur at all or by any certain date, whether by the City of Plan Springs or City of Desert Hot Springs. Any improvements recommended or fees paid to mitigate impacts for City of Desert Hot Springs facilities are beyond the

control of the lead agency and evidence that these improvements will be completed or approved by Caltrans has not been provided. A revised EIR must be prepared to include the LOS analysis as cumulatively considerable significant impact as the project conflicts with Transportation Impact Threshold A and Land Use and Planning Impact Threshold B because it is not consistent with the following General Plan Policy:

1. CR2.1: Maintain Level of Service D or better for the City s circulation network, as measured using in season" peak hour conditions.

Response 13-n:

See response 6-g and 6-m. The Recirculated DEIR made no changes to land use or traffic discussions.

Comment 13-o:

The Recirculated EIR does not provide a consistency analysis with all land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The project has significant potential to conflict with many of these items, including but not limited to the following from the General Plan:

1. Goal LU1: Establish a balanced pattern of land uses that complements the pattern and character of existing uses, offers opportunities for the intensification of key targeted sites, minimizes adverse environmental impacts, and has positive economic results.

2. LU12.6 Require that loading and outdoor storage areas for commercial and industrial uses be screened from public streets and freeway views.

3. LU12.7 Promote the development of high-quality building design, including attractive fenestration, articulated façades, clearly defined entrances, varied colors and materials, varied building sizes and configurations, and varied roof heights during project review and approval.

4. GOAL CD21: It is a goal of the City of Palm Springs to create convenient, attractive, and well designed industrial and business parks.

5. CD21.1 Strengthen the image of business park areas through entry monument signage, distinctive landscaping, and complementary architectural design elements.

6. CD21.2 Encourage clean and distinctive industrial/office buildings with clearly visible entrances.

7. CD21.3 Avoid the use of long, blank walls by breaking them up with vertical and horizontal façade articulation achieved through stamping, colors, materials, modulation, and landscaping.

8. CD21.4 Use screening techniques, such as landscaping, walls, and berms, to minimize views of surface parking, storage and service areas.

9. GOAL AQ4 Reduce vehicular emissions.

10. GOAL AQ3 Protect people and land uses that are sensitive to air contaminants from sources of air pollution to the greatest extent possible.

11. AQ3.1 Discourage the development of land uses and the application of land use practices that contribute significantly to the degradation of air quality.

A revised EIR must be prepared to provide a consistency analysis with all of the most updated versions of the General Plan objectives, goals, policies, and strategies. The Recirculated EIR must also be revised to remove misleading and erroneous consistency analysis. For example, the Recirculated EIR concludes the project is consistent with "LU3.3 Ensure operation of industrial uses is unobtrusive to surrounding areas and prohibit the development of manufacturing uses that operate in a manner or use materials that may impose a danger on adjacent uses or are harmful to the environment," because "surrounding properties include industrial and commercial businesses. The Recirculated EIR does not acknowledge that the project will result in significant and unavoidable cumulatively considerable GHG and VMT impacts, which will directly impact surrounding residents and communities beyond the immediate vicinity. A finding of significance must be made due to the inconsistency with this policy.

Response 13-o:

See response 6-n.

Comment 13-p:

The Recirculated EIR provides misleading information regarding the buildout conditions of the City's General Plan. The Recirculated EIR states that, "Table 2-2, Nonresidential Land Buildout Estimates, in the Updated Land Use Element states that the City estimates 11,638,620 square feet of industrial development to occur during the City's buildout" and concludes that the because the project is less than the total quantity of buildout area, the project will result in less than significant impacts. The Recirculated EIR must be revised to provide the horizon year of the City's adopted General Plan and cumulative development since adoption of the General Plan to ensure that the proposed project is within the General Plan EIR's analysis, particularly since the project EIR tiers from the General Plan EIR. The proposed project's 739,360 square feet of industrial building area accounts for 6.3% of the General Plan Industrial land buildout attributed to a single project. The Recirculated EIR has not provided any analysis of this information and whether the proposed project in combination with cumulative development exceeds the projected buildout scenario. A revised EIR must be prepared to include this analysis in order to provide an adequate and accurate environmental document.

Response 13-p:

See response 6-l.

Comment 13-q:

The Recirculated EIR excludes a consistency analysis with SCAG's 2020-2045 Connect SoCal RTP/SCS. Due to errors in modeling and modeling without supporting evidence (as noted throughout this comment letter and attachments) and the Recirculated EIR's conclusion the project will have significant and unavoidable cumulatively considerable Greenhouse Gas Emissions and Transportation (VMT) impacts, the proposed project is directly inconsistent with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing climate. A revised EIR must be prepared to include a finding of significance due to these inconsistencies with SCAG's 2020-2045 Connect SoCal RTP/SCS.

Response 13-q:

See response 6-p.

Comment 13-r:

Conclusion

For the foregoing reasons, GSEJA believes the Recirculated EIR is flawed and a revised EIR must be prepared for the proposed project and recirculated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

Response 13-r:

As detailed in the responses above, and the responses provided to letter 6 above, the EIR is not flawed, complete analyses have been provided, and no recirculation is necessary. The City will continue to notify the commenter regarding the project.

COMMENT LETTER NO. 1: CITY OF PALM SPRINGS ENGINEERING

From: Rick Minjares <Rick.Minjares@palmspringsca.gov>
Date: Wednesday, May 8, 2024 at 2:06 PM
To: Nicole Criste <ncriste@terranovaplanning.com>
Cc: Glenn Mlaker <Glenn.Mlaker@palmspringsca.gov>
Subject: Draft EIR comments for Palm Springs Fulfillment Center

Nicole,

Below are some comments I have:

- Chapter 4.9 Hydrology –
  - 4.9-1 & 4.9-8 - There are references to the Palm Springs MDP, the Palm Springs MDP does not include the project area. Although there is a Desert Hot Springs MDP which includes the project area, unsure if the DHS MDP has been adopted. 1-a
  - 4.9-14 – references to the project meeting or proposing to meet the LID site design criteria, is the project really eligible for LID? 1-b

Rick Minjares | Engineering Associate (Private Development)
24 years of proud service
City of Palm Springs | Engineering Services Department
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T : 760.323.8253 ext. 8741
rick.minjares@palmspringsca.gov

COMMENT LETTER NO. 2: CDFW

From:	Skaggs, Jacob@Wildlife
To:	Glenn.Mlaker@palmspringsca.gov
Cc:	Brashear, Heather@Wildlife
Subject:	Requesting time extension to submit comments on the draft EIR for the Palm Springs Fulfillment Center (SCH# 2023080091)
Date:	Wednesday, June 5, 2024 8:22:59 AM

Hi Glenn,
CDFW is preparing a comments on the draft EIR for the Palm Springs Fulfillment Center (SCH# 2023080091). Would the City of Palm Springs agree to provide CDFW with a time extension, from Monday, 6/17 to Monday, 6/24 to submit comments? Our workloads have been very full and we would appreciate any additional time to finalize our comments.
Thank you,
Jacob

2-a

Jacob Skaggs
Senior Environmental Scientist Specialist
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Ontario, CA 91764
(760) 218-0320

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
Glenn.Mlaker@palmspringsca.gov
City of Palm Springs
Glenn Mlaker, AICP, Associate Planner
3200 E. Tahquitz Canyon Way
Palm Springs, CA 92262

June 14, 2024

Notice of Availability of a Draft Environmental Impact Report (EIR) for the Proposed Palm Springs Fulfillment Center Project (Proposed Project) (SCH No.: 2023080091)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Palm Springs is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of construction and operation of a warehouse facility on approximately 38 acres of vacant and undeveloped land within the City of Palm Springs in Riverside County.[1] Approximately 16.70 of these acres would be dedicated to construction of a 739,360 square-foot (s.f.) building.[2] Specifically, the 739,360 s.f. building would be developed with: 1) 727,360 s.f. of building space for industrial warehousing use; 2) 12,000 s.f. of building space for office use; and 3) 110 truck loading docks.[3] The Proposed Project is expected to generate 1,574 vehicle trips per day (787 vehicles inbound plus 787 vehicles outbound), which includes 280 truck trips (140 trucks inbound plus 140 trucks outbound).[4] The Proposed Project is also expected to operate 24 hours/day, seven days/week.[5] South Coast AQMD staff reviewed aerial photographs and found that the nearest sensitive receptor, a private residence, is located approximately 1,450 feet northeast of the Proposed Project site (64050 18th Ave, Palm Springs, 92258) and the nearest off-site worker is located approximately 81 feet south of the Proposed Project site. The Interstate 10 freeway on and off ramps are also located approximately 2,000 feet south of the Proposed Project site. For analyzing air quality impacts, construction is anticipated to occur in one phase, commence in January 2024, and be completed by April 2025 (lasting approximately 15 months).[6] The Proposed Project is located on the northwest corner of Indian Canyon Drive and 19th Avenue.[7]

3-a

[1] Draft EIR. Executive Summary. Page 1-1.
[2] *Ibid.* Page 1-2.
[3] *Ibid.* Appendix C.1 Air Quality Impact Analysis. Page 5.
[4] *Ibid.* Appendix C.2 Mobile Source Health Risk Assessment. Page 15.
[5] *Ibid*. Environmental Impact Analysis 4.2 Air Quality. Page 4.2-17.
[6] *Ibid.* Appendix C.1 Air Quality Impact Analysis. Page 28.
[7] *Ibid.* Executive Summary Page 1-1.

South Coast AQMD Staff's Comments

Use of South Coast AQMD's Mass Rate Localized Significance Threshold (LST) Look-Up Table to Analyze the Proposed Project's Operational Localized Air Quality Impact is not Consistent with Guidance for the LST Methodology

The Proposed Project covers approximately 38 acres. The Lead Agency uses South Coast AQMD's Mass Rate LST Look-up Table for five acres as a screening tool to determine if the Proposed Project's operational daily emissions of NOx, CO, PM10 and PM2.5 could result in a significant impact to local air quality.[8,9] South Coast AQMD staff, however, developed the LST methodology for proposed projects that are less than or equal to five acres.[10] For projects that are greater than five acres in size, South Coast AQMD recommends lead agencies perform project-specific dispersion modeling to determine operational localized air quality impacts. Staff therefore recommends the Lead Agency to: 1) perform project-specific air dispersion modeling for the Proposed Project's operational phase emissions to determine localized air quality impacts; and 2) include the results in the Final EIR. 3-b

Warehouse Cold Storage Land Use and the Associated Emissions from Transport Refrigeration Units (TRU)

The project description in the Draft EIR does not specify whether the Proposed Project intends to include cold storage usage. Cold storage warehouses utilize more trucks and trailers equipped with TRUs than warehouses without cold storage. The small diesel engines that are commonly used to provide power to TRUs generate large quantities of diesel exhaust emissions while operating. As a result, it is recommended that the Lead Agency revise the project description in the Final EIR to clarify and explicitly state whether cold storage facilities are part of the Proposed Project and, if applicable, provide an estimate of the number of TRU trucks and trailers associated with the operation of this warehouse. If there are potential uses for TRUs, the Lead Agency is recommended to revise the calculations in the Final EIR to quantify the emissions from the TRUs in addition to the operational truck emissions. 3-c

Inconsistencies and Incorrect Information in Emission Calculations

Potential Underestimation of Construction and Operational Emissions Due to Imprecise Assumptions for Truck Trip Lengths

Appendix C.1 of the Draft EIR explains that the emissions from trucks for the operational air quality impact analysis were based, in part, on the assumption that the average daily truck trip length is 40 miles for 4+-axle heavy-heavy-duty trucks (HHDT), 15.3 miles for 2-axle trucks, and 14.2 miles for 3-axle trucks.[11] The appendix then states that a weighted average trip length of 3-d

[8] South Coast AQMD Appendix C – Mass Rate LST Look-up Table. Access here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf

[9] Draft EIR. Appendix C.1 Air Quality Impact Analysis. Pages 40 - 41.

[10] Final LST Methodology, July 2008. Page 1-1, 3-3, & 3-4. Access here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf

[11] Draft EIR. Appendix C.1 Air Quality Impact Analysis. Page 32.

34.51 miles (based on a traffic study conducted for the Proposed Project) was used.[12] The Proposed Project site, however, is located approximately 110 miles away from the Ports of Long Beach and Los Angeles (Ports), which means that the air quality analysis underestimated the emissions from trucks traveling from the Ports to the Proposed Project site. For this reason, the Lead Agency is recommended to revise the calculations in the Final EIR by taking a project-specific approach to the vehicle trip length. Staff recommends the Lead Agency apply more conservative trip lengths, such as designating 110 miles for Port-related trips.

The CalEEMod output files of Appendix C.1 also show that for vendor truck trips during the construction phase, the miles per trip is set to 10 miles.[13] There is a high probability that the distance from the City of Palm Springs to cities where vendors may be located is greater than 10 miles. For example, west of the Proposed Project site, the City of Banning is approximately 18 miles away. Given the location of the City of Palm Springs in relation to other cities where vendors may be located, the construction phase air quality analysis may have underestimated the vendor emissions from trucks. For this reason, the Lead Agency is recommended to revise the calculations in the Final EIR by taking a project-specific approach to the vendor vehicle trip length. Staff recommends the Lead Agency apply more conservative trip lengths. Tailoring these parameters and assumptions to be based on project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project. 3-d

Potential Underestimation of Operational Emissions Due to Inconsistencies in Parameters used to Model Emissions from On-site Cargo Handling Equipment

Page 33 of Appendix C.1 states that during the operational phase of the Proposed Project four port tractors (200 horsepower, fueled with natural gas) will be utilized and each port tractor will operate up to 4 hours per day, 365 days a year. Appendix 3.1 of Appendix C.1, CalEEMod Emissions Model Outputs, then shows, however, that the Port Tractor Emissions were only modeled for three port tractors rated at 175 brake horsepower (BHP).[14] See Figure 1 below. 3-e

Equipment Qty:	3
Hours/day:	4

Region	Year	Vehicle Category	Fuel	BHP	Emissions (lbs/day)							MT/yr
					ROG	NOX	CO	SOX	PM10	PM2.5	CO2	CO2
South Coast AQMD	2025	Cargo Handling Equipment - Port Tractor	Nat Gas	175	0.35	1.13	49.33	0.00	0.09	0.08	858.45	142.10

Figure 1. Screenshot of Appendix C.1, N Indian Canyon/19th Ave High-Cube Warehouse, Air Quality Impact Analysis, PDF page 158 of 195

This inconsistency raises questions about the accuracy of the modeled emission estimates for the on-site cargo handling equipment. The Lead Agency is recommended to revisit these calculations and update the Final EIR accordingly with the appropriate corrections.

Potential Underestimation of VOC Construction Emissions Due to Incorrect Input of s.f. for Construction Architectural Coatings 3-f

[12] Draft EIR. Appendix L.1 Traffic Study.
[13] *Ibid.* Appendix C.1. Appendix 3.1 CalEEMod Emissions Model Outputs. Page 38 of 51.
[14] *Ibid.* Appendix C.1 Air Quality Impact Analysis. PDF page 158 of 195.

The Proposed Project's estimated maximum regional daily emissions for VOC during the construction phase is 73.90 lbs./day, 1.1 lbs. below South Coast AQMD's CEQA VOC mass daily emissions construction threshold of 75 lbs./day.[15,16] Staff is concerned that the Proposed Project's construction VOC emissions may have been underestimated.

Architectural coating area is one of the model inputs that CalEEMod uses to calculate a project's VOC emissions. Per CalEEMod Version 2022.1.1.24, "The coated area for non-residential buildings is 2.7 times the non-residential floor square footage, of which 75% is interior surface and 25% is exterior surface."[17] The Draft EIR states that the Proposed Project building will have a ground floor area of 727,360 s.f.[18] According to CalEEMod then, if floor square footage = **727,360 s.f.**, then the

- total coated area for this non-residential building should be 727, 360 s.f. *2.7 = **1,963,872 s. f.**
- coated interior surface should be 1,963,872 s. f. *.75 = **1,472,904**
- and the coated exterior surface should be 1,963,872 s. f. *.25 = **490,968**

However, the Proposed Project's CalEEMod s.f. input for Construction Architectural Coatings shows a reduced square footage: 3-f

- coated interior surface: **1,109,040 s.f.**
- coated exterior surface: **369,680 s.f.**

Which means the VOC emissions for the Proposed Project have been calculated, in part, using a floor square footage of only = 547,674 s.f. [(1,109,040 + 369,680)/2.7]. **See Figure 2 below.**


Construction
Architectural Coatings

		VOC Content (g/L) by Building and Surface Type					Coated Area (sqft)			
Phase Name	Phase Type	Residential Interior VOC	Non Residential Interior VOC	Residential Exterior VOC	Non Residential Exterior VOC	VOC for Parking Paint	Residential Interior Area	Non Residential Interior Area	Residential Exterior Area	Non Residential Exterior Area
Architectural Coating (modified)	Architectural Coating	50	50	50	50	100	0	1,109,040	0	369,680

Figure 2. Screenshot of Proposed Project CalEEMod input file[19]

This inconsistency in floor square footage raises questions about the accuracy of the modeled emission estimates for the Proposed Project's VOC construction emissions. The Lead Agency is

[15] Draft EIR. Environmental Impact Analysis 4.2 Air Quality. Page 4.2-25.
[16] South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf
[17] CalEEmod.com, < Inputs<<Construction<<<Architectural Coatings Screen<<<<Coated Area
[18] Draft EIR. Executive Summary. Page 1-2.
[19] CalEEMod technical data files provided to Staff upon request (e-mail communication with Glenn Mlaker, May 14, 2024)

recommended to revisit these calculations and update the Final EIR accordingly with the appropriate corrections. 3-f

Particulate Matter (PM) Quantities in pounds/day (lbs./day) in Draft EIR and Appendix C.1 inconsistent with PM quantities shown in Technical Files

According to the Draft EIR and its accompanying Air Quality Impact Analysis appendix, the peak operational PM emissions are 14.72 lbs./day for PM10 and 3.67 lbs./day for PM2.5.[20,21,22] But these PM emissions do not match the emissions shown in the CalEEMod technical files provided to Staff (technical data files provided to Staff upon request, e-mail communication with Glenn Mlaker, May 14, 2024). In the CalEEMod technical data files provided to staff, the peak operational PM10 emissions are calculated to be 33.61 lbs./day and 9.12 lbs./day for PM2.5. This difference between what is shown to have been calculated in the CalEEMod technical files versus what is presented in the Draft EIR and Appendix C.1 needs to be addressed and the Final EIR revised accordingly. 3-g

Incorrect AERMOD Modeling Parameters used in the Health Risk Assessment (HRA)

South Coast AQMD staff's review of the construction and operation HRA modeling files noted that the ***Urban*** dispersion coefficient and ***Elevated*** modeling parameters were used in the Control Pathway in the AERMOD model.[23] Staff reviewed aerial photographs and found that the Proposed Project Site, however, is in a rural area and that the terrain is generally flat. 3-h

The Lead Agency is therefore recommended to: 1) re-run the construction and operational HRAs to utilize the ***Rural*** dispersion coefficient and ***Flat*** modeling parameters to determine the health risk impacts to the sensitive receptors and off-site workers; and 2) include the results in the Final EIR.

South Coast AQMD Air Permits and Role as a Responsible Agency

The Draft EIR states that South Coast AQMD permits to construct and operate stationary sources may be needed.[24] If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, etc., air permits from South Coast AQMD will be required and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. 3-i

[20] Draft EIR. Environmental Impact Analysis 4.2 Air Quality. Page 4.2-26.
[21] *Ibid.* Appendix C.1 Appendix 3.1 CalEEMod Emissions Model Outputs. Page 9 of 51.
[22] *Ibid*. PDF page 158 of 195.
[23] *Ibid*. Appendix C.2. Mobile Source Health Risk Assessment. Page 19.
[24] *Ibid*. Project Description 3.0. Page 3-17.

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits. 3-i

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. 3-j

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:EA
RVC240501-06
Control Number

COMMENT LETTER NO. 4: CDFW

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

June 24, 2024
Sent via email

Glenn Mlaker
Associate Planner
City of Palm Springs
3200 E. Tahquitz Canyon Way
Palm Springs, CA 92262
Glenn.mlaker@palmspringsca.gov

Palm Springs Fulfillment Center Project (PROJECT)
Draft Environmental Impact Report (DEIR)
SCH# 2023080091

Dear Glenn Mlaker:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Environmental Impact Report (DEIR) from the City of Palm Springs (City) for the Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

4-a

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on Projects and related

4-b

[1]CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code. 4-b

PROJECT DESCRIPTION SUMMARY

Proponent: PS Canyon Development, LLC

Objective: The proposed Project includes to develop an industrial building on approximately 38 acres on the northwest corner of Indian Canyon Drive and 19th Avenue, in the City of Palm Springs. The Project proposes a two-story industrial building with associated improvements such as paved parking spaces and drive aisles, a detention basin, and three gated access points. The two-story facility has a proposed building area of 739,360 square feet. Additionally, the proposed Project will connect to existing offsite infrastructure to provide electricity, natural gas, water, and sewer services to the Project along Indian Canyon Drive and 19th Avenue. 4-c

For security purposes, the Project will provide nighttime lighting to safely illuminate the parking areas, entrances, signs, and walkways. According to the photometric plan, Project light fixtures will consist of downward-oriented post-mounted and wall-mounted fixtures located throughout the Project. The wall-mounted fixtures will provide lighting for building entryways, sidewalks, and general exterior lighting. The post-mounted fixtures are proposed to be located in the parking lot areas and along the paved driveways. The downward-oriented fixtures are designed to not only provide light on the Project site, but also to reduce the amount of light emitted towards adjacent properties.

The Project will include approximately 4.15 acres of landscaped and retention areas, including one landscaped retention basin located along the southern boundary, and trees, shrubs, and accents proposed along the Project's eastern and southern sides. Landscaping will include drought-tolerant trees (24-inch boxes), 12-foot palms, and ground covers (15-gallon) typically found in the region, such as willow acacia, desert museum palo verde, thornless honey mesquite, and date palm. Shrubs and accent plantings proposed for the Project include outback sunrise emu bush, new gold lantana, Lindheimer's muhly, firecracker plant, various agave, cactus, yucca, and aloe. Fractured rock, and decomposed granite will provide ground cover. Exterior irrigation will use drip or micro-spray applicators.

Location: The proposed Project is situated on the northwest corner of Indian Canyon Drive and 19th Avenue in the City of Palm Springs, approximately 0.32 miles north of the Interstate 10 freeway in the City's industrial land use district. The Project is surrounded by vacant land to the north, wind energy facilities to the west, 19th Avenue and existing commercial to the south, and Indian Canyon Drive and industrial uses to the east, within the City of Desert Hot Springs's jurisdiction. The location of the Project can be described as a portion of Section 15, Township 3 South, Range 4 East, San Bernardino Meridian, and at Latitude 33°54'44" N, Longitude 116°32'50" W. Accessor's Parcel Number: 666-032-018.

4-c

Timeframe: The DEIR indicates that Project construction will occur in one phase. The construction activities include site preparation, grading, building construction, paving, and architectural coating. Construction is anticipated to begin in January 2025 and will last through April 2026.

COMMENTS AND RECOMMENDATIONS

CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (i.e., biological resources). CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. The DEIR has not adequately identified and disclosed the Project's impacts (i.e., direct, indirect, and cumulative) on biological resources and whether those impacts are reduced to less than significant.

4-d

CDFW's comments and recommendations on the DEIR are explained in greater detail below and summarized here. CDFW is concerned that the DEIR does not adequately identify or mitigate the Project's significant, or potentially significant, impacts to biological resources. CDFW also concludes that the DEIR lacks sufficient information to facilitate a meaningful review by CDFW, including a complete and accurate assessment of biological resources on the Project site. CDFW requests that additional information and analyses be added to a revised DEIR, along with avoidance, minimization, and mitigation measures that avoid or reduce impacts to less than significant.

<u>Existing Environmental Setting</u>

Compliance with CEQA is predicated on a complete and accurate description of the environmental setting that may be affected by the proposed Project. CDFW is concerned that the assessment of the existing environmental setting has not been adequately analyzed in the DEIR. CDFW is concerned that without a complete and accurate description of the existing environmental setting, the DEIR may provide an incomplete analysis of Project-related environmental impacts.

4-e

The DEIR lacks a complete assessment of biological resources within the Project site and surrounding area specifically as it relates to special-status plants and natural communities. A complete and accurate assessment of the environmental setting and Project-related impacts to special status plants and natural communities is needed to both identify appropriate avoidance, minimization, and mitigation measures and demonstrate that these measures reduce Project impacts to less than significant. 4-e

Mitigation Measures

CEQA requires that a DEIR include mitigation measures to avoid or reduce significant impacts. CDFW is concerned that the mitigation measures proposed in the DEIR are not adequate to avoid or reduce impacts to biological resources to below a level of significance. To support the City in ensuring that Project impacts to biological resources are reduced to less than significant, CDFW recommends adding mitigation measures for special-status plants, assessment of wildlife, artificial nighttime lighting, CDFW's Lake and Streambed Alteration Program, and salvage of sand-dependent Covered Species, as well as revising the mitigation measures for nesting birds and burrowing owl. 4-f

1) Assessment of Biological Resources

Page 12 of the Project's Biological Resources Assessment, dated December 20, 2022 (Biological Assessment), lists several rare annual plant species including, but not limited to, ribbed cryptantha (*Johnstonella costata;* California Rare Plan Rank (CRPR 4:3)), flat-seeded spurge (*Chamaesyce platysperma;* CRPR 1B.2), white-bracted spineflower (*Chorizanthe xanti* var. *leucotheca;* CRPR 1B.2), and slender cottonheads (*Nemacaulis denudate gracilis;* CRPR 2B.2), which "could conceivably occur on the project site." According to page 10 of the Project's Biological Assessment, "Field surveys for plant and animal species were initiated on November 18, 2022. Daytime field surveys were conducted on November 18, 19, 20, 27, 28, 30 December 2, 3, 4, 2022. Night surveys were conducted on November 18, 21, and 22, 2022." Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a Project is critical to the assessment of environmental impacts, that special emphasis should be placed on environmental resources that are rare or unique to the region, and that significant environmental impacts of the proposed Project are adequately investigated and discussed. 4-g

Because surveys for special-status plant species were conducted outside of the typical bloom period for the rare plant species listed above, it is uncertain if any individuals or significant populations of these species exist within the large 38-acre Project site. Surveys implemented using recommended protocols and conducted during the appropriate time(s) of the year is an important step in adequately disclosing potential impacts to special-status native plants and sensitive natural communities. CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant

Populations and Sensitive Natural Communities[2] provides the following guidance on timing and number of visits: “Conduct botanical field surveys in the field at the times of year when plants will be both evident and identifiable. Usually this is during flowering or fruiting. Space botanical field survey visits throughout the growing season to accurately determine what plants exist in the Project area. This usually involves multiple visits to the Project area (e.g., in early, mid, and late-season) to capture the floristic diversity at a level necessary to determine if special status plants are present.[3] The timing and number of visits necessary to determine if special status plants are present is determined by geographic location, the natural communities present, and the weather patterns of the year(s) in which botanical field surveys are conducted.” The findings of appropriate botanical field surveys for special-status native plants and sensitive natural communities are important in informing appropriate avoidance, minimization, and mitigation measures and supporting the City in demonstrating that Project impacts are reduced to less than significant. CDFW recommends that the City include in a revised DEIR the results of a recent and thorough floristic-based assessment of special-status plants and natural communities performed by a qualified biologist and following CDFW's Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018 or most recent version). Based on findings from a recent floristic-based assessment, CDFW recommends that the DEIR is revised to include an analysis of direct, indirect, and cumulative impacts to biological resources and identification of appropriate avoidance, minimization, and mitigation measures. 4-g

CDFW also recommends that City add the following mitigation measure in **bold** to a revised DEIR:

Mitigation Measure BIO-[A]: Special-Status Plants

Prior to Project construction activities, a thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW’s Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (see https://wildlife.ca.gov/Conservation/Plants) shall be performed by a qualified biologist. Should any state-listed plant species (excluding CVMSHCP Covered

[2] Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities, California Department of Fish and Wildlife, March 20, 2018. Link: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline

[3] U.S. Fish and Wildlife Service Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants available at: https://www.fws.gov/sacramento/es/Survey-Protocols-Guidelines/

Species) be present in the Project area, the Project proponent shall obtain appropriate CESA authorization for those species prior to the start of Project activities. Should any species of native plants designated as rare, threatened, or endangered by state law (excluding CVMSHCP Covered Species) be present in the Project area, on-site or off-site habitat restoration (whichever is applicable) and/or enhancement and preservation should be evaluated and discussed in detail. Where habitat preservation is not available on-site, off-site land acquisition, management, and preservation should be evaluated.

4-g

CDFW generally considers biological field assessments for wildlife to be valid for a one-year period. CDFW is also concerned that the field assessments conducted in November and December 2022 were not conducted at the appropriate time of year to detect all special-status wildlife species. In addition, species-specific protocol-level surveys were not performed for the detection of special-status species. CDFW is concerned about the potential for special-status species to occur on or near the Project site, including, but not limited to, desert tortoise (*Gopherus agassizii;* State Endangered; Federally Threatened; CVMSHCP Covered Species), desert kit fox (*Vulpes macrotis;* protected as a fur-bearing mammal under Title 14 of California Code of Regulations (Chap. 5, §460)), American badger (*Taxidea taxus*; Species of Special Concern), and Palm Springs pocket mouse (*Perognathus longimembris bangsi;* Species of Special Concern; CVMSHCP Covered Species). Special-status species may also move into the Project site between the time of field surveys and start of Project construction activities. CDFW recommends that the DEIR is revised to include the findings of recent focused protocol-level surveys for special-status species that may occupy the Project site. CDFW recommends that the City add the following mitigation measure to a revised DEIR:

4-h

Mitigation Measure BIO-[B]: Assessment of Wildlife

Prior to Project construction activities, a complete and recent inventory of threatened, endangered, and other sensitive wildlife species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511), will be completed. Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period. Some aspects of the proposed Project may warrant periodic updated surveys for certain

sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.

Pursuant to the CEQA Guidelines, section 15097(f), CDFW has prepared a draft mitigation monitoring and reporting program (MMRP) in Attachment 1 for revised MM BIO-1 and MM BIO-2, as well as CDFW-recommended MM BIO-[A], MM BIO-[B], MM BIO-[C], MM BIO-[D], and MM BIO-[E]. 4-h

2) Nesting Birds

It is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.).

Permittees of the CVMSHCP must ensure that Covered Activities within their jurisdictions—both inside and outside Conservation Areas—do not take, possess, or needlessly destroy the nest or eggs of nesting birds. Per Section 3.5.6 of the California Department of Fish and Wildlife (CDFW) Natural Community Conservation Plan (NCCP) Permit #2835-2008-001-06 for the CVMSHCP, "take outside of Conservation Areas will be consistent with sections 3503 and 3503.5 of the Fish and Game Code." Per Section 13.2 of the CVMSHCP Implementing Agreement, County and Cities' obligations include, but are not limited to, taking "all necessary and appropriate actions, following applicable land use permit enforcement procedures and practices, to enforce the terms of project approvals for public and private projects, including compliance with the MSHCP, the Permits and this Agreement." 4-i

Page 5-5 of the DEIR indicates that "nesting birds and burrowing owls have the potential to occur given the site conditions and vegetation found on the site." The DEIR includes Mitigation Measure BIO-1 for nesting birds, which indicates that "for any grading or other site disturbance or tree or vegetation removal occurring during the nesting season between February 1st and August 31st, a qualified biologist shall conduct at least one nesting bird survey". CDFW considers the Mitigation Measure BIO-1 to be insufficient in scope and timing to reduce impacts to nesting birds to a level less than significant. CDFW is concerned about impacts to nesting birds including loss of nesting/foraging habitat and potential take from ground-disturbing activities and

construction. Conducting work outside the peak nesting season is an important avoidance and minimization measure. CDFW also recommends the completion of nesting bird surveys *regardless* of the time of year to ensure that impacts to nesting birds are avoided. The timing of the nesting season varies greatly depending on several factors, such as bird species, weather conditions in any given year, and long-term climate changes (e.g., drought, warming, etc.). In response to warming, birds have been reported to breed earlier, thereby reducing temperatures that nests are exposed to during breeding and tracking shifts in availability of resources (Socolar et al., 2017[4]). CDFW staff have observed that climate change conditions may result in nesting bird season occurring earlier and later in the year than historical nesting season dates. CDFW recommends that disturbance of occupied nests of migratory birds and raptors within the Project site and surrounding area be avoided any time birds are nesting on-site. CDFW therefore recommends the completion of nesting bird surveys *regardless of the time of year* to ensure compliance with all applicable laws pertaining to nesting and migratory birds.

Although the DEIR includes Mitigation Measure BIO-2 for nesting birds, CDFW considers the measure insufficient to scope and timing to reduce impacts to a level less than significant. CDFW recommends that the City revise Mitigation Measure BIO-2 with the following additions in **bold** and removals in ~~strikethrough~~: 4-i

Mitigation Measure BIO-2: Nesting Birds

Regardless of the time of year, nesting bird surveys shall be performed by a qualified avian biologist no more than 3 days prior to vegetation removal or ground-disturbing activities. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Construction activities may not occur inside the established buffers, which shall remain on-site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have

[4] Socolar JB, Epanchin PN, Beissinger SR and Tingley MW (2017). Phenological shifts conserve thermal niches. Proceedings of the National Academy of Sciences 114(49): 12976-12981.

fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.
~~For any grading or other site disturbance or tree or vegetation removal occurring during the nesting season between February 1st and August 31st, a qualified biologist shall conduct at least one nesting bird survey, and more if deemed necessary by the consulting biologist, 24 hours prior to initiation of project-related ground disturbing activities. If nesting birds are present, no work shall be permitted near the nest until the young birds have fledged. While there is no established protocol for nest avoidance, when consulted, the CDFW generally recommends avoidance buffers of about 500 feet for birds-of-prey, and 100 – 300 feet for songbirds.~~

4-i

3) Burrowing Owl

Burrowing owl is a California Species of Special Concern. Take of individual burrowing owls and their nests is defined by Fish and Game Code section 86, and prohibited by sections 3503, 3503.5, and 3513. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.). Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill."

Permittees of the CVMSHCP must ensure that Covered Activities within their jurisdictions—both inside and outside Conservation Areas—do not result in the take of the burrowing owl individuals, nests, or eggs. Per Section 3.5.6 of the California Department of Fish and Wildlife (CDFW) Natural Community Conservation Plan (NCCP) Permit #2835-2008-001-06 for the CVMSHCP, "take outside of Conservation Areas will be consistent with sections 3503 and 3503.5 of the Fish and Game Code." Adding further clarification, Section 3.5.6 of CDFW's NCCP Permit indicates that "following all laws applicable to migratory birds (discussed below), the pairs or individuals will not be Taken, just the land around and including the burrows", and "the HCP/NCCP does not authorize Take of nests and eggs as prohibited by Fish and Game Code sections 3503 and 3503.5 and therefore avoidance measures will have to be undertaken for all projects which have breeding burrowing owls present." An activity that results in the take of burrowing owl individuals, nests, or eggs would be unlawful and would not be a Covered Activity under the CVMSHCP. Per Section 13.2 of the CVMSHCP Implementing Agreement, County and Cities' obligations include, but are not limited to, taking "all necessary and appropriate actions, following applicable land use permit enforcement procedures and practices, to enforce the terms of project approvals for public and private projects, including compliance with the MSHCP, the Permits and this Agreement." The City has an obligation under the CVMSHCP to ensure the Project does not result in the take of burrowing owl individuals, nests, and eggs.

4-j

Page 4.3-12 of the DEIR states that "a burrowing owl was observed five times during the field surveys and one active burrow with one owl was found within the site boundaries. The entire site is considered suitable burrowing owl habitat with friable soil and rodent burrows that could be expanded in size by the owls." The Project site contains suitable habitat for burrowing owl and burrowing owls have been identified onsite.

Although the DEIR includes Mitigation Measure BIO-1 for burrowing owl, CDFW considers the measure to be insufficient in scope and timing to reduce impacts to a level less than significant. CDFW recommends that the City revise Mitigation Measure BIO-1 with the following additions in **bold** and removals in ~~strikethrough~~:

Mitigation Measure BIO-1: Burrowing Owl Surveys

Suitable burrowing owl habitat has been confirmed on the site; therefore, focused burrowing owl surveys shall be conducted by a qualified biologist according to the *Staff Report on Burrowing Owl Mitigation* prior to vegetation removal or ground-disturbing activities. If burrowing owls are detected during the focused surveys, the qualified biologist and Project proponent shall begin coordination with CDFW and USFWS immediately, and shall prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval prior to commencing Project activities. The Burrowing Owl Plan shall describe proposed avoidance, minimization, mitigation, and monitoring actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures. If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe minimization and relocation actions that will be implemented. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take. If impacts to occupied burrows cannot be avoided, information shall be provided regarding adjacent or nearby suitable habitat available to owls along with proposed relocation actions. The Project proponent shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval.

Preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the *Staff Report on Burrowing Owl Mitigation* (2012 or most recent version). Preconstruction surveys should be performed by a qualified biologist following the recommendations and guidelines provided in the *Staff Report on Burrowing Owl Mitigation*. If the preconstruction

4-j

surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and prepare a Burrowing Owl Plan that shall be submitted to CDFW and USFWS for review and approval prior to commencing Project activities.
~~Per the 2012, California Department of Fish and Wildlife (CDFW) Staff Report on Burrowing Owl Mitigation, a burrowing owl clearance survey shall be performed by a qualified biologist 14 to 30 days prior to any site disturbance (grubbing, grading, and construction). The pre-construction survey is required to use accepted protocol (CDFW Staff Report). A final clearance survey must be conducted 24 hours prior to ground disturbance. If owls are found to be present during the breeding season (February 15 through September 15), a qualified biologist will prepare a plan and submit it to CDFW for review and approval prior to establishing a buffer area (a no disturbance zone) around the active burrow. When it is determined that all young owls have permanently left the burrow (fledged), the buffer area may be abandoned, and the adult owls captured and relocated, if approved under the plan. If the presence of any burrowing owl is confirmed in preconstruction surveys, regardless of season, a qualified biologist shall prepare a plan for avoidance or relocation and submit it to the CDFW for review and approval. No construction activity shall be permitted until the measures contained in the approved plan have been completed.~~

4-j

4) Artificial Nighttime Lighting

The proposed Project will result in new sources of artificial nighttime lighting, including lighting for safety and security (page 4.1-27 of the DEIR). The Project is located adjacent to open-space areas to the north and west of the Project site—areas that provide suitable nesting, roosting, foraging, and refugia habitat for birds, migratory birds that fly at night, bats, and other nocturnal and crepuscular wildlife. The Project's proposed artificial nighttime lighting has the potential to significantly and adversely affect wildlife in the open-space areas adjacent to the Project site. Artificial lighting alters ecological processes including, but not limited to, the temporal niches of species; the repair and recovery of physiological function; the measurement of time through interference with the detection of circadian and lunar and seasonal cycles; the detection of resources and natural enemies; and navigation.[5] Many species use photoperiod cues for communication (e.g., bird song[6]), determining when to begin foraging,[7]behavioral

4-k

[5] Gatson, K. J., Bennie, J., Davies, T., Hopkins, J. 2013. The ecological impacts of nighttime light pollution: a mechanistic appraisal. Biological Reviews, 88.4: 912-927.
[6] Miller, M. W. 2006. Apparent effects of light pollution on singing behavior of American robins. The Condor 108:130–139.
[7] Stone, E. L., G. Jones, and S. Harris. 2009. Street lighting disturbs commuting bats. Current Biology 19:1123–1127.

thermoregulation,[8] and migration.[9] Phototaxis, a phenomenon that results in attraction and movement towards light, can disorient, entrap, and temporarily blind wildlife species that experience it.[14]

Page 4.1-27 of the DEIR indicates, "For security purposes, the project will provide nighttime lighting to safely illuminate the parking areas, entrances, signs, and walkways. According to the photometric plan, project light fixtures will consist of downward-oriented post-mounted and wall-mounted fixtures located throughout the project. The wall-mounted fixtures will provide lighting for building entryways, sidewalks, and general exterior lighting. The post-mounted fixtures are proposed to be located in the parking lot areas and along the paved driveways. The downward-oriented fixtures are designed to not only provide light on the project site, but also to reduce the amount of light emitted towards adjacent properties." While these plans for shielding artificial lighting support the Project in limiting lighting impacts to biological resources within areas surrounding the Project site, CDFW considers these measures insufficient in scope and timing to reduce impacts to a level less than significant. To support the City in avoiding or reducing impacts of artificial nighttime lighting on biological resources to less than significant, CDFW recommends the City add the following mitigation measure to a revised DEIR: 4-k

Mitigation Measure BIO-[C]: Artificial Nighttime Lighting

Throughout construction and the lifetime operations of the Project, the City of Palm Springs and Project proponent shall eliminate all nonessential lighting throughout the Project area and avoid or limit the use of artificial light at night during the hours of dawn and dusk when many wildlife species are most active. The City of Palm Springs and Project proponent shall ensure that all lighting for the Project is fully shielded, cast downward and directed away from surrounding open-space and agricultural areas, reduced in intensity to the greatest extent possible, and does not result in lighting trespass including glare into surrounding areas or upward into the night sky (see the International Dark-Sky Association standards at http://darksky.org/). The City of Palm Springs and Project proponent shall ensure use of LED lighting with a correlated color temperature of 3,000 Kelvins or less, proper disposal of hazardous waste, and recycling of lighting that contains toxic compounds with a qualified recycler.

5) Lake and Streambed Alteration Program 4-l

[8] Beiswenger, R. E. 1977. Diet patterns of aggregative behavior in tadpoles of *Bufo americanus*, in relation to light and temperature. Ecology 58:98–108.
[9] Longcore, T., and C. Rich. 2004. Ecological light pollution - Review. Frontiers in Ecology and the Environment 2:191–198.

Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following: divert or obstruct the natural flow of any river, stream, or lake; change the bed, channel, or bank of any river, stream, or lake; use material from any river, stream, or lake; or deposit or dispose of material into any river, stream, or lake. Note that "any river, stream, or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow.

Page 4.3-3 of the DEIR indicates that “no blue-line stream corridors (streams or dry washes) occur in the project area.” Based on review of historical aerial imagery using Google Earth Pro, ephemeral streams traverse the western half of the proposed Project area. Evidence of erosion and scour, slopes and depressions, and stream-aligned vegetation are visible and evident in historical imagery particularly on the western half of the Project site. To ensure that impacts to streams and associated fish and wildlife are reduced to a level less than significant, CDFW recommends that the City add the following mitigation measure to a revised DEIR: 4-l

Mitigation Measure BIO-[D]: CDFW Lake and Streambed Alteration Program

Prior to construction, the Project Sponsor shall obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, *or* the Project Sponsor shall obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.

6) Coachella Valley Multiple Species Habitat Conservation Plan

Salvage of Sand-Dependent Covered Species

Section 6.6.1 of the CVMSHCP (Obligations of Local Permittees) states that within and outside Conservation Areas “on parcels approved for Development, the Permittees shall encourage the opportunity to salvage Covered sand-dependent species in accordance with the Implementation Manual.” Page 17 of the Project’s Biological Assessment indicates that “one mammalian species that was detected (burrows) and contained within the California Department of Fish & Game Special Animals List is the Palm Springs ground squirrel (*Spermophilus tereticaudus chlorus*).” To be consistent with the CVMSHCP, CDFW recommends that the City include in a revised DEIR the following mitigation measure: 4-m

Mitigation Measure BIO-[E]: Salvage of Sand-Dependent Covered Species

Prior to vegetation removal or ground-disturbing activities, the City of Palm Springs will collaborate with the Coachella Valley Conservation Commission to plan and implement a salvage of sand-dependent Covered Species within the Project site.

4-m

7) Landscaping

Page 3-7 of the DEIR indicates that the "project landscape will include drought-tolerant trees (24-inch boxes), 12-foot palms, and ground covers (15-gallon) typically found in the region, such as willow acacia, desert museum palo verde, thornless honey mesquite, and date palm. Shrubs and accent plantings proposed for the project include outback sunrise emu bush, new gold lantana, Lindheimer's muhly, firecracker plant, various agave, cactus, yucca, and aloe. Fractured rock, and decomposed granite will provide ground cover. Exterior irrigation will use drip or micro-spray applicators." CDFW recommends incorporation of water-wise concepts in any Project landscape design plans. In particular, CDFW recommends xeriscaping with locally native California species and installing water-efficient and targeted irrigation systems (such as drip irrigation). Native plants support butterflies, birds, reptiles, amphibians, small mammals, bees, and other pollinators that evolved with those plants. More information on native plants suitable for the Project location and nearby nurseries is available at Calscape: https://calscape.org/. Local water agencies/cities and resource conservation cities in your area may be able to provide information on plant nurseries that carry locally native species, and some facilities display drought-tolerant locally native species demonstration gardens. Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website: https://saveourwater.com/. CDFW also recommends that the DEIR include recommendations regarding landscaping from Section 4.0 of the CVMSHCP "Table 4-112: Coachella Valley Native Plants Recommended for Landscaping" (pp. 4-180 to 4-182; https://cvmshcp.org/plan-documents/).

4-n

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

4-o

ENVIRONMENTAL DOCUMENT FILING FEES

4-p

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.) 4-p

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts to biological resources. CDFW concludes that the DEIR does not adequately identify or mitigate the Project's significant, or potentially significant, impacts to biological resources. CDFW also concludes that the DEIR lacks sufficient information for a meaningful review of impacts to biological resources, including a thorough floristic-based assessment of special-status plants and natural communities. The CEQA Guidelines indicate that recirculation is required when insufficient information in the DEIR precludes a meaningful review (§ 15088.5). CDFW recommends that a revised DEIR, including a complete assessment of biological resources (floristic-based assessment of special-status plants and natural communities) be recirculated for public comment. CDFW also recommends that revised and additional mitigation measures and analysis as described in this letter be added to a revised DEIR. 4-q

CDFW personnel are available for consultation regarding biological resources and strategies to avoid and minimize impacts. Questions regarding this letter or further coordination should be directed to Jacob Skaggs, Senior Environmental Scientist Specialist, at jacob.skaggs@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Kim Freeburn
84F92FFEEFD24C8...

Kim Freeburn
Environmental Program Manager

Attachment 1: MMRP for CDFW-Proposed Mitigation Measures

ec:

Heather Brashear, Senior Environmental Scientist (Supervisor), CDFW
Heather.Brashear@Wildlife.ca.gov

Office of Planning and Research, State Clearinghouse, Sacramento

state.clearinghouse@opr.ca.gov

Vincent James, U.S. Fish and Wildlife Service
vincent_james@fws.gov

Peter Satin, Coachella Valley Conservation Commission
psatin@cvag.org

ATTACHMENT 1: MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

Mitigation Measures	Timing and Methods	Responsible Parties
Mitigation Measure BIO-[A]: Special-Status Plants **Prior to Project construction activities, a thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (see https://wildlife.ca.gov/Conservation/Plants) shall be performed by a qualified biologist. Should any species of native plants designated as rare, threatened, or endangered by state law (excluding CVMSHCP Covered Species) be present in the Project area, on-site or off-site habitat restoration (whichever is applicable) and/or enhancement and preservation should be evaluated and discussed in detail. Where habitat preservation is not available on-site, off-site land acquisition, management, and preservation should be evaluated.**	**Timing**: Prior to Project construction activities **Methods:** See Mitigation Measure	**Implementation**: City of Palm Springs and Project proponent **Monitoring and Reporting**: City of Palm Springs
Mitigation Measure BIO-[B]: Assessment of Wildlife **Prior to Project construction activities, a complete and recent inventory of threatened,**	**Timing**: Prior to Project construction activities.	**Implementation**: City of Palm Springs and Project proponent

endangered, and other sensitive wildlife species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511), will be completed. Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.	**Methods:** See Mitigation Measure	**Monitoring and Reporting**: City of Palm Springs
Mitigation Measure BIO-2: Nesting Birds **Regardless of the time of year, nesting bird surveys shall be performed by a qualified avian biologist no more than 3 days prior to vegetation removal or ground-disturbing activities. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may**	**Timing**: No more than 3 days prior to vegetation removal or ground-disturbing activities. **Methods:** See Mitigation Measure	**Implementation**: City of Palm Springs and Project proponent **Monitoring and Reporting**: City of Palm Springs

be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Construction activities may not occur inside the established buffers, which shall remain on-site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.		
Mitigation Measure BIO-1: Burrowing Owl Surveys **Suitable burrowing owl habitat has been confirmed on the site; therefore, focused burrowing owl surveys shall be conducted by a qualified biologist according to the *Staff Report on Burrowing Owl Mitigation* prior to vegetation removal or ground-disturbing activities. If burrowing owls are detected during the focused surveys, the qualified biologist and Project proponent shall begin coordination with CDFW and USFWS immediately, and shall prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval prior to commencing Project activities. The Burrowing Owl Plan shall describe proposed avoidance, minimization, mitigation, and monitoring actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures. If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe minimization and relocation actions that will be implemented. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other**	**Timing: Focused surveys:** Prior to vegetation removal or ground-disturbing activities. **Pre-construction surveys:** No less than 14 days prior to start of Project-related activities and within 24 hours prior to ground disturbance. **Methods:** See Mitigation Measure	**Implementation**: City of Palm Springs and Project proponent **Monitoring and Reporting**: City of Palm Springs

options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take. If impacts to occupied burrows cannot be avoided, information shall be provided regarding adjacent or nearby suitable habitat available to owls along with proposed relocation actions. The Project proponent shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval. **Preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the *Staff Report on Burrowing Owl Mitigation* (2012 or most recent version). Preconstruction surveys should be performed by a qualified biologist following the recommendations and guidelines provided in the *Staff Report on Burrowing Owl Mitigation*. If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and prepare a Burrowing Owl Plan that shall be submitted to CDFW and USFWS for review and approval prior to commencing Project activities.**		
Mitigation Measure BIO-[C]: Artificial Nighttime Lighting **Throughout construction and the lifetime operations of the Project, the City of Palm Springs and Project proponent shall eliminate all nonessential lighting throughout the Project area and avoid or limit the use of artificial light at night during the hours of dawn and dusk when many wildlife species are most active. The City of Palm Springs and Project proponent shall ensure that all lighting for the Project is fully shielded, cast downward and directed away from surrounding open-space and agricultural areas, reduced in intensity to the greatest extent possible, and does not result in lighting trespass including glare into surrounding areas or upward into the night sky (see the International**	**Timing**: Throughout construction and the lifetime operations of the Project. **Methods:** See Mitigation Measure	**Implementation**: City of Palm Springs and Project proponent **Monitoring and Reporting**: City of Palm Springs

Dark-Sky Association standards at http://darksky.org/). The City of Palm Springs and Project proponent shall ensure use of LED lighting with a correlated color temperature of 3,000 Kelvins or less, proper disposal of hazardous waste, and recycling of lighting that contains toxic compounds with a qualified recycler.		
Mitigation Measure BIO-[D]: CDFW Lake and Streambed Alteration Program **Prior to construction, the Project Sponsor shall obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, *or* the Project Sponsor shall obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.**	**Timing**: Prior to construction **Methods:** See Mitigation Measure	**Implementation**: City of Palm Springs and Project proponent **Monitoring and Reporting**: City of Palm Springs
Mitigation Measure BIO-[E]: Salvage of Sand-Dependent Covered Species **Prior to vegetation removal or ground-disturbing activities, the City of Palm Springs will collaborate with the Coachella Valley Conservation Commission to plan and implement a salvage of sand-dependent Covered Species within the Project site.**	**Timing**: Prior to vegetation removal of ground-disturbing activities **Methods:** See Mitigation Measure	**Implementation**: City of Palm Springs and Project proponent **Monitoring and Reporting**: City of Palm Springs

COMMENT LETTER NO. 5: CARE CA

ADAMS BROADWELL JOSEPH & CARDOZO
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Of Counsel
MARC D. JOSEPH
DANIEL L. CARDOZO

May 15, 2024

VIA EMAIL AND U.S. MAIL

Christopher Hadwin
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Brenda Pree, MMC, CERA
City Clerk
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Email: brenda.pree@palmspringsca.gov;
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VIA EMAIL ONLY

Glenn Mlaker, AICP, Associate Planner
Email: glenn.mlaker@palmspringsca.gov

Re: Request for Mailed Notice of Actions and Hearings – Palm Springs Fulfillment Center Project (SCH No. 2023080091; Case No. 34361)

Dear Mr. Hadwin, Ms. Pree, and Mr. Mlaker:

We are writing on behalf of Californians Allied for a Responsible Economy ("CARE CA") to request mailed notice of the availability of any environmental review document, prepared pursuant to the California Environmental Quality Act, related to the Palm Springs Fulfillment Center Project (SCH No. 2023080091; Case No. 34361) ("Project"), proposed by PS Canyon Development LLC ("Applicant"), as well as a copy of the environmental review document when it is made available for public review. 5-a

The Project proposes to construct a two-story, 739,360-square-foot (SF) high cube warehouse with offices and associated infrastructures on approximately 38 acres in the City of Palm Springs, Riverside County, California. The proposed warehouse contains a footprint of 739,360 SF allotted to warehouse uses and 12,000 SF for offices on the second floor. The Project site is located on the Northwest Corner of Indian Canyon Drive and 19th Avenue and comprises of Assessor's Parcel Number 666-320-018.

We also request mailed notice of any and all hearings and/or actions related to the Project. These requests are made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108, 21152, and 21167(f) and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

Please send the above requested items by email and U.S. Mail to our South San Francisco Office as follows: 5-b

U.S. Mail
Sheila M. Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email
ssannadan@adamsbroadwell.com

If you have any questions, please call me at (650) 589-1660 or email me at ssannadan@adamsbroadwell.com. Thank you for your assistance with this matter.

Sincerely,

Sheila M. Sannadan
Legal Assistant

SMS:ljl

COMMENT LETTER NO. 6: GOLDEN STATE ENVIRONMENTAL JUSTICE ALLIANCE

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ATTORNEYS AT LAW
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LOS ANGELES, CALIFORNIA 90017
(213) 572-0400

June 11, 2024

Glenn Mlaker
AICP, Associate Planner
City of Palm Springs
3200 E. Tahquitz Canyon Way
Palm Springs, CA 92262

VIA EMAIL TO:
glenn.Mlaker@palmspringsca.gov

Subject: Comments on Palm Springs Fulfillment Center EIR (SCH NO. 2023080091)

Dear Mr. Mlaker,

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Palm Springs Fulfillment Center Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. 6-a

1.0 Summary

The project proposes the construction and operation of a new cross-dock fulfillment center warehouse building totaling 739,360 square feet. The building includes 727,360 square feet of ground floor warehouse area and 12,000 square feet of 2nd floor office space. The building proposes 110 truck/trailer loading dock doors distributed on the north and south sides of the building. The site includes 430 passenger car parking spaces and 306 truck/trailer parking spaces, which are designed in a tandem configuration within the truck/trailer loading dock courts on both the north and south sides of the building. 6-b

3.0 Project Description

The EIR does not include a floor plan, detailed building elevations, or a detailed grading plan. The basic components of a Planning Application include a detailed site plan, floor plan, conceptual grading plan, written narrative, and detailed elevations. Additionally, an application for a Major Development Permit requires submittal of a "site plan; preliminary grading plan; floor plans; building elevations; roof plan; landscape plan; material and color selections; lighting plan; signage 6-c

plan; and other plans or exhibits required by the Director (Section 94.04.01(B) and 94.04.01(C)(1)(b) of the Palm Springs Municipal Code)." The grading plan provided in Exhibit 3-6 has been edited for public review. For example, it does not include a section drawings or the earthwork quantity notes. Providing the complete grading plan and earthwork quantity notes is vital as the EIR states that, "the AQIA analysis assumed balanced earthwork conditions for the grading stage," but there is no method for the public to verify this statement. Verification of the import/export materials is vital as it directly informs the quantity of necessary truck hauling trips due to soil import/export during the grading phase of construction. There are also no building elevations provided to verify building height, paint colors, or materials. A revised EIR must be prepared to include wholly accurate and adequate detailed project site plan, floor plan, grading plan, elevations, and project narrative for public review. 6-c

4.2 Air Quality, 4.5 Energy Resources, and 4.7 Greenhouse Gas Emissions

The EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. According to CalEnviroScreen 4.0[1], CalEPA s screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project s census tract (6065044522) is highly burdened by pollution. The surrounding community bears the impact of multiple sources of pollution and is more polluted than average on several pollution indicator measured by CalEnviroScreen. For example, the project census tract ranks in the 91st percentile for ozone burden and 60th percentile for traffic burden. These environmental factors are attributed to heavy truck activity in the area. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure[2]. Exhaust fumes contain toxic chemicals that can damage DNA, cause cancer, make breathing difficult, and cause low weight and premature births[3]. 6-d

The census tract also ranks in the 55th percentile for solid waste facility impacts. Solid waste facilities can expose people to hazardous chemicals, release toxic gases into the air (even after these facilites are closed), and chemicals can leach into soil around the facility and pose a health risk to nearby populations[4].

[1] https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0/
[2] OEHHA Ozone https://oehha.ca.gov/calenviroscreen/indicator/air-quality-ozone
[3] OEHHA Traffic https://oehha.ca.gov/calenviroscreen/indicator/traffic-density
[4] OEHHA Solid Waste Facilities https://oehha.ca.gov/calenviroscreen/indicator/solid-waste-sites-and-facilities

Further, the project s census tract is a diverse community including 45% Hispanic, 3% African-American, and 1% Asian-American residents, whom are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 74% of the census tract over age 25 has not attained a high school diploma, which is an indication that they may lack health insurance or access to medical care. The community also has a high rate of poverty, meaning 95% of the households in the census tract have a total income before taxes that is less than the poverty level. Income can affect health when people cannot afford healthy living and working conditions, nutritious food and necessary medical care[5]. Poor communities are often located in areas with high levels of pollution[6]. Poverty can cause stress that weakens the immune system and causes people to become ill from pollution[7]. Living in poverty is also an indication that residents may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 59th percentile for incidence of cardiovascular disease and 51st percentile for incidence of asthma. The community also has a high rate of linguistic isolation, meaning 49% of the census tract speaks little to no English and faces further inequities as a result. 6-d

The State of California lists three approved compliance modeling softwares[8] for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The CalEEMod modeling does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project s significant Energy impacts and fuel consumption to the public and decision makers. Since the EIR did not accurately or adequately model the energy impacts in compliance with Title 24, it cannot conclude the project will generate less than significant impacts and a finding of significance must be made. A revised EIR with modeling using one of the approved software types must be prepared and circulated for public review in order to adequately analyze the project s significant environmental impacts. This is vital as the EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not an approved software.

4.11 Population and Housing

The EIR does not provide a quantified analysis of the construction workforce generated by the proposed project. A revised EIR must be prepared that includes an analysis of the construction jobs generated by the project. Additionally, a revised EIR must also provide demographic and 6-e

[5] OEHHA Poverty https://oehha.ca.gov/calenviroscreen/indicator/poverty
[6] Ibid.
[7] Ibid.
[8] California Energy Commission 2022 Energy Code Compliance Software https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency-1

geographic information on the location of qualified workers (for both project operations and construction) to fill these positions in order to provide an accurate environmental analysis.

The EIR utilizes uncertain language and does not provide any meaningful analysis or supporting evidence to substantiate the conclusion that there will be no significant impacts to population and housing. For example, the EIR states that "a high percentage of City residents and neighboring cities' residents commute outside of the City they reside in for work. For both Desert Hot Springs and Cathedral City, 89% of working residents commute for work." Since the EIR relies upon the entire workforce of the Coachella Valley region, the project would contribute to the increasing percentages of area residents that commute outside of their residence City for work. The EIR has not provided any analysis or meaningful evidence that the unemployed workforce in Palm Springs is qualified for or interested in work in the industrial sector. A revised EIR must be provided to include this information for analysis in order to provide an adequate and accurate environmental analysis. 6-e

SCAG s Connect SoCal Demographics and Growth Forecast[9] notes that the City will add 10,600 jobs between 2016 - 2045. Based on the EIR's calculation of 718 jobs, the project represents 6.7% of the City's job growth over 29 years. A single project accounting for this amount of the projected employment growth over 29 years represents a significant amount of growth. The EIR has not provided a cumulative analysis discussion of projects approved since 2016 and projects in the pipeline" to determine if the project will exceed SCAG s employment growth forecast or the City's General Plan growth projections. A revised EIR must be provided to include this information for analysis in order to provide an adequate and accurate environmental analysis.

4.13 Transportation

The EIR and Appendix L: Traffic Study incorrectly model the project's average daily trip generation. Table 4.13-7 Trip Generation Summary – Actual Vehicles within Appendix L states that the source for modeling is the "TUMF High-Cube Warehouse Trip Generation Study. Prepared by WSP, January 2019. AM/PM peak hour (in/out) splits are estimated from ITE (High-Cube Transload & Short-Term Storage Warehouse)." The proposed project is clearly described as a Fulfillment Center and must be modeled as such. The EIR must be revised to accurately model the proposed project's ADT generation in accordance with the Project Description by fully modeling and analyzing the project as a Fulfillment Center (ITE Land Use Code 155). 6-f

[9] SCAG Connect SoCal Demographics and Growth Forecast adopted September 3, 2020 https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

Table 1-3: Existing Plus Ambient Plus Project Plus Cumulative (2024) Fair Share Calculations within Appendix L concludes the following intersections require improvements to address the deficiencies per the City s thresholds:

1. Intersection #2: Indian Canyon Dr. / 19th Av.

Table 1-3 in Appendix L provides a list of fair-share calculations for improvements that will allegedly mitigate significant and unavoidable impacts to the intersection to less than significant levels. It must be noted that the impacts to intersection #2 are located in the City of Desert Hot Springs. Any improvements planned/constructed or in-lieu fees/fair share fees paid for City of Desert Hot Springs facilities are beyond the control/scope of the lead agency. An assessment of fees is appropriate when linked to a specific mitigation program. (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, *Save our Peninsula Comm. v. Monterey County Bd. Of Supers.* (2001) 87 Cal.App.4th 99, 141.) Payment of fees is not sufficient where there is no evidence mitigation will actually result. (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099,1122.) The assessment of fees here is not adequate as there is no evidence mitigation will actually result. The improvements required are not part of an existing DIF/TUMF program and therefore are not planned to occur at all or by any certain date, whether by the City of Plan Springs or City of Desert Hot Springs. Any improvements recommended or fees paid to mitigate impacts for City of Desert Hot Springs facilities are beyond the control of the lead agency and evidence that these improvements will be completed or approved by Caltrans has not been provided. A revised EIR must be prepared to include the LOS analysis as cumulatively considerable significant impact as the project conflicts with Transportation Impact Threshold A and Land Use and Planning Impact Threshold B because it is not consistent with the following General Plan Policy: 6-g

1. CR2.1: Maintain Level of Service D or better for the City s circulation network, as measured using in season" peak hour conditions.

Further, the EIR has underreported the quantity VMT generated by the proposed project operations. The operational nature of industrial/warehouse uses involves high rates of truck/trailer/delivery van VMT due to traveling from large import hubs to regional distribution centers to smaller industrial parks and then to their final delivery destinations. Once employees arrive at work at the proposed project, they will conduct their jobs by driving delivery vans across the region as part of the daily operations as a fulfillment center, which will drastically increase project-generated VMT. The project's truck/trailer and delivery van activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. The project's total operational VMT generated is further inconsistent with the significance threshold and legislative intent of SB 743 to reduce greenhouse 6-h

gas emissions by reducing VMT. A revised EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer and delivery van activity. 6-h

The EIR has not adequately analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; or the project's potential to result in inadequate emergency access. There are no exhibits adequately depicting the onsite turning radius available for trucks maneuvering throughout the site. Exhibit 3-3: Site Plan depicts truck/trailer parking stalls located in a tandem configuration adjacent to the truck/trailer loading dock courts on both sides of the building. These parking stalls may be in use at any time and further restrict truck/trailer movement, including increasing truck idling times as tandem parked trucks require additional time to maneuver, which will also result in increased queuing duration and associated need for increased queuing area for trucks/trailers. The EIR has not provided any exhibits demonstrating that there is sufficient backup space for trucks/trailers to utilize these spaces. A revised EIR must be prepared to include a finding of significance due to these significant and unavoidable impacts. 6-i

There are also no exhibits depicting emergency vehicle access. Notably, the EIR states that, "City staff, including Police and Fire Department staff, would review site plans and provide conditions of approval that are specific to the provision of emergency access," and that, "all roadway design shall be reviewed and approved by the City and Fire Department," which is deferred mitigation to after the CEQA public review process. This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation, deferred mitigation, and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents. The EIR must be revised with this analysis in order to provide an adequate and accurate environmental analysis. 6-j

Additionally, the EIR has not provided any analysis of the available horizontal and vertical sight distance at the intersection of the project driveways and adjacent streets. Sight distance is the continuous length of street ahead visible to the driver. At unsignalized intersections, corner sight distance must provide a substantially clear line of sight between the driver of the vehicle waiting on the minor road (driveway) and the driver of an approaching vehicle. A revised EIR must be prepared with this analysis based on the American Association of State Highway and Transportation Officials (AASHTO) Stopping Sight Distance requirements. 6-k

5.3 Significant Irreversible Environmental Changes and 5.4 Growth Inducing Impacts 6-l

The EIR relies upon erroneous Energy modeling to determine that the project will meet sustainability requirements. As noted above, the EIR did not model the project's energy consumption in compliance with Title 24 modeling software. The EIR must be revised to include a finding of significance due to the an inaccurate and erroneous analysis regarding the project's Air Quality, Greenhouse Gas, and Energy impacts, including those significant and unavoidable cumulatively considerable GHG impacts.

The EIR does not adequately discuss or and analyze the commitment of resources is not consistent with regional and local growth forecasts. As noted below, the project represents a significant amount of building area growth in the City and a significant amount of the City's employment growth over 29 years. The EIR must also include a cumulative analysis discussion here to demonstrate the impact of the proposed project in a cumulative setting, including the associated cumulative impacts of the project's significant and unavoidable cumulatively considerable GHG and Transportation (VMT) impacts.

The EIR does not provide any analysis here regarding the buildout conditions of the City's General Plan. Table 2-2: Nonresidential Land Buildout Estimates in the Updated Land Use Element states that the City estimates 11,638,620 square feet of industrial development to occur during the City's buildout. The EIR must be revised to provide the horizon year of the City's adopted General Plan and cumulative development since adoption of the General Plan to ensure that the proposed project is within the General Pl's analysis, particularly since the project EIR tiers from the General Plan EIR. The proposed project's 739,360 square feet of industrial building area accounts for 6.3% of the General Plan Industrial land buildout attributed to a single project. The EIR has not provided any analysis of this information and whether the proposed project in combination with cumulative development exceeds the projected buildout scenario. A revised EIR must be prepared to include this analysis in order to provide an adequate and accurate environmental document. 6-I

SCAG s Connect SoCal Demographics and Growth Forecast[10] notes that the City will add 10,600 jobs between 2016 - 2045. Based on the EIR's calculation of 718 jobs, the project represents 6.7% of the City's job growth over 29 years. A single project accounting for this amount of the projected employment growth over 29 years represents a significant amount of growth. The EIR has not provided a cumulative analysis discussion of projects approved since 2016 and projects in the pipeline" to determine if the project will exceed SCAG s employment growth forecast or the City's

[10] SCAG Connect SoCal Demographics and Growth Forecast adopted September 3, 2020 https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

General Plan growth projections. A revised EIR must be provided to include this information for analysis in order to provide an adequate and accurate environmental analysis. 6-l

6.6 Effects Found to Have No Impact: Land Use and Planning

Table 1-3: Existing Plus Ambient Plus Project Plus Cumulative (2024) Fair Share Calculations within Appendix L concludes the following intersections require improvements to address the deficiencies per the City's thresholds:

2. Intersection #2: Indian Canyon Dr. / 19th Av.

Table 1-3 in Appendix L provides a list of fair-share calculations for improvements that will allegedly mitigate significant and unavoidable impacts to the intersection to less than significant levels. It must be noted that the impacts to intersection #2 are located in the City of Desert Hot Springs. Any improvements planned/constructed or in-lieu fees/fair share fees paid for City of Desert Hot Springs facilities are beyond the control/scope of the lead agency. An assessment of fees is appropriate when linked to a specific mitigation program. (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, *Save our Peninsula Comm. v. Monterey County Bd. Of Supers.* (2001) 87 Cal.App.4th 99, 141.) Payment of fees is not sufficient where there is no evidence mitigation will actually result. (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099,1122.) The assessment of fees here is not adequate as there is no evidence mitigation will actually result. The improvements required are not part of an existing DIF/TUMF program and therefore are not planned to occur at all or by any certain date, whether by the City of Plan Springs or City of Desert Hot Springs. Any improvements recommended or fees paid to mitigate impacts for City of Desert Hot Springs facilities are beyond the control of the lead agency and evidence that these improvements will be completed or approved by Caltrans has not been provided. A revised EIR must be prepared to include the LOS analysis as cumulatively considerable significant impact as the project conflicts with Transportation Impact Threshold A and Land Use and Planning Impact Threshold B because it is not consistent with the following General Plan Policy: 6-m

1. CR2.1: Maintain Level of Service D or better for the City s circulation network, as measured using in season" peak hour conditions.

The EIR does not provide a consistency analysis with all land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The project has significant potential to conflict with many of these items, including but not limited to the following from the General Plan: 6-n

1. Goal LU1: Establish a balanced pattern of land uses that complements the pattern and character of existing uses, offers opportunities for the intensification of key targeted sites, minimizes adverse environmental impacts, and has positive economic results.

2. LU12.6 Require that loading and outdoor storage areas for commercial and industrial uses be screened from public streets and freeway views.

3. LU12.7 Promote the development of high-quality building design, including attractive fenestration, articulated façades, clearly defined entrances, varied colors and materials, varied building sizes and configurations, and varied roof heights during project review and approval.

4. GOAL CD21: It is a goal of the City of Palm Springs to create convenient, attractive, and well-designed industrial and business parks.

5. CD21.1 Strengthen the image of business park areas through entry monument signage, distinctive landscaping, and complementary architectural design elements.

6. CD21.2 Encourage clean and distinctive industrial/office buildings with clearly visible entrances.

7. CD21.3 Avoid the use of long, blank walls by breaking them up with vertical and horizontal façade articulation achieved through stamping, colors, materials, modulation, and landscaping.

8. CD21.4 Use screening techniques, such as landscaping, walls, and berms, to minimize views of surface parking, storage and service areas.

9. GOAL AQ4 Reduce vehicular emissions.

10. GOAL AQ3 Protect people and land uses that are sensitive to air contaminants from sources of air pollution to the greatest extent possible.

11. AQ3.1 Discourage the development of land uses and the application of land use practices that contribute significantly to the degradation of air quality.

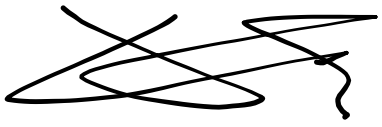
A revised EIR must be prepared to provide a consistency analysis with all of the most updated versions of the General Plan objectives, goals, policies, and strategies. The EIR must also be revised to remove misleading and erroneous consistency analysis. For example, the EIR concludes the project is consistent with "LU3.3 Ensure operation of industrial uses is unobtrusive to surrounding areas and prohibit the development of manufacturing uses that operate in a manner or use materials that may impose a danger on adjacent uses or are harmful to the environment," because "surrounding properties include industrial and commercial businesses. The EIR does not acknowledge that the project will result in significant and unavoidable cumulatively considerable GHG and VMT impacts, which will directly impact surrounding residents and communities beyond the immediate vicinity. A finding of significance must be made due to the inconsistency with this policy.

6-n

The EIR provides misleading information regarding the buildout conditions of the City's General Plan. The EIR states that, "Table 2-2, Nonresidential Land Buildout Estimates, in the Updated Land Use Element states that the City estimates 11,638,620 square feet of industrial development to occur during the City's buildout" and concludes that the because the project is less than the total quantity of buildout area, the project will result in less than significant impacts. The EIR must be revised to provide the horizon year of the City's adopted General Plan and cumulative development since adoption of the General Plan to ensure that the proposed project is within the General Plan EIR's analysis, particularly since the project EIR tiers from the General Plan EIR. The proposed project's 739,360 square feet of industrial building area accounts for 6.3% of the General Plan Industrial land buildout attributed to a single project. The EIR has not provided any analysis of this information and whether the proposed project in combination with cumulative development exceeds the projected buildout scenario. A revised EIR must be prepared to include this analysis in order to provide an adequate and accurate environmental document. 6-o

The EIR excludes a consistency analysis with SCAG's 2020-2045 Connect SoCal RTP/SCS. Due to errors in modeling and modeling without supporting evidence (as noted throughout this comment letter and attachments) and the EIR's conclusion the project will have significant and unavoidable cumulatively considerable Greenhouse Gas Emissions and Transportation (VMT) impacts, the proposed project is directly inconsistent with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing climate. A revised EIR must be prepared to include a finding of significance due to these inconsistencies with SCAG's 2020-2045 Connect SoCal RTP/SCS. 6-p

Sincerely,



Gary Ho
Blum, Collins & Ho LLP

Attachments:
1. SWAPE Technical Analysis

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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June 11, 2024

Gary Ho
Blum, Collins & Ho LLP
707 Wilshire Blvd, Ste. 4880
Los Angeles, CA 90017

Subject: Comments on the Palm Springs Fulfillment Center Project (SCH No. 2023080091)

Dear Mr. Ho,

We have reviewed the April 2024 Draft Environmental Impact Report ("DEIR") for the Palm Springs Fulfillment Center ("Project") located in the City of Palm Springs ("City"). The Project proposes to construct 727,360-square-feet ("SF") of industrial space and 12,000-SF of office space on the 38-acre site.

Our review concludes that the DEIR fails to adequately evaluate the Project's air quality, health risk, and greenhouse gas ("GHG") impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project may be underestimated and inadequately addressed. A revised Environmental Impact Report ("EIR") should be prepared to adequately assess and mitigate the potential air quality, health risk, and GHG impacts that the project may have on the environment.

Air Quality

Failure to Provide Complete CalEEMod Output Files

Land use development projects under the California Environmental Quality Act ("CEQA") typically evaluate air quality impacts and calculate potential criteria air pollutant emissions using the California Emissions Estimator Model ("CalEEMod").[1] CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user

[1] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide.

can change the default values and input project-specific values, but CEQA requires that such changes be justified by substantial evidence. Once all of the values are inputted into the model, the Project's construction and operational emissions are calculated, and "output files" are generated. These output files disclose to the reader what parameters are used in calculating the Project's air pollutant emissions and demonstrate which default values are changed. Justifications are provided for the selected values.

According to the CalEEMod Emissions Model Outputs, included as Appendix 3.1 to the DEIR, CalEEMod Version 2022.1 is relied upon to estimate Project emissions (p. 4.2-1). However, this poses a problem, as the currently available version of CalEEMod 2022.1 is described as a "soft release" which fails to provide complete output files.[2] Specifically, the "User Changes to Default Data" table no longer provides the quantitative counterparts to the changes to the default values (see excerpt below) (Appendix 3.1, pp. 244, 279, 368, 369, 936, 1178):

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Taken from client data
Construction: Off-Road Equipment	T/L/B replaced with Crawler Tractor to accurately calculate disturbance for Site Preparation and Grading phases Standard 8 hours work days
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Site Preparation, Grading, and Building Construction
Construction: Architectural Coatings	SCAQMD Rule 1113
Operations: Vehicle Data	Trip characteristics based on information provided in the Traffic Analysis
Operations: Fleet Mix	Passenger Car Mix estimated based on CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, MCY). Truck Fleet Mix based on 2, 3 and 4 axle trucks
Operations: Architectural Coatings	SCAQMD Rule 1113
Operations: Refrigerants	As of 1 January 2022, new commercial refrigeration equipment may not use refrigerants with a GWP of 150 or greater. Further, R-404A (the CalEEMod default) is unacceptable for new supermarket and cold storage systems as of 1 January 2019 and 2023, respectively.
Operations: Energy Use	Per client data, no natural gas will be utilized

However, previous CalEEMod Versions, such as 2020.4.0, include the specific numeric changes to the model's default values (see example excerpt below):

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	230.00	167.00
tblConstructionPhase	PhaseEndDate	11/22/2023	8/25/2023
tblConstructionPhase	PhaseEndDate	9/27/2023	6/30/2023
tblConstructionPhase	PhaseEndDate	10/25/2023	7/28/2023
tblConstructionPhase	PhaseStartDate	10/26/2023	7/29/2023
tblConstructionPhase	PhaseStartDate	9/28/2023	7/1/2023
tblLandUse	LandUseSquareFeet	160,000.00	160,371.00
tblLandUse	LandUseSquareFeet	119,000.00	41,155.00
tblLandUse	LotAcreage	3.67	3.68
tblLandUse	LotAcreage	2.73	2.74

[2] "CalEEMod California Emissions Estimator Model Soft Release." California Air Pollution Control Officers Association (CAPCOA), 2022, *available at:* https://caleemod.com/.

The output files associated with CalEEMod Version 2022.1 fail to present the exact parameters used to calculate Project emissions. To remedy this issue, the DEIR should have provided access to the model's ".JSON" output files, which allow third parties to review the model's revised input parameters.[3] Without access to the complete output files, including the specific numeric changes to the default values, we cannot verify that the DEIR air modeling and subsequent analysis is an accurate reflection of the proposed Project. As a result, a revised EIR should be prepared to include an updated air quality analysis that correctly provides the complete output files for CalEEMod Version 2022.1, or includes an updated air model using an older release of CalEEMod.[4]

Unsubstantiated Input Parameters Used to Estimate Project Emissions

As previously discussed, the DEIR relies on CalEEMod Version 2022.1 to estimate the Project's air quality emissions and fails to provide the complete output files required to adequately evaluate model's analysis (p. 4.2-1). Regardless, when reviewing the Project's CalEEMod output files, provided in Appendix 3.1, we were able to identify several model inputs that are inconsistent with information disclosed in the DEIR. The Project's construction and operational emissions may consequently be underestimated. A revised EIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality.

Failure to Consider Potential Cold Storage Requirements

Review of the CalEEMod output files demonstrates that the "15097 - N Indian Canyon & 19th Ave Detailed Report" model includes 739,360-SF of the "Unrefrigerated Warehouse-No Rail" land use (see excerpt below) (Appendix 3.1, pp. 252, 253, 325, 326, 894, 1136).

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)
Unrefrigerated Warehouse-No Rail	739	1000sqft	17.0	739,360	0.00
Parking Lot	787	Space	7.08	0.00	0.00
Other Asphalt Surfaces	12.5	Acre	12.5	0.00	0.00
User Defined Industrial	739	User Defined Unit	0.00	0.00	0.00

[3] "Video Tutorials for CalEEMod Version 2022.1." California Air Pollution Control Officers Association (CAPCOA), May 2022, *available at:* https://www.caleemod.com/tutorials.

[4] "CalEEMod Version 2020.4.0." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* http://www.aqmd.gov/caleemod/download-model.

As demonstrated above, the model does not include any refrigerated warehouse space whatsoever. This may be incorrect, as the DEIR does not mention potential tenants whatsoever.

As future site tenants are unknown, the proposed warehouse may require cold storage for operation. As discussed by the South Coast Air Quality Management District ("SCAQMD"), "CEQA requires the use of 'conservative analyses to afford 'fullest possible protection of the environment.'"[5] The DEIR must therefore provide substantial evidence for not including any of the warehouse as cold storage space. Otherwise, an updated model should be prepared to include the entire warehouse land use as refrigerated to account for the additional emissions that refrigeration requirements may generate.

This presents an issue, as refrigerated warehouses release more criteria air pollutant and GHG emissions when compared to unrefrigerated land uses for three reasons. First, warehouses equipped with cold storage, such as refrigerators and freezers, are known to consume more energy when compared to warehouses without cold storage.[6] Second, warehouses equipped with cold storage typically require refrigerated trucks, which are known to idle for much longer when compared to unrefrigerated hauling trucks.[7] Lastly, according to a July 2014 *Warehouse Truck Trip Study Data Results and Usage* presentation prepared by the SCAQMD hauling trucks that require refrigeration result in greater truck trip rates when compared to non-refrigerated hauling trucks.[8]

By failing to account for any potential cold storage requirements, the models may underestimate the Project's operational emissions and should not be relied upon to determine Project significance. A revised EIR should be prepared to account for the possibility of additional refrigerated warehouse needs by the Project's future tenants.

Unsubstantiated Changes to Construction-related and Operational Architectural Coating Emission Factors

Review of the CalEEMod output files demonstrates that the "15097 - N Indian Canyon & 19th Ave Detailed Report" model includes changes to the default construction-related and operational architectural coating emission factors (see excerpt below) (Appendix 3.1, pp. 244, 279, 368, 369, 936, 1178):

[5] "Warehouse Truck Trip Study Data Results and Usage" Presentation. SCAQMD Inland Empire Logistics Council, June 2014, *available at*: http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/final-ielc_6-19-2014.pdf?sfvrsn=2.
[6] "Warehouses." Business Energy Advisor, *available at*: https://ouc.bizenergyadvisor.com/article/warehouses.
[7] "Estimation of Fuel Use by Idling Commercial Trucks." Transportation Research Record Journal of the Transportation Research Board, January 2006, p. 8, *available at:* https://www.researchgate.net/publication/245561735_Estimation_of_Fuel_Use_by_Idling_Commercial_Trucks.
[8] "Warehouse Truck Trip Study Data Results and Usage" Presentation. SCAQMD Mobile Source Committee, July 2014, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/finaltrucktripstudymsc072514.pdf?sfvrsn=2, p. 7, 9.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Taken from client data
Construction: Off-Road Equipment	T/L/B replaced with Crawler Tractor to accurately calculate disturbance for Site Preparation and Grading phases Standard 8 hours work days
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Site Preparation, Grading, and Building Construction
Construction: Architectural Coatings	SCAQMD Rule 1113
Operations: Vehicle Data	Trip characteristics based on information provided in the Traffic Analysis
Operations: Fleet Mix	Passenger Car Mix estimated based on CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, MCY). Truck Fleet Mix based on 2, 3 and 4 axle trucks
Operations: Architectural Coatings	SCAQMD Rule 1113
Operations: Refrigerants	As of 1 January 2022, new commercial refrigeration equipment may not use refrigerants with a GWP of 150 or greater. Further, R-404A (the CalEEMod default) is unacceptable for new supermarket and cold storage systems as of 1 January 2019 and 2023, respectively.
Operations: Energy Use	Per client data, no natural gas will be utilized

As previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified.[9] As demonstrated above in the "User Changes to Default Data" table, the justification provided for these changes are:

> "Rule 1113" (Appendix 3.1, pp. 244, 279, 368, 369, 936, 1178).

The CalEEMod output files list SCAQMD Rule 1113 as a justification for the changes made to architectural coatings values in the model. However, the model's changes to the architectural coating emission factors remain unsubstantiated for two reasons.

First, we cannot verify the accuracy of the revised architectural coating emission factors based on SCAQMD Rule 1113 alone. The SCAQMD Rule 1113 Table of Standards provides the required volatile organic compound ("VOC") limits (grams of VOC per liter of coating) for 57 different coating categories.[10] The VOC limits for each coating varies from a minimum value of 50 g/L to a maximum value of 730 g/L. As such, we cannot verify that SCAQMD Rule 1113 substantiates reductions to the default coating values without more information regarding what category of coating will be used. As the DEIR fails to explicitly require the use of a specific type of coating which would adhere to a specific VOC limit, we are unable to verify the model's revised coating emission factors.

Second, as previously discussed, the output files for CalEEMod 2022.1 do not present the numeric changes to any model defaults. Upon further review of the output files, Table 5.5 contains the only mention of architectural coatings (see excerpt below) (Appendix 3.1, pp. 233, 357, 925, 1167):

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	1,109,040	369,680	51,323

[9] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 1, 14.
[10] "SCAQMD Rule 1113 Advisory Notice." SCAQMD, February 2016, *available at:* http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf?sfvrsn=24, p. 1113-14, Table of Standards 1.

However, as demonstrated above, Table 5.5 only provides the *square footage* of area to be coated. Since the output files fail to demonstrate the architectural coating *emission factors* that the model relies on, we cannot verify that the values included in the model are accurate. As previously stated, the DEIR should have provided access to the model's ".JSON" output files, which allow third parties to review the model's revised input parameters.[11]

These unsubstantiated reductions present an issue, as CalEEMod uses the architectural coating emission factors to calculate the Project's reactive VOC emissions.[12] By including unsubstantiated reductions to the default architectural coating emission factors, the model may underestimate the Project's construction-related VOC emissions and should not be relied upon to determine Project significance.

Unsubstantiated Changes to Operational Fleet Mix Values

Review of the CalEEMod output files demonstrates that the "15097 - N Indian Canyon & 19th Ave Detailed Report" model includes changes to the default operational vehicle fleet mix percentages (see excerpt below (Appendix 3.1, pp. 244, 279, 368, 369, 936, 1178):

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Taken from client data
Construction: Off-Road Equipment	T/L/B replaced with Crawler Tractor to accurately calculate disturbance for Site Preparation and Grading phases Standard 8 hours work days
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Site Preparation, Grading, and Building Construction
Construction: Architectural Coatings	SCAQMD Rule 1113
Operations: Vehicle Data	Trip characteristics based on information provided in the Traffic Analysis
Operations: Fleet Mix	Passenger Car Mix estimated based on CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, MCY). Truck Fleet Mix based on 2, 3 and 4 axle trucks
Operations: Architectural Coatings	SCAQMD Rule 1113
Operations: Refrigerants	As of 1 January 2022, new commercial refrigeration equipment may not use refrigerants with a GWP of 150 or greater. Further, R-404A (the CalEEMod default) is unacceptable for new supermarket and cold storage systems as of 1 January 2019 and 2023, respectively.
Operations: Energy Use	Per client data, no natural gas will be utilized

As previously stated, the CalEEMod User's Guide requires any changes to model defaults be justified.[13] As demonstrated above in the "User Changes to Default Data" table, the justification provided for these changes is:

> "Passenger Car Mix estimated based on CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, MCY). Truck Fleet Mix based on 2, 3 and 4 axle trucks" (Appendix 3.1, pp. 244, 279, 368, 369, 936, 1178).

[11] "Video Tutorials for CalEEMod Version 2022.1." California Air Pollution Control Officers Association (CAPCOA), May 2022, *available at:* https://www.caleemod.com/tutorials.
[12] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 35, 40.
[13] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 1, 14.

The DEIR includes the following Project fleet mix tables for passenger cars and trucks, respectively (see excerpts below) (Appendix C.1, p. 32, Table 3-6, Table 3-7):

TABLE 3-6: PASSENGER CAR FLEET MIX – INDUSTRIAL USE

Land Use	% Vehicle Type				
	LDA	LDT1	LDT2	MDV	MCY
High-Cube Fulfillment Center Warehouse	50.75%	4.55%	25.13%	17.58%	1.99%

Note: The Project-specific passenger car fleet mix used in this analysis is based on a proportional split utilizing the default CalEEMod percentages assigned to LDA, LDT1, LDT2, and MDV vehicle types.

TABLE 3-7: TRUCK FLEET MIX – INDUSTRIAL USE

Land Use	% Vehicle Type			
	LHDT1	LHDT2	MHDT	HHDT
High-Cube Fulfillment Center Warehouse	8.21%	2.50%	10.71%	78.57%

Note: Project-specific truck fleet mix is based on the number of trips generated by each truck type (LHDT1, LHDT2, MHDT, and HHDT) relative to the total number of truck trips

However, the changes to the model's operational fleet mix values remain unsubstantiated. As previously discussed, the output files for CalEEMod 2022.1 do not present the numeric changes to any model defaults. Upon further review of the output files, changes to fleet mix percentages are not mentioned outside of the "User Changes to Default Data" table. Until the DEIR verifies the breakdown of heavy-heavy duty ("HHD"), medium-heavy duty ("MHD"), light-heavy duty ("LHD1, LDH2"), trucks used by the Project, we cannot verify that the values included in the model are accurate.[14]

These unsubstantiated changes present an issue, as CalEEMod uses operational vehicle fleet mix percentages to calculate the Project's operational emissions associated with on-road vehicles.[15] By including several unsubstantiated changes to the default operational vehicle fleet mix percentages, the model may underestimate the Project's mobile-source operational emissions and should not be relied upon to determine Project significance.

Unsubstantiated Changes to Energy Use Values

Review of the CalEEMod output files demonstrates that the "15097 - N Indian Canyon & 19th Ave Detailed Report" model includes changes to the default natural gas energy use values (see excerpt below) (Appendix 3.1, pp. 244, 279, 368, 369, 936, 1178):

[14] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 38.
[15] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 36.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Taken from client data
Construction: Off-Road Equipment	T/L/B replaced with Crawler Tractor to accurately calculate disturbance for Site Preparation and Grading phases Standard 8 hours work days
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Site Preparation, Grading, and Building Construction
Construction: Architectural Coatings	SCAQMD Rule 1113
Operations: Vehicle Data	Trip characteristics based on information provided in the Traffic Analysis
Operations: Fleet Mix	Passenger Car Mix estimated based on CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, MCY). Truck Fleet Mix based on 2, 3 and 4 axle trucks
Operations: Architectural Coatings	SCAQMD Rule 1113
Operations: Refrigerants	As of 1 January 2022, new commercial refrigeration equipment may not use refrigerants with a GWP of 150 or greater. Further, R-404A (the CalEEMod default) is unacceptable for new supermarket and cold storage systems as of 1 January 2019 and 2023, respectively.
Operations: Energy Use	Per client data, no natural gas will be utilized

As demonstrated in the table above, the justification provided for these changes is:

> "Per client data, no natural gas will be utilized" (Appendix 3.1, pp. 244, 279, 368, 369, 936, 1178).

The energy use table consequently does not account for any natural gas whatsoever (see excerpt below) (Appendix 3.1, pp. 235, 270, 927, 1169):

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Unrefrigerated Warehouse-No Rail	3,402,795	349	0.0330	0.0040	0.00
Parking Lot	270,277	349	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	349	0.0330	0.0040	0.00
User Defined Industrial	0.00	349	0.0330	0.0040	0.00

Furthermore, the DEIR states:

> "Based on information provided by the Project applicant, the site is not expected to utilize natural gas for the building envelope, and therefore would not generate any emissions from direct energy consumption" (p. 4.2-29).

As demonstrated above, the DEIR asserts that the site is not "expected" to rely on natural gas for the Project's energy needs. However, the DEIR explains:

> "Although the project is proposing the industrial building to function as a high cube warehouse, possible future tenants of the building are unknown" (p. 4.8-18).

As the DEIR and associated documents fail to address the future tenants and potential use of natural gas, the reductions to natural gas values are unsubstantiated. According to the CalEEMod User's Guide:

> "CalEEMod was also designed to allow the user to change the defaults to reflect site- or project-specific information, when available, provided that the information is supported by substantial evidence as required by CEQA." [16]

As demonstrated above, the DEIR should have provided substantial evidence that supports the reductions in natural gas values. These unsubstantiated reductions present an issue, as the energy use values are used by CalEEMod to calculate the Project's emissions associated with building electricity and natural gas usage.[17] By assuming that the Project would not rely on any natural gas utilities, the model may underestimate the Project's operational emissions and should not be relied upon to determine Project significance.

Updated Analysis Indicates a Potentially Significant Air Quality Impact

In an effort to quantitatively estimate the Project's construction-related and operational emissions, we used the CalEEMod Version 2020.4.0, as well as Project-specific information provided by the DEIR. Consistent with the DEIR's model, our model included 739,360-SF of the "Unrefrigerated Warehouse-No Rail" land use, 787 spaces of the "Parking lot" land use, 12.5-acres of the "Other Asphalt Surfaces" land use, and 739 user defined units of the "User Defined Industrial" land use. We also omitted the unsubstantiated changes to the construction-related and operational architectural coating emission factors, operational fleet mix values, and energy use values. All other values are consistent with the DEIR's model.[18]

Our updated analysis estimates that the VOC emissions associated with Project construction exceed the applicable SCAQMD threshold of 75 pounds per day ("lbs/day"), as referenced by the DEIR (p. 4.2-25) (see table below).[19]

SWAPE Criteria Air Pollutant Emissions	
Checklist	**Construction ROG** (lbs/day)
DEIR	73.9
SWAPE	175.9
% Increase	138%
SCAQMD Threshold	**75.0**
Exceeds?	***Yes***

[16] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 12.
[17] "CalEEMod User's Guide Version 2020.4.0." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 43.
[18] See Attachment A for CalEEMod model.
[19] "South Coast AQMD Air Quality Significance Thresholds." SCAQMD, April 2019, *available at*: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25.

As demonstrated above, construction-related VOC emissions, as estimated by SWAPE, increase by approximately 138% and exceed the applicable SCAQMD significance threshold. Our updated modeling demonstrates that the Project would result in a potentially significant air quality impact that was not previously identified or addressed by the DEIR. As a result, a revised EIR should be prepared to adequately assess and mitigate the potential air quality impacts that the Project may have on the environment.

Diesel Particulate Matter Emissions Inadequately Evaluated

The DEIR concludes that the proposed Project would result in a less-than-significant health risk impact based on a quantified construction and operational health risk assessment ("HRA"), as detailed in the Mobile Health Risk Assessment ("HRA Report"), provided as Appendix C.2 to the DEIR. Specifically, the HRA Report estimates that the cumulative maximum cancer risk posed to nearby, existing residential sensitive receptors associated with construction and operation would be 0.13 in one million, which would not exceed the SCAQMD significance threshold of 10 in one million (see excerpt below) (p. 4.2-31, Table 4.2-10).

Table 4.2-10 Summary of Construction and Operational Cancer and non-cancer risks

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
30 Year Exposure	Maximum Exposed Sensitive Receptor	0.13	10	NO
Time Period	**Location**	**Maximum Hazard Index**	**Significance Threshold**	**Exceeds Significance Threshold**
Annual Average	Maximum Exposed Sensitive Receptor	≤0.01	1.0	NO

Health Risks Related to Criteria Air Pollutant Categories

However, the DEIR's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, is incorrect for two reasons.

First, the DEIR's HRA is unreliable, as it relies upon emissions estimates from a flawed air model, as discussed above in the section titled "Unsubstantiated Input Parameters Used to Estimate Project Emissions." As such, the HRA is based on potentially underestimated DPM concentrations to calculate the health risk associated with Project construction. As a result, the DEIR's HRA and resulting cancer risk should not be relied upon to determine Project significance.

Second, the DEIR's operational HRA underestimates the Fraction of Time At Home ("FAH") values for the third trimester, infant, and child receptors. Specifically, the HRA Report utilizes an FAH value of 0.85 for the third trimester (age -0.25 to 0) and infant (age 0 to 2) receptors, and an FAH value of 0.72 for the child receptors (age 2 to 16) (see excerpt below) (Appendix C.2, p. 20).

TABLE 2-7: EXPOSURE ASSUMPTIONS FOR INDIVIDUAL CANCER RISK (30 YEAR RESIDENTIAL)

Age	Daily Breathing Rate (L/kg-day)	Age Specific Factor	Exposure Duration (years)	Fraction of Time at Home	Exposure Frequency (days/year)	Exposure Time (hours/day)
-0.25 to 0	361	10	0.25	0.85	350	24
0 to 2	1,090	10	2	0.85	350	24
2 to 16	572	3	14	0.72	350	24
16 to 30	261	1	14	0.73	350	24

However, the FAH values used for the third trimester, infant, and childhood receptors are incorrect, as SCAQMD guidance clearly states:

> "For Tiers 1, 2, and 3 screening purposes, the FAH is assumed to be 1 for ages third trimester to 16. As a default, children are assumed to attend a daycare or school in close proximity to their home and no discount should be taken for time spent outside of the area affected by the facility's emissions. People older than age 16 are assumed to spend only 73 percent of their time at home."[20]

Per SCAQMD guidance, the HRA Report should have used an FAH of 1 for the third trimester, infant, and child receptors. By relying on incorrect FAH values, the DEIR may underestimate the cancer risk posed to nearby, existing sensitive receptors as a result of Project construction and operation.

Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts

The DEIR concludes that implementation of the Project would result in net annual GHG emissions of 9,438.47 metric tons of carbon dioxide equivalents per year ("MT CO_2e/year") (see excerpt below) (p. 4.7-13, Table 4.7-2).

[20] "Risk Assessment Procedures." SCAQMD, August 2017, available at: http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf, p. 7.

Table 4.7-2 Project GHG emissions

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	R	Total CO_2e
Amortized Construction Emissions	65.50	2.33E-03	2.83E-03	4.99E-02	66.46
Mobile Source	7,828.68	0.12	0.72	10.25	8,056.38
Area Source	10.80	0.00	0.00	0.00	10.84
Energy Source	580.86	0.05	0.01	0.00	584.22
Water Usage	182.34	5.57	0.13	0.00	361.51
Waste	62.01	6.20	0.00	0.00	216.96
On-site equipment	0.00	0.00	0.00	0.00	142.10
Total CO_2e (All Sources)	**9,438.47**				

As a result, the DEIR concludes that the Project's GHG emissions would exceed the City's significance threshold of 3,000 MT CO_2e/year (p. 4.7-13). According to the DEIR:

> "As shown on Table 4.7-2, the project will result in approximately 9,438.47 MTCO2e/yr; the proposed project would exceed the County's screening threshold of 3,000 MTCO2e/yr. Thus, the project would have the potential to result in a cumulatively considerable impact with respect to GHG emissions. Since the project exceeds the 3,000 MTCO2e/yr threshold, the project's impacts would be significant unless mitigated. As described in Mitigation Measure GHG-1, the project is required to demonstrate compliance with the County's CAP Screening Tables and achieve a minimum of 100 points as identified in the CAP. For reference, an industrial (or commercial) project garnering 100 points would achieve a reduction of approximately 3.22 MTCO2e per 1,000 square feet of building area, as determined by multiplying the reduction of 0.0322 MTCO2e per point by the 100-point total" (p. 4.7-14).

Thus, the DEIR incorporates Mitigation Measure ("MM") GHG-1 to demonstrate consistencies with the CAP Update, stating:

> "GHG-1 Pursuant to MM GHG-1, the Project final plans and designs would conform to provisions of the CAP Update through implementation of the Screening Table Measures listed at Table 4.7-3. The Project shall implement Screening Table Measures providing for a minimum 100 points per the County Screening Tables. The Project would be consistent with the CAP Update's requirement to achieve at least 100 points. The City shall verify incorporation of the identified Screening Table Measures within the Project building plans and site designs prior to the issuance of building permit(s) and/or site plans (as applicable). The City shall verify implementation of the identified Screening Table Measures prior to the issuance of Certificate(s) of Occupancy. As shown on Table 4.7-3, the Project would yield 274 points which is more than double the required 100 points. The Project would therefore be consistent with the CAP" (p. 1-19).

As demonstrated above, the Project is projected to yield 274 points, which exceeds the CAP Update's requirement to achieve at least 100 points. However, the Project fails to incorporate each reduction

measure as a formal mitigation measure. This is incorrect, as according to the Association of Environmental Professionals' ("AEP") *CEQA Portal Topic Paper* on Mitigation Measures:

> "While not 'mitigation', a good practice is to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP). Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact."[21]

As demonstrated above, design features that are not formally included as mitigation measures in an mitigation monitoring and reporting program may be eliminated from the Project's design altogether. Until the specific reduction measures are identified and included as mitigation measures, the Project's GHG analysis should not be relied upon to determine Project significance.

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

Our analysis demonstrates that the Project would result in potentially significant air quality, health risk, and GHG impacts that should be mitigated further. In an effort to reduce emissions, the Project should consider the implementation of the following mitigation measures found in the California Department of Justice Warehouse Project Best Practices document.[22]

- Requiring off-road construction equipment to be hybrid electric-diesel or zero emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Limiting the amount of daily grading disturbance area.

[21] "CEQA Portal Topic Paper Mitigation Measures." AEP, February 2020, *available at:* https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf, p. 6.
[22] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, *available at*: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf, p. 8 – 10.

- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than three minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.
- Requiring all heavy-duty vehicles engaged in drayage to or from the project site to be zero-emission beginning in 2030.
- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.

- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduce emissions released during Project construction and operation.

A revised EIR should be prepared to include all feasible mitigation measures, as well as include updated air quality, health risk, and GHG analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to the maximum extent feasible. The revised EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's potentially significant emissions are reduced to the maximum extent possible.

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

Attachment A: SWAPE's CalEEMod Output Files
Attachment B: Matt Hagemann CV
Attachment C: Paul Rosenfeld CV

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

15097 - N Indian Canyon & 19th Ave Detailed Report

South Coast AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	739.00	1000sqft	17.00	739,360.00	0
User Defined Industrial	739.00	User Defined Unit	0.00	0.00	0
Other Asphalt Surfaces	12.50	Acre	12.50	0.00	0
Parking Lot	787.00	Space	7.08	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	10			**Operational Year**	2026
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with DEIR's model.

Land Use - Consistent with DEIR's model.

Construction Phase - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Grading - Consistent with DEIR's model.

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Architectural Coating - See comment on: "Unsubstantiated Changes to Construction and Operational Architectural Coating Emission Factors".

Area Coating - See comment on: "Unsubstantiated Changes to Construction and Operational Architectural Coating Emission Factors".

Energy Use - See comment on: "Unsubstantiated Changes to Energy Use Values".

Fleet Mix - See comment on: "Unsubstantiated Changes to Operational Fleet Mix Values".

Trips and VMT - Consistent with DEIR's model.

Vehicle Trips - Consistent with DEIR's model.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	30.00	20.00
tblConstructionPhase	NumDays	75.00	335.00
tblConstructionPhase	NumDays	740.00	287.00
tblConstructionPhase	NumDays	55.00	41.00
tblConstructionPhase	NumDays	55.00	30.00
tblGrading	AcresOfGrading	1,340.00	300.00
tblGrading	AcresOfGrading	30.00	40.00
tblLandUse	LandUseSquareFeet	739,000.00	739,360.00
tblLandUse	LandUseSquareFeet	544,500.00	0.00
tblLandUse	LandUseSquareFeet	314,800.00	0.00
tblLandUse	LotAcreage	16.97	17.00
tblOffRoadEquipment	HorsePower	212.00	97.00
tblOffRoadEquipment	LoadFactor	0.43	0.37
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	24.00
tblTripsAndVMT	VendorTripNumber	121.00	91.00
tblTripsAndVMT	WorkerTripNumber	18.00	10.00
tblTripsAndVMT	WorkerTripNumber	62.00	62.10
tblVehicleTrips	ST_TR	1.74	1.00
tblVehicleTrips	SU_TR	1.74	0.96
tblVehicleTrips	WD_TR	1.74	1.75

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2024	0.6998	6.2406	6.2308	0.0154	1.5046	0.2687	1.7733	0.6269	0.2485	0.8755	0.0000	1,378.8961	1,378.8961	0.2861	0.0364	1,396.9018
2025	3.7437	2.4629	2.8795	7.1700e-003	0.6761	0.1020	0.7781	0.2391	0.0945	0.3336	0.0000	642.8366	642.8366	0.1283	0.0169	651.0887
Maximum	**3.7437**	**6.2406**	**6.2308**	**0.0154**	**1.5046**	**0.2687**	**1.7733**	**0.6269**	**0.2485**	**0.8755**	**0.0000**	**1,378.8961**	**1,378.8961**	**0.2861**	**0.0364**	**1,396.9018**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2024	0.6998	6.2406	6.2308	0.0154	1.5046	0.2687	1.7733	0.6269	0.2485	0.8755	0.0000	1,378.8950	1,378.8950	0.2861	0.0364	1,396.9007
2025	3.7437	2.4629	2.8795	7.1700e-003	0.6761	0.1020	0.7781	0.2391	0.0945	0.3336	0.0000	642.8361	642.8361	0.1283	0.0169	651.0882
Maximum	**3.7437**	**6.2406**	**6.2308**	**0.0154**	**1.5046**	**0.2687**	**1.7733**	**0.6269**	**0.2485**	**0.8755**	**0.0000**	**1,378.8950**	**1,378.8950**	**0.2861**	**0.0364**	**1,396.9007**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**1-5-2024**	**4-4-2024**	1.1302	1.1302
2	**4-5-2024**	**7-4-2024**	1.9336	1.9336
3	**7-5-2024**	**10-4-2024**	1.9553	1.9553
4	**10-5-2024**	**1-4-2025**	1.9562	1.9562
5	**1-5-2025**	**4-4-2025**	4.0804	4.0804
6	**4-5-2025**	**7-4-2025**	2.0162	2.0162
		Highest	4.0804	4.0804

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	3.0170	2.6000e-004	0.0290	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004	0.0000	0.0565	0.0565	1.5000e-004	0.0000	0.0602
Energy	8.0100e-003	0.0729	0.0612	4.4000e-004		5.5400e-003	5.5400e-003		5.5400e-003	5.5400e-003	0.0000	383.5082	383.5082	0.0272	4.5700e-003	385.5488
Mobile	0.6209	0.7709	6.7501	0.0160	1.8247	0.0114	1.8361	0.4870	0.0106	0.4976	0.0000	1,477.8845	1,477.8845	0.0903	0.0629	1,498.8857
Waste						0.0000	0.0000		0.0000	0.0000	141.0097	0.0000	141.0097	8.3334	0.0000	349.3456
Water						0.0000	0.0000		0.0000	0.0000	54.2167	394.6306	448.8473	5.6019	0.1355	629.2804
Total	**3.6460**	**0.8440**	**6.8403**	**0.0164**	**1.8247**	**0.0170**	**1.8417**	**0.4870**	**0.0162**	**0.5032**	**195.2264**	**2,256.0799**	**2,451.3063**	**14.0530**	**0.2030**	**2,863.1207**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	3.0170	2.6000e-004	0.0290	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004	0.0000	0.0565	0.0565	1.5000e-004	0.0000	0.0602
Energy	8.0100e-003	0.0729	0.0612	4.4000e-004		5.5400e-003	5.5400e-003		5.5400e-003	5.5400e-003	0.0000	383.5082	383.5082	0.0272	4.5700e-003	385.5488
Mobile	0.6209	0.7709	6.7501	0.0160	1.8247	0.0114	1.8361	0.4870	0.0106	0.4976	0.0000	1,477.8845	1,477.8845	0.0903	0.0629	1,498.8857
Waste						0.0000	0.0000		0.0000	0.0000	141.0097	0.0000	141.0097	8.3334	0.0000	349.3456
Water						0.0000	0.0000		0.0000	0.0000	54.2167	394.6306	448.8473	5.6019	0.1355	629.2804
Total	**3.6460**	**0.8440**	**6.8403**	**0.0164**	**1.8247**	**0.0170**	**1.8417**	**0.4870**	**0.0162**	**0.5032**	**195.2264**	**2,256.0799**	**2,451.3063**	**14.0530**	**0.2030**	**2,863.1207**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/8/2024	2/2/2024	5	20	
2	Grading	Grading	2/5/2024	5/17/2025	5	335	
3	Building Construction	Building Construction	4/5/2024	5/12/2025	5	287	

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4	Architectural Coating	Architectural Coating	2/27/2025	4/24/2025	5	41	
5	Paving	Paving	3/3/2025	4/11/2025	5	30	

Acres of Grading (Site Preparation Phase): 40

Acres of Grading (Grading Phase): 300

Acres of Paving: 19.58

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 1,109,040; Non-Residential Outdoor: 369,680; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Crawler Tractors	2	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

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Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	10.00	6.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	24.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	311.00	91.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	62.10	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Site Preparation - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.2019	0.0000	0.2019	0.1016	0.0000	0.1016	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0266	0.2718	0.1834	3.8000e-004		0.0123	0.0123		0.0113	0.0113	0.0000	33.4571	33.4571	0.0108	0.0000	33.7276
Total	**0.0266**	**0.2718**	**0.1834**	**3.8000e-004**	**0.2019**	**0.0123**	**0.2142**	**0.1016**	**0.0113**	**0.1129**	**0.0000**	**33.4571**	**33.4571**	**0.0108**	**0.0000**	**33.7276**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.0000e-005	2.3000e-003	8.6000e-004	1.0000e-005	3.8000e-004	1.0000e-005	3.9000e-004	1.1000e-004	1.0000e-005	1.2000e-004	0.0000	1.0525	1.0525	4.0000e-005	1.5000e-004	1.0989
Worker	2.9000e-004	2.1000e-004	3.0400e-003	1.0000e-005	1.1000e-003	1.0000e-005	1.1000e-003	2.9000e-004	1.0000e-005	3.0000e-004	0.0000	0.8335	0.8335	2.0000e-005	2.0000e-005	0.8401
Total	**3.5000e-004**	**2.5100e-003**	**3.9000e-003**	**2.0000e-005**	**1.4800e-003**	**2.0000e-005**	**1.4900e-003**	**4.0000e-004**	**2.0000e-005**	**4.2000e-004**	**0.0000**	**1.8860**	**1.8860**	**6.0000e-005**	**1.7000e-004**	**1.9390**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.2019	0.0000	0.2019	0.1016	0.0000	0.1016	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0266	0.2718	0.1834	3.8000e-004		0.0123	0.0123		0.0113	0.0113	0.0000	33.4570	33.4570	0.0108	0.0000	33.7275
Total	**0.0266**	**0.2718**	**0.1834**	**3.8000e-004**	**0.2019**	**0.0123**	**0.2142**	**0.1016**	**0.0113**	**0.1129**	**0.0000**	**33.4570**	**33.4570**	**0.0108**	**0.0000**	**33.7275**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.0000e-005	2.3000e-003	8.6000e-004	1.0000e-005	3.8000e-004	1.0000e-005	3.9000e-004	1.1000e-004	1.0000e-005	1.2000e-004	0.0000	1.0525	1.0525	4.0000e-005	1.5000e-004	1.0989
Worker	2.9000e-004	2.1000e-004	3.0400e-003	1.0000e-005	1.1000e-003	1.0000e-005	1.1000e-003	2.9000e-004	1.0000e-005	3.0000e-004	0.0000	0.8335	0.8335	2.0000e-005	2.0000e-005	0.8401
Total	**3.5000e-004**	**2.5100e-003**	**3.9000e-003**	**2.0000e-005**	**1.4800e-003**	**2.0000e-005**	**1.4900e-003**	**4.0000e-004**	**2.0000e-005**	**4.2000e-004**	**0.0000**	**1.8860**	**1.8860**	**6.0000e-005**	**1.7000e-004**	**1.9390**

3.3 Grading - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.8727	0.0000	0.8727	0.4094	0.0000	0.4094	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.4242	4.1549	3.3332	7.3500e-003		0.1928	0.1928		0.1774	0.1774	0.0000	645.9887	645.9887	0.2089	0.0000	651.2118
Total	**0.4242**	**4.1549**	**3.3332**	**7.3500e-003**	**0.8727**	**0.1928**	**1.0655**	**0.4094**	**0.1774**	**0.5868**	**0.0000**	**645.9887**	**645.9887**	**0.2089**	**0.0000**	**651.2118**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.0000e-003	0.1088	0.0406	5.1000e-004	0.0179	6.0000e-004	0.0185	5.1800e-003	5.8000e-004	5.7500e-003	0.0000	49.8876	49.8876	1.7000e-003	7.2400e-003	52.0871
Worker	6.9000e-003	5.0700e-003	0.0721	2.2000e-004	0.0260	1.4000e-004	0.0261	6.9100e-003	1.3000e-004	7.0400e-003	0.0000	19.7542	19.7542	4.7000e-004	4.9000e-004	19.9112
Total	**9.9000e-003**	**0.1139**	**0.1126**	**7.3000e-004**	**0.0439**	**7.4000e-004**	**0.0447**	**0.0121**	**7.1000e-004**	**0.0128**	**0.0000**	**69.6418**	**69.6418**	**2.1700e-003**	**7.7300e-003**	**71.9983**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.8727	0.0000	0.8727	0.4094	0.0000	0.4094	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.4242	4.1549	3.3331	7.3500e-003		0.1928	0.1928		0.1774	0.1774	0.0000	645.9879	645.9879	0.2089	0.0000	651.2111
Total	**0.4242**	**4.1549**	**3.3331**	**7.3500e-003**	**0.8727**	**0.1928**	**1.0655**	**0.4094**	**0.1774**	**0.5868**	**0.0000**	**645.9879**	**645.9879**	**0.2089**	**0.0000**	**651.2111**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.0000e-003	0.1088	0.0406	5.1000e-004	0.0179	6.0000e-004	0.0185	5.1800e-003	5.8000e-004	5.7500e-003	0.0000	49.8876	49.8876	1.7000e-003	7.2400e-003	52.0871
Worker	6.9000e-003	5.0700e-003	0.0721	2.2000e-004	0.0260	1.4000e-004	0.0261	6.9100e-003	1.3000e-004	7.0400e-003	0.0000	19.7542	19.7542	4.7000e-004	4.9000e-004	19.9112
Total	**9.9000e-003**	**0.1139**	**0.1126**	**7.3000e-004**	**0.0439**	**7.4000e-004**	**0.0447**	**0.0121**	**7.1000e-004**	**0.0128**	**0.0000**	**69.6418**	**69.6418**	**2.1700e-003**	**7.7300e-003**	**71.9983**

3.3 Grading - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.4542	0.0000	0.4542	0.1794	0.0000	0.1794	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1574	1.4841	1.3067	3.0400e-003		0.0678	0.0678		0.0624	0.0624	0.0000	267.0211	267.0211	0.0864	0.0000	269.1801
Total	**0.1574**	**1.4841**	**1.3067**	**3.0400e-003**	**0.4542**	**0.0678**	**0.5219**	**0.1794**	**0.0624**	**0.2417**	**0.0000**	**267.0211**	**267.0211**	**0.0864**	**0.0000**	**269.1801**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.2100e-003	0.0448	0.0165	2.1000e-004	7.4200e-003	2.5000e-004	7.6700e-003	2.1400e-003	2.4000e-004	2.3800e-003	0.0000	20.2529	20.2529	7.0000e-004	2.9400e-003	21.1471
Worker	2.6700e-003	1.8800e-003	0.0278	9.0000e-005	0.0108	6.0000e-005	0.0108	2.8600e-003	5.0000e-005	2.9100e-003	0.0000	7.8904	7.8904	1.8000e-004	1.9000e-004	7.9509
Total	**3.8800e-003**	**0.0467**	**0.0443**	**3.0000e-004**	**0.0182**	**3.1000e-004**	**0.0185**	**5.0000e-003**	**2.9000e-004**	**5.2900e-003**	**0.0000**	**28.1433**	**28.1433**	**8.8000e-004**	**3.1300e-003**	**29.0981**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.4542	0.0000	0.4542	0.1794	0.0000	0.1794	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1574	1.4841	1.3067	3.0400e-003		0.0678	0.0678		0.0624	0.0624	0.0000	267.0208	267.0208	0.0864	0.0000	269.1798
Total	**0.1574**	**1.4841**	**1.3067**	**3.0400e-003**	**0.4542**	**0.0678**	**0.5219**	**0.1794**	**0.0624**	**0.2417**	**0.0000**	**267.0208**	**267.0208**	**0.0864**	**0.0000**	**269.1798**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.2100e-003	0.0448	0.0165	2.1000e-004	7.4200e-003	2.5000e-004	7.6700e-003	2.1400e-003	2.4000e-004	2.3800e-003	0.0000	20.2529	20.2529	7.0000e-004	2.9400e-003	21.1471
Worker	2.6700e-003	1.8800e-003	0.0278	9.0000e-005	0.0108	6.0000e-005	0.0108	2.8600e-003	5.0000e-005	2.9100e-003	0.0000	7.8904	7.8904	1.8000e-004	1.9000e-004	7.9509
Total	**3.8800e-003**	**0.0467**	**0.0443**	**3.0000e-004**	**0.0182**	**3.1000e-004**	**0.0185**	**5.0000e-003**	**2.9000e-004**	**5.2900e-003**	**0.0000**	**28.1433**	**28.1433**	**8.8000e-004**	**3.1300e-003**	**29.0981**

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1420	1.2973	1.5601	2.6000e-003		0.0592	0.0592		0.0557	0.0557	0.0000	223.7344	223.7344	0.0529	0.0000	225.0571
Total	**0.1420**	**1.2973**	**1.5601**	**2.6000e-003**		**0.0592**	**0.0592**		**0.0557**	**0.0557**	**0.0000**	**223.7344**	**223.7344**	**0.0529**	**0.0000**	**225.0571**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.2600e-003	0.3361	0.1253	1.5800e-003	0.0554	1.8600e-003	0.0572	0.0160	1.7800e-003	0.0178	0.0000	154.0394	154.0394	5.2400e-003	0.0224	160.8308
Worker	0.0874	0.0642	0.9124	2.7300e-003	0.3293	1.8000e-003	0.3311	0.0875	1.6600e-003	0.0891	0.0000	250.1487	250.1487	6.0000e-003	6.1700e-003	252.1373
Total	**0.0967**	**0.4003**	**1.0376**	**4.3100e-003**	**0.3847**	**3.6600e-003**	**0.3883**	**0.1034**	**3.4400e-003**	**0.1069**	**0.0000**	**404.1881**	**404.1881**	**0.0112**	**0.0285**	**412.9680**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1420	1.2973	1.5601	2.6000e-003		0.0592	0.0592		0.0557	0.0557	0.0000	223.7341	223.7341	0.0529	0.0000	225.0568
Total	**0.1420**	**1.2973**	**1.5601**	**2.6000e-003**		**0.0592**	**0.0592**		**0.0557**	**0.0557**	**0.0000**	**223.7341**	**223.7341**	**0.0529**	**0.0000**	**225.0568**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.2600e-003	0.3361	0.1253	1.5800e-003	0.0554	1.8600e-003	0.0572	0.0160	1.7800e-003	0.0178	0.0000	154.0394	154.0394	5.2400e-003	0.0224	160.8308
Worker	0.0874	0.0642	0.9124	2.7300e-003	0.3293	1.8000e-003	0.3311	0.0875	1.6600e-003	0.0891	0.0000	250.1487	250.1487	6.0000e-003	6.1700e-003	252.1373
Total	**0.0967**	**0.4003**	**1.0376**	**4.3100e-003**	**0.3847**	**3.6600e-003**	**0.3883**	**0.1034**	**3.4400e-003**	**0.1069**	**0.0000**	**404.1881**	**404.1881**	**0.0112**	**0.0285**	**412.9680**

3.4 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0643	0.5861	0.7560	1.2700e-003		0.0248	0.0248		0.0233	0.0233	0.0000	109.0021	109.0021	0.0256	0.0000	109.6427
Total	**0.0643**	**0.5861**	**0.7560**	**1.2700e-003**		**0.0248**	**0.0248**		**0.0233**	**0.0233**	**0.0000**	**109.0021**	**109.0021**	**0.0256**	**0.0000**	**109.6427**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.4100e-003	0.1629	0.0601	7.5000e-004	0.0270	9.1000e-004	0.0279	7.7800e-003	8.7000e-004	8.6500e-003	0.0000	73.6578	73.6578	2.5600e-003	0.0107	76.9101
Worker	0.0399	0.0281	0.4142	1.2800e-003	0.1604	8.4000e-004	0.1612	0.0426	7.7000e-004	0.0434	0.0000	117.6877	117.6877	2.6400e-003	2.8100e-003	118.5908
Total	**0.0443**	**0.1910**	**0.4743**	**2.0300e-003**	**0.1873**	**1.7500e-003**	**0.1891**	**0.0504**	**1.6400e-003**	**0.0520**	**0.0000**	**191.3455**	**191.3455**	**5.2000e-003**	**0.0135**	**195.5009**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0643	0.5861	0.7560	1.2700e-003		0.0248	0.0248		0.0233	0.0233	0.0000	109.0020	109.0020	0.0256	0.0000	109.6426
Total	**0.0643**	**0.5861**	**0.7560**	**1.2700e-003**		**0.0248**	**0.0248**		**0.0233**	**0.0233**	**0.0000**	**109.0020**	**109.0020**	**0.0256**	**0.0000**	**109.6426**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.4100e-003	0.1629	0.0601	7.5000e-004	0.0270	9.1000e-004	0.0279	7.7800e-003	8.7000e-004	8.6500e-003	0.0000	73.6578	73.6578	2.5600e-003	0.0107	76.9101
Worker	0.0399	0.0281	0.4142	1.2800e-003	0.1604	8.4000e-004	0.1612	0.0426	7.7000e-004	0.0434	0.0000	117.6877	117.6877	2.6400e-003	2.8100e-003	118.5908
Total	**0.0443**	**0.1910**	**0.4743**	**2.0300e-003**	**0.1873**	**1.7500e-003**	**0.1891**	**0.0504**	**1.6400e-003**	**0.0520**	**0.0000**	**191.3455**	**191.3455**	**5.2000e-003**	**0.0135**	**195.5009**

3.5 Architectural Coating - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	3.4269					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.5000e-003	0.0235	0.0371	6.0000e-005		1.0600e-003	1.0600e-003		1.0600e-003	1.0600e-003	0.0000	5.2342	5.2342	2.9000e-004	0.0000	5.2413
Total	**3.4304**	**0.0235**	**0.0371**	**6.0000e-005**		**1.0600e-003**	**1.0600e-003**		**1.0600e-003**	**1.0600e-003**	**0.0000**	**5.2342**	**5.2342**	**2.9000e-004**	**0.0000**	**5.2413**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2025

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.4700e-003	2.4500e-003	0.0361	1.1000e-004	0.0140	7.0000e-005	0.0140	3.7100e-003	7.0000e-005	3.7800e-003	0.0000	10.2499	10.2499	2.3000e-004	2.4000e-004	10.3285
Total	**3.4700e-003**	**2.4500e-003**	**0.0361**	**1.1000e-004**	**0.0140**	**7.0000e-005**	**0.0140**	**3.7100e-003**	**7.0000e-005**	**3.7800e-003**	**0.0000**	**10.2499**	**10.2499**	**2.3000e-004**	**2.4000e-004**	**10.3285**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	3.4269					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.5000e-003	0.0235	0.0371	6.0000e-005		1.0600e-003	1.0600e-003		1.0600e-003	1.0600e-003	0.0000	5.2342	5.2342	2.9000e-004	0.0000	5.2413
Total	**3.4304**	**0.0235**	**0.0371**	**6.0000e-005**		**1.0600e-003**	**1.0600e-003**		**1.0600e-003**	**1.0600e-003**	**0.0000**	**5.2342**	**5.2342**	**2.9000e-004**	**0.0000**	**5.2413**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2025

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.4700e-003	2.4500e-003	0.0361	1.1000e-004	0.0140	7.0000e-005	0.0140	3.7100e-003	7.0000e-005	3.7800e-003	0.0000	10.2499	10.2499	2.3000e-004	2.4000e-004	10.3285
Total	**3.4700e-003**	**2.4500e-003**	**0.0361**	**1.1000e-004**	**0.0140**	**7.0000e-005**	**0.0140**	**3.7100e-003**	**7.0000e-005**	**3.7800e-003**	**0.0000**	**10.2499**	**10.2499**	**2.3000e-004**	**2.4000e-004**	**10.3285**

3.6 Paving - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0137	0.1287	0.2187	3.4000e-004		6.2800e-003	6.2800e-003		5.7800e-003	5.7800e-003	0.0000	30.0289	30.0289	9.7100e-003	0.0000	30.2717
Paving	0.0257					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0394**	**0.1287**	**0.2187**	**3.4000e-004**		**6.2800e-003**	**6.2800e-003**		**5.7800e-003**	**5.7800e-003**	**0.0000**	**30.0289**	**30.0289**	**9.7100e-003**	**0.0000**	**30.2717**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.1000e-004	4.3000e-004	6.3800e-003	2.0000e-005	2.4700e-003	1.0000e-005	2.4800e-003	6.6000e-004	1.0000e-005	6.7000e-004	0.0000	1.8116	1.8116	4.0000e-005	4.0000e-005	1.8255
Total	**6.1000e-004**	**4.3000e-004**	**6.3800e-003**	**2.0000e-005**	**2.4700e-003**	**1.0000e-005**	**2.4800e-003**	**6.6000e-004**	**1.0000e-005**	**6.7000e-004**	**0.0000**	**1.8116**	**1.8116**	**4.0000e-005**	**4.0000e-005**	**1.8255**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0137	0.1287	0.2187	3.4000e-004		6.2800e-003	6.2800e-003		5.7800e-003	5.7800e-003	0.0000	30.0289	30.0289	9.7100e-003	0.0000	30.2717
Paving	0.0257					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0394**	**0.1287**	**0.2187**	**3.4000e-004**		**6.2800e-003**	**6.2800e-003**		**5.7800e-003**	**5.7800e-003**	**0.0000**	**30.0289**	**30.0289**	**9.7100e-003**	**0.0000**	**30.2717**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.1000e-004	4.3000e-004	6.3800e-003	2.0000e-005	2.4700e-003	1.0000e-005	2.4800e-003	6.6000e-004	1.0000e-005	6.7000e-004	0.0000	1.8116	1.8116	4.0000e-005	4.0000e-005	1.8255
Total	**6.1000e-004**	**4.3000e-004**	**6.3800e-003**	**2.0000e-005**	**2.4700e-003**	**1.0000e-005**	**2.4800e-003**	**6.6000e-004**	**1.0000e-005**	**6.7000e-004**	**0.0000**	**1.8116**	**1.8116**	**4.0000e-005**	**4.0000e-005**	**1.8255**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.6209	0.7709	6.7501	0.0160	1.8247	0.0114	1.8361	0.4870	0.0106	0.4976	0.0000	1,477.8845	1,477.8845	0.0903	0.0629	1,498.8857
Unmitigated	0.6209	0.7709	6.7501	0.0160	1.8247	0.0114	1.8361	0.4870	0.0106	0.4976	0.0000	1,477.8845	1,477.8845	0.0903	0.0629	1,498.8857

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	1,293.99	736.78	709.44	4,846,636	4,846,636
User Defined Industrial	0.00	0.00	0.00		
Total	1,293.99	736.78	709.44	4,846,636	4,846,636

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
Parking Lot	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
Unrefrigerated Warehouse-No Rail	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
User Defined Industrial	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	304.2035	304.2035	0.0257	3.1100e-003	305.7728
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	304.2035	304.2035	0.0257	3.1100e-003	305.7728
NaturalGas Mitigated	8.0100e-003	0.0729	0.0612	4.4000e-004		5.5400e-003	5.5400e-003		5.5400e-003	5.5400e-003	0.0000	79.3047	79.3047	1.5200e-003	1.4500e-003	79.7760
NaturalGas Unmitigated	8.0100e-003	0.0729	0.0612	4.4000e-004		5.5400e-003	5.5400e-003		5.5400e-003	5.5400e-003	0.0000	79.3047	79.3047	1.5200e-003	1.4500e-003	79.7760

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.48611e+006	8.0100e-003	0.0729	0.0612	4.4000e-004		5.5400e-003	5.5400e-003		5.5400e-003	5.5400e-003	0.0000	79.3047	79.3047	1.5200e-003	1.4500e-003	79.7760
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**8.0100e-003**	**0.0729**	**0.0612**	**4.4000e-004**		**5.5400e-003**	**5.5400e-003**		**5.5400e-003**	**5.5400e-003**	**0.0000**	**79.3047**	**79.3047**	**1.5200e-003**	**1.4500e-003**	**79.7760**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.48611e+006	8.0100e-003	0.0729	0.0612	4.4000e-004		5.5400e-003	5.5400e-003		5.5400e-003	5.5400e-003	0.0000	79.3047	79.3047	1.5200e-003	1.4500e-003	79.7760
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**8.0100e-003**	**0.0729**	**0.0612**	**4.4000e-004**		**5.5400e-003**	**5.5400e-003**		**5.5400e-003**	**5.5400e-003**	**0.0000**	**79.3047**	**79.3047**	**1.5200e-003**	**1.4500e-003**	**79.7760**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.71532e+006	304.2035	0.0257	3.1100e-003	305.7728
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**304.2035**	**0.0257**	**3.1100e-003**	**305.7728**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.71532e+006	304.2035	0.0257	3.1100e-003	305.7728
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**304.2035**	**0.0257**	**3.1100e-003**	**305.7728**

6.0 Area Detail

6.1 Mitigation Measures Area

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	3.0170	2.6000e-004	0.0290	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004	0.0000	0.0565	0.0565	1.5000e-004	0.0000	0.0602
Unmitigated	3.0170	2.6000e-004	0.0290	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004	0.0000	0.0565	0.0565	1.5000e-004	0.0000	0.0602

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.3427					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.6717					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.6700e-003	2.6000e-004	0.0290	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004	0.0000	0.0565	0.0565	1.5000e-004	0.0000	0.0602
Total	**3.0170**	**2.6000e-004**	**0.0290**	**0.0000**		**1.0000e-004**	**1.0000e-004**		**1.0000e-004**	**1.0000e-004**	**0.0000**	**0.0565**	**0.0565**	**1.5000e-004**	**0.0000**	**0.0602**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.3427					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.6717					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.6700e-003	2.6000e-004	0.0290	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004	0.0000	0.0565	0.0565	1.5000e-004	0.0000	0.0602
Total	**3.0170**	**2.6000e-004**	**0.0290**	**0.0000**		**1.0000e-004**	**1.0000e-004**		**1.0000e-004**	**1.0000e-004**	**0.0000**	**0.0565**	**0.0565**	**1.5000e-004**	**0.0000**	**0.0602**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	448.8473	5.6019	0.1355	629.2804
Unmitigated	448.8473	5.6019	0.1355	629.2804

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	170.894 / 0	448.8473	5.6019	0.1355	629.2804
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**448.8473**	**5.6019**	**0.1355**	**629.2804**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	170.894 / 0	448.8473	5.6019	0.1355	629.2804
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**448.8473**	**5.6019**	**0.1355**	**629.2804**

8.0 Waste Detail

8.1 Mitigation Measures Waste

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	141.0097	8.3334	0.0000	349.3456
Unmitigated	141.0097	8.3334	0.0000	349.3456

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	694.66	141.0097	8.3334	0.0000	349.3456
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**141.0097**	**8.3334**	**0.0000**	**349.3456**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	694.66	141.0097	8.3334	0.0000	349.3456
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**141.0097**	**8.3334**	**0.0000**	**349.3456**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Equipment Type	Number

11.0 Vegetation

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

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1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	739.00	1000sqft	17.00	739,360.00	0
User Defined Industrial	739.00	User Defined Unit	0.00	0.00	0
Other Asphalt Surfaces	12.50	Acre	12.50	0.00	0
Parking Lot	787.00	Space	7.08	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	10			**Operational Year**	2026
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with DEIR's model.

Land Use - Consistent with DEIR's model.

Construction Phase - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Grading - Consistent with DEIR's model.

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Architectural Coating - See comment on: "Unsubstantiated Changes to Construction and Operational Architectural Coating Emission Factors".

Area Coating - See comment on: "Unsubstantiated Changes to Construction and Operational Architectural Coating Emission Factors".

Energy Use - See comment on: "Unsubstantiated Changes to Energy Use Values".

Fleet Mix - See comment on: "Unsubstantiated Changes to Operational Fleet Mix Values".

Trips and VMT - Consistent with DEIR's model.

Vehicle Trips - Consistent with DEIR's model.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	30.00	20.00
tblConstructionPhase	NumDays	75.00	335.00
tblConstructionPhase	NumDays	740.00	287.00
tblConstructionPhase	NumDays	55.00	41.00
tblConstructionPhase	NumDays	55.00	30.00
tblGrading	AcresOfGrading	1,340.00	300.00
tblGrading	AcresOfGrading	30.00	40.00
tblLandUse	LandUseSquareFeet	739,000.00	739,360.00
tblLandUse	LandUseSquareFeet	544,500.00	0.00
tblLandUse	LandUseSquareFeet	314,800.00	0.00
tblLandUse	LotAcreage	16.97	17.00
tblOffRoadEquipment	HorsePower	212.00	97.00
tblOffRoadEquipment	LoadFactor	0.43	0.37
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	24.00
tblTripsAndVMT	VendorTripNumber	121.00	91.00
tblTripsAndVMT	WorkerTripNumber	18.00	10.00
tblTripsAndVMT	WorkerTripNumber	62.00	62.10
tblVehicleTrips	ST_TR	1.74	1.00
tblVehicleTrips	SU_TR	1.74	0.96
tblVehicleTrips	WD_TR	1.74	1.75

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2024	6.1621	53.3328	56.7244	0.1411	20.3375	2.2846	21.5687	10.2004	2.1153	11.3332	0.0000	13,966.5381	13,966.5381	2.6955	0.3918	14,150.6803
2025	175.8026	57.3602	73.1514	0.1725	12.2698	2.4286	14.6983	4.8345	2.2502	7.0847	0.0000	17,019.8853	17,019.8853	3.4288	0.3969	17,223.8929
Maximum	**175.8026**	**57.3602**	**73.1514**	**0.1725**	**20.3375**	**2.4286**	**21.5687**	**10.2004**	**2.2502**	**11.3332**	**0.0000**	**17,019.8853**	**17,019.8853**	**3.4288**	**0.3969**	**17,223.8929**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2024	6.1621	53.3328	56.7244	0.1411	20.3375	2.2846	21.5687	10.2004	2.1153	11.3332	0.0000	13,966.5381	13,966.5381	2.6955	0.3918	14,150.6803
2025	175.8026	57.3602	73.1514	0.1725	12.2698	2.4286	14.6983	4.8345	2.2502	7.0847	0.0000	17,019.8853	17,019.8853	3.4288	0.3969	17,223.8929
Maximum	**175.8026**	**57.3602**	**73.1514**	**0.1725**	**20.3375**	**2.4286**	**21.5687**	**10.2004**	**2.2502**	**11.3332**	**0.0000**	**17,019.8853**	**17,019.8853**	**3.4288**	**0.3969**	**17,223.8929**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Energy	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
Mobile	4.0779	4.4510	43.6167	0.1042	11.6857	0.0715	11.7572	3.1141	0.0665	3.1807		10,622.8177	10,622.8177	0.6150	0.4175	10,762.6190
Total	**20.6602**	**4.8522**	**44.1840**	**0.1066**	**11.6857**	**0.1027**	**11.7884**	**3.1141**	**0.0977**	**3.2118**		**11,102.3214**	**11,102.3214**	**0.6254**	**0.4263**	**11,245.0015**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Energy	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
Mobile	4.0779	4.4510	43.6167	0.1042	11.6857	0.0715	11.7572	3.1141	0.0665	3.1807		10,622.8177	10,622.8177	0.6150	0.4175	10,762.6190
Total	**20.6602**	**4.8522**	**44.1840**	**0.1066**	**11.6857**	**0.1027**	**11.7884**	**3.1141**	**0.0977**	**3.2118**		**11,102.3214**	**11,102.3214**	**0.6254**	**0.4263**	**11,245.0015**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/8/2024	2/2/2024	5	20	
2	Grading	Grading	2/5/2024	5/17/2025	5	335	
3	Building Construction	Building Construction	4/5/2024	5/12/2025	5	287	
4	Architectural Coating	Architectural Coating	2/27/2025	4/24/2025	5	41	
5	Paving	Paving	3/3/2025	4/11/2025	5	30	

Acres of Grading (Site Preparation Phase): 40

Acres of Grading (Grading Phase): 300

Acres of Paving: 19.58

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 1,109,040; Non-Residential Outdoor: 369,680; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Crawler Tractors	2	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Grading	Scrapers	2	8.00	367	0.48
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	10.00	6.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	24.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	311.00	91.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	62.10	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					20.1873	0.0000	20.1873	10.1597	0.0000	10.1597			0.0000			0.0000
Off-Road	2.6609	27.1760	18.3356	0.0381		1.2294	1.2294		1.1310	1.1310		3,688.0100	3,688.0100	1.1928		3,717.8294
Total	**2.6609**	**27.1760**	**18.3356**	**0.0381**	**20.1873**	**1.2294**	**21.4166**	**10.1597**	**1.1310**	**11.2907**		**3,688.0100**	**3,688.0100**	**1.1928**		**3,717.8294**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.4800e-003	0.2188	0.0843	1.0800e-003	0.0384	1.2700e-003	0.0397	0.0111	1.2200e-003	0.0123		115.9265	115.9265	3.9500e-003	0.0168	121.0339
Worker	0.0298	0.0191	0.3267	9.5000e-004	0.1118	6.0000e-004	0.1124	0.0296	5.5000e-004	0.0302		96.0663	96.0663	2.1700e-003	2.1000e-003	96.7477
Total	**0.0363**	**0.2379**	**0.4110**	**2.0300e-003**	**0.1502**	**1.8700e-003**	**0.1521**	**0.0407**	**1.7700e-003**	**0.0425**		**211.9928**	**211.9928**	**6.1200e-003**	**0.0189**	**217.7817**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					20.1873	0.0000	20.1873	10.1597	0.0000	10.1597			0.0000			0.0000
Off-Road	2.6609	27.1760	18.3356	0.0381		1.2294	1.2294		1.1310	1.1310	0.0000	3,688.0100	3,688.0100	1.1928		3,717.8294
Total	**2.6609**	**27.1760**	**18.3356**	**0.0381**	**20.1873**	**1.2294**	**21.4166**	**10.1597**	**1.1310**	**11.2907**	**0.0000**	**3,688.0100**	**3,688.0100**	**1.1928**		**3,717.8294**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.4800e-003	0.2188	0.0843	1.0800e-003	0.0384	1.2700e-003	0.0397	0.0111	1.2200e-003	0.0123		115.9265	115.9265	3.9500e-003	0.0168	121.0339
Worker	0.0298	0.0191	0.3267	9.5000e-004	0.1118	6.0000e-004	0.1124	0.0296	5.5000e-004	0.0302		96.0663	96.0663	2.1700e-003	2.1000e-003	96.7477
Total	**0.0363**	**0.2379**	**0.4110**	**2.0300e-003**	**0.1502**	**1.8700e-003**	**0.1521**	**0.0407**	**1.7700e-003**	**0.0425**		**211.9928**	**211.9928**	**6.1200e-003**	**0.0189**	**217.7817**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.5801	35.0621	28.1278	0.0621		1.6270	1.6270		1.4969	1.4969		6,009.1193	6,009.1193	1.9435		6,057.7061
Total	**3.5801**	**35.0621**	**28.1278**	**0.0621**	**6.9718**	**1.6270**	**8.5988**	**3.4128**	**1.4969**	**4.9096**		**6,009.1193**	**6,009.1193**	**1.9435**		**6,057.7061**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0259	0.8752	0.3374	4.3000e-003	0.1537	5.0900e-003	0.1588	0.0443	4.8600e-003	0.0491		463.7060	463.7060	0.0158	0.0672	484.1357
Worker	0.0596	0.0383	0.6534	1.9000e-003	0.2236	1.2000e-003	0.2248	0.0593	1.1100e-003	0.0604		192.1326	192.1326	4.3500e-003	4.2100e-003	193.4955
Total	**0.0855**	**0.9134**	**0.9907**	**6.2000e-003**	**0.3772**	**6.2900e-003**	**0.3835**	**0.1035**	**5.9700e-003**	**0.1095**		**655.8387**	**655.8387**	**0.0202**	**0.0714**	**677.6311**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.5801	35.0621	28.1278	0.0621		1.6270	1.6270		1.4969	1.4969	0.0000	6,009.1193	6,009.1193	1.9435		6,057.7061
Total	**3.5801**	**35.0621**	**28.1278**	**0.0621**	**6.9718**	**1.6270**	**8.5988**	**3.4128**	**1.4969**	**4.9096**	**0.0000**	**6,009.1193**	**6,009.1193**	**1.9435**		**6,057.7061**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0259	0.8752	0.3374	4.3000e-003	0.1537	5.0900e-003	0.1588	0.0443	4.8600e-003	0.0491		463.7060	463.7060	0.0158	0.0672	484.1357
Worker	0.0596	0.0383	0.6534	1.9000e-003	0.2236	1.2000e-003	0.2248	0.0593	1.1100e-003	0.0604		192.1326	192.1326	4.3500e-003	4.2100e-003	193.4955
Total	**0.0855**	**0.9134**	**0.9907**	**6.2000e-003**	**0.3772**	**6.2900e-003**	**0.3835**	**0.1035**	**5.9700e-003**	**0.1095**		**655.8387**	**655.8387**	**0.0202**	**0.0714**	**677.6311**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.2118	30.2876	26.6678	0.0620		1.3832	1.3832		1.2725	1.2725		6,006.9465	6,006.9465	1.9428		6,055.5157
Total	**3.2118**	**30.2876**	**26.6678**	**0.0620**	**6.9718**	**1.3832**	**8.3550**	**3.4128**	**1.2725**	**4.6853**		**6,006.9465**	**6,006.9465**	**1.9428**		**6,055.5157**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0253	0.8710	0.3323	4.2200e-003	0.1537	5.1000e-003	0.1588	0.0442	4.8800e-003	0.0491		455.2542	455.2542	0.0159	0.0661	475.3425
Worker	0.0558	0.0344	0.6087	1.8400e-003	0.2236	1.1400e-003	0.2247	0.0593	1.0500e-003	0.0603		185.5842	185.5842	3.9200e-003	3.9400e-003	186.8550
Total	**0.0811**	**0.9054**	**0.9409**	**6.0600e-003**	**0.3772**	**6.2400e-003**	**0.3835**	**0.1035**	**5.9300e-003**	**0.1095**		**640.8384**	**640.8384**	**0.0198**	**0.0700**	**662.1975**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.2118	30.2876	26.6678	0.0620		1.3832	1.3832		1.2725	1.2725	0.0000	6,006.9465	6,006.9465	1.9428		6,055.5157
Total	**3.2118**	**30.2876**	**26.6678**	**0.0620**	**6.9718**	**1.3832**	**8.3550**	**3.4128**	**1.2725**	**4.6853**	**0.0000**	**6,006.9465**	**6,006.9465**	**1.9428**		**6,055.5157**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0253	0.8710	0.3323	4.2200e-003	0.1537	5.1000e-003	0.1588	0.0442	4.8800e-003	0.0491		455.2542	455.2542	0.0159	0.0661	475.3425
Worker	0.0558	0.0344	0.6087	1.8400e-003	0.2236	1.1400e-003	0.2247	0.0593	1.0500e-003	0.0603		185.5842	185.5842	3.9200e-003	3.9400e-003	186.8550
Total	**0.0811**	**0.9054**	**0.9409**	**6.0600e-003**	**0.3772**	**6.2400e-003**	**0.3835**	**0.1035**	**5.9300e-003**	**0.1095**		**640.8384**	**640.8384**	**0.0198**	**0.0700**	**662.1975**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769		2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**		**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0983	3.3183	1.2791	0.0163	0.5827	0.0193	0.6020	0.1678	0.0184	0.1862		1,758.2186	1,758.2186	0.0600	0.2549	1,835.6811
Worker	0.9267	0.5952	10.1600	0.0296	3.4763	0.0187	3.4949	0.9219	0.0172	0.9391		2,987.6626	2,987.6626	0.0676	0.0654	3,008.8544
Total	**1.0250**	**3.9136**	**11.4391**	**0.0459**	**4.0589**	**0.0380**	**4.0969**	**1.0897**	**0.0356**	**1.1253**		**4,745.8812**	**4,745.8812**	**0.1275**	**0.3204**	**4,844.5354**

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3.4 Building Construction - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769	0.0000	2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**	**0.0000**	**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0983	3.3183	1.2791	0.0163	0.5827	0.0193	0.6020	0.1678	0.0184	0.1862		1,758.2186	1,758.2186	0.0600	0.2549	1,835.6811
Worker	0.9267	0.5952	10.1600	0.0296	3.4763	0.0187	3.4949	0.9219	0.0172	0.9391		2,987.6626	2,987.6626	0.0676	0.0654	3,008.8544
Total	**1.0250**	**3.9136**	**11.4391**	**0.0459**	**4.0589**	**0.0380**	**4.0969**	**1.0897**	**0.0356**	**1.1253**		**4,745.8812**	**4,745.8812**	**0.1275**	**0.3204**	**4,844.5354**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3674	12.4697	16.0847	0.0270		0.5276	0.5276		0.4963	0.4963		2,556.4744	2,556.4744	0.6010		2,571.4981
Total	**1.3674**	**12.4697**	**16.0847**	**0.0270**		**0.5276**	**0.5276**		**0.4963**	**0.4963**		**2,556.4744**	**2,556.4744**	**0.6010**		**2,571.4981**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0961	3.3026	1.2599	0.0160	0.5827	0.0193	0.6020	0.1678	0.0185	0.1863		1,726.1722	1,726.1722	0.0602	0.2506	1,802.3404
Worker	0.8676	0.5351	9.4647	0.0286	3.4763	0.0178	3.4940	0.9219	0.0164	0.9383		2,885.8337	2,885.8337	0.0610	0.0612	2,905.5955
Total	**0.9637**	**3.8377**	**10.7245**	**0.0446**	**4.0589**	**0.0371**	**4.0961**	**1.0897**	**0.0349**	**1.1245**		**4,612.0059**	**4,612.0059**	**0.1211**	**0.3118**	**4,707.9358**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3674	12.4697	16.0847	0.0270		0.5276	0.5276		0.4963	0.4963	0.0000	2,556.4744	2,556.4744	0.6010		2,571.4981
Total	**1.3674**	**12.4697**	**16.0847**	**0.0270**		**0.5276**	**0.5276**		**0.4963**	**0.4963**	**0.0000**	**2,556.4744**	**2,556.4744**	**0.6010**		**2,571.4981**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0961	3.3026	1.2599	0.0160	0.5827	0.0193	0.6020	0.1678	0.0185	0.1863		1,726.1722	1,726.1722	0.0602	0.2506	1,802.3404
Worker	0.8676	0.5351	9.4647	0.0286	3.4763	0.0178	3.4940	0.9219	0.0164	0.9383		2,885.8337	2,885.8337	0.0610	0.0612	2,905.5955
Total	**0.9637**	**3.8377**	**10.7245**	**0.0446**	**4.0589**	**0.0371**	**4.0961**	**1.0897**	**0.0349**	**1.1245**		**4,612.0059**	**4,612.0059**	**0.1211**	**0.3118**	**4,707.9358**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	167.1675					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515		281.4481	281.4481	0.0154		281.8319
Total	**167.3384**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**		**281.4481**	**281.4481**	**0.0154**		**281.8319**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1733	0.1068	1.8899	5.7000e-003	0.6941	3.5500e-003	0.6977	0.1841	3.2700e-003	0.1874		576.2388	576.2388	0.0122	0.0122	580.1848
Total	**0.1733**	**0.1068**	**1.8899**	**5.7000e-003**	**0.6941**	**3.5500e-003**	**0.6977**	**0.1841**	**3.2700e-003**	**0.1874**		**576.2388**	**576.2388**	**0.0122**	**0.0122**	**580.1848**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	167.1675					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515	0.0000	281.4481	281.4481	0.0154		281.8319
Total	**167.3384**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**	**0.0000**	**281.4481**	**281.4481**	**0.0154**		**281.8319**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1733	0.1068	1.8899	5.7000e-003	0.6941	3.5500e-003	0.6977	0.1841	3.2700e-003	0.1874		576.2388	576.2388	0.0122	0.0122	580.1848
Total	**0.1733**	**0.1068**	**1.8899**	**5.7000e-003**	**0.6941**	**3.5500e-003**	**0.6977**	**0.1841**	**3.2700e-003**	**0.1874**		**576.2388**	**576.2388**	**0.0122**	**0.0122**	**580.1848**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9152	8.5816	14.5780	0.0228		0.4185	0.4185		0.3850	0.3850		2,206.7452	2,206.7452	0.7137		2,224.5878
Paving	1.7100					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**2.6251**	**8.5816**	**14.5780**	**0.0228**		**0.4185**	**0.4185**		**0.3850**	**0.3850**		**2,206.7452**	**2,206.7452**	**0.7137**		**2,224.5878**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0419	0.0258	0.4565	1.3800e-003	0.1677	8.6000e-004	0.1685	0.0445	7.9000e-004	0.0453		139.1881	139.1881	2.9400e-003	2.9500e-003	140.1413
Total	**0.0419**	**0.0258**	**0.4565**	**1.3800e-003**	**0.1677**	**8.6000e-004**	**0.1685**	**0.0445**	**7.9000e-004**	**0.0453**		**139.1881**	**139.1881**	**2.9400e-003**	**2.9500e-003**	**140.1413**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9152	8.5816	14.5780	0.0228		0.4185	0.4185		0.3850	0.3850	0.0000	2,206.7452	2,206.7452	0.7137		2,224.5878
Paving	1.7100					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**2.6251**	**8.5816**	**14.5780**	**0.0228**		**0.4185**	**0.4185**		**0.3850**	**0.3850**	**0.0000**	**2,206.7452**	**2,206.7452**	**0.7137**		**2,224.5878**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0419	0.0258	0.4565	1.3800e-003	0.1677	8.6000e-004	0.1685	0.0445	7.9000e-004	0.0453		139.1881	139.1881	2.9400e-003	2.9500e-003	140.1413
Total	**0.0419**	**0.0258**	**0.4565**	**1.3800e-003**	**0.1677**	**8.6000e-004**	**0.1685**	**0.0445**	**7.9000e-004**	**0.0453**		**139.1881**	**139.1881**	**2.9400e-003**	**2.9500e-003**	**140.1413**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	4.0779	4.4510	43.6167	0.1042	11.6857	0.0715	11.7572	3.1141	0.0665	3.1807		10,622.8177	10,622.8177	0.6150	0.4175	10,762.6190
Unmitigated	4.0779	4.4510	43.6167	0.1042	11.6857	0.0715	11.7572	3.1141	0.0665	3.1807		10,622.8177	10,622.8177	0.6150	0.4175	10,762.6190

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	1,293.99	736.78	709.44	4,846,636	4,846,636
User Defined Industrial	0.00	0.00	0.00		
Total	1,293.99	736.78	709.44	4,846,636	4,846,636

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
Parking Lot	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
Unrefrigerated Warehouse-No Rail	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
User Defined Industrial	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
NaturalGas Unmitigated	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	4071.54	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0439**	**0.3992**	**0.3353**	**2.4000e-003**		**0.0303**	**0.0303**		**0.0303**	**0.0303**		**479.0052**	**479.0052**	**9.1800e-003**	**8.7800e-003**	**481.8517**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	4.07154	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0439**	**0.3992**	**0.3353**	**2.4000e-003**		**0.0303**	**0.0303**		**0.0303**	**0.0303**		**479.0052**	**479.0052**	**9.1800e-003**	**8.7800e-003**	**481.8517**

6.0 Area Detail

6.1 Mitigation Measures Area

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Unmitigated	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.8778					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	14.6393					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0214	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Total	**16.5385**	**2.1000e-003**	**0.2319**	**2.0000e-005**		**8.2000e-004**	**8.2000e-004**		**8.2000e-004**	**8.2000e-004**		**0.4984**	**0.4984**	**1.3000e-003**		**0.5309**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.8778					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	14.6393					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0214	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Total	**16.5385**	**2.1000e-003**	**0.2319**	**2.0000e-005**		**8.2000e-004**	**8.2000e-004**		**8.2000e-004**	**8.2000e-004**		**0.4984**	**0.4984**	**1.3000e-003**		**0.5309**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

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1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	739.00	1000sqft	17.00	739,360.00	0
User Defined Industrial	739.00	User Defined Unit	0.00	0.00	0
Other Asphalt Surfaces	12.50	Acre	12.50	0.00	0
Parking Lot	787.00	Space	7.08	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	10			**Operational Year**	2026
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with DEIR's model.

Land Use - Consistent with DEIR's model.

Construction Phase - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Grading - Consistent with DEIR's model.

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Architectural Coating - See comment on: "Unsubstantiated Changes to Construction and Operational Architectural Coating Emission Factors".

Area Coating - See comment on: "Unsubstantiated Changes to Construction and Operational Architectural Coating Emission Factors".

Energy Use - See comment on: "Unsubstantiated Changes to Energy Use Values".

Fleet Mix - See comment on: "Unsubstantiated Changes to Operational Fleet Mix Values".

Trips and VMT - Consistent with DEIR's model.

Vehicle Trips - Consistent with DEIR's model.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	30.00	20.00
tblConstructionPhase	NumDays	75.00	335.00
tblConstructionPhase	NumDays	740.00	287.00
tblConstructionPhase	NumDays	55.00	41.00
tblConstructionPhase	NumDays	55.00	30.00
tblGrading	AcresOfGrading	1,340.00	300.00
tblGrading	AcresOfGrading	30.00	40.00
tblLandUse	LandUseSquareFeet	739,000.00	739,360.00
tblLandUse	LandUseSquareFeet	544,500.00	0.00
tblLandUse	LandUseSquareFeet	314,800.00	0.00
tblLandUse	LotAcreage	16.97	17.00
tblOffRoadEquipment	HorsePower	212.00	97.00
tblOffRoadEquipment	LoadFactor	0.43	0.37
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	24.00
tblTripsAndVMT	VendorTripNumber	121.00	91.00
tblTripsAndVMT	WorkerTripNumber	18.00	10.00
tblTripsAndVMT	WorkerTripNumber	62.00	62.10
tblVehicleTrips	ST_TR	1.74	1.00
tblVehicleTrips	SU_TR	1.74	0.96
tblVehicleTrips	WD_TR	1.74	1.75

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2024	6.2145	53.5999	55.7536	0.1393	20.3375	2.2847	21.5687	10.2004	2.1155	11.3332	0.0000	13,786.2164	13,786.2164	2.6962	0.3969	13,971.8817
2025	175.8676	57.6327	72.0356	0.1703	12.2698	2.4287	14.6984	4.8345	2.2503	7.0848	0.0000	16,804.6410	16,804.6410	3.4298	0.4026	17,010.3549
Maximum	**175.8676**	**57.6327**	**72.0356**	**0.1703**	**20.3375**	**2.4287**	**21.5687**	**10.2004**	**2.2503**	**11.3332**	**0.0000**	**16,804.6410**	**16,804.6410**	**3.4298**	**0.4026**	**17,010.3549**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2024	6.2145	53.5999	55.7536	0.1393	20.3375	2.2847	21.5687	10.2004	2.1155	11.3332	0.0000	13,786.2164	13,786.2164	2.6962	0.3969	13,971.8817
2025	175.8676	57.6327	72.0356	0.1703	12.2698	2.4287	14.6984	4.8345	2.2503	7.0848	0.0000	16,804.6410	16,804.6410	3.4298	0.4026	17,010.3549
Maximum	**175.8676**	**57.6327**	**72.0356**	**0.1703**	**20.3375**	**2.4287**	**21.5687**	**10.2004**	**2.2503**	**11.3332**	**0.0000**	**16,804.6410**	**16,804.6410**	**3.4298**	**0.4026**	**17,010.3549**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Energy	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
Mobile	3.9509	4.7805	41.9229	0.0993	11.6857	0.0715	11.7573	3.1141	0.0666	3.1807		10,133.4779	10,133.4779	0.6282	0.4330	10,278.2132
Total	**20.5332**	**5.1818**	**42.4901**	**0.1018**	**11.6857**	**0.1027**	**11.7884**	**3.1141**	**0.0977**	**3.2119**		**10,612.9815**	**10,612.9815**	**0.6386**	**0.4418**	**10,760.5958**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Energy	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
Mobile	3.9509	4.7805	41.9229	0.0993	11.6857	0.0715	11.7573	3.1141	0.0666	3.1807		10,133.4779	10,133.4779	0.6282	0.4330	10,278.2132
Total	**20.5332**	**5.1818**	**42.4901**	**0.1018**	**11.6857**	**0.1027**	**11.7884**	**3.1141**	**0.0977**	**3.2119**		**10,612.9815**	**10,612.9815**	**0.6386**	**0.4418**	**10,760.5958**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/8/2024	2/2/2024	5	20	
2	Grading	Grading	2/5/2024	5/17/2025	5	335	
3	Building Construction	Building Construction	4/5/2024	5/12/2025	5	287	
4	Architectural Coating	Architectural Coating	2/27/2025	4/24/2025	5	41	
5	Paving	Paving	3/3/2025	4/11/2025	5	30	

Acres of Grading (Site Preparation Phase): 40

Acres of Grading (Grading Phase): 300

Acres of Paving: 19.58

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 1,109,040; Non-Residential Outdoor: 369,680; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Crawler Tractors	2	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Grading	Scrapers	2	8.00	367	0.48
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	10.00	6.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	24.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	311.00	91.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	62.10	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					20.1873	0.0000	20.1873	10.1597	0.0000	10.1597			0.0000			0.0000
Off-Road	2.6609	27.1760	18.3356	0.0381		1.2294	1.2294		1.1310	1.1310		3,688.0100	3,688.0100	1.1928		3,717.8294
Total	**2.6609**	**27.1760**	**18.3356**	**0.0381**	**20.1873**	**1.2294**	**21.4166**	**10.1597**	**1.1310**	**11.2907**		**3,688.0100**	**3,688.0100**	**1.1928**		**3,717.8294**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.1900e-003	0.2297	0.0871	1.0800e-003	0.0384	1.2800e-003	0.0397	0.0111	1.2200e-003	0.0123		116.1396	116.1396	3.9300e-003	0.0169	121.2598
Worker	0.0316	0.0209	0.2958	9.0000e-004	0.1118	6.0000e-004	0.1124	0.0296	5.5000e-004	0.0302		90.4952	90.4952	2.2100e-003	2.2300e-003	91.2152
Total	**0.0377**	**0.2506**	**0.3829**	**1.9800e-003**	**0.1502**	**1.8800e-003**	**0.1521**	**0.0407**	**1.7700e-003**	**0.0425**		**206.6347**	**206.6347**	**6.1400e-003**	**0.0191**	**212.4749**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					20.1873	0.0000	20.1873	10.1597	0.0000	10.1597			0.0000			0.0000
Off-Road	2.6609	27.1760	18.3356	0.0381		1.2294	1.2294		1.1310	1.1310	0.0000	3,688.0100	3,688.0100	1.1928		3,717.8294
Total	**2.6609**	**27.1760**	**18.3356**	**0.0381**	**20.1873**	**1.2294**	**21.4166**	**10.1597**	**1.1310**	**11.2907**	**0.0000**	**3,688.0100**	**3,688.0100**	**1.1928**		**3,717.8294**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.1900e-003	0.2297	0.0871	1.0800e-003	0.0384	1.2800e-003	0.0397	0.0111	1.2200e-003	0.0123		116.1396	116.1396	3.9300e-003	0.0169	121.2598
Worker	0.0316	0.0209	0.2958	9.0000e-004	0.1118	6.0000e-004	0.1124	0.0296	5.5000e-004	0.0302		90.4952	90.4952	2.2100e-003	2.2300e-003	91.2152
Total	**0.0377**	**0.2506**	**0.3829**	**1.9800e-003**	**0.1502**	**1.8800e-003**	**0.1521**	**0.0407**	**1.7700e-003**	**0.0425**		**206.6347**	**206.6347**	**6.1400e-003**	**0.0191**	**212.4749**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.5801	35.0621	28.1278	0.0621		1.6270	1.6270		1.4969	1.4969		6,009.1193	6,009.1193	1.9435		6,057.7061
Total	**3.5801**	**35.0621**	**28.1278**	**0.0621**	**6.9718**	**1.6270**	**8.5988**	**3.4128**	**1.4969**	**4.9096**		**6,009.1193**	**6,009.1193**	**1.9435**		**6,057.7061**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0248	0.9186	0.3483	4.3100e-003	0.1537	5.1100e-003	0.1588	0.0443	4.8900e-003	0.0491		464.5582	464.5582	0.0157	0.0674	485.0390
Worker	0.0631	0.0419	0.5916	1.7900e-003	0.2236	1.2000e-003	0.2248	0.0593	1.1100e-003	0.0604		180.9903	180.9903	4.4100e-003	4.4600e-003	182.4304
Total	**0.0879**	**0.9604**	**0.9398**	**6.1000e-003**	**0.3772**	**6.3100e-003**	**0.3835**	**0.1035**	**6.0000e-003**	**0.1095**		**645.5485**	**645.5485**	**0.0202**	**0.0719**	**667.4694**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.5801	35.0621	28.1278	0.0621		1.6270	1.6270		1.4969	1.4969	0.0000	6,009.1193	6,009.1193	1.9435		6,057.7061
Total	**3.5801**	**35.0621**	**28.1278**	**0.0621**	**6.9718**	**1.6270**	**8.5988**	**3.4128**	**1.4969**	**4.9096**	**0.0000**	**6,009.1193**	**6,009.1193**	**1.9435**		**6,057.7061**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0248	0.9186	0.3483	4.3100e-003	0.1537	5.1100e-003	0.1588	0.0443	4.8900e-003	0.0491		464.5582	464.5582	0.0157	0.0674	485.0390
Worker	0.0631	0.0419	0.5916	1.7900e-003	0.2236	1.2000e-003	0.2248	0.0593	1.1100e-003	0.0604		180.9903	180.9903	4.4100e-003	4.4600e-003	182.4304
Total	**0.0879**	**0.9604**	**0.9398**	**6.1000e-003**	**0.3772**	**6.3100e-003**	**0.3835**	**0.1035**	**6.0000e-003**	**0.1095**		**645.5485**	**645.5485**	**0.0202**	**0.0719**	**667.4694**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.2118	30.2876	26.6678	0.0620		1.3832	1.3832		1.2725	1.2725		6,006.9465	6,006.9465	1.9428		6,055.5157
Total	**3.2118**	**30.2876**	**26.6678**	**0.0620**	**6.9718**	**1.3832**	**8.3550**	**3.4128**	**1.2725**	**4.6853**		**6,006.9465**	**6,006.9465**	**1.9428**		**6,055.5157**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0242	0.9143	0.3431	4.2300e-003	0.1537	5.1300e-003	0.1588	0.0442	4.9000e-003	0.0492		456.1035	456.1035	0.0158	0.0663	476.2416
Worker	0.0593	0.0376	0.5515	1.7300e-003	0.2236	1.1400e-003	0.2247	0.0593	1.0500e-003	0.0603		174.8361	174.8361	3.9900e-003	4.1700e-003	176.1789
Total	**0.0834**	**0.9519**	**0.8945**	**5.9600e-003**	**0.3772**	**6.2700e-003**	**0.3835**	**0.1035**	**5.9500e-003**	**0.1095**		**630.9396**	**630.9396**	**0.0198**	**0.0704**	**652.4205**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.2118	30.2876	26.6678	0.0620		1.3832	1.3832		1.2725	1.2725	0.0000	6,006.9465	6,006.9465	1.9428		6,055.5157
Total	**3.2118**	**30.2876**	**26.6678**	**0.0620**	**6.9718**	**1.3832**	**8.3550**	**3.4128**	**1.2725**	**4.6853**	**0.0000**	**6,006.9465**	**6,006.9465**	**1.9428**		**6,055.5157**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0242	0.9143	0.3431	4.2300e-003	0.1537	5.1300e-003	0.1588	0.0442	4.9000e-003	0.0492		456.1035	456.1035	0.0158	0.0663	476.2416
Worker	0.0593	0.0376	0.5515	1.7300e-003	0.2236	1.1400e-003	0.2247	0.0593	1.0500e-003	0.0603		174.8361	174.8361	3.9900e-003	4.1700e-003	176.1789
Total	**0.0834**	**0.9519**	**0.8945**	**5.9600e-003**	**0.3772**	**6.2700e-003**	**0.3835**	**0.1035**	**5.9500e-003**	**0.1095**		**630.9396**	**630.9396**	**0.0198**	**0.0704**	**652.4205**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769		2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**		**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0938	3.4830	1.3205	0.0163	0.5827	0.0194	0.6021	0.1678	0.0185	0.1863		1,761.4498	1,761.4498	0.0597	0.2556	1,839.1062
Worker	0.9812	0.6507	9.1986	0.0278	3.4763	0.0187	3.4949	0.9219	0.0172	0.9391		2,814.3998	2,814.3998	0.0686	0.0694	2,836.7923
Total	**1.0750**	**4.1337**	**10.5191**	**0.0442**	**4.0589**	**0.0381**	**4.0970**	**1.0897**	**0.0357**	**1.1254**		**4,575.8496**	**4,575.8496**	**0.1283**	**0.3250**	**4,675.8985**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769	0.0000	2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**	**0.0000**	**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0938	3.4830	1.3205	0.0163	0.5827	0.0194	0.6021	0.1678	0.0185	0.1863		1,761.4498	1,761.4498	0.0597	0.2556	1,839.1062
Worker	0.9812	0.6507	9.1986	0.0278	3.4763	0.0187	3.4949	0.9219	0.0172	0.9391		2,814.3998	2,814.3998	0.0686	0.0694	2,836.7923
Total	**1.0750**	**4.1337**	**10.5191**	**0.0442**	**4.0589**	**0.0381**	**4.0970**	**1.0897**	**0.0357**	**1.1254**		**4,575.8496**	**4,575.8496**	**0.1283**	**0.3250**	**4,675.8985**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3674	12.4697	16.0847	0.0270		0.5276	0.5276		0.4963	0.4963		2,556.4744	2,556.4744	0.6010		2,571.4981
Total	**1.3674**	**12.4697**	**16.0847**	**0.0270**		**0.5276**	**0.5276**		**0.4963**	**0.4963**		**2,556.4744**	**2,556.4744**	**0.6010**		**2,571.4981**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0916	3.4667	1.3007	0.0160	0.5827	0.0194	0.6021	0.1678	0.0186	0.1864		1,729.3923	1,729.3923	0.0599	0.2512	1,805.7495
Worker	0.9215	0.5848	8.5750	0.0269	3.4763	0.0178	3.4940	0.9219	0.0164	0.9383		2,718.7017	2,718.7017	0.0620	0.0649	2,739.5818
Total	**1.0131**	**4.0514**	**9.8757**	**0.0429**	**4.0589**	**0.0372**	**4.0961**	**1.0897**	**0.0349**	**1.1246**		**4,448.0941**	**4,448.0941**	**0.1219**	**0.3161**	**4,545.3313**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3674	12.4697	16.0847	0.0270		0.5276	0.5276		0.4963	0.4963	0.0000	2,556.4744	2,556.4744	0.6010		2,571.4981
Total	**1.3674**	**12.4697**	**16.0847**	**0.0270**		**0.5276**	**0.5276**		**0.4963**	**0.4963**	**0.0000**	**2,556.4744**	**2,556.4744**	**0.6010**		**2,571.4981**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0916	3.4667	1.3007	0.0160	0.5827	0.0194	0.6021	0.1678	0.0186	0.1864		1,729.3923	1,729.3923	0.0599	0.2512	1,805.7495
Worker	0.9215	0.5848	8.5750	0.0269	3.4763	0.0178	3.4940	0.9219	0.0164	0.9383		2,718.7017	2,718.7017	0.0620	0.0649	2,739.5818
Total	**1.0131**	**4.0514**	**9.8757**	**0.0429**	**4.0589**	**0.0372**	**4.0961**	**1.0897**	**0.0349**	**1.1246**		**4,448.0941**	**4,448.0941**	**0.1219**	**0.3161**	**4,545.3313**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	167.1675					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515		281.4481	281.4481	0.0154		281.8319
Total	**167.3384**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**		**281.4481**	**281.4481**	**0.0154**		**281.8319**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1840	0.1168	1.7122	5.3700e-003	0.6941	3.5500e-003	0.6977	0.1841	3.2700e-003	0.1874		542.8662	542.8662	0.0124	0.0130	547.0355
Total	**0.1840**	**0.1168**	**1.7122**	**5.3700e-003**	**0.6941**	**3.5500e-003**	**0.6977**	**0.1841**	**3.2700e-003**	**0.1874**		**542.8662**	**542.8662**	**0.0124**	**0.0130**	**547.0355**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	167.1675					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515	0.0000	281.4481	281.4481	0.0154		281.8319
Total	**167.3384**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**	**0.0000**	**281.4481**	**281.4481**	**0.0154**		**281.8319**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1840	0.1168	1.7122	5.3700e-003	0.6941	3.5500e-003	0.6977	0.1841	3.2700e-003	0.1874		542.8662	542.8662	0.0124	0.0130	547.0355
Total	**0.1840**	**0.1168**	**1.7122**	**5.3700e-003**	**0.6941**	**3.5500e-003**	**0.6977**	**0.1841**	**3.2700e-003**	**0.1874**		**542.8662**	**542.8662**	**0.0124**	**0.0130**	**547.0355**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9152	8.5816	14.5780	0.0228		0.4185	0.4185		0.3850	0.3850		2,206.7452	2,206.7452	0.7137		2,224.5878
Paving	1.7100					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**2.6251**	**8.5816**	**14.5780**	**0.0228**		**0.4185**	**0.4185**		**0.3850**	**0.3850**		**2,206.7452**	**2,206.7452**	**0.7137**		**2,224.5878**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0444	0.0282	0.4136	1.3000e-003	0.1677	8.6000e-004	0.1685	0.0445	7.9000e-004	0.0453		131.1271	131.1271	2.9900e-003	3.1300e-003	132.1342
Total	**0.0444**	**0.0282**	**0.4136**	**1.3000e-003**	**0.1677**	**8.6000e-004**	**0.1685**	**0.0445**	**7.9000e-004**	**0.0453**		**131.1271**	**131.1271**	**2.9900e-003**	**3.1300e-003**	**132.1342**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9152	8.5816	14.5780	0.0228		0.4185	0.4185		0.3850	0.3850	0.0000	2,206.7452	2,206.7452	0.7137		2,224.5878
Paving	1.7100					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**2.6251**	**8.5816**	**14.5780**	**0.0228**		**0.4185**	**0.4185**		**0.3850**	**0.3850**	**0.0000**	**2,206.7452**	**2,206.7452**	**0.7137**		**2,224.5878**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0444	0.0282	0.4136	1.3000e-003	0.1677	8.6000e-004	0.1685	0.0445	7.9000e-004	0.0453		131.1271	131.1271	2.9900e-003	3.1300e-003	132.1342
Total	**0.0444**	**0.0282**	**0.4136**	**1.3000e-003**	**0.1677**	**8.6000e-004**	**0.1685**	**0.0445**	**7.9000e-004**	**0.0453**		**131.1271**	**131.1271**	**2.9900e-003**	**3.1300e-003**	**132.1342**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	3.9509	4.7805	41.9229	0.0993	11.6857	0.0715	11.7573	3.1141	0.0666	3.1807		10,133.4779	10,133.4779	0.6282	0.4330	10,278.2132
Unmitigated	3.9509	4.7805	41.9229	0.0993	11.6857	0.0715	11.7573	3.1141	0.0666	3.1807		10,133.4779	10,133.4779	0.6282	0.4330	10,278.2132

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	1,293.99	736.78	709.44	4,846,636	4,846,636
User Defined Industrial	0.00	0.00	0.00		
Total	1,293.99	736.78	709.44	4,846,636	4,846,636

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
Parking Lot	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
Unrefrigerated Warehouse-No Rail	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
User Defined Industrial	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
NaturalGas Unmitigated	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	4071.54	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0439**	**0.3992**	**0.3353**	**2.4000e-003**		**0.0303**	**0.0303**		**0.0303**	**0.0303**		**479.0052**	**479.0052**	**9.1800e-003**	**8.7800e-003**	**481.8517**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	4.07154	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0439**	**0.3992**	**0.3353**	**2.4000e-003**		**0.0303**	**0.0303**		**0.0303**	**0.0303**		**479.0052**	**479.0052**	**9.1800e-003**	**8.7800e-003**	**481.8517**

6.0 Area Detail

6.1 Mitigation Measures Area

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Unmitigated	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.8778					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	14.6393					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0214	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Total	**16.5385**	**2.1000e-003**	**0.2319**	**2.0000e-005**		**8.2000e-004**	**8.2000e-004**		**8.2000e-004**	**8.2000e-004**		**0.4984**	**0.4984**	**1.3000e-003**		**0.5309**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.8778					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	14.6393					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0214	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Total	**16.5385**	**2.1000e-003**	**0.2319**	**2.0000e-005**		**8.2000e-004**	**8.2000e-004**		**8.2000e-004**	**8.2000e-004**		**0.4984**	**0.4984**	**1.3000e-003**		**0.5309**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Geologic and Hydrogeologic Characterization
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
Industrial Stormwater Compliance
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2104, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
2656 29th Street, Suite 201
Santa Monica, California 90405
Attn: Paul Rosenfeld, Ph.D.
Mobil: (310) 795-2335
Office: (310) 452-5555
Fax: (310) 452-5550
Email: prosenfeld@swape.com

Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Rosenfeld P. E., Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution.* **233,** 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004.* New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division
Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation
Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois
Joseph Ruepke vs. BNSF
Case No. 2019 L 007730
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska
Steven Gillett vs. BNSF
Case No. 4:20-cv-03120
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County
James Eadus vs. Soo Line Railroad and BNSF
Case No. DV 19-1056
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al.cvs. Cerro Flow Products, Inc.
Case No. 0i9-L-2295
Rosenfeld Deposition 5-14-2021
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a AMTRAK,
Case No. 18-L-6845
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois
Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail
Case No. 17-cv-8517
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case No. CV20127-094749
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al vs. CNA Insurance Company et al.
Case No. 1:17-cv-000508
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.
Case No. 1716-CV10006
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintifs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the County Court of Dallas County Texas
Lisa Parr et al, Plaintiff, vs. Aruba et al, Defendant.
Case No. cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.
Civil Action No. 2:09-cv-232-WHA-TFM
Rosenfeld Deposition July 2010, June 2011

In the Circuit Court of Jefferson County Alabama
Jaeanette Moss Anthony, et al., Plaintiffs, vs. Drummond Company Inc., et al., Defendants
Civil Action No. CV 2008-2076
Rosenfeld Deposition September 2010

In the United States District Court, Western District Lafayette Division
Ackle et al., Plaintiffs, vs. Citgo Petroleum Corporation, et al., Defendants.
Case No. 2:07CV1052
Rosenfeld Deposition July 2009

COMMENT LETTER NO. 7: COMMITTEE TO STOP GIANT WAREHOUSE BLIGHT

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June 13, 2024

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Re: Comments on Draft Environmental Impact Report for Palm Springs Fulfillment Center Project; SCH #2023080091

Dear Mr. Mlaker:

On behalf of the Committee to Stop Giant Warehouse Blight ("Committee"), we provide these comments on the draft environmental impact report ("DEIR") for the proposed Palm Springs Fulfillment Center at Indian Canyon Drive and 19th Avenue. Committee is an unincorporated association of Palm Springs area residents concerned with the adverse impacts that are imposed on communities by the development of massive warehouse projects. Such impacts can be witnessed elsewhere throughout the Inland Empire due to the proliferation of similar warehouse projects, resulting in numerous negative impacts with questionable benefits for the surrounding communities. 7-a

The proposed Palm Springs Fulfillment Center includes development of a two-story, 739,360-square-foot structure for industrial warehouse use (the "Project"). The DEIR identifies the Project as a "high cube warehouse with fulfillment capabilities" and states the hours of operation will be 24/7. The DEIR acknowledges the Project would have significant and unavoidable greenhouse gas emissions impacts and vehicle miles traveled impacts.

The DEIR for the first massive warehouse development in Palm Springs is substantively inadequate. The DEIR fails to include an adequate project description, which impedes the analysis of the Project's impacts and a comparison of the Project to alternatives. The DEIR also fails to address previously unanalyzed aesthetic impacts, fails 7-b

to consider inconsistencies with relevant land use policies, and fails to support assumptions relied upon in assessing greenhouse gas emissions. Further, the Project as proposed cannot be approved under the California Environmental Quality Act ("CEQA") because there are feasible and less impactful project alternatives available. 7-b

I. The EIR's Analysis of the Project Description is Inadequate

Every EIR must set forth a project description that is sufficient to allow an adequate evaluation and review of the project's environmental impacts. (CEQA Guidelines, §15124.) "An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192 93; accord *San Joaquin Raptor/Wildlife Reserve Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730.) "[O]nly through an accurate view of the project may the public and interested parties and public agencies balance the proposed project's benefits against its environmental cost, consider appropriate mitigation measures, assess the advantages of terminating the proposal and properly weigh other alternatives." (*City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1454.)

Here, the DEIR fails to provide adequate information and documentation to support environmental review. The DEIR refers to the Project as a "high cube warehouse with fulfillment capabilities." (DEIR p. 3-5.) This does not provide specific enough information regarding how this site will be used as solely warehouse uses function very differently than fulfillment centers. Warehouses store products, often for a specific company, to be used at a later date. In contrast, fulfillment centers house products for only a brief period of time, as a stopping point on the way to their final destination. As such, fulfillment centers have a higher volume of truck traffic. 7-c

The DEIR also does not address whether the Project will provide storage for refrigerated products. Such products require faster and more frequent deliveries, which also increases the volume of truck trips. The volume of truck trips greatly affects the level of greenhouse gas emissions and vehicle miles traveled associated with the Project, thus the DEIR must include detailed and finite information on what types of uses will be included in the Project or condition it to prohibit certain uses.

Additionally, as discussed below regarding alternatives to the project, the type of facility, and whether it is for a specific entity, can greatly influence whether and how much tax income the City could expect from the Project. Since tax benefits have been the City's stated reason for encouraging warehouse use within the City limits, information regarding the financial impacts of the Project must be assessed to allow for an accurate comparison of alternatives. 7-d

Similarly, the City has cited jobs created by warehouses as a basis for allowing such projects. The DEIR identifies that warehouses that are "sort" facilities typically have 7-e

a higher volume of employees, as opposed to "non-sort" facilities that can be highly automated and thus provide a much lower level of employment opportunities. (DEIR p. 3-7.) The DEIR does not address the level of automation that would be included in the Project and instead just states today it is common to have a balance of operations. The DEIR must address the specifics of the use of the facility in order to accurately assess the number of employees for the Project. This is relevant to both the impact analysis and the City's assessment of alternatives to the Project, particularly for a project such as this that admittedly has significant and unavoidable impacts. 7-e

II. The DEIR's Analysis of Impacts is Inadequate.

A. The City Cannot Rely on an Unanalyzed Ordinance to Eliminate Consideration of Aesthetic Impacts.

The DEIR disingenuously claims that because the Project complies with the height, size and setback requirements contained in Palm Springs Municipal Code section 92.17.1.03, it would not have an adverse impact to visual character in a non-urbanized area. (DEIR p. 4.1-23.) This claim fails to recognize that the ordinance adopting section 92.17.1.03, Ordinance No. 2056, was adopted without any environmental review. At the time Ordinance No. 2056 was adopted in January 2022, the City found the ordinance was not subject to CEQA because the ordinance itself would not result in a direct or reasonably foreseeable indirect physical change in the environment. In making this finding, the City also identified that impacts associated with all individual projects would be assessed during CEQA for each project. 7-f

The City cannot piecemeal the approval of warehouse development with significant aesthetic impacts in a sparsely developed area of the City in a manner that leaves those impacts unanalyzed. CEQA prohibits the City from evading analysis of the increased warehouse height, its blockage of mountain views by the two-story structure, and the impact on the visual character of the desert landscape. As noted in comments by Committee member Peter Moruzzi, views of the expansive desert that characterize the Coachella Valley will be decimated by this Project and similar projects it will likely induce. The City did not previously analyze, disclose and mitigate or avoid these impacts and thus must do so now to comply with CEQA.

The DEIR also inaccurately claims that the Project proposes a typical industrial use in this area of the City. (DEIR p. 4.1-29.) This Project would be the first warehouse project and the only two-story industrial development in this area of the City, creating the first of its kind impacts on the surrounding desert landscape. This impact must be analyzed. 7-g

B. The DEIR Fails to Analyze Riverside County General Plan Policies Regarding Eligible Scenic Highways.

Interstate 10 has been officially recognized as an Eligible Scenic Highway by the County of Riverside in its General Plan Circulation Element and in the Western Coachella Valley Area Plan. (Riverside Co. General Plan Circulation Element Fig C-8; Western Coachella Valley Area Plan Fig. 9.) The DEIR's analysis of aesthetic impacts disregards the designation of Interstate 10 as an Eligible Scenic Highway by the County because this highway is not "officially designated." (DEIR p. 4.1-3.) However, the DEIR fails to recognize the County of Riverside General Plan policies apply to Eligible Scenic Highways. The DEIR must evaluate whether the Project would be inconsistent with the following General Plan Circulation Element and Land Element Policies that apply to Eligible Scenic Highways:

- LU 14.3 Ensure that the design and appearance of new landscaping, structures, equipment, signs, or grading within Designated and Eligible State and County scenic highway corridors are compatible with the surrounding scenic setting or environment.
- C 19.1 Preserve scenic routes that have exceptional or unique visual features in accordance with Caltrans' Scenic Highways Plan.

7-h

Additionally, the Western Coachella Valley Area Plan ("WCVAP"), which is an extension of the County's General Plan, establishes that:

> The scenic beauty of the Western Coachella Valley is often enjoyed while traveling on its highways. Several of these routes within the region have been designated or identified as scenic highways for inclusion in the State Scenic Highways program. Moreover, scenic highways play an important role in encouraging the growth of recreation and tourism--both important aspects of the Riverside County economy. Scenic Highways designations recognize this value and place restrictions on adjacent development to help protect this resource for future generations. The location of scenic highways in the Western Coachella Valley area is shown in Figure 9, Scenic Highways.

(WCVAP p. 67.) Figure 9 identifies Interstate 10 east of State Route 62 as a scenic highway. The following WCVAP policy applies to such scenic highways:

- WCVAP 19.1 Protect the scenic highways in the Western Coachella Valley from change that would diminish the aesthetic value of adjacent properties in accordance with policies in the Scenic Corridors sections of the Land Use, Multipurpose Open Space, and Circulation Elements.

The DEIR must also evaluate consistency with this policy but does not. 7-h

C. The DEIR Fails to Include Necessary Mitigation to Support its GHG Emission Assumptions.

The DEIR's analysis of greenhouse gas ("GHG") emissions relies on an assumption there will be a maximum of 280 truck trips to the warehouse facility per day. (DEIR p. 4.7-12.) However, as discussed above, there is inadequate information regarding the type of warehouse facility this Project will be, whether it will include refrigeration, and other inadequacies in the project description that prevent reliance on this truck trip level in the analysis of GHG emissions. 7-i

Moreover, the DEIR fails to include mitigation limiting daily truck trips to the facility to this level, thus 280 truck trips is not a reliable assumption for the DEIR's analysis. The South Coast Air Quality Management District provided scoping comments that if the Project is found to have significant emissions impacts, mitigation should be included to limit the daily number of trucks allowed at the proposed Project to the levels analyzed in the DEIR. (DEIR App. A.) The DEIR failed to include this recommendation from an expert agency.

While the DEIR assumes that GHG emission impacts will be significant and unavoidable, "[a]n adequate description of adverse environmental effects is necessary to inform the critical discussion of mitigation measures and project alternatives at the core of the EIR." (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 519.) Simply assuming a significant adverse impact without adequate analysis that allows for consideration of all impacts and mitigation for those impacts was found by the California Supreme Court to be inadequate. (*Id*. at 519-522.) 7-j

III. The Project's Significant and Adverse Impacts Require the City to Carefully Consider Alternatives.

Just as the EIR is the "heart of CEQA", the alternatives analysis is the "core of the EIR." (CEQA Guidelines, §15003(a); *Laurel Heights Improvement Assn. v. Regents* (1988) 47 Cal.3d 376, 392; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal 3d 553, 564.) Preparation of an adequate EIR with a reasonable range of alternatives and accurate comparative analysis of those alternatives is crucial to CEQA's substantive mandate to "prevent significant avoidable damage to the environment" when alternatives or mitigation measures are feasible. (CEQA Guidelines, §15002(a)(3).) 7-k

This is because CEQA prohibits approval of a project with significant adverse environmental impacts when there are feasible alternatives or mitigation measures that would "avoid or substantially lessen" the project's significant effects. (Pub. Resources

Code § 21002; *City of Marina v. Board of Trustees of California State University* (2006) 39 Cal.4th 341, 350.) More specifically, CEQA states:

> Pursuant to the policy stated in Sections 21002 and 21002.1, no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless . . .:
> (a). . . (3) Specific economic, legal, social, technological, or other considerations . . . make infeasible the mitigation measures or alternatives identified in the environmental impact report.

(Pub. Resources Code, §21081.) It is settled law that:

> CEQA contains *substantive* provisions with which agencies must comply. The most important ... is the provision requiring agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.

7-k

(*Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added.)

An alternative need only avoid or substantially lessen any one of a project's significant impacts to be considered environmentally superior. (CEQA Guidelines, §15021, subd. (a)(2).) The finding that "[t]here is no feasible way to lessen or avoid the significant effect..." of a project must be supported by substantial evidence. (CEQA Guidelines, §§15043, 15093, subd. (b).) An alternative must be "truly infeasible" for its rejection to be legally valid under CEQA. (*City of Marina*, *supra*, 39 Cal.4th 341, 369.) CEQA defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors." (Pub. Resources Code § 21061.1.)

Here, the Project would have significant and unavoidable adverse GHG emissions and vehicle miles traveled ("VMT") impacts. Thus, a thorough consideration of alternatives that would reduce these impacts must be included in the DEIR, and if such alternatives are feasible, the City cannot approve the Project as proposed.

A. The City Cannot Approve the Proposed Project Because Alternative 2 is a Feasible Less Impactful Alternative.

CEQA prohibits approval of a project with significant adverse environmental impacts when there are feasible alternatives or mitigation measures that would "avoid or substantially lessen" the project's significant effects. (Pub. Resources Code § 21002; *City of Marina v. Board of Trustees of California State University* (2006) 39 Cal.4th 341,

7-l

350.) The DEIR includes Alternative 2, a reduced intensity of development alternative. Under Alternative 2, the project would be limited to a maximum of 369,680 square feet. Due to the reduced intensity of development, this alternative would eliminate the Project's significant and unavoidable GHG emission impacts and VMT impacts. (DEIR pp. 7-44, 7-46.) In fact, all impacts would be reduced to less than significant levels under Alternative 2. As such, Alternative 2 is environmentally superior alternative.

Alternative 2 is also feasible as it would meet all project objectives. (DEIR p. 7-44.) An alternative must be "truly infeasible" for its rejection to be legally valid under CEQA. (*City of Marina, supra,* 39 Cal.4th 341, 369.) "Feasible" is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Resources Code, §21061.1.) Reasonable alternatives are feasible and must "attain *most* of the basic objectives" of the Project. (Pub. Resources Code, §21061.1; Guidelines, §15126.6(a), emphasis added.) The definition *does not* require the agreement of the project applicant. 7-l

It is well settled that "[i]f there are feasible alternatives … that would accomplish *most of the objectives* of a project and substantially lessen the significant environmental effects of a project subject to CEQA, the project may not be approved without incorporating those measures." (*Center for Biological Diversity, Inc. v. FPL Group, Inc.* (2008) 166 Cal.App.4th 1349, 1370, fn 19, citation to Pub. Resources Code §§ 21000(g), 21002, Guidelines § 15091.) Alternatives are not required to meet all project objectives, and in reality, it "is virtually a given that the alternatives to a project will not attain *all* of the project's objectives." (*Watsonville Pilots Ass'n v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1087.) Thus, that Alternative 2 would meet the project objectives to a lesser degree than the proposed Project is not a valid basis for rejecting this environmentally superior alternative.

B. The DEIR's Analysis of Alternative 3 Relies on Unsupported Assumptions.

Alternative 3 provides for development of the Project site with an industrial business park. The DEIR's alternatives analysis failed to meet the City's duty to meaningfully consider alternatives to the environmentally damaging proposed Project in its consideration of Alternative 3. (*Laurel Heights I, supra,* 47 Cal.3d at 400.) This is because the DEIR has defined this alternative to fail in violation of CEQA's requirement that an EIR analyze alternatives that would avoid or substantially lessen a project's significant and unavoidable impacts. (CEQA Guidelines, §15126.6, subd. (a).) 7-m

Instead of following CEQA's requirements, the DEIR defines Alternative 3 to include ***increased development and more intensive use*** than the proposed Project. In contrast to the limited information provided regarding the Project's operations (see

Section I), the DEIR very specifically defines every use to be included within Alternative 3. Alternative 3 would include: a 182,000-square-foot storage facility; a 26,000-square-foot vehicle storage and rental facility (i.e., Uhaul); two 26,000-square-foot manufacturing buildings (i.e., stone cutting, lighting and wiring); two 26,000-square-foot buildings for equipment sales; and two 274,000-square-foot wholesale, warehouse, distribution, fulfillment, and import/export centers. (DEIR p. 7-26.) Due to this significant increase in intensity of use and size of development, Alternative 3 would have ***more*** significant impacts than the proposed Project. (DEIR p. 7-46.)

7-m

To comply with CEQA's requirement to assess project alternatives that would ***lessen*** impacts, the EIR must analyze a revised Alternative 3 that includes an industrial business park with a reduction in the intensity of uses. The DEIR acknowledges that an industrial business park would meet the project objectives, making it a feasible alternative. With the impacts reduced after this alternative is revised, the EIR must then address whether Alternative 3 would also be an environmentally superior alternative, further preventing approval of the Project as proposed.

C. Any Claimed Project Benefits Must Be Supported by Substantial Evidence.

CEQA Guidelines section 15093, subdivision (b) requires that when a lead agency approves a project that would result in significant, unavoidable impacts, "the agency shall state in writing the specific reasons to support its action" in a statement of overriding considerations. These project benefits are ***in addition*** to the required finding of no feasible alternatives to substantial lessen a project's significant adverse impacts discussed above. CEQA also requires substantial evidence in the record support the claimed benefits to justify proceeding with a project despite its adverse impacts. (Public Resources Code, §21081; CEQA Guidelines, §15093, subds. (b), (c).) "[A]n unsupported claim that the project will confer general benefits" is insufficient to override a project's significant impacts. (*Woodward Park Homeowners Assn., Inc. v. City of Fresno* (2007) 150 Cal.App.4th 683, 717.) "[A] statement of overriding considerations, like an EIR, must make a good-faith effort to inform the public;" the "statement's purposes are undermined if its conclusions are based on misrepresentations…or it misleads the reader about the relative magnitude of the impacts and benefits..." (*Id.* at 718.)

7-n

Here, if the City attempts to move forward approving the proposed Project with its significant impacts, despite the existence of feasible less impactful alternatives, it will need to adopt a statement of overriding considerations. Based on previous statements made by the City, it appears the benefits the City might consider would include tax revenue to the City that would be generated by the Project and jobs created by the Project. As set forth in Section I, the DEIR lacks adequate information to support either such benefit because it does not clearly define the Project. Variations in the use of this warehouse development could result in greatly varied financial and employment

incentives for the City.

The City must prepare a detailed analysis of the tax implications for the City with each type of warehouse use to have adequate information to support any decision it makes. Further, the City must also assess the Project's workforce requirements under each use, whether solely warehouse, or as a fulfillment center, and also the level of automation, which greatly impacts the amount of jobs created. Without such detailed analysis, the City would lack the substantial evidence required to override the Project's significant and unavoidable impacts. This information is also required to allow the City to accurately compare alternatives to the proposed Project. 7-n

Conclusion

For all of the reasons set forth herein, Committee finds the DEIR to be inadequate. If this Project does move forward as proposed, which we urge the City not to allow, a revised DEIR must be recirculated. Additional financial and job-creation analysis is also required prior to consideration of this Project by the City.

Further, we request that you inform us of any future Project notices pursuant to Public Resources Code section 21092.2 and applicable Municipal Code requirements. We also request that you retain all Project related documents including correspondence and email communications as required by CEQA. (*Golden Door Properties, LLC v. Superior Court of San Diego County* (2020) 52 Cal.App.5th 837 [agency "must retain writings"].) 7-o

Thank you for your consideration of these comments.

Sincerely,

Amy Minteer

June 14, 2024

Advocates for the Environment

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Re: Comments on Draft Environmental Impact Report for Palm Springs Fulfillment Center, SCH No. 2023080091

Dear Mr. Mlaker:

Advocates for the Environment submits the comments in this letter regarding the Draft Environmental Impact Report (**DEIR**) for the Palm Springs Fulfillment Center Project (**Project**). The Project Site is located near 19th Avenue and Indian Canyon Drive in the City of Palm Springs (**City**). The Project proposes to develop the 38-acre Project Site by constructing a 739,360 square-foot two-story fulfillment center. We have reviewed the DEIR prepared in April 2024 and submit comments regarding the sufficiency of the DEIR's Greenhouse-Gas (**GHG**) analysis under the California Environmental Quality Act (**CEQA**). 8-a

The City Should Require the Project to be Net-Zero

Given the current regulatory context and technological advancements, a net-zero significance threshold is feasible and extensively supportable. GHG emissions from buildings, including indirect emissions from offsite generation of electricity, direct emissions produced onsite, and from construction with cement and steel, amounted to 21% of global GHG emissions in 2019. (IPCC Sixth Assessment Report, Climate Change 2022, WGIII, Mitigation of Climate Change, p. 9-4.) This is a considerable portion of global GHG emissions. It is much more affordable to construct new building projects to be net-zero than to obtain the same level of GHG reductions by expensively retrofitting older buildings to comply with climate change regulations. Climate damages will keep increasing until we reach net zero GHG emissions, and there is a California state policy requiring the state to be net-zero by 2045. It therefore is economically unsound to construct new buildings that are not net-zero. 8-b

Environmental groups have achieved tremendous outcomes by litigation under CEQA. Two of the largest mixed-use development projects in the history of California, Newhall Ranch (now FivePoint Valencia), and Centennial (part of Tejon Ranch) decided to move forward as net-zero communities after losing CEQA lawsuits to environmental groups. The ability for these large projects

to become net-zero indicates that it is achievable, even for large-scale developments. The Applicant for this Project should do the same.

We urge the City to adopt net-zero as the GHG significance threshold for this project. This threshold is well-supported by plans for the reduction of GHG emissions in California, and particularly the CARB Climate Change Scoping Plans. The CARB 2017 Scoping Plan states that "achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development." (CARB 2017 Scoping Plan, p. 101.) Additionally, the CARB 2022 Scoping Plan reaffirms the necessity of a net zero target by expressing: "it is clear that California must transition away from fossil fuels to zero-emission technologies with all possible speed … in order to meet our GHG and air quality targets." (CARB 2022 Scoping Plan, p. 184.) CARB further encourages a net-zero threshold in its strategies for local actions in Appendix D to the 2022 Scoping Plan. (CARB 2022 Scoping Plan, Appendix D p. 24-26.) 8-b

Moving this Project forward as a net-zero project would not only be the right thing for the City to do, but also would also help protect the City and the Applicant from CEQA GHG litigation.

GHG Mitigation is Insufficient under CEQA

The calculated project-related emissions amount to 9,438.47 metric tons of carbon dioxide equivalent (**MTCO2e**) per year (DEIR, p. 4.7-13). The City adopted a significance threshold based on Appendix G of the CEQA Guidelines. Based on this threshold, City concluded the Project would have significant GHG emissions. To reduce this identified significant GHG impact, the GHG Analysis offered GHG Mitigation Measure (**MM**) 1. (DEIR, p. 4.7-18.)

The DEIR did not provide evidence that there was no further feasible mitigation, stating the following: "CAP consistency would not lower the calculated GHG emission estimates from construction and operational mobile sources. Operational mobile sources represent approximately 83 percent of the project's total annual GHG emissions, which are not reduced by the building efficiency measures under the CAP screening Table methodology. Therefore, the project will have a significant and unavoidable impact on GHG emissions."(DEIR, p. 4.7-18.) The City did not provide any rationale why, in this instance, existing regulations and the adopted mitigation measures would be the only feasible mitigation for this Project. Despite the availability of other GHG mitigation measures, the DEIR declared that the Project's mitigated emissions were unavoidable. However, because this conclusion is not supported by substantial evidence, the DEIR should have included more mitigation to reduce the Project's GHG emissions to the extent required by CEQA. 8-c

It is Unclear How Much Mitigation will be Provided by MM-GHG-1

MM-GHG-1 is a mitigation measure based on the County of Riverside's Climate Action Plan (**CAP**). MM-GHG-1 requires that projects garner at least 100 points from the County's screening table.

The CAP is not directly applicable to the Project. It analyzes GHG emissions and provides climate guidance only for the unincorporated areas of the County of Riverside. Palm Springs is an incorporated city. The County developed the GHG inventories, strategies for reducing emissions, baselines, and methodologies set forth in the CAP based on data from the unincorporated areas of the County. There is no evidence showing that they are applicable to projects within incorporated cities like Palm Springs. 8-d

The CAP estimates that implementation of the reduction measures listed in the CAP screening tables will reduce GHG emissions by 0.0322 MTCO2e per point per thousand square feet of commercial/industrial building area. (CAP at p. D-3.) But, because this figure is derived from data pertaining to the unincorporated areas of the County, there is no evidence that it would be correct for projects in areas not evaluated in the CAP, such as the City of Palm Springs.

It certainly appears that the features listed in DEIR Table 4.7-3 will reduce GHG emissions, but the EIR provides no information that could be used to reliably estimate the quantity of these emissions reductions.

Infeasibility Finding Lacks Substantial Evidence

The conclusion that the Project will not be able to achieve any mitigation beyond the mitigation from MM-GHG-1 is not supported by substantial evidence. The DEIR should have proposed more mitigation measures to be applied to the maximum-feasible extent in order to justify the conclusion that the Project's GHG impact would be unavoidable due to the lack of feasibility of further mitigation. While the proposed mitigation measures are a good start, the City did not demonstrate that these actions would represent the maximum feasible mitigation to support a finding that the Project's impact would be significant and unavoidable.

CEQA requires that the lead agency identifies specific reasons for infeasibility of further mitigation when concluding significant and unavoidable impact. The City did not attempt to specify any infeasible mitigation measures when concluding that the Project's GHG impact would be unavoidable, nor did it provide any reasoning that the identified mitigation measures represent the maximum feasible mitigation. 8-e

Thus, the DEIR does not provide substantial evidence or reasoning to support the lack of further mitigation given the unavoidable impact conclusion; there are other readily available mitigation measures, especially considering that 85% of the Project's GHG impact originates from mobile emissions which the mitigation measures were not focused on reducing. (DEIR, p. 4.7-16.)

The City could require the Applicant to enter into an agreement for a zero-emission heavy-duty truck fleet to the extent feasible and as soon as practicable. Additionally, the City could mandate the production or purchase of clean power for the electricity usage of the heavy-duty electric vehicle charging stations. Therefore, the conclusion that the project's impact is significant and unavoidable lacks substantial evidence, given the feasibility of further mitigation. 8-e

The Project's GHG Impacts Must be Fully Mitigated

CEQA requires that the Project include fair-share mitigation for all significant cumulative impacts. (*Napa Citizens for Honest Gov't v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 364.) Here, this means mitigation of the full extent of the Project's GHG impacts.

The amount of GHG emissions that comprises the Project's fair share is clear. The reasonable lifespan this Project is approximately 30 years as indicated by the amortization of construction emissions. (DEIR, p. 4.7-11.) The DEIR estimates the Project's annual GHG emissions at 9,438.47 MTCO2e. Therefore, the Project would likely contribute 283,154.1 MTCO2e during its entire lifespan.[1] This would be a good starting point from which to subtract the effect of additional non-offset mitigation measures, before implementing offset purchases.

Despite MM-GHG-1 proposing the installation of charging stations in garages/parking areas, no evidence was presented to suggest that it would be infeasible to install more charging stations. The table indicates that 176 points would be allocated to the installation of charging stations. (DEIR, p. 4.7-15.) According to the County of Riversides 2019 CAP screening tables, eight points are awarded per electric vehicle charging station (CAP, Appendix D, p. 19.) This amounts to a mere twenty-two[2] charging stations, which is only a small fraction of the Project's 736 loading docks, it is feasible to install more truck charging stations. Furthermore, while the project proposes the installation of 110 docks, there is no mention of the installation of truck charging stations, nor any evidence that such installation would be infeasible. Truck charging stations should be installed. 8-f

In addition, the City can choose to further reduce energy usage by installing more solar panels beyond which have already been incorporated by existing mitigation measures, aiming to generate not just 30 percent, but 100 percent of the project's power needs.

Even after implementing on-site emissions reductions to the maximum feasible extent, the City could also require the Applicant to purchase offsets to the extent necessary to mitigate the Project's emissions to the fair share extent.

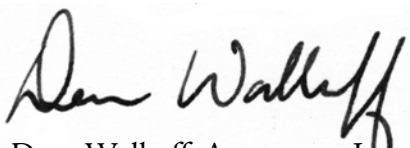
Overall, there are options available to mitigate emissions to the full extent of project emissions.

[1] 9,438.47 MTCO2e per year × 30 years = 283,154.1 MTCO2e
[2] 176 points ÷ 8 points per charger = 22 charging stations

Conclusion

The DEIR fails to require all feasible mitigation, despite concluding that the significant GHG impact will be unavoidable. The lead agency has not met its burden of showing that such measures are infeasible, and therefore the DEIR should be amended to reflect all feasible mitigation to the fair-share extent. Please put me on the interest list to receive updates about the progress of this Project. We make this request under Public Resources Code, section 21092.2. 8-g

Sincerely,



Dean Wallraff, Attorney at Law
Executive Director, Advocates for the Environment

10211 Sunland Blvd., Shadow Hills, CA 91040 (818) 650-0030 X101 dw@aenv.org

COMMENT LETTER NO. 9 PETER MORUZZI

From: Peter Moruzzi
To: Glenn Mlaker; Christopher Hadwin; Kathleen Weremiuk
Subject: 739,360 Square Foot Warehouse Draft EIR Discussion Item 4.B.
Date: Sunday, May 19, 2024 10:36:50 AM

Commissioners,

Having reviewed the Draft Environmental Impact Report (DEIR) I have serious concerns about the proposed project.

Appalling visual blight now characterizes Riverside County cities such as Moreno Valley and Redlands due to the uncontrolled proliferation of massive distribution warehouses. See LA Times article link and second article link.

The proposed two-story warehouse project in north Palm Springs is almost 740,000 square feet in size and 50 feet in height, rivalling the largest warehouses in Riverside County. If the City approves this project, its location just 0.32 miles north of Interstate 10 will dominate the expansive northeast desert view that motorists first see when entering the Coachella Valley on I-10 from the west.

Yet, the DEIR dismisses possible impacts to scenic views under the 4.1 Aesthetics section by focusing on views as observed solely from roads directly adjacent to the project site. However, there is no analysis of the negative impact of desert views to the tens of thousands of cars driving along Interstate 10 looking north towards the mountains. How is it possible that a massive 739,360 square foot, 50 foot tall building will have "no substantial adverse effect on a scenic vista"? Pg 4.1-8

9-a

Pg 4.1.1 Aesthetic Value and Quality
"The evaluation of scenic vistas takes into consideration the physical compatibility of proposed projects in relation to land uses, transportation corridors, or other vantage points, where the enjoyment of unique vistas may exist, such as residential areas or scenic roads."

Pg 4.1-8 Aesthetics. **Potential Impacts on the Environment.** "Unobstructed views of the Little San Bernardino Mountains to the north, and Santa Rosa Mountains to the south will remain visible, due to the orientation of the project along Indian Canyon Drive. Therefore, impacts will be less than significant."

Pg 4.1.3 "According to the Riverside County Western Coachella Valley Area Plan, the Interstate 10 freeway is a County Eligible Scenic Highway but is not officially designated." The fact of it not being "officially" designated should not be dismissed as insignificant.

In order for you as commissioners to make a careful evaluation of aesthetic impacts I strongly recommend that you request the preparation of simulated perspective views of the proposed warehouse within the surrounding desert from various motorist viewpoints when heading east and west along Interstate 10.

The City of Palm Springs should not be complicit in the desecration of our beautiful desert by approving

such a monstrous building for fleeting financial gain regardless of whether other desert cities succumb to such short term thinking.

We must not sacrifice our open desert areas and views for short term financial gain.

Peter Moruzzi

This is what a 700,000 square foot warehouse looks like:

700,000 square feet of industrial developed by

Proposed project site in relation to Interstate 10:

9-a

I-10 and Project Site.jpg

COMMENT LETTER NO. 10 MSWD

66575 Second Street, Desert Hot Springs, CA 92240 • www.mswd.org • p 760.329.6448 • f 760.329.2482

Glenn Mlaker, AICP, Associate Planner
City of Palm Springs
3200 E. Tahquitz Canyon Way
Palm Springs, CA 92262

Date: September 24, 2024

Subject: Notice of Availability for the Palm Springs Fulfillment Center Recirculated Draft Environmental Impact Report (EIR) SCH #2023080091

Dear Mr. Mlaker,

Mission Springs Water District (MSWD) appreciates the opportunity to review the Recirculated Draft Environmental Impact Report (RDEIR) for the Palm Springs Fulfillment Center.

It is our understanding that the proposed Project would develop a two-story 739,360 square foot (SF) industrial building fulfillment center with offices, and associated infrastructure (paved driveways and parking, landscaping, three gated access points, retention area, and perimeter fencing). The entire Project is planned to be constructed within one phase, with 727,360 SF of building area dedicated to warehouse uses and 12,000 SF of building area dedicated to office use. The Project is located in the City of Palm Springs within MSWD's water and wastewater collection service area, located along Indian Canyon Drive (the Project's eastern boundary) and 19th Avenue (the Project's southern boundary). 10-a

MSWD offers the same comments on the RDEIR as it offered on the DEIR that was published in April 2024 of this year, as the Notice of Availability indicates that Chapter 4 of the RDEIR was not modified, and this is the only chapter that MSWD had comments on, and further has reviewed the revised chapters in the RDEIR and has no comments on the changes that were made as part of the Recirculation. Thus, MSWD offers following comments on the RDEIR and supporting technical studies that have been prepared for the Project: 10-b

- **Page 4.9-4 Groundwater Resources**: The last paragraph says "Water service to the Project site is provided by Mission Springs Water District (MSWD), which relies on well sites and groundwater resources from the Mission Creek Subbasin." However, on **page 4.15-1 Domestic Water Service**, the following is stated: "MSWD currently receives 100 percent of its water supply from groundwater produced from subbasins within the Coachella Valley Groundwater Basin, which underlies the District's water service area. MSWD primarily produces groundwater from the Mission Creek Subbasin via eight active wells. To a lesser extent, the District also produces groundwater from the Indio Subbasin (including the Garnet Hill Subarea) via three active wells; and the San Gorgonio Pass Subbasin via two active wells." — The statement on **Page 4.9-4 Groundwater Resources** should be corrected to reflect 10-c

that MSWD does not receive 100% of its supply from the Mission Creek Subbasin. The statement on **Page 4.15-1**, is correct, as this appears to have been extracted from the 2020 Coachella Valley Regional Urban Water Management Plan. 10-c

- **Page 4.9-4 to 4.9-5**: The EIR lists that the Project is located within the Planning Area of the Mission Creek Subbasin Alternative Update, completed in November of 2021 in compliance with SGMA, but in the analysis provided under issue (e) under Subchapter 4.9, references the Indio Subbasin Sustainable Groundwater Management Plan. The environmental setting of this Subchapter (Hydrology & Water Quality) does not discuss the terms of, nor outline either of these Plans as a basis from which to measure impacts. The analysis provided under issue (e) on **Page 4.9-20**, states that, because the WSA/WSV determined that there will be sufficient water supplies to meet the demands of the proposed Project, and future demands of the Project, plus all forecasted demands in the next 20 years, the Project would not conflict with the applicable sustainable groundwater management plan. As the Indio Subbasin Sustainable Groundwater Management Plan (SGMP) is only mentioned once in the body of the RDEIR, and the Mission Creek Subbasin Alternative Update is not referenced at all in the analysis presented under issue (e), under Subchapter 4.9, MSWD believes that further analysis should be presented in the Final EIR to confirm that the Project would not conflict with these groundwater sustainability plans. As the Project will receive water from MSWD, which pumps groundwater from both the Indio and Mission Creek Subbasins, each of these plans should be outlined, and the Project impacts should detail why the provisions of these plans would not be violated as a result of Project implementation. MSWD understands that the findings of the WSA/WSV demonstrate that there will be sufficient water supplies to meet the demands of the proposed Project, but the City should provide an analytical link from this fact to compliance or lack of conflict with the two SGMPs to ensure that this impact issue has been fully substantiated. 10-d

MSWD appreciate the opportunity to comment on this RDEIR. Should you have any other questions or require additional information, please contact me by phone at 760.329.6448 ext. 122 or via email at eweck@mswd.org. 10-e

Sincerely,

Eric Weck, P.E.
Engineering Manager
Mission Springs Water District

COMMENT LETTER NO. 11: SCAQMD

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
Glenn.Mlaker@palmspringsca.gov
City of Palm Springs
Glenn Mlaker, AICP, Associate Planner
3200 E. Tahquitz Canyon Way
Palm Springs, CA 92262

October 9, 2024

Recirculated Draft Environmental Impact Report (RDEIR) for the Proposed Palm Springs Fulfillment Center Project (Proposed Project) (SCH No. 2023080091)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Palm Springs is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff (Staff) has provided a brief summary of the project information and prepared the following comments.

South Coast AQMD Staff's Summary of Project Information in the RDEIR

The Draft Environmental Impact Report (DEIR) for the Proposed Project was released in April of 2024 with a public comment period of April 30, 2024, to June 17, 2024.[1] South Coast AQMD submitted a comment letter on the DEIR on June 14, 2024.[2] The DEIR was recirculated in August of 2024 because the City of Palm Springs Planning Commission requested: 11-a

- a fourth alternative be analyzed in the DEIR for the purpose of comparing the fulfillment use to a warehouse use, and
- additional analysis of the Proposed Project's impact to scenic vistas from the Interstate 10 freeway.[3]

Staff reviewed the RDEIR and found that the air quality analysis for the Proposed Project remains the same as in the DEIR. Staff therefore focused their review and this comment letter on the RDEIR's newly added fourth alternative. Staff also request that the Lead Agency reply to both this comment letter and the June 14, 2024, comment letter.

South Coast AQMD Staff's Comments

Clarification Needed for Operational Emissions from Trucks in Alternative 4 11-b

Based on the RDEIR, the Proposed Project's fourth alternative consists of developing the site as a distribution center/conventional warehouse as opposed to a fulfillment center. The warehouse

[1] RDEIR. 1.0 Executive Summary, p. 1-1.
[2] South Coast AQMD comment letter submitted for the DEIR on the Proposed Palm Springs Fulfillment Center Project on June 14, 2024. Accessed here: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/june-2024/rvc240501-06-deir-palm-springs-fulfillment-center-project.pdf
[3] RDEIR. 1.0 Executive Summary, p. 1-1.

building, number of parking spaces, site access, and landscaping will be the same as the Proposed Project.[4] Additionally, the RDEIR states that:

- under Alternative 4 the, '…amount of truck trips would be reduced with the warehousing use compared to the fulfillment center use based on the difference in truck types between the two scenarios.'[5],
- 'In general, the proposed project would include a higher percentage of larger trucks with a higher axle count (5 axle) than Alternative 4…'[6], and
- for potential health risks during the operation phase of Alternative 4, 'Since truck intensity is expected to be lower under this alternative, operational DPM [diesel particulate matter] and TAC [toxic air contaminants] emissions from diesel-fueled truck activities would be lower in terms of health risk impacts.'[7]

Staff reviewed Appendix N of the RDEIR, *Project Alternatives Memo*, and notes that although Alternative 4 has less overall vehicle trips (**1,264 total**) than the Proposed Project (**1,574 total**), Alternative 4 has more truck trips (**407 total**) than the Proposed Project (**280 total**). See figures 1 and 2.

TABLE 1: PROPOSED PROJECT TRIP GENERATION SUMMARY
ACTUAL VEHICLES

Proposed Project Trip Generation Rates (Actual Vehicles)

Land Use	ITE LU Code	Quantity[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
High-Cube Warehouse[2]	--	739.360 TSF	0.094	0.028	0.122	0.046	0.119	0.165	2.129
		Passenger Cars	0.079	0.024	0.103	0.040	0.104	0.144	1.750
		2 to 4-Axle Trucks	0.006	0.002	0.008	0.003	0.008	0.011	0.162
		5+-Axle Trucks	0.008	0.003	0.011	0.003	0.007	0.010	0.217

Proposed Project Trip Generation Results (Actual Vehicles)

Land Use	ITE LU Code	Quantity[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
High-Cube Warehouse	--	739.360 TSF							
- Passenger Cars			58	18	76	30	77	107	1,294
- Truck Trips									
2 to 4-Axle Trucks			*4*	*1*	*5*	*2*	*6*	*8*	*120*
5+-Axle Trucks			*6*	*2*	*8*	*2*	*5*	*7*	*160*
- Net Truck Trips (Actual Vehicles)			10	3	13	4	11	15	280
PROPOSED PROJECT TOTAL TRIPS (ACTUAL VEHICLES)[3]			68	21	89	34	88	122	1,574

[1] TSF = Thousand Square Feet
[2] Source: *TUMF High-Cube Warehouse Trip Generation Study*. Prepared by WSP, January 2019.
AM/PM peak hour (in/out) splits are estimated from ITE 154 (High-Cube Transload & Short-Term Storage Warehouse)
[3] Proposed Project Total Trips (Actual Vehicles) = Passenger Cars + Net Truck Trips (Actual Trucks).

Figure 1. Screenshot of Appendix N, Project Alternative Memo, Table 1, p. 7

11-b

[4] RDEIR. 1.0 Executive Summary, p. 1-5.
[5] *Ibid.* 7.0 Alternatives, p. 7-46.
[6] *Ibid.*
[7] *Ibid.* 7.0 Alternatives, p. 7-47.

TABLE 7: ALTERNATIVE 4, WAREHOUSING PROJECT TRIP GENERATION SUMMARY
ACTUAL VEHICLES

Alternative 4 Project Trip Generation Rates (Actual Vehicles)

Land Use	ITE LU Code	Quantity[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Warehousing[2,3,4]	150	739.360 TSF	0.130	0.040	0.170	0.050	0.130	0.180	1.710
Passenger Cars (69.2% AM, 78.3% PM, 67.8% Daily)			0.090	0.028	0.118	0.039	0.102	0.141	1.159
2-Axle Trucks (5.10% AM, 3.70% PM, 5.40% Daily)			0.007	0.002	0.009	0.002	0.005	0.007	0.092
3-Axle Trucks (6.40% AM, 4.60% PM, 6.70% Daily)			0.008	0.002	0.011	0.002	0.006	0.008	0.114
4-Axle+ Trucks (19.30% AM, 13.40% PM, 20.10% Daily)			0.025	0.008	0.033	0.007	0.018	0.024	0.345

Alternative 4 Project Trip Generation Results (Actual Vehicles)

Land Use	ITE LU Code	Quantity[1]	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Warehousing	150	739.360 TSF							
- Passenger Cars			67	21	88	29	75	104	857
Truck Trips (2-axle):			*5*	*1*	*6*	*1*	*3*	*4*	*68*
Truck Trips (3-axle):			*6*	*2*	*8*	*2*	*4*	*6*	*84*
Truck Trips (4+-axle):			*19*	*6*	*25*	*5*	*13*	*18*	*255*
- Net Truck Trips (Actual Vehicles)			30	9	39	8	20	28	407
ALTERNATIVE 4 PROJECT TOTAL TRIPS (ACTUAL VEHICLES)[5]			97	30	127	37	95	132	1,264

[1] TSF = Thousand Square Feet
[2] Vehicle Mix Source: Institute of Transportation Engineers (ITE), Trip Generation Handbook, Third Edition (September 2017).
[3] Vehicle Mix Source: Institute of Transportation Engineers (ITE), High-Cube Warehouse Vehicle Trip Generation Analysis (October 2016).
[4] Truck Mix Source: SCAQMD Warehouse Truck Trip Study Data Results and Usage (2014).
Normalized % - Without Cold Storage: 16.7% 2-Axle trucks, 20.7% 3-Axle trucks, 62.6% 4-Axle trucks
[5] Alternative 4 Project Total (Actual Vehicles) = Passenger Cars + Net Truck Trips (Actual Trucks).

Figure 2. Screenshot of Appendix N, Project Alternative Memo, Table 7, p. 10

Alternative 4 thus results in 127 additional diesel-fueled truck trips than the Proposed Project. 255 of the total Alternative 4 truck trips are allotted to 4+ axle trucks (which includes 5+ axle trucks). 160 of the Proposed Project's total truck trips are allotted to 5+ axle trucks. It is unclear: 1) how many fewer 5+ axle truck trips are expected in Alternative 4 when compared to the Proposed Project; and 2) how the conclusion was reached that the potential health risks during the operation phase of Alternative 4 would be lower than that of the Proposed Project. Staff therefore recommends that the Lead Agency: 1) include further analysis and information to support the claim that the potential health risks during the operation phase of Alternative 4 would be lower than that of the Proposed Project; and 2) update the Final EIR accordingly. 11-b

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. 11-c

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions. 11-c

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:EA
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September 27, 2024

Glenn Mlaker, AICP
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City of Palm Springs
3200 E. Tahquitz Canyon Way
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Glenn.Mlaker@palmspringsca.gov

Re: Comments on Revised Draft Environmental Impact Report for Palm Springs Fulfillment Center Project; SCH #2023080091

Dear Mr. Mlaker:

On behalf of the Committee to Stop Giant Warehouse Blight ("Committee"), we hereby resubmit Committee's June 13, 2024 comments on the draft environmental impact report ("DEIR") for the proposed Palm Springs Fulfillment Center at Indian Canyon Drive and 19th Avenue. The revised DEIR fails to address the issues identified in these comments and we request the City respond to each of these comments in the final EIR as required by CEQA. 12-a

Thank you for your consideration of these comments.

Sincerely,

Amy Minteer

Enclosure: June 13, 2024 DEIR Comments

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June 13, 2024

Glenn Mlaker, AICP
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City of Palm Springs
3200 E. Tahquitz Canyon Way
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Glenn.Mlaker@palmspringsca.gov

Re: Comments on Draft Environmental Impact Report for Palm Springs Fulfillment Center Project; SCH #2023080091

Dear Mr. Mlaker:

On behalf of the Committee to Stop Giant Warehouse Blight ("Committee"), we provide these comments on the draft environmental impact report ("DEIR") for the proposed Palm Springs Fulfillment Center at Indian Canyon Drive and 19th Avenue. Committee is an unincorporated association of Palm Springs area residents concerned with the adverse impacts that are imposed on communities by the development of massive warehouse projects. Such impacts can be witnessed elsewhere throughout the Inland Empire due to the proliferation of similar warehouse projects, resulting in numerous negative impacts with questionable benefits for the surrounding communities.

The proposed Palm Springs Fulfillment Center includes development of a two-story, 739,360-square-foot structure for industrial warehouse use (the "Project"). The DEIR identifies the Project as a "high cube warehouse with fulfillment capabilities" and states the hours of operation will be 24/7. The DEIR acknowledges the Project would have significant and unavoidable greenhouse gas emissions impacts and vehicle miles traveled impacts.

The DEIR for the first massive warehouse development in Palm Springs is substantively inadequate. The DEIR fails to include an adequate project description, which impedes the analysis of the Project's impacts and a comparison of the Project to alternatives. The DEIR also fails to address previously unanalyzed aesthetic impacts, fails

to consider inconsistencies with relevant land use policies, and fails to support assumptions relied upon in assessing greenhouse gas emissions. Further, the Project as proposed cannot be approved under the California Environmental Quality Act ("CEQA") because there are feasible and less impactful project alternatives available.

I. The EIR's Analysis of the Project Description is Inadequate

Every EIR must set forth a project description that is sufficient to allow an adequate evaluation and review of the project's environmental impacts. (CEQA Guidelines, §15124.) "An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192 93; accord *San Joaquin Raptor/Wildlife Reserve Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730.) "[O]nly through an accurate view of the project may the public and interested parties and public agencies balance the proposed project's benefits against its environmental cost, consider appropriate mitigation measures, assess the advantages of terminating the proposal and properly weigh other alternatives." (*City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1454.)

Here, the DEIR fails to provide adequate information and documentation to support environmental review. The DEIR refers to the Project as a "high cube warehouse with fulfillment capabilities." (DEIR p. 3-5.) This does not provide specific enough information regarding how this site will be used as solely warehouse uses function very differently than fulfillment centers. Warehouses store products, often for a specific company, to be used at a later date. In contrast, fulfillment centers house products for only a brief period of time, as a stopping point on the way to their final destination. As such, fulfillment centers have a higher volume of truck traffic.

The DEIR also does not address whether the Project will provide storage for refrigerated products. Such products require faster and more frequent deliveries, which also increases the volume of truck trips. The volume of truck trips greatly affects the level of greenhouse gas emissions and vehicle miles traveled associated with the Project, thus the DEIR must include detailed and finite information on what types of uses will be included in the Project or condition it to prohibit certain uses.

Additionally, as discussed below regarding alternatives to the project, the type of facility, and whether it is for a specific entity, can greatly influence whether and how much tax income the City could expect from the Project. Since tax benefits have been the City's stated reason for encouraging warehouse use within the City limits, information regarding the financial impacts of the Project must be assessed to allow for an accurate comparison of alternatives.

Similarly, the City has cited jobs created by warehouses as a basis for allowing such projects. The DEIR identifies that warehouses that are "sort" facilities typically have

a higher volume of employees, as opposed to "non-sort" facilities that can be highly automated and thus provide a much lower level of employment opportunities. (DEIR p. 3-7.) The DEIR does not address the level of automation that would be included in the Project and instead just states today it is common to have a balance of operations. The DEIR must address the specifics of the use of the facility in order to accurately assess the number of employees for the Project. This is relevant to both the impact analysis and the City's assessment of alternatives to the Project, particularly for a project such as this that admittedly has significant and unavoidable impacts.

II. The DEIR's Analysis of Impacts is Inadequate.

A. The City Cannot Rely on an Unanalyzed Ordinance to Eliminate Consideration of Aesthetic Impacts.

The DEIR disingenuously claims that because the Project complies with the height, size and setback requirements contained in Palm Springs Municipal Code section 92.17.1.03, it would not have an adverse impact to visual character in a non-urbanized area. (DEIR p. 4.1-23.) This claim fails to recognize that the ordinance adopting section 92.17.1.03, Ordinance No. 2056, was adopted without any environmental review. At the time Ordinance No. 2056 was adopted in January 2022, the City found the ordinance was not subject to CEQA because the ordinance itself would not result in a direct or reasonably foreseeable indirect physical change in the environment. In making this finding, the City also identified that impacts associated with all individual projects would be assessed during CEQA for each project.

The City cannot piecemeal the approval of warehouse development with significant aesthetic impacts in a sparsely developed area of the City in a manner that leaves those impacts unanalyzed. CEQA prohibits the City from evading analysis of the increased warehouse height, its blockage of mountain views by the two-story structure, and the impact on the visual character of the desert landscape. As noted in comments by Committee member Peter Moruzzi, views of the expansive desert that characterize the Coachella Valley will be decimated by this Project and similar projects it will likely induce. The City did not previously analyze, disclose and mitigate or avoid these impacts and thus must do so now to comply with CEQA.

The DEIR also inaccurately claims that the Project proposes a typical industrial use in this area of the City. (DEIR p. 4.1-29.) This Project would be the first warehouse project and the only two-story industrial development in this area of the City, creating the first of its kind impacts on the surrounding desert landscape. This impact must be analyzed.

B. The DEIR Fails to Analyze Riverside County General Plan Policies Regarding Eligible Scenic Highways.

Interstate 10 has been officially recognized as an Eligible Scenic Highway by the County of Riverside in its General Plan Circulation Element and in the Western Coachella Valley Area Plan. (Riverside Co. General Plan Circulation Element Fig C-8; Western Coachella Valley Area Plan Fig. 9.) The DEIR's analysis of aesthetic impacts disregards the designation of Interstate 10 as an Eligible Scenic Highway by the County because this highway is not "officially designated." (DEIR p. 4.1-3.) However, the DEIR fails to recognize the County of Riverside General Plan policies apply to Eligible Scenic Highways. The DEIR must evaluate whether the Project would be inconsistent with the following General Plan Circulation Element and Land Element Policies that apply to Eligible Scenic Highways:

- LU 14.3 Ensure that the design and appearance of new landscaping, structures, equipment, signs, or grading within Designated and Eligible State and County scenic highway corridors are compatible with the surrounding scenic setting or environment.
- C 19.1 Preserve scenic routes that have exceptional or unique visual features in accordance with Caltrans' Scenic Highways Plan.

Additionally, the Western Coachella Valley Area Plan ("WCVAP"), which is an extension of the County's General Plan, establishes that:

> The scenic beauty of the Western Coachella Valley is often enjoyed while traveling on its highways. Several of these routes within the region have been designated or identified as scenic highways for inclusion in the State Scenic Highways program. Moreover, scenic highways play an important role in encouraging the growth of recreation and tourism--both important aspects of the Riverside County economy. Scenic Highways designations recognize this value and place restrictions on adjacent development to help protect this resource for future generations. The location of scenic highways in the Western Coachella Valley area is shown in Figure 9, Scenic Highways.

(WCVAP p. 67.) Figure 9 identifies Interstate 10 east of State Route 62 as a scenic highway. The following WCVAP policy applies to such scenic highways:

- WCVAP 19.1 Protect the scenic highways in the Western Coachella Valley from change that would diminish the aesthetic value of adjacent properties in accordance with policies in the Scenic Corridors sections of the Land Use, Multipurpose Open Space, and Circulation Elements.

The DEIR must also evaluate consistency with this policy but does not.

C. The DEIR Fails to Include Necessary Mitigation to Support its GHG Emission Assumptions.

The DEIR's analysis of greenhouse gas ("GHG") emissions relies on an assumption there will be a maximum of 280 truck trips to the warehouse facility per day. (DEIR p. 4.7-12.) However, as discussed above, there is inadequate information regarding the type of warehouse facility this Project will be, whether it will include refrigeration, and other inadequacies in the project description that prevent reliance on this truck trip level in the analysis of GHG emissions.

Moreover, the DEIR fails to include mitigation limiting daily truck trips to the facility to this level, thus 280 truck trips is not a reliable assumption for the DEIR's analysis. The South Coast Air Quality Management District provided scoping comments that if the Project is found to have significant emissions impacts, mitigation should be included to limit the daily number of trucks allowed at the proposed Project to the levels analyzed in the DEIR. (DEIR App. A.) The DEIR failed to include this recommendation from an expert agency.

While the DEIR assumes that GHG emission impacts will be significant and unavoidable, "[a]n adequate description of adverse environmental effects is necessary to inform the critical discussion of mitigation measures and project alternatives at the core of the EIR." (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 519.) Simply assuming a significant adverse impact without adequate analysis that allows for consideration of all impacts and mitigation for those impacts was found by the California Supreme Court to be inadequate. (*Id*. at 519-522.)

III. The Project's Significant and Adverse Impacts Require the City to Carefully Consider Alternatives.

Just as the EIR is the "heart of CEQA", the alternatives analysis is the "core of the EIR." (CEQA Guidelines, §15003(a); *Laurel Heights Improvement Assn. v. Regents* (1988) 47 Cal.3d 376, 392; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal 3d 553, 564.) Preparation of an adequate EIR with a reasonable range of alternatives and accurate comparative analysis of those alternatives is crucial to CEQA's substantive mandate to "prevent significant avoidable damage to the environment" when alternatives or mitigation measures are feasible. (CEQA Guidelines, §15002(a)(3).)

This is because CEQA prohibits approval of a project with significant adverse environmental impacts when there are feasible alternatives or mitigation measures that would "avoid or substantially lessen" the project's significant effects. (Pub. Resources

Code § 21002; *City of Marina v. Board of Trustees of California State University* (2006) 39 Cal.4th 341, 350.) More specifically, CEQA states:

> Pursuant to the policy stated in Sections 21002 and 21002.1, no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless . . .:
> (a). . . (3) Specific economic, legal, social, technological, or other considerations . . . make infeasible the mitigation measures or alternatives identified in the environmental impact report.

(Pub. Resources Code, §21081.) It is settled law that:

> CEQA contains *substantive* provisions with which agencies must comply. The most important ... is the provision requiring agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.

(*Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added.)

An alternative need only avoid or substantially lessen any one of a project's significant impacts to be considered environmentally superior. (CEQA Guidelines, §15021, subd. (a)(2).) The finding that "[t]here is no feasible way to lessen or avoid the significant effect..." of a project must be supported by substantial evidence. (CEQA Guidelines, §§15043, 15093, subd. (b).) An alternative must be "truly infeasible" for its rejection to be legally valid under CEQA. (*City of Marina*, *supra*, 39 Cal.4th 341, 369.) CEQA defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors." (Pub. Resources Code § 21061.1.)

Here, the Project would have significant and unavoidable adverse GHG emissions and vehicle miles traveled ("VMT") impacts. Thus, a thorough consideration of alternatives that would reduce these impacts must be included in the DEIR, and if such alternatives are feasible, the City cannot approve the Project as proposed.

A. The City Cannot Approve the Proposed Project Because Alternative 2 is a Feasible Less Impactful Alternative.

CEQA prohibits approval of a project with significant adverse environmental impacts when there are feasible alternatives or mitigation measures that would "avoid or substantially lessen" the project's significant effects. (Pub. Resources Code § 21002; *City of Marina v. Board of Trustees of California State University* (2006) 39 Cal.4th 341,

350.) The DEIR includes Alternative 2, a reduced intensity of development alternative. Under Alternative 2, the project would be limited to a maximum of 369,680 square feet. Due to the reduced intensity of development, this alternative would eliminate the Project's significant and unavoidable GHG emission impacts and VMT impacts. (DEIR pp. 7-44, 7-46.) In fact, all impacts would be reduced to less than significant levels under Alternative 2. As such, Alternative 2 is environmentally superior alternative.

Alternative 2 is also feasible as it would meet all project objectives. (DEIR p. 7-44.) An alternative must be "truly infeasible" for its rejection to be legally valid under CEQA. (*City of Marina, supra,* 39 Cal.4th 341, 369.) "Feasible" is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Resources Code, §21061.1.) Reasonable alternatives are feasible and must "attain *most* of the basic objectives" of the Project. (Pub. Resources Code, §21061.1; Guidelines, §15126.6(a), emphasis added.) The definition *does not* require the agreement of the project applicant.

It is well settled that "[i]f there are feasible alternatives … that would accomplish *most of the objectives* of a project and substantially lessen the significant environmental effects of a project subject to CEQA, the project may not be approved without incorporating those measures." (*Center for Biological Diversity, Inc. v. FPL Group, Inc.* (2008) 166 Cal.App.4th 1349, 1370, fn 19, citation to Pub. Resources Code §§ 21000(g), 21002, Guidelines § 15091.) Alternatives are not required to meet all project objectives, and in reality, it "is virtually a given that the alternatives to a project will not attain *all* of the project's objectives." (*Watsonville Pilots Ass'n v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1087.) Thus, that Alternative 2 would meet the project objectives to a lesser degree than the proposed Project is not a valid basis for rejecting this environmentally superior alternative.

B. The DEIR's Analysis of Alternative 3 Relies on Unsupported Assumptions.

Alternative 3 provides for development of the Project site with an industrial business park. The DEIR's alternatives analysis failed to meet the City's duty to meaningfully consider alternatives to the environmentally damaging proposed Project in its consideration of Alternative 3. (*Laurel Heights I, supra,* 47 Cal.3d at 400.) This is because the DEIR has defined this alternative to fail in violation of CEQA's requirement that an EIR analyze alternatives that would avoid or substantially lessen a project's significant and unavoidable impacts. (CEQA Guidelines, §15126.6, subd. (a).)

Instead of following CEQA's requirements, the DEIR defines Alternative 3 to include ***increased development and more intensive use*** than the proposed Project. In contrast to the limited information provided regarding the Project's operations (see

Section I), the DEIR very specifically defines every use to be included within Alternative 3. Alternative 3 would include: a 182,000-square-foot storage facility; a 26,000-square-foot vehicle storage and rental facility (i.e., Uhaul); two 26,000-square-foot manufacturing buildings (i.e., stone cutting, lighting and wiring); two 26,000-square-foot buildings for equipment sales; and two 274,000-square-foot wholesale, warehouse, distribution, fulfillment, and import/export centers. (DEIR p. 7-26.) Due to this significant increase in intensity of use and size of development, Alternative 3 would have ***more*** significant impacts than the proposed Project. (DEIR p. 7-46.)

To comply with CEQA's requirement to assess project alternatives that would ***lessen*** impacts, the EIR must analyze a revised Alternative 3 that includes an industrial business park with a reduction in the intensity of uses. The DEIR acknowledges that an industrial business park would meet the project objectives, making it a feasible alternative. With the impacts reduced after this alternative is revised, the EIR must then address whether Alternative 3 would also be an environmentally superior alternative, further preventing approval of the Project as proposed.

C. Any Claimed Project Benefits Must Be Supported by Substantial Evidence.

CEQA Guidelines section 15093, subdivision (b) requires that when a lead agency approves a project that would result in significant, unavoidable impacts, "the agency shall state in writing the specific reasons to support its action" in a statement of overriding considerations. These project benefits are ***in addition*** to the required finding of no feasible alternatives to substantial lessen a project's significant adverse impacts discussed above. CEQA also requires substantial evidence in the record support the claimed benefits to justify proceeding with a project despite its adverse impacts. (Public Resources Code, §21081; CEQA Guidelines, §15093, subds. (b), (c).) "[A]n unsupported claim that the project will confer general benefits" is insufficient to override a project's significant impacts. (*Woodward Park Homeowners Assn., Inc. v. City of Fresno* (2007) 150 Cal.App.4th 683, 717.) "[A] statement of overriding considerations, like an EIR, must make a good-faith effort to inform the public;" the "statement's purposes are undermined if its conclusions are based on misrepresentations…or it misleads the reader about the relative magnitude of the impacts and benefits..." (*Id.* at 718.)

Here, if the City attempts to move forward approving the proposed Project with its significant impacts, despite the existence of feasible less impactful alternatives, it will need to adopt a statement of overriding considerations. Based on previous statements made by the City, it appears the benefits the City might consider would include tax revenue to the City that would be generated by the Project and jobs created by the Project. As set forth in Section I, the DEIR lacks adequate information to support either such benefit because it does not clearly define the Project. Variations in the use of this warehouse development could result in greatly varied financial and employment

incentives for the City.

The City must prepare a detailed analysis of the tax implications for the City with each type of warehouse use to have adequate information to support any decision it makes. Further, the City must also assess the Project's workforce requirements under each use, whether solely warehouse, or as a fulfillment center, and also the level of automation, which greatly impacts the amount of jobs created. Without such detailed analysis, the City would lack the substantial evidence required to override the Project's significant and unavoidable impacts. This information is also required to allow the City to accurately compare alternatives to the proposed Project.

Conclusion

For all of the reasons set forth herein, Committee finds the DEIR to be inadequate. If this Project does move forward as proposed, which we urge the City not to allow, a revised DEIR must be recirculated. Additional financial and job-creation analysis is also required prior to consideration of this Project by the City.

Further, we request that you inform us of any future Project notices pursuant to Public Resources Code section 21092.2 and applicable Municipal Code requirements. We also request that you retain all Project related documents including correspondence and email communications as required by CEQA. (*Golden Door Properties, LLC v. Superior Court of San Diego County* (2020) 52 Cal.App.5th 837 [agency "must retain writings"].)

Thank you for your consideration of these comments.

Sincerely,

Amy Minteer

COMMENT LETTER 13: GOLDEN STATE ENVIRONMENTAL JUSTICE ALLIANCE

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Via Email to:
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Subject: Comments on Palm Springs Fulfillment Center Recirculated EIR (SCH NO. 2023080091)

Dear Mr. Mlaker,

Thank you for the opportunity to comment on the Recirculated Environmental Impact Report (EIR) for the proposed Palm Springs Fulfillment Center Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. 13-a

1.0 Summary

The project proposes the construction and operation of a new cross-dock fulfillment center warehouse building totaling 739,360 square feet. The building includes 727,360 square feet of ground floor warehouse area and 12,000 square feet of 2nd floor office space. The building proposes 110 truck/trailer loading dock doors distributed on the north and south sides of the building. The site includes 430 passenger car parking spaces and 306 truck/trailer parking spaces, which are designed in a tandem configuration within the truck/trailer loading dock courts on both the north and south sides of the building. 13-b

3.0 Project Description

The Recirculated EIR does not include a floor plan, detailed building elevations, or a detailed grading plan. The basic components of a Planning Application include a detailed site plan, floor plan, conceptual grading plan, written narrative, and detailed elevations. Additionally, an application for a Major Development Permit requires submittal of a "site plan; preliminary grading plan; floor plans; building elevations; roof plan; landscape plan; material and color selections; 13-c

lighting plan; signage plan; and other plans or exhibits required by the Director (Section 94.04.01(B) and 94.04.01(C)(1)(b) of the Palm Springs Municipal Code)." The building elevations provided in Exhibits 4.1-13 and 4.1-14 do not include the overall height of the building. The grading plan provided in Exhibit 3-6 has been edited for public review. For example, it does not include section drawings or the earthwork quantity notes. Providing the complete grading plan and earthwork quantity notes is vital as the Recirculated EIR states that, "the AQIA analysis assumed balanced earthwork conditions for the grading stage," but there is no method for the public to verify this statement. Verification of the import/export materials is vital as it directly informs the quantity of necessary truck hauling trips due to soil import/export during the grading phase of construction. There are also no building elevations provided to verify building height, paint colors, or materials. A revised EIR must be prepared to include wholly accurate and adequate detailed project site plan, floor plan, grading plan, elevations, and project narrative for public review. 13-c

Further, the Recirculated EIR has not complied with CEQA Guidelines Section 15088.5: Recirculation of an EIR Prior to Certification. CEQA Guidelines Section 15088.5 (f) states that "The lead agency shall evaluate and respond to comments as provided in Section 15088. Recirculating an EIR can result in the lead agency receiving more than one set of comments from reviewers. The following are two ways in which the lead agency may identify the set of comments to which it will respond. This dual approach avoids confusion over whether the lead agency must respond to comments which are duplicates or which are no longer pertinent due to revisions to the EIR. In no case shall the lead agency fail to respond to pertinent comments on significant environmental issues." No portion of the Recirculated EIR, NOA, or NOC discuss that comments were received on the Draft EIR or provides information on which set of comments the lead agency will respond to. 13-d

CEQA Guidelines Section 15088.5 (f)(1) requires that, "When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and, in such cases, need not respond to those comments received during the earlier circulation period. The lead agency shall advise reviewers, either in the text of the revised EIR or by an attachment to the revised EIR, that although part of the administrative record, the previous comments do not require a written response in the final EIR, and that new comments must be submitted for the revised EIR. The lead agency need only respond to those comments submitted in response to the recirculated revised EIR."

The Recirculated EIR has recirculated the entirety of the document. The administrative record of the Recirculated EIR has not provided any information regarding whether new comments are

required by those who submitted comments during the earlier circulation period. Due to this noncompliance with CEQA Guidelines Section 15088.5 (f) and CEQA Guidelines Section 15088.5 (f)(1), the Recirculated EIR must be revised and recirculated to include a statement within the administrative record advising reviewers whether or not the previous comments do not require a written response in the final EIR, and if new comments must be submitted for the revised EIR. 13-d

4.2 Air Quality, 4.5 Energy Resources, and 4.7 Greenhouse Gas Emissions

The Recirculated EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. According to CalEnviroScreen 4.0[1], CalEPA's screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project's census tract (6065044522) is highly burdened by pollution. The surrounding community bears the impact of multiple sources of pollution and is more polluted than average on several pollution indicator measured by CalEnviroScreen. For example, the project census tract ranks in the 91st percentile for ozone burden and 60th percentile for traffic burden. These environmental factors are attributed to heavy truck activity in the area. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure[2]. Exhaust fumes contain toxic chemicals that can damage DNA, cause cancer, make breathing difficult, and cause low weight and premature births[3]. 13-e

The census tract also ranks in the 55th percentile for solid waste facility impacts. Solid waste facilities can expose people to hazardous chemicals, release toxic gases into the air (even after these facilites are closed), and chemicals can leach into soil around the facility and pose a health risk to nearby populations[4].

Further, the project's census tract is a diverse community including 45% Hispanic, 3% African-American, and 1% Asian-American residents, whom are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 74% of the census tract over age 25 has not attained a high school diploma, which is an indication that they may lack health insurance or access to medical care. The community also has a high rate of poverty, meaning 95% of the households in the census tract have a total income before taxes that

[1] https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0/
[2] OEHHA Ozone https://oehha.ca.gov/calenviroscreen/indicator/air-quality-ozone
[3] OEHHA Traffic https://oehha.ca.gov/calenviroscreen/indicator/traffic-density
[4] OEHHA Solid Waste Facilities https://oehha.ca.gov/calenviroscreen/indicator/solid-waste-sites-and-facilities

is less than the poverty level. Income can affect health when people cannot afford healthy living and working conditions, nutritious food and necessary medical care[5]. Poor communities are often located in areas with high levels of pollution[6]. Poverty can cause stress that weakens the immune system and causes people to become ill from pollution[7]. Living in poverty is also an indication that residents may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 59th percentile for incidence of cardiovascular disease and 51st percentile for incidence of asthma. The community also has a high rate of linguistic isolation, meaning 49% of the census tract speaks little to no English and faces further inequities as a result.

13-e

The State of California lists three approved compliance modeling softwares[8] for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The CalEEMod modeling does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project's significant Energy impacts and fuel consumption to the public and decision makers. Since the Recirculated EIR did not accurately or adequately model the energy impacts in compliance with Title 24, it cannot conclude the project will generate less than significant impacts and a finding of significance must be made. A revised EIR with modeling using one of the approved software types must be prepared and circulated for public review in order to adequately analyze the project's significant environmental impacts. This is vital as the Recirculated EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not an approved software.

4.11 Population and Housing

The Recirculated EIR does not provide a quantified analysis of the construction workforce generated by the proposed project. A revised EIR must be prepared that includes an analysis of the construction jobs generated by the project. Additionally, a revised EIR must also provide demographic and geographic information on the location of qualified workers (for both project operations and construction) to fill these positions in order to provide an accurate environmental analysis.

13-f

The Recirculated EIR utilizes uncertain language and does not provide any meaningful analysis or supporting evidence to substantiate the conclusion that there will be no significant impacts to

[5] OEHHA Poverty https://oehha.ca.gov/calenviroscreen/indicator/poverty
[6] Ibid.
[7] Ibid.
[8] California Energy Commission 2022 Energy Code Compliance Software https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency-1

population and housing. For example, the Recirculated EIR states that, "a high percentage of City residents and neighboring cities' residents commute outside of the City they reside in for work. For both Desert Hot Springs and Cathedral City, 89% of working residents commute for work." Since the Recirculated EIR relies upon the entire workforce of the Coachella Valley region, the project would contribute to the increasing percentages of area residents that commute outside of their residence City for work. The Recirculated EIR has not provided any analysis or meaningful evidence that the unemployed workforce in Palm Springs is qualified for or interested in work in the industrial sector. A revised EIR must be provided to include this information for analysis in order to provide an adequate and accurate environmental analysis. 13-f

SCAG's Connect SoCal Demographics and Growth Forecast[9] notes that the City will add 10,600 jobs between 2016 - 2045. Based on the Recirculated EIR's calculation of 718 jobs, the project represents 6.7% of the City's job growth over 29 years. A single project accounting for this amount of the projected employment growth over 29 years represents a significant amount of growth. The Recirculated EIR has not provided a cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" to determine if the project will exceed SCAG's employment growth forecast or the City's General Plan growth projections. A revised EIR must be provided to include this information for analysis in order to provide an adequate and accurate environmental analysis.

4.13 Transportation

The Recirculated EIR and Appendix L: Traffic Study incorrectly model the project's average daily trip generation. Table 4.13-7 Trip Generation Summary – Actual Vehicles within Appendix L states that the source for modeling is the "TUMF High-Cube Warehouse Trip Generation Study. Prepared by WSP, January 2019. AM/PM peak hour (i n/out) splits are estimated from ITE (High-Cube Transload & Short-Term Storage Warehouse)." The proposed project is clearly described as a Fulfillment Center and must be modeled as such. The Recirculated EIR must be revised to accurately model the proposed project's ADT generation in accordance with the Project Description by fully modeling and analyzing the project as a Fulfillment Center (ITE Land Use Code 155). 13-g

[9] SCAG Connect SoCal Demographics and Growth Forecast adopted September 3, 2020 https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

Table 1-3: Existing Plus Ambient Plus Project Plus Cumulative (2024) Fair Share Calculations within Appendix L concludes the following intersections require improvements to address the deficiencies per the City's thresholds:

1. Intersection #2: Indian Canyon Dr. / 19th Av.

Table 1-3 in Appendix L provides a list of fair-share calculations for improvements that will allegedly mitigate significant and unavoidable impacts to the intersection to less than significant levels. It must be noted that the impacts to intersection #2 are located in the City of Desert Hot Springs. Any improvements planned/constructed or in-lieu fees/fair share fees paid for City of Desert Hot Springs facilities are beyond the control/scope of the lead agency. An assessment of fees is appropriate when linked to a specific mitigation program. (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, *Save our Peninsula Comm. v. Monterey County Bd. Of Supers.* (2001) 87 Cal.App.4th 99, 141.) Payment of fees is not sufficient where there is no evidence mitigation will actually result. (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099,1122.) The assessment of fees here is not adequate as there is no evidence mitigation will actually result. The improvements required are not part of an existing DIF/TUMF program and therefore are not planned to occur at all or by any certain date, whether by the City of Plan Springs or City of Desert Hot Springs. Any improvements recommended or fees paid to mitigate impacts for City of Desert Hot Springs facilities are beyond the control of the lead agency and evidence that these improvements will be completed or approved by Caltrans has not been provided. A revised EIR must be prepared to include the LOS analysis as cumulatively considerable significant impact as the project conflicts with Transportation Impact Threshold A and Land Use and Planning Impact Threshold B because it is not consistent with the following General Plan Policy:

1. CR2.1: Maintain Level of Service D or better for the City's circulation network, as measured using "in season" peak hour conditions.

13-h

Further, the Recirculated EIR has underreported the quantity VMT generated by the proposed project operations. The operational nature of industrial/warehouse uses involves high rates of truck/trailer/delivery van VMT due to traveling from large import hubs to regional distribution centers to smaller industrial parks and then to their final delivery destinations. Once employees arrive at work at the proposed project, they will conduct their jobs by driving delivery vans across the region as part of the daily operations as a fulfillment center, which will drastically increase project-generated VMT. The project's truck/trailer and delivery van activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. The project's total operational VMT generated is further inconsistent with the significance threshold and legislative intent of SB 743 to reduce greenhouse

13-i

gas emissions by reducing VMT. A revised EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer and delivery van activity. 13-i

The Recirculated EIR has not adequately analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; or the project's potential to result in inadequate emergency access. There are no exhibits adequately depicting the onsite turning radius available for trucks maneuvering throughout the site. Exhibit 3-3: Site Plan depicts truck/trailer parking stalls located in a tandem configuration adjacent to the truck/trailer loading dock courts on both sides of the building. These parking stalls may be in use at any time and further restrict truck/trailer movement, including increasing truck idling times as tandem parked trucks require additional time to maneuver, which will also result in increased queuing duration and associated need for increased queuing area for trucks/trailers. The Recirculated EIR has not provided any exhibits demonstrating that there is sufficient backup space for trucks/trailers to utilize these spaces. A revised EIR must be prepared to include a finding of significance due to these significant and unavoidable impacts. 13-j

There are also no exhibits depicting emergency vehicle access. Notably, the Recirculated EIR states that, "City staff, including Police and Fire Department staff, would review site plans and provide conditions of approval that are specific to the provision of emergency access," and that, "all roadway design shall be reviewed and approved by the City and Fire Department," which is deferred mitigation to after the CEQA public review process. This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation, deferred mitigation, and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents. The Recirculated EIR must be revised with this analysis in order to provide an adequate and accurate environmental analysis. 13-k

Additionally, the Recirculated EIR has not provided any analysis of the available horizontal and vertical sight distance at the intersection of the project driveways and adjacent streets. Sight distance is the continuous length of street ahead visible to the driver. At unsignalized intersections, corner sight distance must provide a substantially clear line of sight between the driver of the vehicle waiting on the minor road (driveway) and the driver of an approaching vehicle. A revised EIR must be prepared with this analysis based on the American Association of State Highway and Transportation Officials (AASHTO) Stopping Sight Distance requirements. 13-l

5.3 Significant Irreversible Environmental Changes and 5.4 Growth Inducing Impacts

The Recirculated EIR relies upon erroneous Energy modeling to determine that the project will meet sustainability requirements. As noted above, the Recirculated EIR did not model the project's energy consumption in compliance with Title 24 modeling software. The Recirculated EIR must be revised to include a finding of significance due to the an inaccurate and erroneous analysis regarding the project's Air Quality, Greenhouse Gas, and Energy impacts, including those significant and unavoidable cumulatively considerable GHG impacts.

The Recirculated EIR does not adequately discuss or and analyze the commitment of resources is not consistent with regional and local growth forecasts. As noted below, the project represents a significant amount of building area growth in the City and a significant amount of the City's employment growth over 29 years. The Recirculated EIR must also include a cumulative analysis discussion here to demonstrate the impact of the proposed project in a cumulative setting, including the associated cumulative impacts of the project's significant and unavoidable cumulatively considerable GHG and Transportation (VMT) impacts. 13-m

The Recirculated EIR does not provide any analysis here regarding the buildout conditions of the City's General Plan. Table 2-2: Nonresidential Land Buildout Estimates in the Updated Land Use Element states that the City estimates 11,638,620 square feet of industrial development to occur during the City's buildout. The Recirculated EIR must be revised to provide the horizon year of the City's adopted General Plan and cumulative development since adoption of the General Plan to ensure that the proposed project is within the General Pl's analysis, particularly since the project EIR tiers from the General Plan EIR. The proposed project's 739,360 square feet of industrial building area accounts for 6.3% of the General Plan Industrial land buildout attributed to a single project. The Recirculated EIR has not provided any analysis of this information and whether the proposed project in combination with cumulative development exceeds the projected buildout scenario. A revised EIR must be prepared to include this analysis in order to provide an adequate and accurate environmental document.

SCAG's Connect SoCal Demographics and Growth Forecast[10] notes that the City will add 10,600 jobs between 2016 - 2045. Based on the Recirculated EIR's calculation of 718 jobs, the project represents 6.7% of the City's job growth over 29 years. A single project accounting for this amount of the projected employment growth over 29 years represents a significant amount of growth. The

[10] SCAG Connect SoCal Demographics and Growth Forecast adopted September 3, 2020 https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

Recirculated EIR has not provided a cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" to determine if the project will exceed SCAG's employment growth forecast or the City's General Plan growth projections. A revised EIR must be provided to include this information for analysis in order to provide an adequate and accurate environmental analysis. 13-m

6.6 Effects Found to Have No Impact: Land Use and Planning

Table 1-3: Existing Plus Ambient Plus Project Plus Cumulative (2024) Fair Share Calculations within Appendix L concludes the following intersections require improvements to address the deficiencies per the City's thresholds:

2. Intersection #2: Indian Canyon Dr. / 19th Av.

Table 1-3 in Appendix L provides a list of fair-share calculations for improvements that will allegedly mitigate significant and unavoidable impacts to the intersection to less than significant levels. It must be noted that the impacts to intersection #2 are located in the City of Desert Hot Springs. Any improvements planned/constructed or in-lieu fees/fair share fees paid for City of Desert Hot Springs facilities are beyond the control/scope of the lead agency. An assessment of fees is appropriate when linked to a specific mitigation program. (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, *Save our Peninsula Comm. v. Monterey County Bd. Of Supers.* (2001) 87 Cal.App.4th 99, 141.) Payment of fees is not sufficient where there is no evidence mitigation will actually result. (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099,1122.) The assessment of fees here is not adequate as there is no evidence mitigation will actually result. The improvements required are not part of an existing DIF/TUMF program and therefore are not planned to occur at all or by any certain date, whether by the City of Plan Springs or City of Desert Hot Springs. Any improvements recommended or fees paid to mitigate impacts for City of Desert Hot Springs facilities are beyond the control of the lead agency and evidence that these improvements will be completed or approved by Caltrans has not been provided. A revised EIR must be prepared to include the LOS analysis as cumulatively considerable significant impact as the project conflicts with Transportation Impact Threshold A and Land Use and Planning Impact Threshold B because it is not consistent with the following General Plan Policy: 13-n

1. CR2.1: Maintain Level of Service D or better for the City's circulation network, as measured using "in season" peak hour conditions.

The Recirculated EIR does not provide a consistency analysis with all land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The project 13-o

has significant potential to conflict with many of these items, including but not limited to the following from the General Plan:

1. Goal LU1: Establish a balanced pattern of land uses that complements the pattern and character of existing uses, offers opportunities for the intensification of key targeted sites, minimizes adverse environmental impacts, and has positive economic results.

2. LU12.6 Require that loading and outdoor storage areas for commercial and industrial uses be screened from public streets and freeway views.

3. LU12.7 Promote the development of high-quality building design, including attractive fenestration, articulated façades, clearly defined entrances, varied colors and materials, varied building sizes and configurations, and varied roof heights during project review and approval.

4. GOAL CD21: It is a goal of the City of Palm Springs to create convenient, attractive, and well-designed industrial and business parks.

5. CD21.1 Strengthen the image of business park areas through entry monument signage, distinctive landscaping, and complementary architectural design elements.

6. CD21.2 Encourage clean and distinctive industrial/office buildings with clearly visible entrances.

7. CD21.3 Avoid the use of long, blank walls by breaking them up with vertical and horizontal façade articulation achieved through stamping, colors, materials, modulation, and landscaping.

8. CD21.4 Use screening techniques, such as landscaping, walls, and berms, to minimize views of surface parking, storage and service areas.

9. GOAL AQ4 Reduce vehicular emissions.

10. GOAL AQ3 Protect people and land uses that are sensitive to air contaminants from sources of air pollution to the greatest extent possible.

11. AQ3.1 Discourage the development of land uses and the application of land use practices that contribute significantly to the degradation of air quality.

A revised EIR must be prepared to provide a consistency analysis with all of the most updated versions of the General Plan objectives, goals, policies, and strategies. The Recirculated EIR must also be revised to remove misleading and erroneous consistency analysis. For example, the Recirculated EIR concludes the project is consistent with "LU3.3 Ensure operation of industrial uses is unobtrusive to surrounding areas and prohibit the development of manufacturing uses that operate in a manner or use materials that may impose a danger on adjacent uses or are harmful to the environment," because "surrounding properties include industrial and commercial businesses. The Recirculated EIR does not acknowledge that the project will result in significant and

13-o

unavoidable cumulatively considerable GHG and VMT impacts, which will directly impact surrounding residents and communities beyond the immediate vicinity. A finding of significance must be made due to the inconsistency with this policy. 13-o

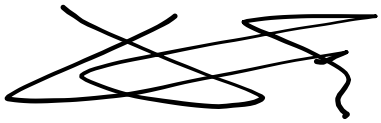
The Recirculated EIR provides misleading information regarding the buildout conditions of the City's General Plan. The Recirculated EIR states that, "Table 2-2, Nonresidential Land Buildout Estimates, in the Updated Land Use Element states that the City estimates 11,638,620 square feet of industrial development to occur during the City's buildout" and concludes that the because the project is less than the total quantity of buildout area, the project will result in less than significant impacts. The Recirculated EIR must be revised to provide the horizon year of the City's adopted General Plan and cumulative development since adoption of the General Plan to ensure that the proposed project is within the General Plan EIR's analysis, particularly since the project EIR tiers from the General Plan EIR. The proposed project's 739,360 square feet of industrial building area accounts for 6.3% of the General Plan Industrial land buildout attributed to a single project. The Recirculated EIR has not provided any analysis of this information and whether the proposed project in combination with cumulative development exceeds the projected buildout scenario. A revised EIR must be prepared to include this analysis in order to provide an adequate and accurate environmental document. 13-p

The Recirculated EIR excludes a consistency analysis with SCAG's 2020-2045 Connect SoCal RTP/SCS. Due to errors in modeling and modeling without supporting evidence (as noted throughout this comment letter and attachments) and the Recirculated EIR's conclusion the project will have significant and unavoidable cumulatively considerable Greenhouse Gas Emissions and Transportation (VMT) impacts, the proposed project is directly inconsistent with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing climate. A revised EIR must be prepared to include a finding of significance due to these inconsistencies with SCAG's 2020-2045 Connect SoCal RTP/SCS. 13-q

Conclusion

For the foregoing reasons, GSEJA believes the Recirculated EIR is flawed and a revised EIR must be prepared for the proposed project and recirculated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. 13-r

Sincerely,



Gary Ho
Blum, Collins & Ho LLP

Attachments:
1. SWAPE Technical Analysis

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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October 8, 2024

Gary Ho
Blum, Collins & Ho LLP
707 Wilshire Blvd, Ste. 4880
Los Angeles, CA 90017

Subject: Comments on the Recirculated Palm Springs Fulfillment Center Project (SCH No. 2023080091)

Dear Mr. Ho,

We have reviewed the April 2024 Recirculated Draft Environmental Impact Report ("Recirculated DEIR") for the Palm Springs Fulfillment Center Project ("Project") located in the City of Palm Springs ("City"). The Project proposes to construct 727,360-square-feet ("SF") of industrial space and 12,000-SF of office space on the 38-acre site.

Our review concludes that the Recirculated DEIR fails to adequately reevaluate the Project's air quality, health risk, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project may be underestimated and inadequately addressed. A revised Environmental Impact Report ("EIR") should be prepared to adequately assess and mitigate the potential health risk and greenhouse gas impacts that the project may have on the environment.

Air Quality

Failure to Respond to Previous Air Modeling Concerns

Upon review of the Recirculated DEIR, our concerns outlined in our June 11th comment letter remain unresolved. In our previous comment letter, we identified several changes to default values within the "15097 - N Indian Canyon & 19th Ave" model that were not substantiated by the DEIR. Review of the Recirculated DEIR reveals that these same changes remain, and that our previous recommendations were not adequately addressed. As such, we maintain that the following issues continue to raise concern (see below).

Failure to Provide Complete CalEEMod Output Files

Land use development projects under the California Environmental Quality Act ("CEQA") typically evaluate air quality impacts and calculate potential criteria air pollutant emissions using the California Emissions Estimator Model ("CalEEMod").[1] CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but CEQA requires that such changes be justified by substantial evidence. Once all of the values are inputted into the model, the Project's construction and operational emissions are calculated, and "output files" are generated. These output files disclose to the reader what parameters are used in calculating the Project's air pollutant emissions and demonstrate which default values are changed. Justifications are provided for the selected values.

According to the CalEEMod Emissions Model Outputs, included as Appendix 3.1 to the DEIR, CalEEMod Version 2022.1 is relied upon to estimate Project emissions (p. 4.2-1). However, this poses a problem, as the currently available version of CalEEMod 2022.1 is described as a "soft release" which fails to provide complete output files.[2] Specifically, the "User Changes to Default Data" table no longer provides the quantitative counterparts to the changes to the default values (see excerpt below) (Appendix 3.1, pp. 244, 279, 368, 369, 936, 1178):

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Taken from client data
Construction: Off-Road Equipment	T/L/B replaced with Crawler Tractor to accurately calculate disturbance for Site Preparation and Grading phases Standard 8 hours work days
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Site Preparation, Grading, and Building Construction
Construction: Architectural Coatings	SCAQMD Rule 1113
Operations: Vehicle Data	Trip characteristics based on information provided in the Traffic Analysis
Operations: Fleet Mix	Passenger Car Mix estimated based on CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, MCY). Truck Fleet Mix based on 2, 3 and 4 axle trucks
Operations: Architectural Coatings	SCAQMD Rule 1113
Operations: Refrigerants	As of 1 January 2022, new commercial refrigeration equipment may not use refrigerants with a GWP of 150 or greater. Further, R-404A (the CalEEMod default) is unacceptable for new supermarket and cold storage systems as of 1 January 2019 and 2023, respectively.
Operations: Energy Use	Per client data, no natural gas will be utilized

However, previous CalEEMod Versions, such as 2020.4.0, include the specific numeric changes to the model's default values (see example excerpt below):

[1] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide.

[2] "CalEEMod California Emissions Estimator Model Soft Release." California Air Pollution Control Officers Association (CAPCOA), 2022, *available at:* https://caleemod.com/.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	230.00	167.00
tblConstructionPhase	PhaseEndDate	11/22/2023	8/25/2023
tblConstructionPhase	PhaseEndDate	9/27/2023	6/30/2023
tblConstructionPhase	PhaseEndDate	10/25/2023	7/28/2023
tblConstructionPhase	PhaseStartDate	10/26/2023	7/29/2023
tblConstructionPhase	PhaseStartDate	9/28/2023	7/1/2023
tblLandUse	LandUseSquareFeet	160,000.00	160,371.00
tblLandUse	LandUseSquareFeet	119,000.00	41,155.00
tblLandUse	LotAcreage	3.67	3.68
tblLandUse	LotAcreage	2.73	2.74

The output files associated with CalEEMod Version 2022.1 fail to present the exact parameters used to calculate Project emissions. To remedy this issue, the DEIR should have provided access to the model's ".JSON" output files, which allow third parties to review the model's revised input parameters.[3] Without access to the complete output files, including the specific numeric changes to the default values, we cannot verify that the DEIR air modeling and subsequent analysis is an accurate reflection of the proposed Project. As a result, a revised EIR should be prepared to include an updated air quality analysis that correctly provides the complete output files for CalEEMod Version 2022.1, or includes an updated air model using an older release of CalEEMod.[4]

Unsubstantiated Input Parameters Used to Estimate Project Emissions

As previously discussed, the DEIR relies on CalEEMod Version 2022.1 to estimate the Project's air quality emissions and fails to provide the complete output files required to adequately evaluate model's analysis (p. 4.2-1). Regardless, when reviewing the Project's CalEEMod output files, provided in Appendix 3.1, we were able to identify several model inputs that are inconsistent with information disclosed in the DEIR. The Project's construction and operational emissions may consequently be underestimated. A revised EIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality.

Failure to Consider Potential Cold Storage Requirements

Review of the CalEEMod output files demonstrates that the "15097 - N Indian Canyon & 19th Ave" model includes 739,360-SF of the "Unrefrigerated Warehouse-No Rail" land use (see excerpt below) (Appendix 3.1, pp. 252, 253, 325, 326, 894, 1136).

[3] "Video Tutorials for CalEEMod Version 2022.1." California Air Pollution Control Officers Association (CAPCOA), May 2022, *available at:* https://www.caleemod.com/tutorials.
[4] "CalEEMod Version 2020.4.0." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* http://www.aqmd.gov/caleemod/download-model.

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)
Unrefrigerated Warehouse-No Rail	739	1000sqft	17.0	739,360	0.00
Parking Lot	787	Space	7.08	0.00	0.00
Other Asphalt Surfaces	12.5	Acre	12.5	0.00	0.00
User Defined Industrial	739	User Defined Unit	0.00	0.00	0.00

As demonstrated above, the model does not include any refrigerated warehouse space. This remains incorrect, as the DEIR does not mention potential tenants whatsoever.

As future site tenants are unknown, the proposed warehouse may require cold storage for operation. As discussed by the South Coast Air Quality Management District ("SCAQMD"), "CEQA requires the use of 'conservative analyses to afford 'fullest possible protection of the environment.'"[5] The DEIR must therefore provide substantial evidence for not including any of the warehouse as cold storage space. Otherwise, an updated model should be prepared to include the entire warehouse land use as refrigerated to account for the additional emissions that refrigeration requirements may generate.

This remains as an issue as refrigerated warehouses release more criteria air pollutant and GHG emissions when compared to unrefrigerated land uses. Warehouses equipped with cold storage, such as refrigerators and freezers, are known to consume more energy when compared to warehouses without cold storage.[6] Additionally, warehouses equipped with cold storage typically require refrigerated trucks, which are known to idle for much longer when compared to unrefrigerated hauling trucks.[7] According to a July 2014 *Warehouse Truck Trip Study Data Results and Usage* presentation prepared by the SCAQMD hauling trucks that require refrigeration result in greater truck trip rates when compared to non-refrigerated hauling trucks.[8]

By failing to account for any potential cold storage requirements, the models may underestimate the Project's operational emissions and should not be relied upon to determine Project significance. A revised EIR should be prepared to account for the possibility of additional refrigerated warehouse needs by the Project's future tenants.

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[5] "Warehouse Truck Trip Study Data Results and Usage" Presentation. SCAQMD Inland Empire Logistics Council, June 2014, *available at*: http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/final-ielc_6-19-2014.pdf?sfvrsn=2.

[6] "Warehouses." Business Energy Advisor, *available at*: https://ouc.bizenergyadvisor.com/article/warehouses.

[7] "Estimation of Fuel Use by Idling Commercial Trucks." Transportation Research Record Journal of the Transportation Research Board, January 2006, p. 8, *available at:* https://www.researchgate.net/publication/245561735_Estimation_of_Fuel_Use_by_Idling_Commercial_Trucks.

[8] "Warehouse Truck Trip Study Data Results and Usage" Presentation. SCAQMD Mobile Source Committee, July 2014, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/finaltrucktripstudymsc072514.pdf?sfvrsn=2, p. 7, 9.

Unsubstantiated Changes to Construction-related and Operational Architectural Coating Emission Factors

Review of the CalEEMod output files demonstrates that the "15097 - N Indian Canyon & 19th Ave" model includes changes to the default construction-related and operational architectural coating emission factors (see excerpt below) (Appendix 3.1, pp. 244, 279, 368, 369, 936, 1178):

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Taken from client data
Construction: Off-Road Equipment	T/L/B replaced with Crawler Tractor to accurately calculate disturbance for Site Preparation and Grading phases Standard 8 hours work days
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Site Preparation, Grading, and Building Construction
Construction: Architectural Coatings	SCAQMD Rule 1113
Operations: Vehicle Data	Trip characteristics based on information provided in the Traffic Analysis
Operations: Fleet Mix	Passenger Car Mix estimated based on CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, MCY). Truck Fleet Mix based on 2, 3 and 4 axle trucks
Operations: Architectural Coatings	SCAQMD Rule 1113
Operations: Refrigerants	As of 1 January 2022, new commercial refrigeration equipment may not use refrigerants with a GWP of 150 or greater. Further, R-404A (the CalEEMod default) is unacceptable for new supermarket and cold storage systems as of 1 January 2019 and 2023, respectively.
Operations: Energy Use	Per client data, no natural gas will be utilized

As previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified.[9] As demonstrated above in the "User Changes to Default Data" table, the justification provided for these changes are:

> "Rule 1113" (Appendix 3.1, pp. 244, 279, 368, 369, 936, 1178).

The CalEEMod output files list SCAQMD Rule 1113 as a justification for the changes made to architectural coatings values in the model. However, the model's changes to the architectural coating emission factors remain unsubstantiated for two reasons.

First, we cannot verify the accuracy of the revised architectural coating emission factors based on SCAQMD Rule 1113 alone. The SCAQMD Rule 1113 Table of Standards provides the required volatile organic compound ("VOC") limits (grams of VOC per liter of coating) for 57 different coating categories.[10] The VOC limits for each coating varies from a minimum value of 50 g/L to a maximum value of 730 g/L. As such, we cannot verify that SCAQMD Rule 1113 substantiates reductions to the default coating values without more information regarding what category of coating will be used. As the DEIR fails to explicitly require the use of a specific type of coating which would adhere to a specific VOC limit, we are unable to verify the model's revised coating emission factors.

[9] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 1, 14.
[10] "SCAQMD Rule 1113 Advisory Notice." SCAQMD, February 2016, *available at:* http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf?sfvrsn=24, p. 1113-14, Table of Standards 1.

Second, as previously discussed, the output files for CalEEMod 2022.1 do not present the numeric changes to any model defaults. Upon further review of the output files, Table 5.5 contains the only mention of architectural coatings (see excerpt below) (Appendix 3.1, pp. 233, 357, 925, 1167):

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	1,109,040	369,680	51,323

However, as demonstrated above, Table 5.5 only provides the *square footage* of area to be coated. Since the output files fail to demonstrate the architectural coating *emission factors* that the model relies on, we cannot verify that the values included in the model are accurate. As previously stated, the DEIR should have provided access to the model's ".JSON" output files, which allow third parties to review the model's revised input parameters.[11]

These unsubstantiated reductions present an issue, as CalEEMod uses the architectural coating emission factors to calculate the Project's reactive VOC emissions.[12] By including unsubstantiated reductions to the default architectural coating emission factors, the model may underestimate the Project's construction-related VOC emissions and should not be relied upon to determine Project significance.

Unsubstantiated Changes to Operational Fleet Mix Values

Review of the CalEEMod output files demonstrates that the "15097 - N Indian Canyon & 19th Ave" model includes changes to the default operational vehicle fleet mix percentages (see excerpt below (Appendix 3.1, pp. 244, 279, 368, 369, 936, 1178):

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Taken from client data
Construction: Off-Road Equipment	T/L/B replaced with Crawler Tractor to accurately calculate disturbance for Site Preparation and Grading phases Standard 8 hours work days
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Site Preparation, Grading, and Building Construction
Construction: Architectural Coatings	SCAQMD Rule 1113
Operations: Vehicle Data	Trip characteristics based on information provided in the Traffic Analysis
Operations: Fleet Mix	Passenger Car Mix estimated based on CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, MCY). Truck Fleet Mix based on 2, 3 and 4 axle trucks
Operations: Architectural Coatings	SCAQMD Rule 1113
Operations: Refrigerants	As of 1 January 2022, new commercial refrigeration equipment may not use refrigerants with a GWP of 150 or greater. Further, R-404A (the CalEEMod default) is unacceptable for new supermarket and cold storage systems as of 1 January 2019 and 2023, respectively.
Operations: Energy Use	Per client data, no natural gas will be utilized

[11] "Video Tutorials for CalEEMod Version 2022.1." California Air Pollution Control Officers Association (CAPCOA), May 2022, *available at:* https://www.caleemod.com/tutorials.

[12] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 35, 40.

As previously stated, the CalEEMod User's Guide requires any changes to model defaults be justified.[13] As demonstrated above in the "User Changes to Default Data" table, the justification provided for these changes is:

> "Passenger Car Mix estimated based on CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, MCY). Truck Fleet Mix based on 2, 3 and 4 axle trucks" (Appendix 3.1, pp. 244, 279, 368, 369, 936, 1178).

The DEIR includes the following Project fleet mix tables for passenger cars and trucks, respectively (see excerpts below) (Appendix C.1, p. 32, Table 3-6, Table 3-7):

TABLE 3-6: PASSENGER CAR FLEET MIX – INDUSTRIAL USE

Land Use	% Vehicle Type				
	LDA	LDT1	LDT2	MDV	MCY
High-Cube Fulfillment Center Warehouse	50.75%	4.55%	25.13%	17.58%	1.99%

Note: The Project-specific passenger car fleet mix used in this analysis is based on a proportional split utilizing the default CalEEMod percentages assigned to LDA, LDT1, LDT2, and MDV vehicle types.

TABLE 3-7: TRUCK FLEET MIX – INDUSTRIAL USE

Land Use	% Vehicle Type			
	LHDT1	LHDT2	MHDT	HHDT
High-Cube Fulfillment Center Warehouse	8.21%	2.50%	10.71%	78.57%

Note: Project-specific truck fleet mix is based on the number of trips generated by each truck type (LHDT1, LHDT2, MHDT, and HHDT) relative to the total number of truck trips

However, the changes to the model's operational fleet mix values remain unsubstantiated. As previously discussed, the output files for CalEEMod 2022.1 do not present the numeric changes to any model defaults. Upon further review of the output files, changes to fleet mix percentages are not mentioned outside of the "User Changes to Default Data" table. Until the DEIR verifies the breakdown of heavy-heavy duty ("HHD"), medium-heavy duty ("MHD"), light-heavy duty ("LHD1, LDH2"), trucks used by the Project, we cannot verify that the values included in the model are accurate.[14]

These unsubstantiated changes present an issue, as CalEEMod uses operational vehicle fleet mix percentages to calculate the Project's operational emissions associated with on-road vehicles.[15] By including several unsubstantiated changes to the default operational vehicle fleet mix percentages, the model may underestimate the Project's mobile-source operational emissions and should not be relied upon to determine Project significance.

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[13] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 1, 14.
[14] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 38.
[15] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 36.

Unsubstantiated Changes to Energy Use Values

Review of the CalEEMod output files demonstrates that the "15097 - N Indian Canyon & 19th Ave Detailed Report" model includes changes to the default natural gas energy use values (see excerpt below) (Appendix 3.1, pp. 244, 279, 368, 369, 936, 1178):

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Taken from client data
Construction: Off-Road Equipment	T/L/B replaced with Crawler Tractor to accurately calculate disturbance for Site Preparation and Grading phases Standard 8 hours work days
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Site Preparation, Grading, and Building Construction
Construction: Architectural Coatings	SCAQMD Rule 1113
Operations: Vehicle Data	Trip characteristics based on information provided in the Traffic Analysis
Operations: Fleet Mix	Passenger Car Mix estimated based on CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, MCY). Truck Fleet Mix based on 2, 3 and 4 axle trucks
Operations: Architectural Coatings	SCAQMD Rule 1113
Operations: Refrigerants	As of 1 January 2022, new commercial refrigeration equipment may not use refrigerants with a GWP of 150 or greater. Further, R-404A (the CalEEMod default) is unacceptable for new supermarket and cold storage systems as of 1 January 2019 and 2023, respectively.
Operations: Energy Use	Per client data, no natural gas will be utilized

As demonstrated in the table above, the justification provided for these changes is:

> "Per client data, no natural gas will be utilized" (Appendix 3.1, pp. 244, 279, 368, 369, 936, 1178).

The energy use table consequently does not account for any natural gas whatsoever (see excerpt below) (Appendix 3.1, pp. 235, 270, 927, 1169):

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Unrefrigerated Warehouse-No Rail	3,402,795	349	0.0330	0.0040	0.00
Parking Lot	270,277	349	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	349	0.0330	0.0040	0.00
User Defined Industrial	0.00	349	0.0330	0.0040	0.00

Furthermore, the DEIR states:

> "Based on information provided by the Project applicant, the site is not expected to utilize natural gas for the building envelope, and therefore would not generate any emissions from direct energy consumption" (p. 4.2-29).

As demonstrated above, the DEIR asserts that the site is not "expected" to rely on natural gas for the Project's energy needs. However, the DEIR explains:

> "Although the project is proposing the industrial building to function as a high cube warehouse, possible future tenants of the building are unknown" (p. 4.8-18).

As the DEIR and associated documents fail to address the future tenants and potential use of natural gas, the reductions to natural gas values are unsubstantiated. According to the CalEEMod User's Guide:

> "CalEEMod was also designed to allow the user to change the defaults to reflect site- or project-specific information, when available, provided that the information is supported by substantial evidence as required by CEQA." [16]

As demonstrated above, the DEIR should have provided substantial evidence that supports the reductions in natural gas values. These unsubstantiated reductions present an issue, as the energy use values are used by CalEEMod to calculate the Project's emissions associated with building electricity and natural gas usage.[17] By assuming that the Project would not rely on any natural gas utilities, the model may underestimate the Project's operational emissions and should not be relied upon to determine Project significance.

Updated Analysis Indicates a Potentially Significant Air Quality Impact

In an effort to quantitatively estimate the Project's construction-related and operational emissions, we used the CalEEMod Version 2020.4.0, as well as Project-specific information provided by the DEIR. Consistent with the DEIR's model, our model included 739,360-SF of the "Unrefrigerated Warehouse-No Rail" land use, 787 spaces of the "Parking lot" land use, 12.5-acres of the "Other Asphalt Surfaces" land use, and 739 user defined units of the "User Defined Industrial" land use. We also omitted the unsubstantiated changes to the construction-related and operational architectural coating emission factors, operational fleet mix values, and energy use values. All other values are consistent with the DEIR's model.[18]

As demonstrated in our June 11th comment letter, the updated analysis estimates that the VOC emissions associated with Project construction exceed the applicable SCAQMD threshold of 75 pounds per day ("lbs/day"), as referenced by the DEIR (p. 4.2-25) (see table below).[19]

SWAPE Criteria Air Pollutant Emissions	
Checklist	**Construction VOC** (lbs/day)
DEIR	73.9
SWAPE	175.9
% Increase	138%
SCAQMD Threshold	**75.0**
Exceeds?	***Yes***

[16] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 12.
[17] "CalEEMod User's Guide Version 2020.4.0." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 43.
[18] See Attachment A for CalEEMod model.
[19] "South Coast AQMD Air Quality Significance Thresholds." SCAQMD, April 2019, *available at*: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25.

Construction-related VOC emissions, as previously estimated by SWAPE, increase by approximately 138% and exceed the applicable SCAQMD significance threshold. Our updated modeling demonstrates that the Project would result in a potentially significant air quality impact that was not previously identified or addressed by the DEIR. As a result, we maintain that a revised EIR should be prepared to adequately assess and mitigate the potential air quality impacts that the Project may have on the environment.

Diesel Particulate Matter Emissions Inadequately Evaluated

Review of the Recirculated DEIR reveals that our concerns remain consistent with our June 11th comment letter. In our previous comment letter, we identified several issues with the DEIR's health risk analysis ("HRA"). We, therefore, maintain the following issues with the current, recirculated version of the DEIR (see below).

The DEIR concludes that the proposed Project would result in a less-than-significant health risk impact based on a quantified construction and operational HRA, as detailed in the Mobile Health Risk Assessment ("HRA Report"), provided as Appendix C.2 to the DEIR. Specifically, the HRA Report estimates that the cumulative maximum cancer risk posed to nearby, existing residential sensitive receptors associated with construction and operation would be 0.13 in one million, which would not exceed the SCAQMD significance threshold of 10 in one million (see excerpt below) (p. 4.7-13, Table 4.7-2).

Table 4.2-10 Summary of Construction and Operational Cancer and non-cancer risks

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
30 Year Exposure	Maximum Exposed Sensitive Receptor	0.13	10	NO
Time Period	**Location**	**Maximum Hazard Index**	**Significance Threshold**	**Exceeds Significance Threshold**
Annual Average	Maximum Exposed Sensitive Receptor	≤0.01	1.0	NO

Health Risks Related to Criteria Air Pollutant Categories

The DEIR's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion remains incorrect.

The DEIR's HRA continues to be unreliable, as it relies upon emissions estimates from a flawed air model, as discussed above in the section titled "Unsubstantiated Input Parameters Used to Estimate Project Emissions." As such, the HRA is based on potentially underestimated DPM concentrations to calculate the health risk associated with Project construction. As a result, the DEIR's HRA and resulting cancer risk should not be relied upon to determine Project significance.

Additionally, the DEIR's operational HRA underestimates the Fraction of Time At Home ("FAH") values for the third trimester, infant, and child receptors. Specifically, the HRA Report utilizes an FAH value of 0.85 for the third trimester (age -0.25 to 0) and infant (age 0 to 2) receptors, and an FAH value of 0.72 for the child receptors (age 2 to 16) (see excerpt below) (Appendix C.2, p. 20).

TABLE 2-7: EXPOSURE ASSUMPTIONS FOR INDIVIDUAL CANCER RISK (30 YEAR RESIDENTIAL)

Age	Daily Breathing Rate (L/kg-day)	Age Specific Factor	Exposure Duration (years)	Fraction of Time at Home	Exposure Frequency (days/year)	Exposure Time (hours/day)
-0.25 to 0	361	10	0.25	0.85	350	24
0 to 2	1,090	10	2	0.85	350	24
2 to 16	572	3	14	0.72	350	24
16 to 30	261	1	14	0.73	350	24

The FAH values used for the third trimester, infant, and childhood receptors remain incorrect, as SCAQMD guidance clearly states:

> "For Tiers 1, 2, and 3 screening purposes, the FAH is assumed to be 1 for ages third trimester to 16. As a default, children are assumed to attend a daycare or school in close proximity to their home and no discount should be taken for time spent outside of the area affected by the facility's emissions. People older than age 16 are assumed to spend only 73 percent of their time at home."[20]

Per SCAQMD guidance, the HRA Report should have used an FAH of 1 for the third trimester, infant, and child receptors. By relying on incorrect FAH values, we maintain that the DEIR may underestimate the cancer risk posed to nearby, existing sensitive receptors as a result of Project construction and operation.

Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts

Review of the Recirculated DEIR reveals that our previous concerns remain consistent with our June 11th comment letter. In the June 11th comment letter, we identified several issues concerning the DEIR's greenhouse gas ("GHG") emissions. The Recirculated DEIR presents the following issues (see below).

The DEIR concludes that implementation of the Project would result in net annual GHG emissions of 9,438.47 metric tons of carbon dioxide equivalents per year ("MT CO_2e/year") (see excerpt below) (p. 4.7-13, Table 4.7-2).

[20] "Risk Assessment Procedures." SCAQMD, August 2017, available at: http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf, p. 7.

Table 4.7-2 Project GHG emissions

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	R	Total CO_2e
Amortized Construction Emissions	65.50	2.33E-03	2.83E-03	4.99E-02	66.46
Mobile Source	7,828.68	0.12	0.72	10.25	8,056.38
Area Source	10.80	0.00	0.00	0.00	10.84
Energy Source	580.86	0.05	0.01	0.00	584.22
Water Usage	182.34	5.57	0.13	0.00	361.51
Waste	62.01	6.20	0.00	0.00	216.96
On-site equipment	0.00	0.00	0.00	0.00	142.10
Total CO_2e (All Sources)	**9,438.47**				

The DEIR, therefore, concludes that the Project's GHG emissions would exceed the City's significance threshold of 3,000 MT CO_2e/year (p. 4.7-13). According to the DEIR:

> "As shown on Table 4.7-2, the project will result in approximately 9,438.47 MTCO2e/yr; the proposed project would exceed the County's screening threshold of 3,000 MTCO2e/yr. Thus, the project would have the potential to result in a cumulatively considerable impact with respect to GHG emissions. Since the project exceeds the 3,000 MTCO2e/yr threshold, the project's impacts would be significant unless mitigated. As described in Mitigation Measure GHG-1, the project is required to demonstrate compliance with the County's CAP Screening Tables and achieve a minimum of 100 points as identified in the CAP. For reference, an industrial (or commercial) project garnering 100 points would achieve a reduction of approximately 3.22 MTCO2e per 1,000 square feet of building area, as determined by multiplying the reduction of 0.0322 MTCO2e per point by the 100-point total" (p. 4.7-14).

Mitigation Measure ("MM") GHG-1 are implemented as a result to demonstrate consistencies with the CAP Update, stating:

> "GHG-1 Pursuant to MM GHG-1, the Project final plans and designs would conform to provisions of the CAP Update through implementation of the Screening Table Measures listed at Table 4.7-3. The Project shall implement Screening Table Measures providing for a minimum 100 points per the County Screening Tables. The Project would be consistent with the CAP Update's requirement to achieve at least 100 points. The City shall verify incorporation of the identified Screening Table Measures within the Project building plans and site designs prior to the issuance of building permit(s) and/or site plans (as applicable). The City shall verify implementation of the identified Screening Table Measures prior to the issuance of Certificate(s) of Occupancy. As shown on Table 4.7-3, the Project would yield 274 points which is more than double the required 100 points. The Project would therefore be consistent with the CAP" (p. 1-19).

The Project is projected to yield 274 points, which exceeds the CAP Update's requirement to achieve at least 100 points. As maintained in our June 11th comment letter, the Project continues to fail to incorporate each reduction measure as a formal mitigation measure. This is unsupported, as according

to the Association of Environmental Professionals' ("AEP") *CEQA Portal Topic Paper* on Mitigation Measures:

> "While not 'mitigation', a good practice is to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP). Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact."[21]

Design features that are not formally included as mitigation measures in a mitigation monitoring and reporting program may be eliminated from the Project's design altogether. As discussed in our June 11th comment letter, until the specific reduction measures are identified and included as mitigation measures, the Project's GHG analysis should not be relied upon to determine Project significance.

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

According to California Environmental Quality Act ("CEQA") Guidelines § 15096(g)(2):

> "When an updated EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment."

The DEIR is consequently required under CEQA to implement all feasible mitigation to reduce the Project's potential impacts. As demonstrated in the sections above, the Project would result in potentially significant air quality, health risk, and GHG impacts that should be mitigated further.

First, in order to reduce the VOC emissions associated with Project construction, we recommend the Recirculated DEIR consider incorporating the following mitigation measure from the California Department of Justice ("CA DOJ"):[22]

- Require the use of super compliant, low-VOC paints less than 10 g/L during the architectural coating construction phase and during Project maintenance.

[21] "CEQA Portal Topic Paper Mitigation Measures." AEP, February 2020, *available at:* https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf, p. 6.
[22] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, *available at*: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf, p. 8 – 10.

Further mitigation used by other land use development projects to address VOC emissions is as follows: [23]

- Recycle leftover paint. Take any leftover paint to a household hazardous waste center; do not mix leftover water-based and oil-based paints.
- Keep lids closed on all paint containers when not in use to prevent VOC emissions and excessive odors.
- For water-based paints, clean up with water only. Whenever possible, do not rinse the cleanup water down the drain or pour it directly into the ground or the storm drain
- Use compliant low-VOC cleaning solvents to clean paint application equipment.
- Keep all paint- and solvent-laden rags in sealed containers to prevent VOC emissions.
- Contractors shall construct/build with materials that do not require painting and use pre-painted construction materials to the extent practicable.
- Use high-pressure/low-volume paint applicators with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.

Additionally, Los Angeles County recommends:[24]

- If paints and coatings with VOC content of 0 grams/liter to less than 10 grams/liter cannot be utilized, the developer shall avoid application of architectural coatings during the peak smog season: July, August, and September.

While the Project is not located in Los Angeles County, the use of low-VOC paints would nonetheless decrease the Project's significant VOC emissions.

Second, in order to reduce the DPM emissions associated with Project construction and operation, we recommend the DEIR consider several mitigation measures (see list below).

The California Air Resources Board ("CARB") recommends: [25]

- Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
- Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling

[23] "Banning Commerce Center Project." Kimley-Horn and Associates, Inc., June 2024, *available at*: https://ceqanet.opr.ca.gov/2022090102/2; Draft Environmental Impact Report, p. 1-7.
[24] "Mitigation Monitoring and Reporting Program." Los Angeles County Housing Element Update Program EIR. August 2021, *available at*: https://planning.lacounty.gov/wp-content/uploads/2023/07/Housing_final-peir-mitigation-monitoring.pdf.
[25] "Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers." CARB, August 2023, *available at*: https://ww2.arb.ca.gov/sites/default/files/2023-08/CARB%20Comments%20-%20NOP%20for%20the%20%20Oak%20Valley%20North%20Project%20DEIR.pdf; Attachment A, p. 5 – 8.

infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.

- Require all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved are equal to or exceed that of a Tier 4 engine.
- Requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.
- Require all heavy-duty trucks entering the construction site during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen (NOx) standard starting in the year 2022.
- Require all construction equipment and fleets to be in compliance with all current air quality regulations.
- Require tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.
- Require all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units.
- Requiring all TRUs entering the project-site be plug-in capable.
- Requiring all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available and can be purchased using incentive funding from CARB's Clean Off-Road Equipment Voucher Incentive Project (CORE).
- Require future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.
- Require all heavy-duty trucks entering or on the project site to be zero-emission vehicles, and be fully zero-emission. A list of commercially available zero-emission trucks can be obtained from the Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP). Additional incentive funds can be obtained from the Carl Moyer Program and Voucher Incentive Program.
- Restrict trucks and support equipment from idling longer than two minutes while on site.
- Require the installation of vegetative walls or other effective barriers that separate loading docks and people living or working nearby.

In addition to recommending similar mitigation as the above-mentioned measures from CARB, the CA DOJ suggests:[26]

- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.

[26] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, *available at*: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf, p. 8 – 10.

- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Running conduit to designated locations for future electric truck charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.

Lastly, SCAQMD staff recommends: [27]

- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

The CalEEMod User's Guide confirms that the methods for mitigating DPM emissions include the use of "alternative fuel, electric equipment, diesel particulate filters (DPF), oxidation catalysts, newer tier engines, and dust suppression."[28]

Third, in order to reduce the GHG emissions associated with the Project, we recommend several mitigation measures (see list below).

The CA DOJ recommends: [29]

[27] "Draft Environmental Impact Report (EIR) for the Proposed CADO Menifee Industrial Warehouse Project (Proposed Project)." SCAQMD, April 2024, *available at*: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/april-2024/RVC240313-05.pdf?sfvrsn=8, p. 3 - 4.
[28] "Calculation Details for CalEEMod." CAPCOA, May 2021, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-a2020-4-0.pdf?sfvrsn=6, Appendix A, p. 60.
[29] *Ibid.* p. 9 – 10.

- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces.
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

SCAQMD staff recommends: [30]

- Using light-colored paving and roofing materials.

CEQA Guidelines 15126.4 (c)(3) include "[o]ffsite measures, including offsets that are not otherwise required, to mitigate a project's emissions" as an option for GHG mitigation.[31] An example of this was in the case of the Oakland Sports and Mixed-Use Project, where off-site reduction measures in the

[30] "Draft Environmental Impact Report (EIR) for the Proposed CADO Menifee Industrial Warehouse Project (Proposed Project)." SCAQMD, April 2024, *available at*: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/april-2024/RVC240313-05.pdf?sfvrsn=8, p. 3.
[31] "Cal. Code Regs. tit. 14 § 15126.4." CEQA Guidelines, May 2024, *available at*: https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-9-contents-of-environmental-impact-reports/section-151264-consideration-and-discussion-of-mitigation-measures-proposed-to-minimize-significant-effects.

neighboring communities were recommended.[32] We recommend consideration of local carbon offset programs to reduce the Project's GHG impacts as a measure of last result.

As demonstrated above, we have provided several mitigation measures that would reduce Project-related VOC, DPM, and GHG emissions developed from sources including CARB, the CA DOJ and others. These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently reduce emissions released during Project construction and operation.

As stated in our June 11th comment letter, we maintain that a revised EIR should be prepared that includes all feasible mitigation measures, as well as updated air quality, health risk and GHG analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to the maximum extent feasible. The revised EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's potentially significant emissions are reduced to the maximum extent possible.

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

[32] "Cal. Pub. Resources Code § 21168.6.7." 2023, *available at*: https://casetext.com/statute/california-codes/california-public-resources-code/division-13-environmental-quality/chapter-6-limitations/section-2116867-oakland-sports-and-mixed-use-project-conditions-for-approval-certification-of-project-for-streamlining.

Attachment A: CalEEMod Output Files
Attachment B: Matt Hagemann CV
Attachment C: Paul Rosenfeld CV

Attachment A

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

15097 - N Indian Canyon & 19th Ave Detailed Report

South Coast AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	739.00	1000sqft	17.00	739,360.00	0
User Defined Industrial	739.00	User Defined Unit	0.00	0.00	0
Other Asphalt Surfaces	12.50	Acre	12.50	0.00	0
Parking Lot	787.00	Space	7.08	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	10			**Operational Year**	2026
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with DEIR's model.

Land Use - Consistent with DEIR's model.

Construction Phase - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Grading - Consistent with DEIR's model.

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Architectural Coating - See comment on: "Unsubstantiated Changes to Construction and Operational Architectural Coating Emission Factors".

Area Coating - See comment on: "Unsubstantiated Changes to Construction and Operational Architectural Coating Emission Factors".

Energy Use - See comment on: "Unsubstantiated Changes to Energy Use Values".

Fleet Mix - See comment on: "Unsubstantiated Changes to Operational Fleet Mix Values".

Trips and VMT - Consistent with DEIR's model.

Vehicle Trips - Consistent with DEIR's model.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	30.00	20.00
tblConstructionPhase	NumDays	75.00	335.00
tblConstructionPhase	NumDays	740.00	287.00
tblConstructionPhase	NumDays	55.00	41.00
tblConstructionPhase	NumDays	55.00	30.00
tblGrading	AcresOfGrading	1,340.00	300.00
tblGrading	AcresOfGrading	30.00	40.00
tblLandUse	LandUseSquareFeet	739,000.00	739,360.00
tblLandUse	LandUseSquareFeet	544,500.00	0.00
tblLandUse	LandUseSquareFeet	314,800.00	0.00
tblLandUse	LotAcreage	16.97	17.00
tblOffRoadEquipment	HorsePower	212.00	97.00
tblOffRoadEquipment	LoadFactor	0.43	0.37
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	24.00
tblTripsAndVMT	VendorTripNumber	121.00	91.00
tblTripsAndVMT	WorkerTripNumber	18.00	10.00
tblTripsAndVMT	WorkerTripNumber	62.00	62.10
tblVehicleTrips	ST_TR	1.74	1.00
tblVehicleTrips	SU_TR	1.74	0.96
tblVehicleTrips	WD_TR	1.74	1.75

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2024	0.6998	6.2406	6.2308	0.0154	1.5046	0.2687	1.7733	0.6269	0.2485	0.8755	0.0000	1,378.8961	1,378.8961	0.2861	0.0364	1,396.9018
2025	3.7437	2.4629	2.8795	7.1700e-003	0.6761	0.1020	0.7781	0.2391	0.0945	0.3336	0.0000	642.8366	642.8366	0.1283	0.0169	651.0887
Maximum	**3.7437**	**6.2406**	**6.2308**	**0.0154**	**1.5046**	**0.2687**	**1.7733**	**0.6269**	**0.2485**	**0.8755**	**0.0000**	**1,378.8961**	**1,378.8961**	**0.2861**	**0.0364**	**1,396.9018**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2024	0.6998	6.2406	6.2308	0.0154	1.5046	0.2687	1.7733	0.6269	0.2485	0.8755	0.0000	1,378.8950	1,378.8950	0.2861	0.0364	1,396.9007
2025	3.7437	2.4629	2.8795	7.1700e-003	0.6761	0.1020	0.7781	0.2391	0.0945	0.3336	0.0000	642.8361	642.8361	0.1283	0.0169	651.0882
Maximum	**3.7437**	**6.2406**	**6.2308**	**0.0154**	**1.5046**	**0.2687**	**1.7733**	**0.6269**	**0.2485**	**0.8755**	**0.0000**	**1,378.8950**	**1,378.8950**	**0.2861**	**0.0364**	**1,396.9007**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**1-5-2024**	**4-4-2024**	1.1302	1.1302
2	**4-5-2024**	**7-4-2024**	1.9336	1.9336
3	**7-5-2024**	**10-4-2024**	1.9553	1.9553
4	**10-5-2024**	**1-4-2025**	1.9562	1.9562
5	**1-5-2025**	**4-4-2025**	4.0804	4.0804
6	**4-5-2025**	**7-4-2025**	2.0162	2.0162
		Highest	4.0804	4.0804

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	3.0170	2.6000e-004	0.0290	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004	0.0000	0.0565	0.0565	1.5000e-004	0.0000	0.0602
Energy	8.0100e-003	0.0729	0.0612	4.4000e-004		5.5400e-003	5.5400e-003		5.5400e-003	5.5400e-003	0.0000	383.5082	383.5082	0.0272	4.5700e-003	385.5488
Mobile	0.6209	0.7709	6.7501	0.0160	1.8247	0.0114	1.8361	0.4870	0.0106	0.4976	0.0000	1,477.8845	1,477.8845	0.0903	0.0629	1,498.8857
Waste						0.0000	0.0000		0.0000	0.0000	141.0097	0.0000	141.0097	8.3334	0.0000	349.3456
Water						0.0000	0.0000		0.0000	0.0000	54.2167	394.6306	448.8473	5.6019	0.1355	629.2804
Total	**3.6460**	**0.8440**	**6.8403**	**0.0164**	**1.8247**	**0.0170**	**1.8417**	**0.4870**	**0.0162**	**0.5032**	**195.2264**	**2,256.0799**	**2,451.3063**	**14.0530**	**0.2030**	**2,863.1207**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	3.0170	2.6000e-004	0.0290	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004	0.0000	0.0565	0.0565	1.5000e-004	0.0000	0.0602
Energy	8.0100e-003	0.0729	0.0612	4.4000e-004		5.5400e-003	5.5400e-003		5.5400e-003	5.5400e-003	0.0000	383.5082	383.5082	0.0272	4.5700e-003	385.5488
Mobile	0.6209	0.7709	6.7501	0.0160	1.8247	0.0114	1.8361	0.4870	0.0106	0.4976	0.0000	1,477.8845	1,477.8845	0.0903	0.0629	1,498.8857
Waste						0.0000	0.0000		0.0000	0.0000	141.0097	0.0000	141.0097	8.3334	0.0000	349.3456
Water						0.0000	0.0000		0.0000	0.0000	54.2167	394.6306	448.8473	5.6019	0.1355	629.2804
Total	**3.6460**	**0.8440**	**6.8403**	**0.0164**	**1.8247**	**0.0170**	**1.8417**	**0.4870**	**0.0162**	**0.5032**	**195.2264**	**2,256.0799**	**2,451.3063**	**14.0530**	**0.2030**	**2,863.1207**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/8/2024	2/2/2024	5	20	
2	Grading	Grading	2/5/2024	5/17/2025	5	335	
3	Building Construction	Building Construction	4/5/2024	5/12/2025	5	287	

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4	Architectural Coating	Architectural Coating	2/27/2025	4/24/2025	5	41	
5	Paving	Paving	3/3/2025	4/11/2025	5	30	

Acres of Grading (Site Preparation Phase): 40

Acres of Grading (Grading Phase): 300

Acres of Paving: 19.58

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 1,109,040; Non-Residential Outdoor: 369,680; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Crawler Tractors	2	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	10.00	6.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	24.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	311.00	91.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	62.10	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Site Preparation - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.2019	0.0000	0.2019	0.1016	0.0000	0.1016	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0266	0.2718	0.1834	3.8000e-004		0.0123	0.0123		0.0113	0.0113	0.0000	33.4571	33.4571	0.0108	0.0000	33.7276
Total	**0.0266**	**0.2718**	**0.1834**	**3.8000e-004**	**0.2019**	**0.0123**	**0.2142**	**0.1016**	**0.0113**	**0.1129**	**0.0000**	**33.4571**	**33.4571**	**0.0108**	**0.0000**	**33.7276**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.0000e-005	2.3000e-003	8.6000e-004	1.0000e-005	3.8000e-004	1.0000e-005	3.9000e-004	1.1000e-004	1.0000e-005	1.2000e-004	0.0000	1.0525	1.0525	4.0000e-005	1.5000e-004	1.0989
Worker	2.9000e-004	2.1000e-004	3.0400e-003	1.0000e-005	1.1000e-003	1.0000e-005	1.1000e-003	2.9000e-004	1.0000e-005	3.0000e-004	0.0000	0.8335	0.8335	2.0000e-005	2.0000e-005	0.8401
Total	**3.5000e-004**	**2.5100e-003**	**3.9000e-003**	**2.0000e-005**	**1.4800e-003**	**2.0000e-005**	**1.4900e-003**	**4.0000e-004**	**2.0000e-005**	**4.2000e-004**	**0.0000**	**1.8860**	**1.8860**	**6.0000e-005**	**1.7000e-004**	**1.9390**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.2019	0.0000	0.2019	0.1016	0.0000	0.1016	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0266	0.2718	0.1834	3.8000e-004		0.0123	0.0123		0.0113	0.0113	0.0000	33.4570	33.4570	0.0108	0.0000	33.7275
Total	**0.0266**	**0.2718**	**0.1834**	**3.8000e-004**	**0.2019**	**0.0123**	**0.2142**	**0.1016**	**0.0113**	**0.1129**	**0.0000**	**33.4570**	**33.4570**	**0.0108**	**0.0000**	**33.7275**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.0000e-005	2.3000e-003	8.6000e-004	1.0000e-005	3.8000e-004	1.0000e-005	3.9000e-004	1.1000e-004	1.0000e-005	1.2000e-004	0.0000	1.0525	1.0525	4.0000e-005	1.5000e-004	1.0989
Worker	2.9000e-004	2.1000e-004	3.0400e-003	1.0000e-005	1.1000e-003	1.0000e-005	1.1000e-003	2.9000e-004	1.0000e-005	3.0000e-004	0.0000	0.8335	0.8335	2.0000e-005	2.0000e-005	0.8401
Total	**3.5000e-004**	**2.5100e-003**	**3.9000e-003**	**2.0000e-005**	**1.4800e-003**	**2.0000e-005**	**1.4900e-003**	**4.0000e-004**	**2.0000e-005**	**4.2000e-004**	**0.0000**	**1.8860**	**1.8860**	**6.0000e-005**	**1.7000e-004**	**1.9390**

3.3 Grading - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.8727	0.0000	0.8727	0.4094	0.0000	0.4094	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.4242	4.1549	3.3332	7.3500e-003		0.1928	0.1928		0.1774	0.1774	0.0000	645.9887	645.9887	0.2089	0.0000	651.2118
Total	**0.4242**	**4.1549**	**3.3332**	**7.3500e-003**	**0.8727**	**0.1928**	**1.0655**	**0.4094**	**0.1774**	**0.5868**	**0.0000**	**645.9887**	**645.9887**	**0.2089**	**0.0000**	**651.2118**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.0000e-003	0.1088	0.0406	5.1000e-004	0.0179	6.0000e-004	0.0185	5.1800e-003	5.8000e-004	5.7500e-003	0.0000	49.8876	49.8876	1.7000e-003	7.2400e-003	52.0871
Worker	6.9000e-003	5.0700e-003	0.0721	2.2000e-004	0.0260	1.4000e-004	0.0261	6.9100e-003	1.3000e-004	7.0400e-003	0.0000	19.7542	19.7542	4.7000e-004	4.9000e-004	19.9112
Total	**9.9000e-003**	**0.1139**	**0.1126**	**7.3000e-004**	**0.0439**	**7.4000e-004**	**0.0447**	**0.0121**	**7.1000e-004**	**0.0128**	**0.0000**	**69.6418**	**69.6418**	**2.1700e-003**	**7.7300e-003**	**71.9983**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.8727	0.0000	0.8727	0.4094	0.0000	0.4094	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.4242	4.1549	3.3331	7.3500e-003		0.1928	0.1928		0.1774	0.1774	0.0000	645.9879	645.9879	0.2089	0.0000	651.2111
Total	**0.4242**	**4.1549**	**3.3331**	**7.3500e-003**	**0.8727**	**0.1928**	**1.0655**	**0.4094**	**0.1774**	**0.5868**	**0.0000**	**645.9879**	**645.9879**	**0.2089**	**0.0000**	**651.2111**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.0000e-003	0.1088	0.0406	5.1000e-004	0.0179	6.0000e-004	0.0185	5.1800e-003	5.8000e-004	5.7500e-003	0.0000	49.8876	49.8876	1.7000e-003	7.2400e-003	52.0871
Worker	6.9000e-003	5.0700e-003	0.0721	2.2000e-004	0.0260	1.4000e-004	0.0261	6.9100e-003	1.3000e-004	7.0400e-003	0.0000	19.7542	19.7542	4.7000e-004	4.9000e-004	19.9112
Total	**9.9000e-003**	**0.1139**	**0.1126**	**7.3000e-004**	**0.0439**	**7.4000e-004**	**0.0447**	**0.0121**	**7.1000e-004**	**0.0128**	**0.0000**	**69.6418**	**69.6418**	**2.1700e-003**	**7.7300e-003**	**71.9983**

3.3 Grading - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.4542	0.0000	0.4542	0.1794	0.0000	0.1794	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1574	1.4841	1.3067	3.0400e-003		0.0678	0.0678		0.0624	0.0624	0.0000	267.0211	267.0211	0.0864	0.0000	269.1801
Total	**0.1574**	**1.4841**	**1.3067**	**3.0400e-003**	**0.4542**	**0.0678**	**0.5219**	**0.1794**	**0.0624**	**0.2417**	**0.0000**	**267.0211**	**267.0211**	**0.0864**	**0.0000**	**269.1801**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.2100e-003	0.0448	0.0165	2.1000e-004	7.4200e-003	2.5000e-004	7.6700e-003	2.1400e-003	2.4000e-004	2.3800e-003	0.0000	20.2529	20.2529	7.0000e-004	2.9400e-003	21.1471
Worker	2.6700e-003	1.8800e-003	0.0278	9.0000e-005	0.0108	6.0000e-005	0.0108	2.8600e-003	5.0000e-005	2.9100e-003	0.0000	7.8904	7.8904	1.8000e-004	1.9000e-004	7.9509
Total	**3.8800e-003**	**0.0467**	**0.0443**	**3.0000e-004**	**0.0182**	**3.1000e-004**	**0.0185**	**5.0000e-003**	**2.9000e-004**	**5.2900e-003**	**0.0000**	**28.1433**	**28.1433**	**8.8000e-004**	**3.1300e-003**	**29.0981**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.4542	0.0000	0.4542	0.1794	0.0000	0.1794	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1574	1.4841	1.3067	3.0400e-003		0.0678	0.0678		0.0624	0.0624	0.0000	267.0208	267.0208	0.0864	0.0000	269.1798
Total	**0.1574**	**1.4841**	**1.3067**	**3.0400e-003**	**0.4542**	**0.0678**	**0.5219**	**0.1794**	**0.0624**	**0.2417**	**0.0000**	**267.0208**	**267.0208**	**0.0864**	**0.0000**	**269.1798**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.2100e-003	0.0448	0.0165	2.1000e-004	7.4200e-003	2.5000e-004	7.6700e-003	2.1400e-003	2.4000e-004	2.3800e-003	0.0000	20.2529	20.2529	7.0000e-004	2.9400e-003	21.1471
Worker	2.6700e-003	1.8800e-003	0.0278	9.0000e-005	0.0108	6.0000e-005	0.0108	2.8600e-003	5.0000e-005	2.9100e-003	0.0000	7.8904	7.8904	1.8000e-004	1.9000e-004	7.9509
Total	**3.8800e-003**	**0.0467**	**0.0443**	**3.0000e-004**	**0.0182**	**3.1000e-004**	**0.0185**	**5.0000e-003**	**2.9000e-004**	**5.2900e-003**	**0.0000**	**28.1433**	**28.1433**	**8.8000e-004**	**3.1300e-003**	**29.0981**

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1420	1.2973	1.5601	2.6000e-003		0.0592	0.0592		0.0557	0.0557	0.0000	223.7344	223.7344	0.0529	0.0000	225.0571
Total	**0.1420**	**1.2973**	**1.5601**	**2.6000e-003**		**0.0592**	**0.0592**		**0.0557**	**0.0557**	**0.0000**	**223.7344**	**223.7344**	**0.0529**	**0.0000**	**225.0571**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.2600e-003	0.3361	0.1253	1.5800e-003	0.0554	1.8600e-003	0.0572	0.0160	1.7800e-003	0.0178	0.0000	154.0394	154.0394	5.2400e-003	0.0224	160.8308
Worker	0.0874	0.0642	0.9124	2.7300e-003	0.3293	1.8000e-003	0.3311	0.0875	1.6600e-003	0.0891	0.0000	250.1487	250.1487	6.0000e-003	6.1700e-003	252.1373
Total	**0.0967**	**0.4003**	**1.0376**	**4.3100e-003**	**0.3847**	**3.6600e-003**	**0.3883**	**0.1034**	**3.4400e-003**	**0.1069**	**0.0000**	**404.1881**	**404.1881**	**0.0112**	**0.0285**	**412.9680**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1420	1.2973	1.5601	2.6000e-003		0.0592	0.0592		0.0557	0.0557	0.0000	223.7341	223.7341	0.0529	0.0000	225.0568
Total	**0.1420**	**1.2973**	**1.5601**	**2.6000e-003**		**0.0592**	**0.0592**		**0.0557**	**0.0557**	**0.0000**	**223.7341**	**223.7341**	**0.0529**	**0.0000**	**225.0568**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.2600e-003	0.3361	0.1253	1.5800e-003	0.0554	1.8600e-003	0.0572	0.0160	1.7800e-003	0.0178	0.0000	154.0394	154.0394	5.2400e-003	0.0224	160.8308
Worker	0.0874	0.0642	0.9124	2.7300e-003	0.3293	1.8000e-003	0.3311	0.0875	1.6600e-003	0.0891	0.0000	250.1487	250.1487	6.0000e-003	6.1700e-003	252.1373
Total	**0.0967**	**0.4003**	**1.0376**	**4.3100e-003**	**0.3847**	**3.6600e-003**	**0.3883**	**0.1034**	**3.4400e-003**	**0.1069**	**0.0000**	**404.1881**	**404.1881**	**0.0112**	**0.0285**	**412.9680**

3.4 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0643	0.5861	0.7560	1.2700e-003		0.0248	0.0248		0.0233	0.0233	0.0000	109.0021	109.0021	0.0256	0.0000	109.6427
Total	**0.0643**	**0.5861**	**0.7560**	**1.2700e-003**		**0.0248**	**0.0248**		**0.0233**	**0.0233**	**0.0000**	**109.0021**	**109.0021**	**0.0256**	**0.0000**	**109.6427**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.4100e-003	0.1629	0.0601	7.5000e-004	0.0270	9.1000e-004	0.0279	7.7800e-003	8.7000e-004	8.6500e-003	0.0000	73.6578	73.6578	2.5600e-003	0.0107	76.9101
Worker	0.0399	0.0281	0.4142	1.2800e-003	0.1604	8.4000e-004	0.1612	0.0426	7.7000e-004	0.0434	0.0000	117.6877	117.6877	2.6400e-003	2.8100e-003	118.5908
Total	**0.0443**	**0.1910**	**0.4743**	**2.0300e-003**	**0.1873**	**1.7500e-003**	**0.1891**	**0.0504**	**1.6400e-003**	**0.0520**	**0.0000**	**191.3455**	**191.3455**	**5.2000e-003**	**0.0135**	**195.5009**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0643	0.5861	0.7560	1.2700e-003		0.0248	0.0248		0.0233	0.0233	0.0000	109.0020	109.0020	0.0256	0.0000	109.6426
Total	**0.0643**	**0.5861**	**0.7560**	**1.2700e-003**		**0.0248**	**0.0248**		**0.0233**	**0.0233**	**0.0000**	**109.0020**	**109.0020**	**0.0256**	**0.0000**	**109.6426**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.4100e-003	0.1629	0.0601	7.5000e-004	0.0270	9.1000e-004	0.0279	7.7800e-003	8.7000e-004	8.6500e-003	0.0000	73.6578	73.6578	2.5600e-003	0.0107	76.9101
Worker	0.0399	0.0281	0.4142	1.2800e-003	0.1604	8.4000e-004	0.1612	0.0426	7.7000e-004	0.0434	0.0000	117.6877	117.6877	2.6400e-003	2.8100e-003	118.5908
Total	**0.0443**	**0.1910**	**0.4743**	**2.0300e-003**	**0.1873**	**1.7500e-003**	**0.1891**	**0.0504**	**1.6400e-003**	**0.0520**	**0.0000**	**191.3455**	**191.3455**	**5.2000e-003**	**0.0135**	**195.5009**

3.5 Architectural Coating - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	3.4269					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.5000e-003	0.0235	0.0371	6.0000e-005		1.0600e-003	1.0600e-003		1.0600e-003	1.0600e-003	0.0000	5.2342	5.2342	2.9000e-004	0.0000	5.2413
Total	**3.4304**	**0.0235**	**0.0371**	**6.0000e-005**		**1.0600e-003**	**1.0600e-003**		**1.0600e-003**	**1.0600e-003**	**0.0000**	**5.2342**	**5.2342**	**2.9000e-004**	**0.0000**	**5.2413**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2025

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.4700e-003	2.4500e-003	0.0361	1.1000e-004	0.0140	7.0000e-005	0.0140	3.7100e-003	7.0000e-005	3.7800e-003	0.0000	10.2499	10.2499	2.3000e-004	2.4000e-004	10.3285
Total	**3.4700e-003**	**2.4500e-003**	**0.0361**	**1.1000e-004**	**0.0140**	**7.0000e-005**	**0.0140**	**3.7100e-003**	**7.0000e-005**	**3.7800e-003**	**0.0000**	**10.2499**	**10.2499**	**2.3000e-004**	**2.4000e-004**	**10.3285**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	3.4269					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.5000e-003	0.0235	0.0371	6.0000e-005		1.0600e-003	1.0600e-003		1.0600e-003	1.0600e-003	0.0000	5.2342	5.2342	2.9000e-004	0.0000	5.2413
Total	**3.4304**	**0.0235**	**0.0371**	**6.0000e-005**		**1.0600e-003**	**1.0600e-003**		**1.0600e-003**	**1.0600e-003**	**0.0000**	**5.2342**	**5.2342**	**2.9000e-004**	**0.0000**	**5.2413**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2025

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.4700e-003	2.4500e-003	0.0361	1.1000e-004	0.0140	7.0000e-005	0.0140	3.7100e-003	7.0000e-005	3.7800e-003	0.0000	10.2499	10.2499	2.3000e-004	2.4000e-004	10.3285
Total	**3.4700e-003**	**2.4500e-003**	**0.0361**	**1.1000e-004**	**0.0140**	**7.0000e-005**	**0.0140**	**3.7100e-003**	**7.0000e-005**	**3.7800e-003**	**0.0000**	**10.2499**	**10.2499**	**2.3000e-004**	**2.4000e-004**	**10.3285**

3.6 Paving - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0137	0.1287	0.2187	3.4000e-004		6.2800e-003	6.2800e-003		5.7800e-003	5.7800e-003	0.0000	30.0289	30.0289	9.7100e-003	0.0000	30.2717
Paving	0.0257					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0394**	**0.1287**	**0.2187**	**3.4000e-004**		**6.2800e-003**	**6.2800e-003**		**5.7800e-003**	**5.7800e-003**	**0.0000**	**30.0289**	**30.0289**	**9.7100e-003**	**0.0000**	**30.2717**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.1000e-004	4.3000e-004	6.3800e-003	2.0000e-005	2.4700e-003	1.0000e-005	2.4800e-003	6.6000e-004	1.0000e-005	6.7000e-004	0.0000	1.8116	1.8116	4.0000e-005	4.0000e-005	1.8255
Total	**6.1000e-004**	**4.3000e-004**	**6.3800e-003**	**2.0000e-005**	**2.4700e-003**	**1.0000e-005**	**2.4800e-003**	**6.6000e-004**	**1.0000e-005**	**6.7000e-004**	**0.0000**	**1.8116**	**1.8116**	**4.0000e-005**	**4.0000e-005**	**1.8255**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0137	0.1287	0.2187	3.4000e-004		6.2800e-003	6.2800e-003		5.7800e-003	5.7800e-003	0.0000	30.0289	30.0289	9.7100e-003	0.0000	30.2717
Paving	0.0257					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0394**	**0.1287**	**0.2187**	**3.4000e-004**		**6.2800e-003**	**6.2800e-003**		**5.7800e-003**	**5.7800e-003**	**0.0000**	**30.0289**	**30.0289**	**9.7100e-003**	**0.0000**	**30.2717**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.1000e-004	4.3000e-004	6.3800e-003	2.0000e-005	2.4700e-003	1.0000e-005	2.4800e-003	6.6000e-004	1.0000e-005	6.7000e-004	0.0000	1.8116	1.8116	4.0000e-005	4.0000e-005	1.8255
Total	**6.1000e-004**	**4.3000e-004**	**6.3800e-003**	**2.0000e-005**	**2.4700e-003**	**1.0000e-005**	**2.4800e-003**	**6.6000e-004**	**1.0000e-005**	**6.7000e-004**	**0.0000**	**1.8116**	**1.8116**	**4.0000e-005**	**4.0000e-005**	**1.8255**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

15097 - N Indian Canyon & 19th Ave Detailed Report - South Coast AQMD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.6209	0.7709	6.7501	0.0160	1.8247	0.0114	1.8361	0.4870	0.0106	0.4976	0.0000	1,477.8845	1,477.8845	0.0903	0.0629	1,498.8857
Unmitigated	0.6209	0.7709	6.7501	0.0160	1.8247	0.0114	1.8361	0.4870	0.0106	0.4976	0.0000	1,477.8845	1,477.8845	0.0903	0.0629	1,498.8857

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	1,293.99	736.78	709.44	4,846,636	4,846,636
User Defined Industrial	0.00	0.00	0.00		
Total	1,293.99	736.78	709.44	4,846,636	4,846,636

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
Parking Lot	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
Unrefrigerated Warehouse-No Rail	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
User Defined Industrial	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	304.2035	304.2035	0.0257	3.1100e-003	305.7728
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	304.2035	304.2035	0.0257	3.1100e-003	305.7728
NaturalGas Mitigated	8.0100e-003	0.0729	0.0612	4.4000e-004		5.5400e-003	5.5400e-003		5.5400e-003	5.5400e-003	0.0000	79.3047	79.3047	1.5200e-003	1.4500e-003	79.7760
NaturalGas Unmitigated	8.0100e-003	0.0729	0.0612	4.4000e-004		5.5400e-003	5.5400e-003		5.5400e-003	5.5400e-003	0.0000	79.3047	79.3047	1.5200e-003	1.4500e-003	79.7760

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.48611e+006	8.0100e-003	0.0729	0.0612	4.4000e-004		5.5400e-003	5.5400e-003		5.5400e-003	5.5400e-003	0.0000	79.3047	79.3047	1.5200e-003	1.4500e-003	79.7760
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**8.0100e-003**	**0.0729**	**0.0612**	**4.4000e-004**		**5.5400e-003**	**5.5400e-003**		**5.5400e-003**	**5.5400e-003**	**0.0000**	**79.3047**	**79.3047**	**1.5200e-003**	**1.4500e-003**	**79.7760**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.48611e+006	8.0100e-003	0.0729	0.0612	4.4000e-004		5.5400e-003	5.5400e-003		5.5400e-003	5.5400e-003	0.0000	79.3047	79.3047	1.5200e-003	1.4500e-003	79.7760
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**8.0100e-003**	**0.0729**	**0.0612**	**4.4000e-004**		**5.5400e-003**	**5.5400e-003**		**5.5400e-003**	**5.5400e-003**	**0.0000**	**79.3047**	**79.3047**	**1.5200e-003**	**1.4500e-003**	**79.7760**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.71532e+006	304.2035	0.0257	3.1100e-003	305.7728
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**304.2035**	**0.0257**	**3.1100e-003**	**305.7728**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.71532e+006	304.2035	0.0257	3.1100e-003	305.7728
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**304.2035**	**0.0257**	**3.1100e-003**	**305.7728**

6.0 Area Detail

6.1 Mitigation Measures Area

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	3.0170	2.6000e-004	0.0290	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004	0.0000	0.0565	0.0565	1.5000e-004	0.0000	0.0602
Unmitigated	3.0170	2.6000e-004	0.0290	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004	0.0000	0.0565	0.0565	1.5000e-004	0.0000	0.0602

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.3427					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.6717					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.6700e-003	2.6000e-004	0.0290	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004	0.0000	0.0565	0.0565	1.5000e-004	0.0000	0.0602
Total	**3.0170**	**2.6000e-004**	**0.0290**	**0.0000**		**1.0000e-004**	**1.0000e-004**		**1.0000e-004**	**1.0000e-004**	**0.0000**	**0.0565**	**0.0565**	**1.5000e-004**	**0.0000**	**0.0602**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.3427					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.6717					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.6700e-003	2.6000e-004	0.0290	0.0000		1.0000e-004	1.0000e-004		1.0000e-004	1.0000e-004	0.0000	0.0565	0.0565	1.5000e-004	0.0000	0.0602
Total	**3.0170**	**2.6000e-004**	**0.0290**	**0.0000**		**1.0000e-004**	**1.0000e-004**		**1.0000e-004**	**1.0000e-004**	**0.0000**	**0.0565**	**0.0565**	**1.5000e-004**	**0.0000**	**0.0602**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	448.8473	5.6019	0.1355	629.2804
Unmitigated	448.8473	5.6019	0.1355	629.2804

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	170.894 / 0	448.8473	5.6019	0.1355	629.2804
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**448.8473**	**5.6019**	**0.1355**	**629.2804**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	170.894 / 0	448.8473	5.6019	0.1355	629.2804
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**448.8473**	**5.6019**	**0.1355**	**629.2804**

8.0 Waste Detail

8.1 Mitigation Measures Waste

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	141.0097	8.3334	0.0000	349.3456
Unmitigated	141.0097	8.3334	0.0000	349.3456

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	694.66	141.0097	8.3334	0.0000	349.3456
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**141.0097**	**8.3334**	**0.0000**	**349.3456**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	694.66	141.0097	8.3334	0.0000	349.3456
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**141.0097**	**8.3334**	**0.0000**	**349.3456**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Equipment Type	Number

11.0 Vegetation

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

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1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	739.00	1000sqft	17.00	739,360.00	0
User Defined Industrial	739.00	User Defined Unit	0.00	0.00	0
Other Asphalt Surfaces	12.50	Acre	12.50	0.00	0
Parking Lot	787.00	Space	7.08	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	10			**Operational Year**	2026
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with DEIR's model.

Land Use - Consistent with DEIR's model.

Construction Phase - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Grading - Consistent with DEIR's model.

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Architectural Coating - See comment on: "Unsubstantiated Changes to Construction and Operational Architectural Coating Emission Factors".

Area Coating - See comment on: "Unsubstantiated Changes to Construction and Operational Architectural Coating Emission Factors".

Energy Use - See comment on: "Unsubstantiated Changes to Energy Use Values".

Fleet Mix - See comment on: "Unsubstantiated Changes to Operational Fleet Mix Values".

Trips and VMT - Consistent with DEIR's model.

Vehicle Trips - Consistent with DEIR's model.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	30.00	20.00
tblConstructionPhase	NumDays	75.00	335.00
tblConstructionPhase	NumDays	740.00	287.00
tblConstructionPhase	NumDays	55.00	41.00
tblConstructionPhase	NumDays	55.00	30.00
tblGrading	AcresOfGrading	1,340.00	300.00
tblGrading	AcresOfGrading	30.00	40.00
tblLandUse	LandUseSquareFeet	739,000.00	739,360.00
tblLandUse	LandUseSquareFeet	544,500.00	0.00
tblLandUse	LandUseSquareFeet	314,800.00	0.00
tblLandUse	LotAcreage	16.97	17.00
tblOffRoadEquipment	HorsePower	212.00	97.00
tblOffRoadEquipment	LoadFactor	0.43	0.37
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	24.00
tblTripsAndVMT	VendorTripNumber	121.00	91.00
tblTripsAndVMT	WorkerTripNumber	18.00	10.00
tblTripsAndVMT	WorkerTripNumber	62.00	62.10
tblVehicleTrips	ST_TR	1.74	1.00
tblVehicleTrips	SU_TR	1.74	0.96
tblVehicleTrips	WD_TR	1.74	1.75

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2024	6.1621	53.3328	56.7244	0.1411	20.3375	2.2846	21.5687	10.2004	2.1153	11.3332	0.0000	13,966.5381	13,966.5381	2.6955	0.3918	14,150.6803
2025	175.8026	57.3602	73.1514	0.1725	12.2698	2.4286	14.6983	4.8345	2.2502	7.0847	0.0000	17,019.8853	17,019.8853	3.4288	0.3969	17,223.8929
Maximum	**175.8026**	**57.3602**	**73.1514**	**0.1725**	**20.3375**	**2.4286**	**21.5687**	**10.2004**	**2.2502**	**11.3332**	**0.0000**	**17,019.8853**	**17,019.8853**	**3.4288**	**0.3969**	**17,223.8929**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2024	6.1621	53.3328	56.7244	0.1411	20.3375	2.2846	21.5687	10.2004	2.1153	11.3332	0.0000	13,966.5381	13,966.5381	2.6955	0.3918	14,150.6803
2025	175.8026	57.3602	73.1514	0.1725	12.2698	2.4286	14.6983	4.8345	2.2502	7.0847	0.0000	17,019.8853	17,019.8853	3.4288	0.3969	17,223.8929
Maximum	**175.8026**	**57.3602**	**73.1514**	**0.1725**	**20.3375**	**2.4286**	**21.5687**	**10.2004**	**2.2502**	**11.3332**	**0.0000**	**17,019.8853**	**17,019.8853**	**3.4288**	**0.3969**	**17,223.8929**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Energy	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
Mobile	4.0779	4.4510	43.6167	0.1042	11.6857	0.0715	11.7572	3.1141	0.0665	3.1807		10,622.8177	10,622.8177	0.6150	0.4175	10,762.6190
Total	**20.6602**	**4.8522**	**44.1840**	**0.1066**	**11.6857**	**0.1027**	**11.7884**	**3.1141**	**0.0977**	**3.2118**		**11,102.3214**	**11,102.3214**	**0.6254**	**0.4263**	**11,245.0015**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Energy	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
Mobile	4.0779	4.4510	43.6167	0.1042	11.6857	0.0715	11.7572	3.1141	0.0665	3.1807		10,622.8177	10,622.8177	0.6150	0.4175	10,762.6190
Total	**20.6602**	**4.8522**	**44.1840**	**0.1066**	**11.6857**	**0.1027**	**11.7884**	**3.1141**	**0.0977**	**3.2118**		**11,102.3214**	**11,102.3214**	**0.6254**	**0.4263**	**11,245.0015**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/8/2024	2/2/2024	5	20	
2	Grading	Grading	2/5/2024	5/17/2025	5	335	
3	Building Construction	Building Construction	4/5/2024	5/12/2025	5	287	
4	Architectural Coating	Architectural Coating	2/27/2025	4/24/2025	5	41	
5	Paving	Paving	3/3/2025	4/11/2025	5	30	

Acres of Grading (Site Preparation Phase): 40

Acres of Grading (Grading Phase): 300

Acres of Paving: 19.58

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 1,109,040; Non-Residential Outdoor: 369,680; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Crawler Tractors	2	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Grading	Scrapers	2	8.00	367	0.48
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	10.00	6.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	24.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	311.00	91.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	62.10	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					20.1873	0.0000	20.1873	10.1597	0.0000	10.1597			0.0000			0.0000
Off-Road	2.6609	27.1760	18.3356	0.0381		1.2294	1.2294		1.1310	1.1310		3,688.0100	3,688.0100	1.1928		3,717.8294
Total	**2.6609**	**27.1760**	**18.3356**	**0.0381**	**20.1873**	**1.2294**	**21.4166**	**10.1597**	**1.1310**	**11.2907**		**3,688.0100**	**3,688.0100**	**1.1928**		**3,717.8294**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.4800e-003	0.2188	0.0843	1.0800e-003	0.0384	1.2700e-003	0.0397	0.0111	1.2200e-003	0.0123		115.9265	115.9265	3.9500e-003	0.0168	121.0339
Worker	0.0298	0.0191	0.3267	9.5000e-004	0.1118	6.0000e-004	0.1124	0.0296	5.5000e-004	0.0302		96.0663	96.0663	2.1700e-003	2.1000e-003	96.7477
Total	**0.0363**	**0.2379**	**0.4110**	**2.0300e-003**	**0.1502**	**1.8700e-003**	**0.1521**	**0.0407**	**1.7700e-003**	**0.0425**		**211.9928**	**211.9928**	**6.1200e-003**	**0.0189**	**217.7817**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					20.1873	0.0000	20.1873	10.1597	0.0000	10.1597			0.0000			0.0000
Off-Road	2.6609	27.1760	18.3356	0.0381		1.2294	1.2294		1.1310	1.1310	0.0000	3,688.0100	3,688.0100	1.1928		3,717.8294
Total	**2.6609**	**27.1760**	**18.3356**	**0.0381**	**20.1873**	**1.2294**	**21.4166**	**10.1597**	**1.1310**	**11.2907**	**0.0000**	**3,688.0100**	**3,688.0100**	**1.1928**		**3,717.8294**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.4800e-003	0.2188	0.0843	1.0800e-003	0.0384	1.2700e-003	0.0397	0.0111	1.2200e-003	0.0123		115.9265	115.9265	3.9500e-003	0.0168	121.0339
Worker	0.0298	0.0191	0.3267	9.5000e-004	0.1118	6.0000e-004	0.1124	0.0296	5.5000e-004	0.0302		96.0663	96.0663	2.1700e-003	2.1000e-003	96.7477
Total	**0.0363**	**0.2379**	**0.4110**	**2.0300e-003**	**0.1502**	**1.8700e-003**	**0.1521**	**0.0407**	**1.7700e-003**	**0.0425**		**211.9928**	**211.9928**	**6.1200e-003**	**0.0189**	**217.7817**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.5801	35.0621	28.1278	0.0621		1.6270	1.6270		1.4969	1.4969		6,009.1193	6,009.1193	1.9435		6,057.7061
Total	**3.5801**	**35.0621**	**28.1278**	**0.0621**	**6.9718**	**1.6270**	**8.5988**	**3.4128**	**1.4969**	**4.9096**		**6,009.1193**	**6,009.1193**	**1.9435**		**6,057.7061**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0259	0.8752	0.3374	4.3000e-003	0.1537	5.0900e-003	0.1588	0.0443	4.8600e-003	0.0491		463.7060	463.7060	0.0158	0.0672	484.1357
Worker	0.0596	0.0383	0.6534	1.9000e-003	0.2236	1.2000e-003	0.2248	0.0593	1.1100e-003	0.0604		192.1326	192.1326	4.3500e-003	4.2100e-003	193.4955
Total	**0.0855**	**0.9134**	**0.9907**	**6.2000e-003**	**0.3772**	**6.2900e-003**	**0.3835**	**0.1035**	**5.9700e-003**	**0.1095**		**655.8387**	**655.8387**	**0.0202**	**0.0714**	**677.6311**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.5801	35.0621	28.1278	0.0621		1.6270	1.6270		1.4969	1.4969	0.0000	6,009.1193	6,009.1193	1.9435		6,057.7061
Total	**3.5801**	**35.0621**	**28.1278**	**0.0621**	**6.9718**	**1.6270**	**8.5988**	**3.4128**	**1.4969**	**4.9096**	**0.0000**	**6,009.1193**	**6,009.1193**	**1.9435**		**6,057.7061**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0259	0.8752	0.3374	4.3000e-003	0.1537	5.0900e-003	0.1588	0.0443	4.8600e-003	0.0491		463.7060	463.7060	0.0158	0.0672	484.1357
Worker	0.0596	0.0383	0.6534	1.9000e-003	0.2236	1.2000e-003	0.2248	0.0593	1.1100e-003	0.0604		192.1326	192.1326	4.3500e-003	4.2100e-003	193.4955
Total	**0.0855**	**0.9134**	**0.9907**	**6.2000e-003**	**0.3772**	**6.2900e-003**	**0.3835**	**0.1035**	**5.9700e-003**	**0.1095**		**655.8387**	**655.8387**	**0.0202**	**0.0714**	**677.6311**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.2118	30.2876	26.6678	0.0620		1.3832	1.3832		1.2725	1.2725		6,006.9465	6,006.9465	1.9428		6,055.5157
Total	**3.2118**	**30.2876**	**26.6678**	**0.0620**	**6.9718**	**1.3832**	**8.3550**	**3.4128**	**1.2725**	**4.6853**		**6,006.9465**	**6,006.9465**	**1.9428**		**6,055.5157**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0253	0.8710	0.3323	4.2200e-003	0.1537	5.1000e-003	0.1588	0.0442	4.8800e-003	0.0491		455.2542	455.2542	0.0159	0.0661	475.3425
Worker	0.0558	0.0344	0.6087	1.8400e-003	0.2236	1.1400e-003	0.2247	0.0593	1.0500e-003	0.0603		185.5842	185.5842	3.9200e-003	3.9400e-003	186.8550
Total	**0.0811**	**0.9054**	**0.9409**	**6.0600e-003**	**0.3772**	**6.2400e-003**	**0.3835**	**0.1035**	**5.9300e-003**	**0.1095**		**640.8384**	**640.8384**	**0.0198**	**0.0700**	**662.1975**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.2118	30.2876	26.6678	0.0620		1.3832	1.3832		1.2725	1.2725	0.0000	6,006.9465	6,006.9465	1.9428		6,055.5157
Total	**3.2118**	**30.2876**	**26.6678**	**0.0620**	**6.9718**	**1.3832**	**8.3550**	**3.4128**	**1.2725**	**4.6853**	**0.0000**	**6,006.9465**	**6,006.9465**	**1.9428**		**6,055.5157**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0253	0.8710	0.3323	4.2200e-003	0.1537	5.1000e-003	0.1588	0.0442	4.8800e-003	0.0491		455.2542	455.2542	0.0159	0.0661	475.3425
Worker	0.0558	0.0344	0.6087	1.8400e-003	0.2236	1.1400e-003	0.2247	0.0593	1.0500e-003	0.0603		185.5842	185.5842	3.9200e-003	3.9400e-003	186.8550
Total	**0.0811**	**0.9054**	**0.9409**	**6.0600e-003**	**0.3772**	**6.2400e-003**	**0.3835**	**0.1035**	**5.9300e-003**	**0.1095**		**640.8384**	**640.8384**	**0.0198**	**0.0700**	**662.1975**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769		2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**		**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0983	3.3183	1.2791	0.0163	0.5827	0.0193	0.6020	0.1678	0.0184	0.1862		1,758.2186	1,758.2186	0.0600	0.2549	1,835.6811
Worker	0.9267	0.5952	10.1600	0.0296	3.4763	0.0187	3.4949	0.9219	0.0172	0.9391		2,987.6626	2,987.6626	0.0676	0.0654	3,008.8544
Total	**1.0250**	**3.9136**	**11.4391**	**0.0459**	**4.0589**	**0.0380**	**4.0969**	**1.0897**	**0.0356**	**1.1253**		**4,745.8812**	**4,745.8812**	**0.1275**	**0.3204**	**4,844.5354**

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3.4 Building Construction - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769	0.0000	2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**	**0.0000**	**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0983	3.3183	1.2791	0.0163	0.5827	0.0193	0.6020	0.1678	0.0184	0.1862		1,758.2186	1,758.2186	0.0600	0.2549	1,835.6811
Worker	0.9267	0.5952	10.1600	0.0296	3.4763	0.0187	3.4949	0.9219	0.0172	0.9391		2,987.6626	2,987.6626	0.0676	0.0654	3,008.8544
Total	**1.0250**	**3.9136**	**11.4391**	**0.0459**	**4.0589**	**0.0380**	**4.0969**	**1.0897**	**0.0356**	**1.1253**		**4,745.8812**	**4,745.8812**	**0.1275**	**0.3204**	**4,844.5354**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3674	12.4697	16.0847	0.0270		0.5276	0.5276		0.4963	0.4963		2,556.4744	2,556.4744	0.6010		2,571.4981
Total	**1.3674**	**12.4697**	**16.0847**	**0.0270**		**0.5276**	**0.5276**		**0.4963**	**0.4963**		**2,556.4744**	**2,556.4744**	**0.6010**		**2,571.4981**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0961	3.3026	1.2599	0.0160	0.5827	0.0193	0.6020	0.1678	0.0185	0.1863		1,726.1722	1,726.1722	0.0602	0.2506	1,802.3404
Worker	0.8676	0.5351	9.4647	0.0286	3.4763	0.0178	3.4940	0.9219	0.0164	0.9383		2,885.8337	2,885.8337	0.0610	0.0612	2,905.5955
Total	**0.9637**	**3.8377**	**10.7245**	**0.0446**	**4.0589**	**0.0371**	**4.0961**	**1.0897**	**0.0349**	**1.1245**		**4,612.0059**	**4,612.0059**	**0.1211**	**0.3118**	**4,707.9358**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3674	12.4697	16.0847	0.0270		0.5276	0.5276		0.4963	0.4963	0.0000	2,556.4744	2,556.4744	0.6010		2,571.4981
Total	**1.3674**	**12.4697**	**16.0847**	**0.0270**		**0.5276**	**0.5276**		**0.4963**	**0.4963**	**0.0000**	**2,556.4744**	**2,556.4744**	**0.6010**		**2,571.4981**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0961	3.3026	1.2599	0.0160	0.5827	0.0193	0.6020	0.1678	0.0185	0.1863		1,726.1722	1,726.1722	0.0602	0.2506	1,802.3404
Worker	0.8676	0.5351	9.4647	0.0286	3.4763	0.0178	3.4940	0.9219	0.0164	0.9383		2,885.8337	2,885.8337	0.0610	0.0612	2,905.5955
Total	**0.9637**	**3.8377**	**10.7245**	**0.0446**	**4.0589**	**0.0371**	**4.0961**	**1.0897**	**0.0349**	**1.1245**		**4,612.0059**	**4,612.0059**	**0.1211**	**0.3118**	**4,707.9358**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	167.1675					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515		281.4481	281.4481	0.0154		281.8319
Total	**167.3384**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**		**281.4481**	**281.4481**	**0.0154**		**281.8319**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1733	0.1068	1.8899	5.7000e-003	0.6941	3.5500e-003	0.6977	0.1841	3.2700e-003	0.1874		576.2388	576.2388	0.0122	0.0122	580.1848
Total	**0.1733**	**0.1068**	**1.8899**	**5.7000e-003**	**0.6941**	**3.5500e-003**	**0.6977**	**0.1841**	**3.2700e-003**	**0.1874**		**576.2388**	**576.2388**	**0.0122**	**0.0122**	**580.1848**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	167.1675					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515	0.0000	281.4481	281.4481	0.0154		281.8319
Total	**167.3384**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**	**0.0000**	**281.4481**	**281.4481**	**0.0154**		**281.8319**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1733	0.1068	1.8899	5.7000e-003	0.6941	3.5500e-003	0.6977	0.1841	3.2700e-003	0.1874		576.2388	576.2388	0.0122	0.0122	580.1848
Total	**0.1733**	**0.1068**	**1.8899**	**5.7000e-003**	**0.6941**	**3.5500e-003**	**0.6977**	**0.1841**	**3.2700e-003**	**0.1874**		**576.2388**	**576.2388**	**0.0122**	**0.0122**	**580.1848**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9152	8.5816	14.5780	0.0228		0.4185	0.4185		0.3850	0.3850		2,206.7452	2,206.7452	0.7137		2,224.5878
Paving	1.7100					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**2.6251**	**8.5816**	**14.5780**	**0.0228**		**0.4185**	**0.4185**		**0.3850**	**0.3850**		**2,206.7452**	**2,206.7452**	**0.7137**		**2,224.5878**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0419	0.0258	0.4565	1.3800e-003	0.1677	8.6000e-004	0.1685	0.0445	7.9000e-004	0.0453		139.1881	139.1881	2.9400e-003	2.9500e-003	140.1413
Total	**0.0419**	**0.0258**	**0.4565**	**1.3800e-003**	**0.1677**	**8.6000e-004**	**0.1685**	**0.0445**	**7.9000e-004**	**0.0453**		**139.1881**	**139.1881**	**2.9400e-003**	**2.9500e-003**	**140.1413**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9152	8.5816	14.5780	0.0228		0.4185	0.4185		0.3850	0.3850	0.0000	2,206.7452	2,206.7452	0.7137		2,224.5878
Paving	1.7100					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**2.6251**	**8.5816**	**14.5780**	**0.0228**		**0.4185**	**0.4185**		**0.3850**	**0.3850**	**0.0000**	**2,206.7452**	**2,206.7452**	**0.7137**		**2,224.5878**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0419	0.0258	0.4565	1.3800e-003	0.1677	8.6000e-004	0.1685	0.0445	7.9000e-004	0.0453		139.1881	139.1881	2.9400e-003	2.9500e-003	140.1413
Total	**0.0419**	**0.0258**	**0.4565**	**1.3800e-003**	**0.1677**	**8.6000e-004**	**0.1685**	**0.0445**	**7.9000e-004**	**0.0453**		**139.1881**	**139.1881**	**2.9400e-003**	**2.9500e-003**	**140.1413**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	4.0779	4.4510	43.6167	0.1042	11.6857	0.0715	11.7572	3.1141	0.0665	3.1807		10,622.8177	10,622.8177	0.6150	0.4175	10,762.6190
Unmitigated	4.0779	4.4510	43.6167	0.1042	11.6857	0.0715	11.7572	3.1141	0.0665	3.1807		10,622.8177	10,622.8177	0.6150	0.4175	10,762.6190

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	1,293.99	736.78	709.44	4,846,636	4,846,636
User Defined Industrial	0.00	0.00	0.00		
Total	1,293.99	736.78	709.44	4,846,636	4,846,636

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
Parking Lot	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
Unrefrigerated Warehouse-No Rail	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
User Defined Industrial	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
NaturalGas Unmitigated	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	4071.54	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0439**	**0.3992**	**0.3353**	**2.4000e-003**		**0.0303**	**0.0303**		**0.0303**	**0.0303**		**479.0052**	**479.0052**	**9.1800e-003**	**8.7800e-003**	**481.8517**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	4.07154	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0439**	**0.3992**	**0.3353**	**2.4000e-003**		**0.0303**	**0.0303**		**0.0303**	**0.0303**		**479.0052**	**479.0052**	**9.1800e-003**	**8.7800e-003**	**481.8517**

6.0 Area Detail

6.1 Mitigation Measures Area

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Unmitigated	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.8778					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	14.6393					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0214	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Total	**16.5385**	**2.1000e-003**	**0.2319**	**2.0000e-005**		**8.2000e-004**	**8.2000e-004**		**8.2000e-004**	**8.2000e-004**		**0.4984**	**0.4984**	**1.3000e-003**		**0.5309**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.8778					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	14.6393					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0214	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Total	**16.5385**	**2.1000e-003**	**0.2319**	**2.0000e-005**		**8.2000e-004**	**8.2000e-004**		**8.2000e-004**	**8.2000e-004**		**0.4984**	**0.4984**	**1.3000e-003**		**0.5309**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

15097 - N Indian Canyon & 19th Ave Detailed Report

South Coast AQMD Air District, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	739.00	1000sqft	17.00	739,360.00	0
User Defined Industrial	739.00	User Defined Unit	0.00	0.00	0
Other Asphalt Surfaces	12.50	Acre	12.50	0.00	0
Parking Lot	787.00	Space	7.08	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	10			**Operational Year**	2026
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with DEIR's model.

Land Use - Consistent with DEIR's model.

Construction Phase - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Grading - Consistent with DEIR's model.

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Architectural Coating - See comment on: "Unsubstantiated Changes to Construction and Operational Architectural Coating Emission Factors".

Area Coating - See comment on: "Unsubstantiated Changes to Construction and Operational Architectural Coating Emission Factors".

Energy Use - See comment on: "Unsubstantiated Changes to Energy Use Values".

Fleet Mix - See comment on: "Unsubstantiated Changes to Operational Fleet Mix Values".

Trips and VMT - Consistent with DEIR's model.

Vehicle Trips - Consistent with DEIR's model.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	30.00	20.00
tblConstructionPhase	NumDays	75.00	335.00
tblConstructionPhase	NumDays	740.00	287.00
tblConstructionPhase	NumDays	55.00	41.00
tblConstructionPhase	NumDays	55.00	30.00
tblGrading	AcresOfGrading	1,340.00	300.00
tblGrading	AcresOfGrading	30.00	40.00
tblLandUse	LandUseSquareFeet	739,000.00	739,360.00
tblLandUse	LandUseSquareFeet	544,500.00	0.00
tblLandUse	LandUseSquareFeet	314,800.00	0.00
tblLandUse	LotAcreage	16.97	17.00
tblOffRoadEquipment	HorsePower	212.00	97.00
tblOffRoadEquipment	LoadFactor	0.43	0.37
tblTripsAndVMT	VendorTripNumber	0.00	6.00
tblTripsAndVMT	VendorTripNumber	0.00	24.00
tblTripsAndVMT	VendorTripNumber	121.00	91.00
tblTripsAndVMT	WorkerTripNumber	18.00	10.00
tblTripsAndVMT	WorkerTripNumber	62.00	62.10
tblVehicleTrips	ST_TR	1.74	1.00
tblVehicleTrips	SU_TR	1.74	0.96
tblVehicleTrips	WD_TR	1.74	1.75

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2024	6.2145	53.5999	55.7536	0.1393	20.3375	2.2847	21.5687	10.2004	2.1155	11.3332	0.0000	13,786.2164	13,786.2164	2.6962	0.3969	13,971.8817
2025	175.8676	57.6327	72.0356	0.1703	12.2698	2.4287	14.6984	4.8345	2.2503	7.0848	0.0000	16,804.6410	16,804.6410	3.4298	0.4026	17,010.3549
Maximum	**175.8676**	**57.6327**	**72.0356**	**0.1703**	**20.3375**	**2.4287**	**21.5687**	**10.2004**	**2.2503**	**11.3332**	**0.0000**	**16,804.6410**	**16,804.6410**	**3.4298**	**0.4026**	**17,010.3549**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2024	6.2145	53.5999	55.7536	0.1393	20.3375	2.2847	21.5687	10.2004	2.1155	11.3332	0.0000	13,786.2164	13,786.2164	2.6962	0.3969	13,971.8817
2025	175.8676	57.6327	72.0356	0.1703	12.2698	2.4287	14.6984	4.8345	2.2503	7.0848	0.0000	16,804.6410	16,804.6410	3.4298	0.4026	17,010.3549
Maximum	**175.8676**	**57.6327**	**72.0356**	**0.1703**	**20.3375**	**2.4287**	**21.5687**	**10.2004**	**2.2503**	**11.3332**	**0.0000**	**16,804.6410**	**16,804.6410**	**3.4298**	**0.4026**	**17,010.3549**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Energy	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
Mobile	3.9509	4.7805	41.9229	0.0993	11.6857	0.0715	11.7573	3.1141	0.0666	3.1807		10,133.4779	10,133.4779	0.6282	0.4330	10,278.2132
Total	**20.5332**	**5.1818**	**42.4901**	**0.1018**	**11.6857**	**0.1027**	**11.7884**	**3.1141**	**0.0977**	**3.2119**		**10,612.9815**	**10,612.9815**	**0.6386**	**0.4418**	**10,760.5958**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Energy	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
Mobile	3.9509	4.7805	41.9229	0.0993	11.6857	0.0715	11.7573	3.1141	0.0666	3.1807		10,133.4779	10,133.4779	0.6282	0.4330	10,278.2132
Total	**20.5332**	**5.1818**	**42.4901**	**0.1018**	**11.6857**	**0.1027**	**11.7884**	**3.1141**	**0.0977**	**3.2119**		**10,612.9815**	**10,612.9815**	**0.6386**	**0.4418**	**10,760.5958**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/8/2024	2/2/2024	5	20	
2	Grading	Grading	2/5/2024	5/17/2025	5	335	
3	Building Construction	Building Construction	4/5/2024	5/12/2025	5	287	
4	Architectural Coating	Architectural Coating	2/27/2025	4/24/2025	5	41	
5	Paving	Paving	3/3/2025	4/11/2025	5	30	

Acres of Grading (Site Preparation Phase): 40

Acres of Grading (Grading Phase): 300

Acres of Paving: 19.58

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 1,109,040; Non-Residential Outdoor: 369,680; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Crawler Tractors	2	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Grading	Scrapers	2	8.00	367	0.48
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	10.00	6.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	24.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	311.00	91.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	62.10	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					20.1873	0.0000	20.1873	10.1597	0.0000	10.1597			0.0000			0.0000
Off-Road	2.6609	27.1760	18.3356	0.0381		1.2294	1.2294		1.1310	1.1310		3,688.0100	3,688.0100	1.1928		3,717.8294
Total	**2.6609**	**27.1760**	**18.3356**	**0.0381**	**20.1873**	**1.2294**	**21.4166**	**10.1597**	**1.1310**	**11.2907**		**3,688.0100**	**3,688.0100**	**1.1928**		**3,717.8294**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.1900e-003	0.2297	0.0871	1.0800e-003	0.0384	1.2800e-003	0.0397	0.0111	1.2200e-003	0.0123		116.1396	116.1396	3.9300e-003	0.0169	121.2598
Worker	0.0316	0.0209	0.2958	9.0000e-004	0.1118	6.0000e-004	0.1124	0.0296	5.5000e-004	0.0302		90.4952	90.4952	2.2100e-003	2.2300e-003	91.2152
Total	**0.0377**	**0.2506**	**0.3829**	**1.9800e-003**	**0.1502**	**1.8800e-003**	**0.1521**	**0.0407**	**1.7700e-003**	**0.0425**		**206.6347**	**206.6347**	**6.1400e-003**	**0.0191**	**212.4749**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					20.1873	0.0000	20.1873	10.1597	0.0000	10.1597			0.0000			0.0000
Off-Road	2.6609	27.1760	18.3356	0.0381		1.2294	1.2294		1.1310	1.1310	0.0000	3,688.0100	3,688.0100	1.1928		3,717.8294
Total	**2.6609**	**27.1760**	**18.3356**	**0.0381**	**20.1873**	**1.2294**	**21.4166**	**10.1597**	**1.1310**	**11.2907**	**0.0000**	**3,688.0100**	**3,688.0100**	**1.1928**		**3,717.8294**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.1900e-003	0.2297	0.0871	1.0800e-003	0.0384	1.2800e-003	0.0397	0.0111	1.2200e-003	0.0123		116.1396	116.1396	3.9300e-003	0.0169	121.2598
Worker	0.0316	0.0209	0.2958	9.0000e-004	0.1118	6.0000e-004	0.1124	0.0296	5.5000e-004	0.0302		90.4952	90.4952	2.2100e-003	2.2300e-003	91.2152
Total	**0.0377**	**0.2506**	**0.3829**	**1.9800e-003**	**0.1502**	**1.8800e-003**	**0.1521**	**0.0407**	**1.7700e-003**	**0.0425**		**206.6347**	**206.6347**	**6.1400e-003**	**0.0191**	**212.4749**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.5801	35.0621	28.1278	0.0621		1.6270	1.6270		1.4969	1.4969		6,009.1193	6,009.1193	1.9435		6,057.7061
Total	**3.5801**	**35.0621**	**28.1278**	**0.0621**	**6.9718**	**1.6270**	**8.5988**	**3.4128**	**1.4969**	**4.9096**		**6,009.1193**	**6,009.1193**	**1.9435**		**6,057.7061**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0248	0.9186	0.3483	4.3100e-003	0.1537	5.1100e-003	0.1588	0.0443	4.8900e-003	0.0491		464.5582	464.5582	0.0157	0.0674	485.0390
Worker	0.0631	0.0419	0.5916	1.7900e-003	0.2236	1.2000e-003	0.2248	0.0593	1.1100e-003	0.0604		180.9903	180.9903	4.4100e-003	4.4600e-003	182.4304
Total	**0.0879**	**0.9604**	**0.9398**	**6.1000e-003**	**0.3772**	**6.3100e-003**	**0.3835**	**0.1035**	**6.0000e-003**	**0.1095**		**645.5485**	**645.5485**	**0.0202**	**0.0719**	**667.4694**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.5801	35.0621	28.1278	0.0621		1.6270	1.6270		1.4969	1.4969	0.0000	6,009.1193	6,009.1193	1.9435		6,057.7061
Total	**3.5801**	**35.0621**	**28.1278**	**0.0621**	**6.9718**	**1.6270**	**8.5988**	**3.4128**	**1.4969**	**4.9096**	**0.0000**	**6,009.1193**	**6,009.1193**	**1.9435**		**6,057.7061**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0248	0.9186	0.3483	4.3100e-003	0.1537	5.1100e-003	0.1588	0.0443	4.8900e-003	0.0491		464.5582	464.5582	0.0157	0.0674	485.0390
Worker	0.0631	0.0419	0.5916	1.7900e-003	0.2236	1.2000e-003	0.2248	0.0593	1.1100e-003	0.0604		180.9903	180.9903	4.4100e-003	4.4600e-003	182.4304
Total	**0.0879**	**0.9604**	**0.9398**	**6.1000e-003**	**0.3772**	**6.3100e-003**	**0.3835**	**0.1035**	**6.0000e-003**	**0.1095**		**645.5485**	**645.5485**	**0.0202**	**0.0719**	**667.4694**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.2118	30.2876	26.6678	0.0620		1.3832	1.3832		1.2725	1.2725		6,006.9465	6,006.9465	1.9428		6,055.5157
Total	**3.2118**	**30.2876**	**26.6678**	**0.0620**	**6.9718**	**1.3832**	**8.3550**	**3.4128**	**1.2725**	**4.6853**		**6,006.9465**	**6,006.9465**	**1.9428**		**6,055.5157**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0242	0.9143	0.3431	4.2300e-003	0.1537	5.1300e-003	0.1588	0.0442	4.9000e-003	0.0492		456.1035	456.1035	0.0158	0.0663	476.2416
Worker	0.0593	0.0376	0.5515	1.7300e-003	0.2236	1.1400e-003	0.2247	0.0593	1.0500e-003	0.0603		174.8361	174.8361	3.9900e-003	4.1700e-003	176.1789
Total	**0.0834**	**0.9519**	**0.8945**	**5.9600e-003**	**0.3772**	**6.2700e-003**	**0.3835**	**0.1035**	**5.9500e-003**	**0.1095**		**630.9396**	**630.9396**	**0.0198**	**0.0704**	**652.4205**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					6.9718	0.0000	6.9718	3.4128	0.0000	3.4128			0.0000			0.0000
Off-Road	3.2118	30.2876	26.6678	0.0620		1.3832	1.3832		1.2725	1.2725	0.0000	6,006.9465	6,006.9465	1.9428		6,055.5157
Total	**3.2118**	**30.2876**	**26.6678**	**0.0620**	**6.9718**	**1.3832**	**8.3550**	**3.4128**	**1.2725**	**4.6853**	**0.0000**	**6,006.9465**	**6,006.9465**	**1.9428**		**6,055.5157**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0242	0.9143	0.3431	4.2300e-003	0.1537	5.1300e-003	0.1588	0.0442	4.9000e-003	0.0492		456.1035	456.1035	0.0158	0.0663	476.2416
Worker	0.0593	0.0376	0.5515	1.7300e-003	0.2236	1.1400e-003	0.2247	0.0593	1.0500e-003	0.0603		174.8361	174.8361	3.9900e-003	4.1700e-003	176.1789
Total	**0.0834**	**0.9519**	**0.8945**	**5.9600e-003**	**0.3772**	**6.2700e-003**	**0.3835**	**0.1035**	**5.9500e-003**	**0.1095**		**630.9396**	**630.9396**	**0.0198**	**0.0704**	**652.4205**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769		2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**		**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0938	3.4830	1.3205	0.0163	0.5827	0.0194	0.6021	0.1678	0.0185	0.1863		1,761.4498	1,761.4498	0.0597	0.2556	1,839.1062
Worker	0.9812	0.6507	9.1986	0.0278	3.4763	0.0187	3.4949	0.9219	0.0172	0.9391		2,814.3998	2,814.3998	0.0686	0.0694	2,836.7923
Total	**1.0750**	**4.1337**	**10.5191**	**0.0442**	**4.0589**	**0.0381**	**4.0970**	**1.0897**	**0.0357**	**1.1254**		**4,575.8496**	**4,575.8496**	**0.1283**	**0.3250**	**4,675.8985**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4716	13.4438	16.1668	0.0270		0.6133	0.6133		0.5769	0.5769	0.0000	2,555.6989	2,555.6989	0.6044		2,570.8077
Total	**1.4716**	**13.4438**	**16.1668**	**0.0270**		**0.6133**	**0.6133**		**0.5769**	**0.5769**	**0.0000**	**2,555.6989**	**2,555.6989**	**0.6044**		**2,570.8077**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0938	3.4830	1.3205	0.0163	0.5827	0.0194	0.6021	0.1678	0.0185	0.1863		1,761.4498	1,761.4498	0.0597	0.2556	1,839.1062
Worker	0.9812	0.6507	9.1986	0.0278	3.4763	0.0187	3.4949	0.9219	0.0172	0.9391		2,814.3998	2,814.3998	0.0686	0.0694	2,836.7923
Total	**1.0750**	**4.1337**	**10.5191**	**0.0442**	**4.0589**	**0.0381**	**4.0970**	**1.0897**	**0.0357**	**1.1254**		**4,575.8496**	**4,575.8496**	**0.1283**	**0.3250**	**4,675.8985**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3674	12.4697	16.0847	0.0270		0.5276	0.5276		0.4963	0.4963		2,556.4744	2,556.4744	0.6010		2,571.4981
Total	**1.3674**	**12.4697**	**16.0847**	**0.0270**		**0.5276**	**0.5276**		**0.4963**	**0.4963**		**2,556.4744**	**2,556.4744**	**0.6010**		**2,571.4981**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0916	3.4667	1.3007	0.0160	0.5827	0.0194	0.6021	0.1678	0.0186	0.1864		1,729.3923	1,729.3923	0.0599	0.2512	1,805.7495
Worker	0.9215	0.5848	8.5750	0.0269	3.4763	0.0178	3.4940	0.9219	0.0164	0.9383		2,718.7017	2,718.7017	0.0620	0.0649	2,739.5818
Total	**1.0131**	**4.0514**	**9.8757**	**0.0429**	**4.0589**	**0.0372**	**4.0961**	**1.0897**	**0.0349**	**1.1246**		**4,448.0941**	**4,448.0941**	**0.1219**	**0.3161**	**4,545.3313**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3674	12.4697	16.0847	0.0270		0.5276	0.5276		0.4963	0.4963	0.0000	2,556.4744	2,556.4744	0.6010		2,571.4981
Total	**1.3674**	**12.4697**	**16.0847**	**0.0270**		**0.5276**	**0.5276**		**0.4963**	**0.4963**	**0.0000**	**2,556.4744**	**2,556.4744**	**0.6010**		**2,571.4981**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0916	3.4667	1.3007	0.0160	0.5827	0.0194	0.6021	0.1678	0.0186	0.1864		1,729.3923	1,729.3923	0.0599	0.2512	1,805.7495
Worker	0.9215	0.5848	8.5750	0.0269	3.4763	0.0178	3.4940	0.9219	0.0164	0.9383		2,718.7017	2,718.7017	0.0620	0.0649	2,739.5818
Total	**1.0131**	**4.0514**	**9.8757**	**0.0429**	**4.0589**	**0.0372**	**4.0961**	**1.0897**	**0.0349**	**1.1246**		**4,448.0941**	**4,448.0941**	**0.1219**	**0.3161**	**4,545.3313**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	167.1675					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515		281.4481	281.4481	0.0154		281.8319
Total	**167.3384**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**		**281.4481**	**281.4481**	**0.0154**		**281.8319**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1840	0.1168	1.7122	5.3700e-003	0.6941	3.5500e-003	0.6977	0.1841	3.2700e-003	0.1874		542.8662	542.8662	0.0124	0.0130	547.0355
Total	**0.1840**	**0.1168**	**1.7122**	**5.3700e-003**	**0.6941**	**3.5500e-003**	**0.6977**	**0.1841**	**3.2700e-003**	**0.1874**		**542.8662**	**542.8662**	**0.0124**	**0.0130**	**547.0355**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	167.1675					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515	0.0000	281.4481	281.4481	0.0154		281.8319
Total	**167.3384**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**	**0.0000**	**281.4481**	**281.4481**	**0.0154**		**281.8319**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1840	0.1168	1.7122	5.3700e-003	0.6941	3.5500e-003	0.6977	0.1841	3.2700e-003	0.1874		542.8662	542.8662	0.0124	0.0130	547.0355
Total	**0.1840**	**0.1168**	**1.7122**	**5.3700e-003**	**0.6941**	**3.5500e-003**	**0.6977**	**0.1841**	**3.2700e-003**	**0.1874**		**542.8662**	**542.8662**	**0.0124**	**0.0130**	**547.0355**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9152	8.5816	14.5780	0.0228		0.4185	0.4185		0.3850	0.3850		2,206.7452	2,206.7452	0.7137		2,224.5878
Paving	1.7100					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**2.6251**	**8.5816**	**14.5780**	**0.0228**		**0.4185**	**0.4185**		**0.3850**	**0.3850**		**2,206.7452**	**2,206.7452**	**0.7137**		**2,224.5878**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0444	0.0282	0.4136	1.3000e-003	0.1677	8.6000e-004	0.1685	0.0445	7.9000e-004	0.0453		131.1271	131.1271	2.9900e-003	3.1300e-003	132.1342
Total	**0.0444**	**0.0282**	**0.4136**	**1.3000e-003**	**0.1677**	**8.6000e-004**	**0.1685**	**0.0445**	**7.9000e-004**	**0.0453**		**131.1271**	**131.1271**	**2.9900e-003**	**3.1300e-003**	**132.1342**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9152	8.5816	14.5780	0.0228		0.4185	0.4185		0.3850	0.3850	0.0000	2,206.7452	2,206.7452	0.7137		2,224.5878
Paving	1.7100					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**2.6251**	**8.5816**	**14.5780**	**0.0228**		**0.4185**	**0.4185**		**0.3850**	**0.3850**	**0.0000**	**2,206.7452**	**2,206.7452**	**0.7137**		**2,224.5878**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0444	0.0282	0.4136	1.3000e-003	0.1677	8.6000e-004	0.1685	0.0445	7.9000e-004	0.0453		131.1271	131.1271	2.9900e-003	3.1300e-003	132.1342
Total	**0.0444**	**0.0282**	**0.4136**	**1.3000e-003**	**0.1677**	**8.6000e-004**	**0.1685**	**0.0445**	**7.9000e-004**	**0.0453**		**131.1271**	**131.1271**	**2.9900e-003**	**3.1300e-003**	**132.1342**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	3.9509	4.7805	41.9229	0.0993	11.6857	0.0715	11.7573	3.1141	0.0666	3.1807		10,133.4779	10,133.4779	0.6282	0.4330	10,278.2132
Unmitigated	3.9509	4.7805	41.9229	0.0993	11.6857	0.0715	11.7573	3.1141	0.0666	3.1807		10,133.4779	10,133.4779	0.6282	0.4330	10,278.2132

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	1,293.99	736.78	709.44	4,846,636	4,846,636
User Defined Industrial	0.00	0.00	0.00		
Total	1,293.99	736.78	709.44	4,846,636	4,846,636

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
Parking Lot	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
Unrefrigerated Warehouse-No Rail	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594
User Defined Industrial	0.540893	0.062748	0.186142	0.127785	0.023768	0.006610	0.012333	0.009205	0.000817	0.000491	0.024860	0.000754	0.003594

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
NaturalGas Unmitigated	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	4071.54	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0439**	**0.3992**	**0.3353**	**2.4000e-003**		**0.0303**	**0.0303**		**0.0303**	**0.0303**		**479.0052**	**479.0052**	**9.1800e-003**	**8.7800e-003**	**481.8517**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	4.07154	0.0439	0.3992	0.3353	2.4000e-003		0.0303	0.0303		0.0303	0.0303		479.0052	479.0052	9.1800e-003	8.7800e-003	481.8517
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0439**	**0.3992**	**0.3353**	**2.4000e-003**		**0.0303**	**0.0303**		**0.0303**	**0.0303**		**479.0052**	**479.0052**	**9.1800e-003**	**8.7800e-003**	**481.8517**

6.0 Area Detail

6.1 Mitigation Measures Area

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Unmitigated	16.5385	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.8778					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	14.6393					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0214	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Total	**16.5385**	**2.1000e-003**	**0.2319**	**2.0000e-005**		**8.2000e-004**	**8.2000e-004**		**8.2000e-004**	**8.2000e-004**		**0.4984**	**0.4984**	**1.3000e-003**		**0.5309**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.8778					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	14.6393					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0214	2.1000e-003	0.2319	2.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		0.4984	0.4984	1.3000e-003		0.5309
Total	**16.5385**	**2.1000e-003**	**0.2319**	**2.0000e-005**		**8.2000e-004**	**8.2000e-004**		**8.2000e-004**	**8.2000e-004**		**0.4984**	**0.4984**	**1.3000e-003**		**0.5309**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
Industrial Stormwater Compliance
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2104, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Rosenfeld P. E., Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution.* **233,** 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

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Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

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Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

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Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

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Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

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Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

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Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division
Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation
Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois
Joseph Ruepke vs. BNSF
Case No. 2019 L 007730
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska
Steven Gillett vs. BNSF
Case No. 4:20-cv-03120
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County
James Eadus vs. Soo Line Railroad and BNSF
Case No. DV 19-1056
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al.cvs. Cerro Flow Products, Inc.
Case No. 0i9-L-2295
Rosenfeld Deposition 5-14-2021
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a AMTRAK,
Case No. 18-L-6845
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois
Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail
Case No. 17-cv-8517
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case No. CV20127-094749
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al vs. CNA Insurance Company et al.
Case No. 1:17-cv-000508
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.
Case No. 1716-CV10006
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintifs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the County Court of Dallas County Texas
Lisa Parr et al, Plaintiff, vs. Aruba et al, Defendant.
Case No. cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.
Civil Action No. 2:09-cv-232-WHA-TFM
Rosenfeld Deposition July 2010, June 2011

In the Circuit Court of Jefferson County Alabama
Jaeanette Moss Anthony, et al., Plaintiffs, vs. Drummond Company Inc., et al., Defendants
Civil Action No. CV 2008-2076
Rosenfeld Deposition September 2010

In the United States District Court, Western District Lafayette Division
Ackle et al., Plaintiffs, vs. Citgo Petroleum Corporation, et al., Defendants.
Case No. 2:07CV1052
Rosenfeld Deposition July 2009

Chapter 3.0 Revisions to the DEIR

3.1 Purpose

The following provides changes to the Draft EIR being made as a result of the Response to Comments (Chapter 2.0) of this Final EIR. Typographical errors and other editorial modifications are also provided below. Please note that deletions are indicated in strikethrough and additions are underlined text.

Location & Page	***Revision***
Section 4.2, *Air Quality,* page 4.2-26	**Table 4.2-4, *Summary of Peak Operational Emissions,*** in **Section 4.2, *Air Quality***, of the DEIR was updated in response to a comment from SCAQMD in Comment Letter No. 3 (see Response 3-g). **Table 4.2-4** has been updated to indicate the following:

Table 4.2-4 Summary of Peak Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer (Smog Season)						
Mobile Source	6.97	35.10	134.00	0.54	~~14.30~~33.60	~~3.24~~9.08
Area Source	22.20	0.27	32.20	< 0.005	~~0.04~~0.06	~~0.06~~0.04
Energy Source	0.21	3.79	3.18	0.02	~~0.29~~0.00	~~0.29~~0.00
On-Site Equipment Source	0.35	1.13	49.33	0.00	0.09	0.08
Total Maximum Daily Emissions	**29.73**	**40.29**	**218.71**	**0.56**	**~~14.72~~33.75**	**~~3.67~~9.20**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Mobile Source	5.99	38.00	85.00	0.51	~~14.30~~29.1	~~3.24~~7.88
Area Source	16.90	0.00	0.00	0.00	~~0.00~~0.03	~~0.00~~0.02
Energy Source	0.21	3.79	3.18	0.02	~~0.29~~0.00	~~0.29~~0.00
On-Site Equipment Source	0.35	1.13	49.33	0.00	0.09	0.08
Total Maximum Daily Emissions	**23.45**	**42.92**	**137.51**	**0.53**	**~~14.68~~29.22**	**~~3.61~~7.98**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Section 4.9, *Hydrology and Water Quality*, Page 4.9-4

Revisions to page 4.9-4 of **Section 4.9, *Hydrology and Water Quality,*** is indicated by the text below. This revision is in response to Comment Letter No. 10 from the Mission Springs Water District (MSWD) (Comment 10-c).

"Groundwater Resources

California's Groundwater Update 2020 (Bulletin 118), completed in November of 2021 by the California Department of Water Resources, is the State's most current compendium of Statewide data and information on groundwater resources and management. According to the Department's Basin Boundaries Data Viewer, the project site is underlain by the Garnet Hill Subarea of the Indio Subbasin (Basin No. 7-021.01), which is a subarea generally confined by the Banning Fault to the north and Garnet Hill Fault to the south. The mapped northern limit of the Garnet Hill Subarea and Indio Subbasin is located approximately 800 feet north of the project boundary, beyond which is the Mission Creek Subbasin.

Water service to the project site is provided by Mission Springs Water District (MSWD), which relies on well sites and groundwater resources from the Mission Creek Subbasin and the Indio Subbasin (including the Garnet Hill Subarea). The project site is located within the Planning Area of the Mission Creek Subbasin Alternative Update, completed in November of 2021 in compliance with the Sustainable Groundwater Management Act (SGMA)."

Section 4.9, *Hydrology and Water Quality*, Page 4.9-4

Revisions to page 4.9-4 and -5 of **Section 4.9, *Hydrology and Water Quality,*** is indicated by the text below. This revision is in response to Comment Letter No. 10 from the Mission Springs Water District (MSWD) (Comment 10-c). The text has been revised to state:

"Water service to the project site is provided by Mission Springs Water District (MSWD), which relies on well sites and groundwater resources from the Mission Creek Subbasin and the Indio Subbasin (including the Garnet Hill Subarea). The project site is located within the Planning Area of the Mission Creek Subbasin Alternative Update, completed in November of 2021 in compliance with the Sustainable Groundwater Management Act (SGMA)."

Section 4.9, *Hydrology and Water Quality*, Page 4.9-20

Revisions to page 4.9-20 of **Section 4.9, *Hydrology and Water Quality,*** is indicated by the text below. This revision is in response to Comment Letter No. 10 from the Mission Springs Water District (MSWD) (Comment 10-d). The text has been revised to state:

"Project implementation is not expected to conflict with the Mission Creek Subbasin Alternative Update ~~Indio Subbasin Sustainable Groundwater Management Plan~~ from the aspect of on-site stormwater capture, retention, and source controls for groundwater quality."

3.2 No Significant New Information Requiring Recirculation

CEQA and the CEQA Guidelines provide that when "significant new information" is added to an EIR after the expiration of the public comment period but before certification, the lead agency must recirculate the EIR for additional public comment. However, recirculation is required only when the information added to the EIR changes the EIR in a way that deprives the public of a meaningful opportunity to comment on either a substantial adverse environmental impact of the project or a feasible project alternative or mitigation measure that would clearly reduce the impact and that is not going to be implemented. Section 15088.5 (e) of the CEQA Guidelines provides that a decision not to recirculate is appropriate if it is supported by substantial evidence in the administrative record.

Under CEQA and the CEQA Guidelines, the following constitutes substantial evidence: (a) facts; (b) reasonable assumptions predicated on facts; and (c) expert opinions supported by facts. Basically, a lead agency's determination whether information in the record constitutes "substantial evidence" boils down to a determination not only that the information is relevant and material but also that it is sufficiently reliable to have solid evidentiary value. Under CEQA, to determine the reliability of the evidence, a lead agency may consider several factors, such as, but not limited to:

- Whether the evidence has an adequate foundation in the witness's personal knowledge of facts;
- Whether the evidence is provided by a qualified source, such as when an opinion is provided by a witness who is qualified to render an opinion on the subject; and
- Whether the evidence is just simply credible.

Upon reviewing all of the written comments submitted during the 45-day public review period, responses were provided based on the multitude of studies and analyses prepared and/or conducted by various experts (consultants) in preparation of the Draft EIR, the Final EIR, and the project's Mitigation Monitoring and Reporting Program.

The consultants who prepared the studies utilized in the Draft EIR, performed the necessary analyses and/or otherwise participated in reviewing the proposed project's potential effects under CEQA and the CEQA Guidelines included, the Director of Environmental Services, a Senior Environmental Planner/GIS Analyst, a Planner, an Environmental Planner, and a Principal Engineer of MSA Consulting, Inc.; Biologists with James W. Cornett Ecological Consultants; a Senior Principal Investigator and Project Director with Statistical Research, Inc.; a Senior Associate Geologist and Senior Principal Engineer with Petra Geosciences; and an Associate Principal, Principal Engineer, Senior Associate, and AICP Principal with Urban Crossroads, Inc. The City staff who also coordinated efforts with the various consultants included the City's AICP Associate Planner and Principal City Planner.

Through the coordinated efforts of all who participated in studying, researching and analyzing the proposed project and its potential effects in the environment, the Draft EIR, and Final EIR was organized to address the following environmental topics:

4.1 Aesthetics	4.9 Hydrology and Water Quality
4.2 Air Quality	4.10 Noise
4.3 Biological Resources	4.11 Population and Housing
4.4 Cultural Resources	4.12 Public Services
4.5 Energy Resources	4.13 Transportation
4.6 Geology and Soils	4.14 Tribal Cultural Resources
4.7 Greenhouse Gas Emissions	4.15 Utilities
4.8 Hazards and Hazardous Materials	

The City relied on the collective expertise of each of the above consultants and staff as reflected in the analyses of each of the aforementioned environmental topics to prepare its responses to each of the comments received at the close of the public review period. It was determined that none of the comments and none of the responses to the comments generated any "significant new information" that needed to be added to the EIR, such as but not limited to identifying or disclosing an unbeknownst substantial adverse environmental impact of the project, an unbeknownst feasible project alternative or unbeknownst mitigation measure that would clearly reduce a significant impact and/or one that was not going to be implemented.

In light of the foregoing, it was determined that there is substantial evidence in the administrative record to support the City's decision to not recirculate the EIR for further public comment.

Chapter 4.0 Mitigation Monitoring and Reporting Program

4.1 Introduction

If mitigation measures are required or incorporated into a project as part of the CEQA process, the lead agency must adopt a Mitigation Monitoring and Reporting Program (MMRP) to ensure compliance with the project's mitigation measures. CEQA and the CEQA Guidelines further provide that the MMRP must be adopted at the time of project approval. While the MMRP does not have to be included in the EIR, for the sake of maximizing public transparency, a copy of the proposed project's MMRP has been included below.

4.2 Monitoring Authority

The City may delegate duties and responsibilities for monitoring any given mitigation measure to designated environmental monitors or consultants as deemed necessary. The City may also delegate such duties and responsibilities to certain responsible agencies, affected jurisdictions, enforcement and regulatory agencies of the state or county, special districts and other agencies. The same duties and responsibilities may also be delegated to qualified private entities which accept the delegation. The City's Development Services (or equivalent positions of other designated agencies or entities) must ensure that the officials delegated the duties or responsibilities to monitor any given set of mitigation measures are qualified to assume such duties and responsibilities.

Any deviation from the procedures identified under the MMRP shall require prior approval or authorization by the City. Moreover, any deviations from any of the established monitoring procedures set forth in the MMRP and any remedial actions taken to correct such deviations shall be reported immediately to the City by the assigned environmental monitor or consultant.

The City shall remain responsible for monitoring the implementation of all of the project's mitigation measures in accordance with the project's MMRP.

4.3 Mitigation Monitoring Table

Table 4-1, *Palm Springs Fulfillment Center Mitigation Monitoring and Reporting Program*, below identifies for each mitigation measure: (1) the potential impact on the environment that the mitigation measure is focused on; (2) a description of the mitigation measure; (3) who or which entity is responsible for monitoring the mitigation measure; (4) the timing for implementing the measure; and (5) the anticipated level of significance after mitigation.

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Table 4-1
Palm Springs Fulfillment Center Mitigation Monitoring and Reporting Program

Potential Impacts on the Environment	Mitigation Measure	Responsible for Monitoring	Timing	Level of Significance after Mitigation
4.3 Biological Resources				
a. Candidate, sensitive or special status species (SI) b. Riparian habitat (NI) c. Federally protected wetlands (NI) d. Movement of wildlife (SI) e. Conflict with local policies (NI) f. Conflict with applicable habitat conservation plan (SI)	**BIO-1** Per the 2012, California Department of Fish and Wildlife (CDFW) Staff Report on Burrowing Owl Mitigation, a burrowing owl clearance survey shall be performed by a qualified biologist 14 to 30 days prior to any site disturbance (grubbing, grading, and construction). The pre-construction survey is required to use accepted protocol (CDFW Staff Report). A final clearance survey must be conducted 24 hours prior to ground disturbance. If owls are found to be present during the breeding season (February 15 through September 15), a qualified biologist will prepare a plan and submit it to CDFW for review and approval prior to establishing a buffer area (a no disturbance zone) around the active burrow. When it is determined that all young owls have permanently left the burrow (fledged), the buffer area may be abandoned, and the adult owls captured and relocated, if approved under the plan. If the presence of any burrowing owl is confirmed in preconstruction surveys, regardless of season, a qualified biologist shall prepare a plan for avoidance or relocation and submit it to the CDFW for review and approval. No construction activity shall be permitted until the measures contained in the approved plan have been completed. **BIO-2** For any grading or other site disturbance or tree or vegetation removal occurring during the nesting season between February 1st and August 31st, a qualified biologist shall conduct at least one nesting bird survey, and more if deemed necessary by the	Qualified Biologist City Planning Department Project Applicant/ Developer	Prior to ground disturbing activities	Less than Significant

	consulting biologist, 24 hours prior to initiation of project-related ground disturbing activities. If nesting birds are present, no work shall be permitted near the nest until the young birds have fledged. While there is no established protocol for nest avoidance, when consulted, the CDFW generally recommends avoidance buffers of about 500 feet for birds-of-prey, and 100 – 300 feet for songbirds. **BIO-3** The project applicant will pay the Local Development Mitigation Fee (LDMF). The payment of this fee will mitigate impact to species on the project site that are covered under the CVMSHCP to a less than significant level.			
4.4 Cultural Resources				
a. Adverse change to Historical Resources (LTS) b. Adverse change to Archaeological Resources (SI) c. Disturb any human remains, including those interred outside of formal cemeteries (LTS)	**CUL-1** Prior to ground disturbance (including clearing, grubbing, etc.) the applicant/developer will retain a qualified archaeological monitor and an ACBCI Tribal monitor to be present during all ground disturbing activities. If cultural materials are discovered during grading or excavation, the construction contractor shall cease all earthmoving activity within and around the immediate discovery area until a qualified archaeologist can assess the nature and significance of the find. An archaeological monitoring plan will be developed and implemented to ensure that any unanticipated discoveries made during project-related ground-disturbing activities are properly treated. The archaeologist, in consultation with ACBCI, shall be consulted to reduce or terminate monitoring when it is indicated by field conditions and as appropriate.	Qualified Archaeologist City Planning Department Project Applicant/ Developer	Prior to ground disturbance	Less than Significant
4.6 Geology and Soils				
a. Expose people or structures to potential substantial adverse effects involving: i. Rupture (NI) ii. Strong Seismic Shaking (SI)	**GEO-1** The project shall comply with all the grading and excavation codes of the County of Riverside and shall be in compliance with all applicable provisions of the 2022 California Building Code (2022 CBC). The project shall also be in accordance with the	Qualified Soils Engineer City Planning, Engineering	During ground disturbing activities	Less than Significant

iii. Seismic-related ground failure, including liquefaction (SI) iv. Landslides (LTS) b. Substantial Soil Erosion or loss of topsoil (SI) c. Located on an Unstable Geologic Unit (SI) d. Located on Expansive Soil (SI) e. Inadequate soils to support septic tanks (NI)	project-specific Geotechnical Investigation for the submittal of grading and building plans. **GEO-2** Clearing operations shall include the removal of any trash, debris, vegetation, and similar deleterious materials including the root balls of any trees. Voids created by the removal shall be backfilled as well as the removal and replacement of surficial artificial and compressible soil materials with engineered fill. Any buried deleterious materials encountered within the site due to past site usage may need to be removed by hand (e.g., root pickers) during grading operations. **GEO-3** Any existing undocumented fill and near surface native soils are considered unsuitable for support of proposed structures and shall be removed to underlying competent alluvial materials as approved by the project geotechnical consultant. The estimated depth of removal is recommended to be approximately 6 feet below the existing ground surface in proposed building areas. Consideration shall be given to locally deepening the excavation at the location of tree roots or proposed subterranean features (if any) in order to provide a uniform depth of compacted fill in all areas. Soil removals could be locally deeper depending upon the actual exposed conditions encountered during grading. At a minimum, the over-excavation shall extend a distance beyond the perimeter of the structure equal to the depth of the over-excavation. The actual depths and horizontal limits of removals and over-excavations shall be evaluated upon availability of the site grading plan and during grading on the basis of observations and testing performed by the project geotechnical consultant. Excavated soils, if free of deleterious materials, are considered acceptable for use as compacted fill.	& Public Works Department Project Applicant/ Developer		

	GEO-4 Prior to placing engineered fill, the exposed bottom surfaces in the removal areas shall be approved by a representative of project geotechnical consultant. The exposed bottom(s) shall be scarified to a minimum depth of 12 inches, moisture-conditioned or air-dried to achieve approximately two percent above optimum moisture content and then compacted with a heavy construction equipment prior to placement of fill. Minimum compaction of the upper 12 inches of the removal bottom shall meet or exceed 90 percent relative compaction. The laboratory maximum dry density, the standard for determining relative compaction, and optimum moisture content for each change in soil type shall be determined in accordance with Test Method ASTM D 1557. **GEO-5** If remedial grading is necessary immediately adjacent to the property boundaries, a geotechnical consultant must prepare a plan addressing issues including as follows: temporary backcut slopes shall generally be restricted to a slope ratio of 1:1 (h:v) or flatter to protect adjacent offsite improvements (including pavement, sidewalks, walls, buried utilities, etc.). Depending on the actual horizontal extent of necessary remedial grading, a wedge of unsuitable soil may remain in place along the site perimeter that will extend into the site. Any new perimeter site improvements that are anticipated to be within this zone may need to be designed and constructed with deepened and/or strengthened foundation systems designed to withstand relative movement that is likely to result from settlement of these likely compressible surficial soils. Alternately, the remedial grading adjacent to the site boundaries may be accomplished by the slot-cutting method. More specific recommendations may be appropriate once the rough grading plan is available for review.			

	GEO-6 All fill materials shall be placed in approximately 6- to 8-inch-thick loose lifts, watered or air-dried as necessary to achieve a minimum moisture content at least 2 percent above the optimum moisture condition, and then compacted in-place to a minimum relative compaction of 90 percent. The laboratory maximum dry density and optimum moisture content for each change in soil type shall be determined in accordance with ASTM D 1557. **GEO-7** Prior to the start of earthwork, a meeting shall be held at the site with the owner's representative, contractor, and geotechnical consultant to discuss the work schedule and geotechnical aspects of the grading. Earthwork, which in this instance will generally entail removal and re-compaction of the near surface soils, shall be accomplished under full-time observation and testing by the geotechnical consultant. A representative of the project geotechnical consultant shall be present onsite during all earthwork operations to document placement and compaction of fills, as well as to document compliance with the other recommendations presented herein. Additionally, the project geotechnical consultant shall provide observation and testing services based on scheduling determined during the pre-earthwork meeting during final clearing and grubbing operations to document compliance with the above recommendations. In addition, shall unusual or adverse soil conditions or buried structures be encountered during grading that are not described herein, these conditions shall be brought to the immediate attention of the project geotechnical consultant for corrective recommendations. **GEO-8** Footings:			

	a) Exterior continuous footings supporting one- and two-story light-weight construction shall be founded at a minimum depth of 15 inches below the lowest adjacent final grade. For concrete tilt up structures, continuous footings shall be founded at a minimum depth of 24 inches. Interior continuous footings may be founded at a minimum depth of 12 inches below the top of the adjacent finish floor slabs. b) In accordance with Table 1809.7 of 2022 CBC, all continuous footings shall have minimum widths of 12 inches for one- and two-story construction. Petra recommends all continuous footings shall be reinforced with a minimum of two No. 4 bars, one top and one bottom. c) A minimum 12-inch-wide grade beam founded at the same depth as adjacent footings shall be provided across openings such as large doors or bay windows. The grade beam shall be reinforced in a similar manner as provided above. d) Interior isolated pad footings, if required, shall be a minimum of 24 inches square and founded at a minimum depth of 12 inches below the bottoms of the adjacent floor slabs. Pad footings shall be reinforced with No. 4 bars spaced a maximum of 18 inches on centers, both ways, placed near the bottoms of the footings. e) Exterior isolated pad footings intended for support of roof overhangs such as patio covers and similar construction shall be a minimum of 24 inches square, and founded at a minimum depth of 18 inches below the lowest adjacent final grade. The pad footings shall be reinforced with No. 4 bars spaced a maximum of 18 inches on centers, both ways, placed near the bottoms of the footings. Exterior isolated pad footings may need to be connected to adjacent pad			

	and/or continuous footings via tie beams at the discretion of the project structural engineer. f) The minimum footing dimensions and reinforcement recommended herein may be modified (increased or decreased subject to the constraints of Chapter 18 of the 2022 CBC) by the structural engineer responsible for foundation design based on calculations, engineering experience, and judgment. **GEO-9** Building Floor Slabs: a) For office areas, and areas with light floor loading, concrete floor slabs shall be a minimum 4 inches thick and reinforced with a minimum No. 3 bars spaced a maximum of 18 inches on centers, both ways. For warehouse floors the slabs shall be a minimum of 5 inches thick and reinforced with a minimum No. 4 bars spaced a maximum of 18 inches on centers, both ways. All slab reinforcement shall be supported on concrete chairs or brick to ensure the desired placement near mid-depth. b) Slab dimension, reinforcement type, size and spacing need to account for internal concrete forces (e.g., thermal, shrinkage and expansion) as well as external forces (e.g., applied loads), as deemed necessary. c) Moisture sensitive concrete floor slabs and areas to receive moisture sensitive floor covering shall be underlain with a moisture vapor retarder consisting of a minimum 10-mil-thick polyethylene or polyolefin membrane that meets the minimum requirements of ASTM E96 and ASTM E1745 for vapor retarders (such as Husky Yellow Guard®, Stego® Wrap, or equivalent). All laps within the membrane shall be sealed,			

	and at least 2 inches of clean sand shall be placed over the membrane to promote uniform curing of the concrete. To reduce the potential for punctures, the membrane shall be placed on a pad surface that has been graded smooth without any sharp protrusions. If a smooth surface cannot be achieved by grading, consideration shall be given to lowering the pad finished grade an additional inch and then placing a 1-inch-thick leveling course of sand across the pad surface prior to the placement of the membrane. d) Prior to placing concrete, the subgrade soils below building and auxiliary area floor slabs shall be moisture conditioned to achieve a moisture content that is at least 1.2 times the optimum moisture content. This moisture shall penetrate to a depth of approximately 12 inches into the subgrade. e) The modulus of subgrade reaction for design of load bearing elements depends on the size of the element and soil-structure interaction. As a first level of approximation, a modulus of subgrade reaction of 125 pounds per cubic inch may be assumed for floor slab design. f) The minimum dimensions and reinforcement recommended herein for building floor slabs may be modified (increased or decreased) by the structural engineer responsible for foundation design based on calculations, engineering experience, and judgment. **GEO-10** Positive surface drainage systems consisting of a combination of sloped concrete flatwork/asphalt pavement, sheet flow gradients, swales, and surface area drains (where needed) shall be provided around the building and within any planter areas to collect and direct all surface waters to an appropriate drainage facility as determined by the project civil engineer. The ground			

	surfaces of planter and landscape areas that are located within 10 feet of building foundations shall be sloped at a minimum gradient of 5 percent away from the foundations and towards the nearest area drains. The ground surface of planter and landscape areas that are located more than 10 feet away from building foundations may be sloped at a minimum gradient of 2 percent away from the foundations and towards the nearest area drains. Concrete flatwork surfaces that are located within 10 feet of building foundations shall be inclined at a minimum gradient of one percent away from the building foundations and towards the nearest area drains. Concrete flatwork surfaces that are located more than 10 feet away from building foundations may be sloped at a minimum gradient of 1 percent towards the nearest area drains. Surface waters shall not be allowed to collect or pond against building foundations and within the level areas of the site. All drainage devices shall be properly maintained throughout the lifetime of the development. Future changes to site improvements, or planting and watering practices, shall not be allowed to cause over-saturation of site soils adjacent to the structures. **GEO-11** If imported soils are required to complete the planned grading, these soils shall consist of clean materials devoid of rock exceeding a maximum dimension of 4 inches, organics, trash, and other deleterious materials. To avoid making revisions to the foundation design, imported soils shall also be granular and exhibit a very low expansion potential (Expansion Index 0-20). Prospective import soils shall be observed at the source, tested and approved by the geotechnical consultant prior to importing the soils to the site. It is recommended that the project			

		environmental consultant shall also be notified so that they can confirm the suitability of the proposed import material from an environmental standpoint. Additional sampling and testing shall be performed during site grading for determining actual expansion potential of the supporting building pad soils.			
f. Destroy a unique paleontological resource or site or unique geologic feature (SI)	**GEO-12**	If grading plans show that project related excavations go deeper than ten (10) feet, a qualified paleontological monitor shall be retained by the site developer(s) to check for fossils. Should construction/development activities uncover paleontological resources, work will be halted in that area and moved to other parts of the project site and the monitor shall determine the significance of these resources. The paleontologist shall have authority to divert grading away from exposed fossils temporarily in order to recover the fossil specimens. If the find is determined to be significant, avoidance or other appropriate measures shall be implemented as recommended by the monitor.	Qualified Paleontological Monitor City Planning Department Project Applicant/ Developer	During earth-moving activities reaching beyond the depth of three feet	Less than Significant
	GEO-13	All fossils and associated data recovered during the paleontological monitoring shall be reposted in a public museum or other approved curation facility based upon the specific resource recovered and recommendations form the paleontological consultant.			
4.7 Greenhouse Gas Emissions					
a. GHG Emissions that may Significantly Impact the Environment (SI) b. Conflict with Applicable Plan, Policy or Regulation (SI)	**GHG-1**	The Project shall implement Screening Table Measures providing for a minimum 100 points per the County Screening Tables. The City shall verify incorporation of the identified Screening Table Measures within the Project building plans and site designs prior to the issuance of building permit(s) The City shall verify	City Planning Department Project Applicant/ Developer	Prior to the issuance of grading plans	Significant and Unavoidable

	implementation of the identified Screening Table Measures prior to the issuance of Certificate(s) of Occupancy.			
	4.13 Transportation			
a. Conflict with an applicable plan or policy addressing the circulation system (LTS) b. Inconsistent with CEQA Guidelines section 15064.3, subdivision (b) (SI) c. Increase hazards due to a geometric design feature (SI) d. Result in inadequate emergency access (SI)	**TRA-1: VMT Reduction Program** The Applicant will implement a VMT Reduction Program during operations which includes the following measures: • Implement a ridesharing program and provide preferential parking for rideshares. • Provide opportunities for telecommuting/ alternative work hour programs. • Construct on-site bicycle racks, lockers and shower rooms. **TRA-2: Traffic Control Plan** Prior to construction of any project related improvements, including offsite utilities and/ or issuance of a grading permit, the applicant shall prepare and submit the City of Palm Springs for review and approval detailed construction traffic management plans, including street closure information, detour plans, haul routes, and staging plans as necessary for any off-site work that would encroach on public right-of-way. The construction traffic management plans shall include the following elements, as appropriate: • Provisions for temporary traffic control during all construction activities adjacent to public right-of-way to improve traffic flow on public roadways (e.g., flag person); • Construction-related vehicles shall not park on surrounding public streets;	City Public Works and Engineering, and Planning Departments Project Applicant	Prior to construction of any project related improvements including offsite utilities and/or issuance of grading plans	Significant and Unavoidable

	• Provision of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers; • Schedule construction-related deliveries to reduce travel during peak travel periods; • Obtain the required permits for truck haul routes from the County of Riverside and the City of Desert Hot Springs prior to the issuance of any permit for the project; and • Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities. • Outline adequate measures to ensure emergency vehicle access during all aspects of the project's construction, including, but not limited to, the use of flagmen during partial closures to streets surrounding the project site to facilitate the traffic flow until construction is complete. • Include the implementation of security measures during construction in areas that are accessible to the general public to help reduce any increased demand on law enforcement services, including fencing construction areas, providing security lighting, and providing security personnel to patrol construction sites.			
4.14 Tribal Cultural Resources				
a. Cause substantial adverse change in significance of tribal cultural resource that is i. A site listed in the CRHR or Local Register, Tribal Cultural Resources	See **CUL-1**	N/A	N/A	Less than Significant

ii. A resource determined to be significant to a California Native American tribe.				