Appendix B

Air Quality and Greenhouse Gas Emissions Assessment HELIX Environmental Planning, Inc. 1180 Iron Point Road, Suite 130 Folsom, CA 95630 916.435.1205 tel 619.462.0552 fax www.helixepi.com



June 21, 2024

08951.00001.001

Mr. Vic Singh SHK Group, LLC 5276 Penning Place Fairfield, CA 94533

Subject: Raley Boulevard Truck Service and Parking Facility Air Quality and Greenhouse Gas Emissions Assessment

Dear Mr. Singh:

HELIX Environmental Planning, Inc. (HELIX) has assessed the air quality and greenhouse gas (GHG) emissions impacts associated with the construction and operation of the proposed Raley Boulevard Truck Service and Parking Facility (project) located in the City of Sacramento (City). Analysis within this report was prepared to support impact analysis pursuant to the California Environmental Quality Act (CEQA; Public Resources Code Sections 21000 et seq.), CEQA Guidelines (Title 14, Section 15000 et seq. of the California Code of Regulations). The analysis reviews the discussions of potential impacts and irreversible significant effects analyzed in the 2040 General Plan Master EIR (Master EIR) to determine their adequacy for the project (see CEQA Guidelines Section 15178(b),(c)) and identifies any potential new or additional project-specific significant environmental effects that were not analyzed in the Master EIR and any mitigation measures or alternatives that may avoid or mitigate the identified effects to a level of insignificance, if any (City 2023a).

PROJECT LOCATION

The project site is located on an approximately 6.42-acre site located at 5221 Raley Boulevard in North Sacramento in the City of Sacramento (City). The project consists of Assessor's Parcel Number (APN): 215-0250-061. See Figure 1, *Site and Vicinity Map*, and Figure 2, *Aerial Map*, attached to this letter report.

PROJECT DESCRIPTION

The project would develop a truck service facility and a truck and trailer parking facility. The project would be accessed from a driveway connecting to Raley Boulevard on the northeastern side of the project site. The project would include right-of-way improvements along the project's frontage with Raley Boulevard including widening Raley Boulevard by approximately 20 feet to accommodate a bicycle

lane, landscaping, and new sidewalk. Total paving in the right-of-way would include 129,430 square feet (SF) of asphalt and 80,920 SF of concrete.

Additional project improvements would include: an employee/visitor vehicle parking area with nine parking spaces; an 8-foot-high wrought iron fence surrounding the truck repair facility and truck parking facility; a sidewalk connecting Raley Boulevard, the employee/customer parking area and the mechanics shop building; landscaping at the project entrance and along the project perimeter; a covered trash enclosure; and three stormwater retention basins in the northwest, southwest, and southeast corners of the project site. See Figure 3, *Site Plan*, attached to this letter report.

Truck Service Facility

The truck service facility would consist of a mechanics shop building with administrative/office space and three truck service bays. The building would be located within the truck and trailer parking facility (described below) and set back approximately 152 feet from the nearest front (east) property line, 191 feet from the nearest side (north), and 269 feet from the rear (west) property line. The mechanics shop building would total approximately 6,090 sf including: three approximately 499.2 SF (19.5 feet x 25.6 feet) truck servicing bays on the first floor; approximately 2,396 SF of office area (including a reception area, storage, two restrooms, and an office) on the first floor; and approximately 691 SF of storage area and a 320 SF breakroom located on a second floor above the office area. Each truck servicing bay would have 12-foot-high roll-up doors on the east and west ends. See Figure 3. The project mechanics shop building would be all-electric and would not include any natural gas appliance or natural gas infrastructure.

Truck and Trailer Parking Facility

The truck and trailer parking facility would include 150 parking stalls, each with dimensions of 11 feet by 75 feet. The parking spaces would be placed along the north, south, west, and east sides of the project site as well as in the central portion on either side of the mechanics shop building. Truck parking spaces would be paved with asphalt. A 50-foot-wide truck drive aisle would circle the mechanics shop building providing access to the truck/trial parking stalls. See Figure 3. The project truck parking facility would not be used for storage of cargo which would require the operation of transport refrigeration units (TRUs) on the project site.

REGULATORY SETTING

Air Quality

The project site lies within the Sacramento County portion of the Sacramento Valley Air Basin (SVAB). The SVAB comprises all of Sacramento, Yolo, Yuba, Sutter, Colusa, Glenn, Butte, Tehama, and Shasta Counties, as well as parts of Solano and Placer County. The Sacramento Metropolitan Air Quality Management District (SMAQMD) is responsible for implementing emissions standards and other requirements of federal and State laws in the project area. As required by the California Clean Air Act (CCAA), SMAQMD has published various air quality planning documents to address requirements to bring the SVAB into compliance with the federal and State ambient air quality standards. The Air Quality Attainment Plans are incorporated into the State Implementation Plan (SIP), which is subsequently



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submitted to the U.S. Environmental Protection Agency (USEPA), the federal agency that administrates the Federal Clean Air Act (CAA) of 1970, as amended in 1990.

Criteria Pollutants

Criteria pollutants are defined and regulated by State and federal law as a risk to the health and welfare of the public and are categorized into primary and secondary pollutants. Primary air pollutants are those that are emitted directly from sources, including carbon monoxide (CO); reactive organic gases ([ROGs] also known as volatile organic compounds [VOCs]); ¹ nitrogen oxides (NO_x); sulfur dioxide (SO₂); coarse particulate matter (PM₁₀); fine particulate matter (PM_{2.5}); and lead. Of these primary pollutants, CO, SO₂, PM₁₀, PM_{2.5}, and lead are criteria pollutants. ROGs and NO_x are criteria pollutant precursors and go on to form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. The principal secondary criteria pollutants are ozone and nitrogen dioxide (NO₂). In addition to being primary pollutants, PM₁₀ and PM_{2.5} can be secondary pollutants formed by chemical reactions in the atmosphere.

Ambient air quality is described in terms of compliance with State and national standards, and the levels of air pollutant concentrations considered safe, to protect the public health and welfare. These standards are designed to protect people most sensitive to respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The USEPA has established national ambient air quality standards (NAAQS) for criteria pollutants. As permitted by the CAA, California has adopted the more stringent California ambient air quality standards (CAAQS) and expanded the number of regulated air pollutant constituents.

The California Air Resources Board (CARB) is required to designate areas of the state as attainment, nonattainment, or unclassified for any State standard. An "attainment" designation for an area signifies that pollutant concentrations do not violate the standard for that pollutant in that area. A "nonattainment" designation indicates that a pollutant concentration violated the standard at least once. The air quality attainment status of the SVAB, including the project site, is shown in Table 1, *Sacramento County – Attainment Status*.

Dellutent	State of California	Federal
Pollutant	Attainment Status	Attainment Status
Ozone (1-hour)	Nonattainment	No Federal Standard
Ozone (8-hour)	Nonattainment	Nonattainment
Coarse Particulate Matter (PM ₁₀)	Nonattainment	Attainment
Fine Particulate Matter (PM _{2.5})	Attainment	Nonattainment
Carbon Monoxide (CO)	Attainment	Attainment/Unclassified
Nitrogen Dioxide (NO ₂)	Attainment	Attainment/Unclassified

Table 1 SACRAMENTO COUNTY – ATTAINMENT STATUS

¹ CARB defines and uses the term ROGs while the USEPA defines and uses the term VOCs. The compounds included in the lists of ROGs and VOCs and the methods of calculation are slightly different. However, for the purposes of estimating criteria pollutant precursor emissions, the two terms are often used interchangeably.



Pollutant	State of California	Federal
Pollutant	Attainment Status	Attainment Status
Lead	Attainment	Attainment/Unclassified
Sulfur Dioxide (SO ₂)	Attainment	Attainment/Unclassified
Sulfates	Attainment	No Federal Standard
Hydrogen Sulfide	Unclassified	No Federal Standard
Visibility Reducing Particles	Unclassified	No Federal Standard

Source: CARB 2022a

Sacramento County is designated as nonattainment for the State and federal ozone standards, the State PM₁₀ standards, and the federal PM_{2.5} standards. Sacramento County is designated as attainment or unclassified for all other criteria pollutant NAAQS and CAAQS.

Ground-level ozone is not emitted directly into the environment but is generated from complex chemical reactions between the precursor pollutant ROGs (or non-methane hydrocarbons) and NO_x that occur in the presence of sunlight. Anthropogenic sources of ROG and NO_x in Sacramento County include motor vehicles, recreational boats, other transportation sources, industrial processes, and agriculture. Anthropogenic sources of PM₁₀ and PM_{2.5} in Sacramento County include road dust, diesel exhaust, fuel combustion, tire and brake wear, construction activities, agriculture, and windblown dust.

Toxic Air Contaminants

The Health and Safety Code (§39655, subd. (a).) defines a toxic air contaminant (TAC) as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the CAA (42 United States Code Section 7412[b]) is a TAC. Under State law, the California Environmental Protection Agency (CalEPA), acting through CARB, is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or that may pose a present or potential hazard to human health.

Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material. The solid material in diesel exhaust is referred to as diesel particulate matter (DPM). Almost all DPM is 10 microns or less in diameter, and 90 percent of DPM is 2.5 microns or less in diameter (CARB 2024). Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung. In 1998, CARB identified DPM as a TAC based on published evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects. DPM has a notable effect on California's population—it is estimated that about 70 percent of total known cancer risk related to air toxins in California is attributable to DPM (CARB 2024).

Sacramento Metropolitan Air Quality Management District

Air quality in Sacramento County is regulated by the SMAQMD. As a regional agency, the SMAQMD works directly with the Sacramento Area Council of Governments (SACOG), County transportation commissions, and local governments and cooperates actively with all federal and State government agencies. The SMAQMD develops rules and regulations; establishes permitting requirements for



stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary.

Air Quality Plans

The current air quality plan applicable to the project, the *Sacramento Regional 2008 NAAQS 8-Hour Ozone Attainment and Reasonable Further Progress Plan* (Regional Ozone Plan), was developed by the SMAQMD and adjacent air district to describe how the air districts in and near the Sacramento metropolitan area will continue the progress toward attaining state and national ozone air quality standards (SMAQMD 2017). In addition to not attaining the federal or state ozone standards, the region is classified as nonattainment for the federal PM_{2.5} standard and the state PM₁₀ standard. The SIP contains all plans, programs, and regulations for attainment of the PM NAAQS in Sacramento County.

Rules and Regulations

The following rules promulgated by the SMAQMD would be applicable to construction and/or operation of the project.

Rule 402 – Nuisance: Prohibits the discharge of such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public (SMAQMD 1977a).

Rule 403 – Fugitive Dust: Requires actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions, including emissions from construction activities. (SMAQMD 1977b).

Rule 442 – Architectural Coating: Establishes VOC limits for architectural coatings (e.g., paints, stains, preservatives). Building interior and exterior paint is limited to a maximum VOC content of 50 grams per liter for flat coatings and 100 grams per liter for non-flat coatings (SMAQMD 2015).

Greenhouse Gases

Global climate change refers to changes in average climatic conditions on Earth including temperature, wind patterns, precipitation, and storms. Global temperatures are moderated by atmospheric gases. These gases are commonly referred to as GHGs because they function like a greenhouse by letting sunlight in but preventing heat from escaping, thus warming the Earth's atmosphere.

GHGs are emitted by natural processes and human (anthropogenic) activities. Anthropogenic GHG emissions are primarily associated with: (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activity; and (4) solid waste decomposition.

The GHGs defined under California's Assembly Bill (AB) 32, described below, include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. Estimates of GHG emissions are commonly presented in carbon dioxide equivalents (CO₂e), which weigh each gas by its global warming potential (GWP). Expressing GHG emissions in CO₂e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only



 CO_2 were being emitted. GHG emissions quantities in this analysis are presented in metric tons (MT) of CO_2e . For consistency with United Nations Standards, modeling, and reporting of GHGs in California and the U.S. use the GWPs defined in the Intergovernmental Panel on Climate Change's (IPCC) Fourth Assessment Report (IPCC 2007): $CO_2 - 1$; $CH_4 - 25$; $N_2O - 298$.

GHG Reduction Regulations and Plans

The primary GHG reduction regulatory legislation and plans (applicable to the project) at the State, regional, and local levels are described below. Implementation of California's GHG reduction mandates are primarily under the authority of CARB at the State level, SMAQMD and SACOG at the regional level, and Sacramento County at the local level.

State GHG Regulations and Plans

Executive Order S-3-05: On June 1, 2005, Executive Order (EO) S-3-05 proclaimed that California is vulnerable to climate change impacts. It declared that increased temperatures could reduce snowpack in the Sierra Nevada, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To avoid or reduce climate change impacts, EO S-3-05 calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. Executive Orders are not laws and can only provide the governor's direction to State agencies to act within their authority to reinforce existing laws.

Assembly Bill 32 – Global Warming Solution Act of 2006: The California Global Warming Solutions Act of 2006, widely known as AB 32, requires that CARB develop and enforce regulations for the reporting and verification of Statewide GHG emissions. CARB is directed by AB 32 to set a GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG emission reductions.

Executive Order B-30-15: On April 29, 2015, EO B-30-15 established a California GHG emission reduction target of 40 percent below 1990 levels by 2030. The EO aligns California's GHG emission reduction targets with those of leading international governments, including the 28 nation European Union. California is on track to meet or exceed the target of reducing GHGs emissions to 1990 levels by 2020, as established in AB 32. California's new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the goal established by EO S-3-05 of reducing emissions 80 percent under 1990 levels by 2050.

Senate Bill 32: Signed into law by Governor Brown on September 8, 2016, Senate Bill (SB) 32 (Amendments to the California Global Warming Solutions Action of 2006) extends California's GHG reduction programs beyond 2020. SB 32 amended the Health and Safety Code to include Section 38566, which contains language to authorize CARB to achieve a Statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the State's continuing efforts to pursue the long-term target expressed in EO B-30-15 of 80 percent below 1990 emissions levels by 2050.

Assembly Bill 197: A condition of approval for SB 32 was the passage of AB 197. AB 197 requires that CARB consider the social costs of GHG emissions and prioritize direct reductions in GHG emissions at



mobile sources and large stationary sources. AB 197 also gives the California legislature more oversight over CARB through the addition of two legislatively appointed members to the CARB Board and the establishment a legislative committee to make recommendations about CARB programs to the legislature.

Assembly Bill 341: The State legislature enacted AB 341 (California Public Resource Code Section 42649.2), increasing the diversion target to 75 percent Statewide. AB 341 requires all businesses and public entities that generate 4 cubic yards or more of waste per week to have a recycling program in place. The final regulation was approved by the Office of Administrative Law on May 7, 2012, and went into effect on July 1, 2012.

Senate Bill 350: Approved by Governor Brown on October 7, 2015, SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. This will increase the use of Renewables Portfolio Standard eligible resources, including solar, wind, biomass, and geothermal. In addition, large utilities are required to develop and submit Integrated Resource Plans to detail how each entity will meet their customers resource needs, reduce GHG emissions, and increase the use of clean energy.

Senate Bill 375: SB 375, the Sustainable Communities and Climate Protection Act of 2008, supports the State's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities.

Under the Sustainable Communities Act, CARB sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established these targets for 2020 and 2035 for each region covered by one of the State's metropolitan planning organizations (MPOs). CARB periodically reviews and updates the targets, as needed.

Each of California's MPOs must prepare a Sustainable Communities Strategy (SCS) as an integral part of its regional transportation plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate alternative planning strategy (APS) to meet the targets. The APS is not a part of the RTP. Qualified projects consistent with an approved SCS or Alternative Planning Strategy categorized as "transit priority projects" would receive incentives to streamline CEQA processing.

Senate Bill 100: Approved by Governor Brown on September 10, 2018, SB 100 requires that all retail sales of electricity to California end-use customers be procured from 100 percent eligible renewable energy resources and zero-carbon resources by the end of 2045.

Executive Order N-79-20: EO N-79-20, signed by Governor Newsom on September 23, 2020, establishes three goals for the implementation of zero emissions vehicles in California: first, 100 percent of in-State sales of new passenger cars and trucks will be zero-emissions by 2035; second, 100 percent of medium-and heavy-duty vehicles in the State will be zero-emissions vehicles by 2045 for all operations where



feasible, and by 2035 for drayage trucks; and third, 100 percent of off-road vehicles and equipment will be zero emissions by 2035 where feasible.

Assembly Bill 1279: Approved by Governor Newsom on September 16, 2022, AB 1279, the California Climate Crisis Act, declares the policy of the State to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045, Statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels. AB 1279 anticipates achieving these policies through direct GHG emissions reductions, removal of CO₂ from the atmosphere (carbon capture), and an almost complete transition away from fossil fuels.

Senate Bill 905: Approved by Governor Newsom on September 16, 2022, SB 905, Carbon Sequestration: Carbon Capture, Removal, Utilization, and Storage Program, requires CARB to establish a Carbon Capture, Removal, Utilization, and Storage Program to evaluate the efficacy, safety, and viability of carbon capture, utilization, or storage technologies and CO₂ removal technologies and facilitate the capture and sequestration of CO₂ from those technologies, where appropriate. SB 905 is an integral part of achieving the State policies mandated in AB 1279.

California Air Resources Board Scoping Plan: The Scoping Plan is a strategy CARB develops and updates at least once every five years, as required by AB 32. It lays out the transformations needed across our society and economy to reduce emissions and reach our climate targets. The 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) is the third update to the original plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 mandate of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual. The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan assessed progress toward achieving the 2020 mandate and made the case for addressing short-lived climate pollutants (SLCPs). The 2017 Scoping Plan also assessed the progress toward achieving the 2020 limit and provided a technologically feasible and cost-effective path to achieving the SB 32 mandate of reducing GHGs by at least 40 percent below 1990 levels by 2030. On December 15, 2022, CARB approved the 2022 Scoping Plan. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels; further reductions in SLCPs; support for sustainable development; increased action on natural and working lands to reduce emissions and sequester carbon; and the capture and storage of carbon (CARB 2022b).

Local GHG Plans and Policies

Sacramento Area Council of Governments MTP/SCS: As required by the Sustainable Communities and Climate Protection Act of 2008 (SB 375), SACOG has developed the 2020 Metropolitan Transportation Plan and Sustainable Communities Strategy (MTP/SCS). This plan seeks to reduce GHG and other mobile source emissions through coordinated transportation and land use planning to reduce vehicle miles travels (VMT) (SACOG 2019).



City of Sacramento Climate Action and Adaptation Plan: The City adopted the Climate Action and Adaptation Plan (CAAP) on February 27, 2024. The CAAP sets new GHG emission target for the City and community and establishes strategies and actions to achieve the City's goal of carbon neutrality by 2045. the CAAP was developed to exceed the requirements of SB 32, which calls for a reduction in statewide GHG emissions 40 percent below 1990 levels by 2030. The CAAP also demonstrates the City's plan for substantial progress towards consistency with the State's goals for GHG emission reductions, as enacted by AB 1279 and the CARB's 2022 Scoping Plan which sets a path to achieve carbon neutrality by 2045. The CAAP is a qualified GHG reduction plan per CEQA Guidelines § 15183.5(b) which allows streamlined GHG impact analysis for development project in the City (City 2024).

ENVIRONMENTAL SETTING

Climate and Meteorology

The climate of the SVAB is characterized by hot dry summers and mild rainy winters. During the year the temperature may range from 20 to 115 degrees Fahrenheit with summer highs usually in the 90s and winter lows occasionally below freezing. Average annual rainfall is about 20 inches with snowfall being very rare. The prevailing winds are moderate in strength and vary from moist breezes from the south to dry land flows from the north. The mountains surrounding the Sacramento Valley create a barrier to airflow, which can trap air pollutants in the valley when certain meteorological conditions are right, and a temperature inversion (areas of warm air overlying areas of cooler air) exists. Air stagnation in the autumn and early winter occurs when large high-pressure cells lie over the valley. The lack of surface wind during these periods and the reduced vertical flow caused by less surface heating reduces the influx of outside air and allows pollutants to become concentrated in the air.

The surface concentrations of pollutants are highest when these conditions are combined with increased levels of smoke or when temperature inversions trap cool air, fog, and pollutants near the ground. The ozone season (May through October) in the SVAB is characterized by stagnant morning air or light winds with the breeze arriving in the afternoon out of the southwest from the San Francisco Bay. Usually, the evening breeze transports the airborne pollutants to the north out of the SVAB. During about half of the days from July to September, however, a phenomenon called the "Schultz Eddy" prevents this from occurring. Instead of allowing for the prevailing wind patterns to move north carrying the pollutants out of the valley, the Schultz Eddy causes the wind pattern and pollutants to circle back southward. This phenomenon's effect exacerbates the pollution levels in the area and increases the likelihood of violating the federal and State air quality standards (SMAQMD 2020a).

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved and are referred to as sensitive receptors locations. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals (sensitive receptors) as the most likely to be affected by air pollution: the elderly over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis (CARB 2005; OEHHA 2015).



Residential areas are considered sensitive receptors locations to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Children and infants are considered more susceptible to health effects of air pollution due to their immature immune systems, developing organs, and higher breathing rates. As such, schools are also considered sensitive receptor locations, as children are present for extended durations and engage in regular outdoor activities.

The closest existing sensitive receptor location to the project site is a single-family residence approximately 870 feet west of the project site. Additional single-family residences are located approximately 1,160 and 1,260 feet southwest of the project site. The closest school to the project site is the Main Avenue Elementary School approximately 2,890 feet (0.55 mile) south of the project site. There are no hospitals or daycare centers in the project vicinity.

METHODOLOGY AND ASSUMPTIONS

Criteria pollutant and precursor emissions, and GHG emissions for the project construction activities and long-term operation were calculated using the California Emissions Estimator Model (CalEEMod), Version 2022.1. CalEEMod is a Statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. The model was developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California air districts. CalEEMod allows for the use of default data (e.g., emission factors, trip lengths, meteorology, source inventory) provided by the various California air districts to account for local requirements and conditions, and/or user-defined inputs. The model calculates emissions of criteria pollutants, ozone precursors, and GHGs, including ROGs, NO_x, CO, SO_x, PM₁₀, PM_{2.5}, and CO₂e. The calculation methodology and input data used in CalEEMod can be found in the CalEEMod User's Guide Appendices C, D, and G (CAPCOA 2022). The input data and subsequent construction and operation emission estimates for the project are discussed below. The CalEEMod output files are included as Attachment A to this letter.

Construction

Project construction schedule details were unknown at the time of this analysis. Construction of the project is assumed to begin as early as October 2024 and be completed in December 2025 for a total construction duration of approximately 15 months. The project site is vacant, and no demolition would be required. All other construction activities were modeled using CalEEMod defaults except for paving which was extended from 20 to 40 days to account for the large portion of project paved areas. Project construction would include: site preparation (e.g., clearing and grubbing) – 10 workdays; grading – 20 workdays; building construction – 230 workdays; paving – 40 workdays; and architectural coating (e.g., building painting and parking lot striping) – 20 workdays. Construction was assumed to occur 5 days per week with equipment operating up to 8 hours pers day, per CalEEMod defaults. Construction equipment was modeled using CalEEMod defaults with the addition of an off-road water truck for dust suppression. Construction equipment would include dozers, backhoes, excavators, graders, cranes, forklifts, generators, welders, pavers, rollers, and air compressors. Complete details of modeled construction activities and equipment is in the CalEEMod detailed output report, included as Attachment A to this letter report.



Based on the project area and site visits, approximately 1,600 cubic yards (CY) of vegetation and debris would be hauled from the project site during site preparation, resulting in approximately 20 one-way truck trips per workday. Based on estimates from the project engineer, grading would require 6,990 CY of cut and 4,020 of fill for a net export of 2,970 CY of soil, resulting in approximately 19 one-way tuck trips per workday. Paving would require the import of aggregate, asphalt and concrete to the project site. Based on an estimate of 4.8 acres of total paved and concrete area (including off-site improvements), assuming 12 inches uncompressed aggregate/asphalt depth and 16 CY per tandem trailer load, paving would require the import of approximately 484 truckloads of material, or 24 on-way truck trips per workday. Construction worker trips were modeled using CalEEMod defaults and would vary from 2 to 20 trips per workday. Construction trip distances were modeled using CalEEMod defaults. Approximately 500 feet of each haul truck trip was assumed to occur on unpaved on-site access roads. Construction emissions modeling assumes implementation of dust mitigation (watering exposed areas twice per day and limiting vehicle speeds on unpaved roads to 25 miles per hour) to comply with the requirements of SMAQMD Rule 403, *Fugitive Dust*.

Construction architectural coatings were modeled using default CalEEMod paint VOC content for Sacramento County: 75 grams per liter for building coatings and 100 grams per liter for parking lot striping.

Operation

Operational modeling analyzes emissions from six sectors:

- Mobiles Sources (emissions from on-road vehicles) A project trip generation analysis was not • available at the time of this analysis, and there are no CalEEMod defaults for land uses similar to the project which would provide reasonable trip generation estimates. Therefore, project trip generation was estimated using the City of San Diego Land Development Code Trip Generation Manual which has trip generation rates for a truck repair service (2.5 trips per 1,000 SF of administrative office space plus 140 trips per site) and for a truck parking facility (60 trips per acre) (City of San Diego 2003). Using the trip generation rates from the City of San Diego, the project would generate 424 average daily trips (ADT), conservatively assuming there would be no internal trip capture (project truck repair service customers coming from the project truck parking facility). To estimate the mix of cars and trucks, 30 ADT were assumed to be from project employee commute trips, one half of the truck parking facility trips were assumed to be truck driver car commute trips (139 ADT) and the remaining project trips (255 ADT) were assumed to be truck trips. All project truck trips were assumed to be by heavy duty trucks (gross vehicle weight more than 33,000 pounds). A printout of the project trip generation calculation sheet is included as Attachment B to this letter report. All trips were assumed to be primary trips (no pass-by or diverted trip reductions). CalEEMod default trip distances were used.
- Area Sources Includes emissions from landscaping equipment, the use of consumer products, and the reapplication of architectural coatings for maintenance. Emissions associated with area sources were estimated using the CalEEMod default values.
- Energy Sources The use of electricity results in indirect GHG emissions at the site of power generation. Because the project would be all electric, CalEEMod default natural gas use was



converted to equivalent electrical energy (1,000 British Thermal Units equals 0.293 kilowatthours) and added to the CalEEMod default electricity use.

- Water and Wastewater Sources Water-related GHG emissions are from the conveyance and treatment of water and wastewater. Indoor water use (and wastewater generation) and outdoor water use (i.e., landscape irrigation) was modeled using CalEEMod defaults.
- Solid Waste Sources The disposal of solid waste produces GHG emissions from anaerobic decomposition in landfills, incineration, and transportation of waste. Solid waste was modeled using CalEEMod defaults.
- Refrigerants CalEEMod calculates GHG emissions associated with refrigerants (typically HFCs or blends of gases containing HFCs) which are emitted through leakage or maintenance from project refrigeration systems, freezers, and air conditioning systems. Refrigerant emissions were calculated using CalEEMod defaults.

STANDARDS OF SIGNIFICANCE

Air Quality

Thresholds used to evaluate potential air quality and odor impacts are based on applicable criteria in the State's CEQA Guidelines Appendix G. A significant air quality and/or odor impact could occur if the implementation of the proposed project would:

- 1. Conflict with or obstruct implementation of the Regional Ozone Plan, or applicable portions of the SIP;
- 2. Result in a cumulatively considerable net increase of any criteria pollutant for which Sacramento County is non-attainment under an applicable NAAQS or CAAQS;
- 3. Expose sensitive receptors to substantial pollutant concentrations; or
- 4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Appendix G of the State CEQA Guidelines states that the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the above determinations. The SMAQMD has established significance thresholds to assess the regional and localized impacts of project-related air pollutant emissions. The significance thresholds are updated, as needed, to appropriately represent the most current technical information and attainment status in Sacramento County.

Table 2, *SMAQMD Thresholds of Significance*, presents the most current significance thresholds, including regional daily thresholds for short-term construction and long-term operational emissions; maximum incremental cancer risk and hazard indices for TACs; and maximum ambient concentrations for exposure of sensitive receptors to localized pollutants. A project with daily emission rates, risk values, or concentrations below these thresholds is generally considered to have a less than significant effect on air quality (SMAQMD 2020b).



Pollutant	Construction	Operation	
Mass Daily Thresholds (pounds per day)			
ROG	None	65	
NOx	85	65	
PM10	80 ¹	80 ¹	
PM _{2.5}	82 ¹	82 ¹	
Toxic Air Contaminants			
TACa	Maximum Incremental Cancer Risk ≥ 10 in 1 million		
TACS	Chronic & Acute Hazard Index ≥ 1.0 (project increment)		
Ambient Air Quality for Criteria Pollutants			
NO-	1-hour average ≥ 0.18 ppm		
NO2	Annual average ≥ 0.03 ppm		
	1-hour average ≥ 20.0 ppm (state)		
	8-hour average ≥ 9.0 ppm (state/federal)		
SO ₂	1-hour average ≥ 0.075 ppm		
	24-hour average ≥ 0.04 ppm		
Lead	1.5 μg/m ³ 30-day average		

Table 2 SMAQMD THRESHOLDS OF SIGNIFICANCE

Source: SMAQMD 2020b

¹ PM thresholds are zero (0) unless all feasible Best Available Control Practices/Best Management Practices are applied. lbs/day = pounds per day; VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; PM₁₀ = respirable particulate matter with a diameter of 10 microns or less; PM_{2.5} = fine particulate matter with a diameter of 2.5 microns or less; SO_X = sulfur oxides; TACs = toxic air contaminants; GHG = greenhouse gas emissions; MT/yr = metric tons per year; CO₂e = carbon dioxide equivalent; NO₂ = nitrogen dioxide; ppm = parts per million; $\mu g/m^3$ = micrograms per cubic meter

Greenhouse Gas Emissions

Given the relatively small levels of emissions generated by a typical development in relationship to the total amount of GHG emissions generated on a national or global basis, individual development projects are not expected to result in significant, direct impacts with respect to climate change. However, given the magnitude of the impact of GHG emissions on the global climate, GHG emissions from new development could result in significant, cumulative impacts with respect to climate change. Therefore, the potential for a significant GHG impact is limited to cumulative impacts.

According to Appendix G of the CEQA Guidelines, a project would have a significant environmental impact if it would:

- 1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- 2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The final determination of whether or not a project has a significant effect is within the purview of the lead agency pursuant to CEQA Guidelines Section 15064(b). The City's CAAP, described above, is a qualified plan for the reduction of greenhouse gases pursuant to CEQA Guidelines Section 15183.5.



Therefore, consistency with the CAAP may be used to determine the significance of the project's GHG emissions.

AIR QUALITY IMPACT ANALYSIS

Issue 1

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

Summary of Analysis Under the 2040 General Plan Master EIR and Applicable General Plan Policies

The Master EIR analyzed whether implementation of the 2040 General Plan could conflict with or obstruct implementation of an applicable air quality plan in Impact 4.3-1. The Master EIR concluded that the growth projections used for the 2040 General Plan assume that growth in population, vehicle use, and other source categories would occur at rates that are consistent with the rates used to develop the SMAQMD's attainment plans. The 2040 General Plan would increase the City's sustainability efforts that reduce motor vehicle use and energy consumption through the implementation of various policies. The goals and policies of the 2040 General Plan would be consistent with the applicable transportation control measures (TCMs) included in the SMAQMD attainment plan, which would reduce vehicle trips and VMT, and provide transportation alternatives. The 2040 General Plan would be consistent with the air quality attainment plans, would result in a less than significant impact, and no mitigation would be required.

Project Impact Analysis

Less than Significant Impact. The project site has a General Plan Designation of Employment Mixed Use and the project's proposed truck service, and truck and trailer parking would be compatible with the land use designation. Therefore, employment growth in the City as a result of project implementation would be accounted for in the City's 2040 General Plan and SMAQMD's air quality plan growth projections. In addition, per the SMAQMD's CEQA Guide, construction-generated NO_x, PM₁₀, and PM_{2.5}, and operation-generated ROG and NO_x are used to determine consistency with the Regional Ozone Plan. The Guide states (SMAQMD 2020c p. 4-6):

By exceeding the District's mass emission thresholds for operational emissions of ROG, NO_x , PM_{10} , or $PM_{2.5}$, the project would be considered to conflict with or obstruct implementation of the District's air quality planning efforts.

As shown in the discussion for Issue 2 below, the project's construction and operational emissions of ROG, NO_X , PM_{10} , and $PM_{2.5}$ would not exceed SMAQMD thresholds. Therefore, the project would not conflict with or obstruct implementation of the applicable air quality plan. The impact would be less than significant, no mitigation would be required, and the project would not result in a new or more severe impact than identified in the Master EIR.



Issue 2

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

Summary of Analysis Under the 2040 General Plan Master EIR and Applicable General Plan Policies

The Master EIR analyzed whether implementation of the 2040 General Plan would result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment in Impact 4.3-2. The Master EIR concluded that compliance with the required 2040 General Plan policies along with the implementing action aimed at reduction of construction and operational criteria air pollutant emissions would help reduce impacts associated with buildout of the 2040 General Plan. Future projects under the 2040 General Plan would comply with applicable SMAQMD rules and regulations to meet SMAQMD significance thresholds, as required under Policy ERC-4.4. SMAQMD significance thresholds are based on levels that the SVAB can accommodate without affecting the attainment date for the AAQS, that has been established to protect public health and welfare. Therefore, the 2040 General Plan would result in less-than-significant health effects associated with criteria air pollutants, and no mitigation would be required.

Project Impact Analysis

Less than Significant Impact. The Sacramento region is in non-attainment for ozone (ozone precursors NO_X and ROG) and particulate matter ($PM_{2.5}$ and PM_{10}). The project's emissions of these criteria pollutants and precursors during construction and operation are evaluated below.

Construction Emissions

CalEEMod version 2022.1 was used to quantify project-generated construction emissions. Assumptions included in the model are described previously and detailed model output sheets are included in Attachment A to this letter. Construction activities were assumed to commence as early as October 2024 and be completed in December 2025. The quantity, duration, and intensity of construction activity influence the amount of construction emissions and related pollutant concentrations that occur at any one time. As such, the emission forecasts provided herein reflect a specific set of conservative assumptions based on the expected construction scenario wherein a relatively large amount of construction activity intensive manner. Because of this conservative assumption, actual emissions could be less than those forecasted. If construction is delayed or occurs over a longer time period, emissions could be reduced because of (1) a more modern and cleaner-burning construction equipment fleet mix than assumed in CalEEMod; and/or (2) a less intensive buildout schedule (i.e., fewer daily emissions occurring over a longer time interval).

The project's construction period emissions of ROG, NO_x, PM₁₀, and PM_{2.5} are compared to the SMAQMD construction thresholds in Table 3, *Construction Criteria Pollutant and Precursor Emissions*. The SMAQMD does not have a recommended threshold for construction-generated ROG. However, quantification and disclosure of ROG emissions is recommended. The model output and calculation sheets are included as Attachment A to this letter.



	Poll	utant Emissior	ns (pounds per	· day)
Construction Activity	ROG	NOx	PM10	PM2.5
Site Preparation	3.9	40.3	12.9	5.9
Grading	2.2	22.3	6.9	2.6
Building Construction	1.2	11.3	0.5	0.5
Paving	1.1	10.5	1.0	0.5
Architectural Coating	5.2	10.7	<0.1	<0.1
Maximum Daily Emissions	5.2	40.3	12.9	5.9
SMAQMD Thresholds	None	85	80	82
Exceed Thresholds?	No	No	No	No

Table 3 CONSTRUCTION CRITERIA POLLUTANT AND PRECURSOR EMISSIONS

Source: CalEEMod (output data is provided in Attachment A)

ROG = reactive organic gases; NO_X = nitrogen oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; SMAQMD= Sacramento Metropolitan Air Quality Management District

As shown in Table 3, project construction emissions of criteria pollutants and precursors would not exceed the SMAQMD significant thresholds. Regardless of emission levels, SMAQMD considers construction period PM₁₀ and PM_{2.5} emissions to be significant unless a set of Basic Construction Emissions Control Practices (BCECPs) is implemented, considered by the SMAQMD to be feasible for controlling fugitive dust from a construction site (SMAQMD 2019). Implementation of the BCEPs allows the use of the non-zero particulate matter significance thresholds. The City's 2040 General Plan Policy ERC-4.5, Construction Emissions, requires implementation of the SMAQMD 2019):

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 mph.
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
- Minimize idling time by either shutting equipment off when not in use or reducing time of idling to 5 minutes. Provide clear signage that posts this requirement for workers at the entrances to the site; and



• Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.

Impacts related to short-term construction emissions of ROG, NO_X , PM_{10} , and $PM_{2.5}$ would be less than significant.

Operational Emissions

CalEEMod version 2022.1 was used to quantify project-generated operational emissions. The results of the modeling for project operational activities are shown in Table 4, *Maximum Daily Operational Emissions*. Because the project would be all-electric, energy source emissions would be limited to GHG emissions. The data is presented as the maximum anticipated daily emissions for comparison with the SMAQMD thresholds, the model output and calculation sheets are included as Attachment A to this letter. As shown in Table 4, the proposed project operation period emissions of the ozone precursors NO_X and ROG, PM₁₀, and PM_{2.5} would not exceed the SMAQMD thresholds. Impacts related to project operational emissions of ROG, NO_X, PM₁₀, and PM_{2.5} would be less than significant.

		Pollutant Emissions (pounds per day)			
	Source	ROG	NOx	PM10	PM2.5
Mobile		1.1	21.6	4.1	1.2
Area		0.2	<0.1	<0.1	<0.1
	Maximum Daily Emissions	1.3	21.6	4.1	1.2
	SMAQMD Thresholds	65	65	80	82
	Exceed Thresholds?	No	No	No	No

Table 4 MAXIMUM DAILY OPERATIONAL EMISSIONS

Source: CalEEMod (output data is provided in Attachment A)

ROG = reactive organic gases; NO_X = nitrogen oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; SMAQMD= Sacramento Metropolitan Air Quality Management District

Impact Conclusion

The project's maximum daily construction or operational emissions would not exceed the SMAQMD's thresholds. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment. The impact would be less than significant, no mitigation would be required, and the project would not result in a new or more severe impact than identified in the Master EIR.



Issue 3

Would the project expose sensitive receptors to substantial pollutant concentrations?

Summary of Analysis Under the 2040 General Plan Master EIR and Applicable General Plan Policies

The Master EIR analyzed whether implementation of the 2040 General Plan would expose sensitive receptors to substantial pollutant concentrations in Impact 4.3-3. The Master EIR concluded that implementation of policies contained in the 2040 General Plan would help reduce construction- and operational-related emissions and ensure that exposure to TACs is taken into account in planning for future projects, and that precautions are taken to reduce potential health risks resulting from exposure to TACs. With these policies in place, impacts associated with the exposure of sensitive receptors to substantial pollutant concentrations would be less than significant, and no mitigation would be required.

Project Impact Analysis

Less than Significant Impact. As described above, the closest existing sensitive receptor location is a single-family residence approximately 870 feet west of the project site, and two additional single-family residences are located approximately 1,160 and 1,260 feet southwest of the project site.

Construction

Construction TAC Emissions

Implementation of the project would result in the use of heavy-duty construction equipment, haul trucks, and construction worker vehicles. These vehicles and equipment could generate the DPM. Generation of DPM from construction projects typically occurs in a localized area (e.g., at the project site) for a short period of time. Because construction activities and subsequent emissions vary depending on the phase of construction (e.g., grading, building construction), the construction-related emissions to which nearby receptors are exposed to would also vary throughout the construction period. During some equipment-intensive phases such as grading, construction-related emissions would be higher than other less equipment-intensive phases such as building construction. Concentrations of mobile-source DPM emissions are typically reduced by 70 percent at approximately 500 feet (CARB 2005).

The dose (of TAC) to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has to the substance; a longer exposure period to a fixed quantity of emissions would result in higher health risks. Current models and methodologies for conducting cancer health risk assessments are associated with longer-term exposure periods (typically 30 years for individual residents based on guidance from OEHHA) and are best suited for evaluation of long duration TAC emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of construction activities. Cancer potency factors are based on animal lifetime studies or worker studies where there is long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime (OEHHA 2015). Considering this information, the distance



to the nearest sensitive receptors, the highly dispersive nature of DPM, and the fact that construction activities would occur at various locations throughout the project site for short periods, construction of the project would not expose sensitive receptors to substantial DPM concentrations. Therefore, impacts related to construction period TAC emissions would be less than significant.

Operational

Operational Localized Criteria Pollutants

Per the SMAQMD CEQA Guide, land use development projects do not typically have the potential to result in localized concentrations of criteria air pollutants that expose sensitive receptors to substantial pollutant concentrations. This is because criteria air pollutants are predominantly generated in the form of mobile-source exhaust from vehicle trips associated with the land use development project. These vehicle trips occur throughout a paved network of roads, and, therefore, associated exhaust emissions of criteria air pollutants are not generated in a single location where high concentrations could be formed (SMAQMD 2020c). Therefore, localized concentration of CO from exhaust emissions, or "CO hotspots," would only be a concern on high-volume roadways where vertical and/or horizontal mixing is substantially limited, such as tunnels or below grade highways. There are no high-volume roadways in the region with limited mixing that would be affected by project-generated traffic. Impacts related to localized criteria pollutant concentrations would be less than significant.

Operational TAC Emissions

Project-related truck trips would generate DPM. However, the project would not be used for short-term truck parking for mandated driver rest (the project would not be a truck stop) or be used for storage of cargo which would require the operation of transport refrigeration units (TRUs) on the project site. Truck activity on the project site would be limited to circulation on project driveways to a parking stall, reversing into the parking stall, and limited idling. The CARB Airborne Toxic Control Measure Title 13, CCR, section 2485, prohibits diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds from idling the vehicle's primary diesel engine longer than five minutes at any location. In addition, a wind rose for the Sacramento McClellan Airport (approximately one mile east of the project site) shows that the prevailing wind in the area is from the southeast at six miles per hour (Iowa Mesonet 2024). As discussed above, the closest sensitive receptor locations to the project site or to the west and southwest and 870 feet to 1,260 feet from the project site. The prevailing wind would disperse any project DPM emissions away from sensitive receptor locations. Therefore, due to the limited operation time of truck and other diesel engines on the project site, the distance to the closest sensitive receptor locations, and the prevailing wind direction away from sensitive receptor locations, operation of the project would not expose sensitive receptors to substantial DPM concentrations. Impacts related to operational period TAC emissions would be less than significant.

Impact Conclusion

Construction and operation of the project would not expose sensitive receptors to substantial concentrations of DPM or substantial localized concentrations of criteria pollutants, including from CO hotspots. The impact would be less than significant, no mitigation would be required, and the project would not result in a new or more severe impact than identified in the Master EIR.



Issue 4

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

Summary of Analysis Under the 2040 General Plan Master EIR and Applicable General Plan Policies

The Master EIR analyzed whether implementation of the 2040 General Plan would result in odor emissions affecting a substantial number of people in Impact 4.3-4. The Master EIR concluded that future development under the 2040 General Plan would be required to comply with local regulations and general policies to ensure odors would not affect a substantial number of people. The impact would be less than significant, and no mitigation would be required.

Project Impact Analysis

Less than Significant Impact. Odors associated with diesel exhaust and ROG from application of asphalt and architectural coatings would be emitted during project construction. The odor of these emissions is objectionable to some; however, emissions would disperse rapidly from the project site and therefore should not be at a level that would affect a substantial number of people. Further, construction activities would be temporary. As a result, impacts associated with temporary odors during construction are not considered significant.

Per the SMAQMD CEQA Guide, typical land uses which could generate significant odor impacts include wastewater treatment plants, sanitary landfills, composting/green waste facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting/coating operations, rendering plants, and food packaging plants (SMAQMD 2016). The project would not include any of these land uses. Therefore, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, the impact would be less than significant, and the project would not result in a new or more severe impact than identified in the Master EIR.

GHG EMISSIONS IMPACT ANALYSIS

Issue 1

Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Summary of Analysis Under the 2040 General Plan Master EIR and Applicable General Plan Policies

The Master EIR analyzed this issue under impact 4.8-1 and concluded that projects developed under the 2040 General Plan would comply with all regulations adopted in furtherance of CARB's 2022 Scoping Plan to the extent applicable and required by law. Other relevant GHG emissions reduction targets for the 2040 General Plan include those established by SB 32 and AB 1279, which require GHG emissions be reduced to 40 percent below 1990 levels by 2030, and 85 percent below 1990 levels by 2045, respectively. The 2040 General Plan and CAAP measures will enable the City to meet the 2030 GHG



emission requirements included in SB 32, even with a voluntary approach to New Building Electrification. In addition, AB 1279 requires the state achieve net zero GHG emissions by no later than 2045 and achieve and maintain net negative GHG emissions thereafter. However, since the specific path to compliance for the state in regard to the long-term goals will likely require development of technology or other changes that are not currently known or available, specific additional reduction measures in addition to the policies presented within the 2040 General Plan would be speculative and cannot be identified at this time. The 2040 General Plan would assist in meeting the city's contribution to GHG emission reduction targets in California. The Sacramento 2040 Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. The impact would be less than significant, and no mitigation would be required.

Project Impact Analysis

Less than significant impact. As discussed above, the City's CAAP is a qualified plan for the reduction of greenhouse gases pursuant to CEQA Guidelines Section 15183.5. Development projects under the City's jurisdiction would have less than significant GHG emission impacts if the project would be consistent with applicable GHG reduction measures in the CAAP.

Project GHG emissions were quantified using CalEEMod 2022.1, as described above. The project's calculated construction period and operational GHG emission are disclosed for information purposes below. GHG emissions would be generated by the project during construction (vehicle engine exhaust from construction equipment, on-road hauling trucks, vendor trips, and worker commuting trips) and during long-term operation (vehicle engine exhaust; landscape equipment exhaust; electricity use; electricity resulting from water consumption and wastewater treatment; solid waste disposal; and refrigerant leaks). The project's temporary construction GHG emissions are shown in Table 5, *Construction GHG Emissions*, and the project's operational GHG emissions for the anticipated first full year of operation (2026) are shown in Table 6, *Operational GHG Emissions*. The model output is included as Attachment A to this letter.

Year of Emissions	Emissions (MT CO2e)
2024	121.0
2025	282.3

Table 5 CONSTRUCTION GHG EMISSIONS

Source: CalEEMod (output data is provided in Attachment A)

GHG = greenhouse gas; MT = metric tons; CO₂e = carbon dioxide equivalent



Emission Sources		2026 Emissions (MT CO2e)
Mobile		2,030.3
Area		0.1
Energy		42.0
Water and Wastewater		0.9
Solid Waste		5.1
Refrigerants		<0.1
	Total ¹	2,078.4

Table 6 OPERATIONAL GHG EMISSIONS

Source: CalEEMod (output data is provided in Attachment A)

¹ Totals may not sum due to rounding.

GHG = greenhouse gas; MT = metric tons; CO₂e = carbon dioxide equivalent

At the time of this analysis, the City had not developed guidelines or a checklist for determining a project's consistency with the CAAP. For GHG reduction plans, a project would be consistent if population and employment growth resulting from the project would be accounted for the growth projections used to develop the plan, and if the project would be consistent with applicable plan GHG reduction measures. The project would not result in population growth in the city. The project site has General Plan Designation of Employment Mixed Use and the project's proposed truck service, and truck and trailer parking would be compatible with the land use designation. Therefore, employment growth in the city as a result of project implementation would be accounted for in the City's 2040 General Plan and CAAP growth projections. Consistency with the CAAP's GHG reduction measures is discussed in Table 7, *City of Sacramento CAAP Consistency*.

	GHG Reduction Measure	Project Consistency
Built Env	vironment	
E1	Support the Sacramento Municipal Utility	Not Applicable. This measure is implemented by
	District (SMUD) as it implements the 2030	SMUD and by the City.
	Zero Carbon Plan.	
E2	Eliminate natural gas in new construction.	Consistent. The project would be all electric and
		would not utilize natural gas.
E-3	Transition natural gas in existing buildings	Not Applicable. The project does not include any
	to carbon-freeelectricity by 2045.	existing buildings.
E-4	Increase the amount of electricity produced	Consistent . This measure is primarily implemented by
	from local resources and work with SMUD	SMUD. The project would support this measure by
	to install additional local storage by 2030.	installing photovoltaic electricity generation (solar
		panels) in accordance with the current Title 24
		building energy efficiency regulations, section 140.10.
E-5	Support infill growth with the goal that 90	Consistent. The project would result in minimal
	percent of growth is inthe established and	employment growth and would not result in
	center/corridor communities and 90	population growth in the city. The project would be
	percent small-lot and attached homes by	considered infill and would develop a vacant lot within
	2040, consistent with theregional	an existing commercial/industrial land use area. The
	Sustainable Communities Strategy.	City's Public Works Transportation Division has

Table 7 CITY OF SACRAMENTO CAAP CONSISTENCY



	GHG Reduction Measure	Project Consistency
		determined that the project's VMT would be less than the less than the threshold of 100 percent of regional VMT average for industrial uses, due to the project's location.
Mobility		
TR-1	Improve active transportation infrastructure to achieve 6 percent active transportation mode share by 2030 and 12 percent by 2045 Support public transit improvements to achieve 11 percent publictransit mode	Consistent . This measure is primarily implemented at the City level. The project would support this measure by widening Raley Boulevard along the project frontage and installing a bicycle lane and sidewalk. Not Applicable . This measure is implemented by the Sacramento Regional Transit District and the City
	share by 2030 and maintain through 2045	
TR-3	Achieve zero-emission vehicle (ZEV) adoption rates of 28 percent for passenger vehicles and 22 percent for commercial vehicles by2030 and 100 percent for all vehicles by 2045.	Consistent . This measure is primarily implemented at the State and City level. The project would support this measure by complying with all applicable City codes and CALGreen requirements for private development electric vehicle charging infrastructure.
Waste		
W-1	Work to reduce organic waste disposal 75 percent below 2014 levels by 2025	Consistent . This measure is primarily implemented at the State and City level. The project would support this measure by complying with all applicable City and State regulations to divert organic waste, including landscape maintenance vegetation waste.
Water an	d Wastewater	
	Reduce water utility emissions (in MT of CO2e per MG) by 100 percent by 2030 and maintain that through 2045.	Consistent . This measure is primarily implemented at the utility provider and City level. The project would support this measure by complying with all applicable City and CALGreen requirements for low-flow plumbing fixtures and water efficient landscaping.
WW-2	Reduce wastewater emissions by 22 percent by 2030 and 40 percent by 2045.	Consistent . This measure is primarily implemented by the Sacramento Regional Sanitation District. The project would support this measure by complying with City and CALGreen indoor water use efficiency requirements, and by installing bioretention basins on the project site to reduce stormwater runoff.
Carbon S	Sequestration	
CS-1	Increase urban tree canopy cover to 25 percent by 2030 and 35 percent by 2045.	Consistent . The project site does not contain any existing trees. The project's proposed landscaping includes 20 white ash, 14 eastern redbud, six holly oak, and approximately 100 Italian cypress trees.

Source: City 2024

As discussed in Table 7, the project would be consistent with all of the applicable CAAP GHG reduction measures. Therefore, the project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. The impact would be less than significant, no mitigation would be required, and the project would not result in a new or more severe impact than identified in the Master EIR.



Issue 2

Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

Summary of Analysis Under the 2040 General Plan Master EIR and Applicable General Plan Policies

The Master EIR analyzed this issue under impact 4.8-1 in connection with GHG impact Issue 1, described above. See the summary of the Master EIR impact 4.8-1 conclusions above.

Project Impact Analysis

Less than significant impact. There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Statewide plans and regulations such as GHG emissions standards for vehicles, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the Statewide level; as such, compliance at the project level is not addressed. Therefore, the project would not conflict with those plans and regulations.

As discussed in GHG Impact Issue 1, above, the project would be consistent with the City's CAAP, and the City's CAAP was developed with the same local growth projections used in development of CARB's 2022 Scoping Plan and SACOG's 2020 MTP/SCS. As discussed in CARB's 2022 Scoping Plan Appendix D, Local Actions, local jurisdictions should focus on three priority areas for regional plan or project-level GHG reduction: transportation electrification, VMT reduction, and building decarbonization (CARB 2022c). The project would be required to comply with all applicable City codes and CALGreen requirements for private development electric vehicle charging infrastructure; the City's Public Works Transportation Division has determined that the project's VMT would be less than the less than the threshold of 100 percent of regional VMT average for industrial uses (City 2023b); and the project would be all electric and would not install any natural gas infrastructure or appliances. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, including the City's CAAP, CARB's 2022 Scoping Plan, and the SACOG 202 MTP/SCS. The impact would be less than significant, no mitigation would be required, and the project would not result in a new or more severe impact than identified in the Master EIR.

SUMMARY

Emissions of criteria pollutants would be below SMAQMD thresholds, and the project would not conflict with the Regional Ozone Plan or applicable portions of the SIP. Sensitive receptors would not be exposed to substantial concentrations of pollutants, and the project would not result in other emissions, such as those leading to odors, affecting a substantial number of people. Impacts related to air quality would be less than significant and would not result in a new or more severe impact than identified in the Master EIR.

The project would be consistent with the GHG reduction measures the City's CAAP and with the growth projections used to develop the CAAP and regional and State GHG plans, including CARB's 2022 Scoping Plan and SACOG's 2020 MTP/RCS. Because the projection would be consistent with the City's CAAP, a qualified GHG reduction plan for GHG impact analysis streamlining, project GHG emission would be less



than significant. The project would not conflict with applicable GHG reduction plans, policies, or regulations. Impacts related to GHG emissions would be less than significant and would not result in a new or more severe impact than identified in the Master EIR.

Sincerely,

Martin D. Rolp

Martin Rolph Air Quality Specialist

Attachments:

Victor Ortiz Senior Air Quality Specialist

Figure 1:	Site and Vicinity Map
Figure 2:	Aerial Map
Figure 3:	Site Plan
A:	CalEEMod Output
В:	Trip Generation Calculations



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Figures

Raley Boulevard Truck Service/Parking



HELIX Environmental Planning

Site and Vicinity Map

Raley Boulevard Truck Service/Parking





Aerial Map Figure 2





Source: CWee, 2023



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Siteplan.

RaleyBlvdTruckServiceParkingISMND\Map\Fig3_

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Attachment A

CalEEMod Output

Raley Blvd Truck Repair and Parking Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Raley Blvd Truck Repair and Parking
Construction Start Date	10/1/2024
Operational Year	2026
Lead Agency	
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.50
Precipitation (days)	39.2
Location	38.66327862404373, -121.43081781609574
County	Sacramento
City	Sacramento
Air District	Sacramento Metropolitan AQMD
Air Basin	Sacramento Valley
TAZ	639
EDFZ	13
Electric Utility	Sacramento Municipal Utility District
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.23

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
------------------	------	------	-------------	-----------------------	---------------------------	-----------------------------------	------------	-------------

Automobile Care Center	3.69	1000sqft	1.42	3,694	57,015	_	—	—
General Office Building	2.40	1000sqft	0.00	2,396	0.00	_	_	_
Parking Lot	4.62	Acre	4.62	0.00	0.00	_	—	—
Other Asphalt Surfaces	0.18	Acre	0.18	0.00	0.00	_		

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	СО	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.14	10.7	13.2	0.03	0.43	0.61	0.99	0.40	0.16	0.51	3,575
Daily, Winter (Max)	—	—		—	—	_		—	_	_	—
Unmit.	5.15	40.3	36.1	0.07	1.67	11.2	12.9	1.54	4.38	5.92	7,612
Average Daily (Max)	—	—		—	—	_			—	_	_
Unmit.	1.01	6.84	8.37	0.02	0.27	0.61	0.76	0.25	0.21	0.35	1,705
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.18	1.25	1.53	< 0.005	0.05	0.11	0.14	0.05	0.04	0.06	282

2.2. Construction Emissions by Year, Unmitigated

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily - Summer (Max)	_	_	_	_	_	_	_	_	_	-	-
2025	1.14	10.7	13.2	0.03	0.43	0.61	0.99	0.40	0.16	0.51	3,575
Daily - Winter (Max)		_	_	_	_	_	—	_	—	—	—
2024	3.94	40.3	36.1	0.07	1.67	11.2	12.9	1.54	4.38	5.92	7,612
2025	5.15	11.0	13.1	0.03	0.43	0.61	0.99	0.40	0.16	0.51	3,551
Average Daily	_	_					_	_	_	_	_
2024	0.35	3.42	3.48	0.01	0.14	0.61	0.76	0.13	0.21	0.35	731
2025	1.01	6.84	8.37	0.02	0.27	0.08	0.35	0.25	0.02	0.27	1,705
Annual	_	_	_	_	_	_	—	_	_	_	_
2024	0.06	0.62	0.63	< 0.005	0.03	0.11	0.14	0.02	0.04	0.06	121
2025	0.18	1.25	1.53	< 0.005	0.05	0.01	0.06	0.05	< 0.005	0.05	282

2.4. Operations Emissions Compared Against Thresholds

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	_	—	—	—	—		—	—	—	—
Unmit.	1.33	20.1	15.3	0.11	0.19	3.90	4.08	0.18	1.03	1.21	12,678
Daily, Winter (Max)	_		—	_	_	_	_	_	—	—	_
Unmit.	1.19	21.6	14.1	0.11	0.19	3.90	4.08	0.18	1.03	1.21	12,514
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.23	21.2	14.1	0.11	0.19	3.81	4.00	0.18	1.01	1.19	12,554
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.23	3.87	2.57	0.02	0.03	0.70	0.73	0.03	0.18	0.22	2,078

2.5. Operations Emissions by Sector, Unmitigated

Sector	ROG	NOx	со	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	_	—	—	—	—	—	—	—	—	_	—
Mobile	1.11	20.1	15.1	0.11	0.19	3.90	4.08	0.18	1.03	1.21	12,387
Area	0.22	< 0.005	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	1.09
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	254
Water	_	_	_	_	_	_	_	_	_	_	5.46
Waste	—	_	—	—	—	—	_	—	—	—	30.8
Refrig.	—	_	—	—	—	—	_	—	—	—	0.01
Total	1.33	20.1	15.3	0.11	0.19	3.90	4.08	0.18	1.03	1.21	12,678
Daily, Winter (Max)		—	—	—	—	—	—	—	—	—	—
Mobile	1.02	21.6	14.1	0.11	0.19	3.90	4.08	0.18	1.03	1.21	12,224
Area	0.17	_	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	254
Water	—	_	—	—	—	—	—	—	—	—	5.46
Waste	—	_	—	—	—	—	—	—	—	—	30.8
Refrig.	—	_	—	—	—	—	—	—	—	—	0.01
Total	1.19	21.6	14.1	0.11	0.19	3.90	4.08	0.18	1.03	1.21	12,514
Average Daily	—	_	—	—	—	—	—	—	—	—	—
Mobile	1.03	21.2	13.9	0.11	0.19	3.81	4.00	0.18	1.01	1.19	12,263
Area	0.20	< 0.005	0.18	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.75
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	254
Water	_	_	_	_	_	_	_	_	_	_	5.46
Waste	_	_	—	_	—	_	_	_	_	_	30.8
Refrig.	_	_	—	—	—	—	-	_	—	_	0.01

Total	1.23	21.2	14.1	0.11	0.19	3.81	4.00	0.18	1.01	1.19	12,554
Annual	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.19	3.87	2.54	0.02	0.03	0.70	0.73	0.03	0.18	0.22	2,030
Area	0.04	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.12
Energy	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	42.0
Water	—	—	—	—	—	—	—	—	—	—	0.90
Waste	_	_	—	—	_	_	—	—	_	_	5.10
Refrig.	_	_	—	—	_	_	—	—	_	_	< 0.005
Total	0.23	3.87	2.57	0.02	0.03	0.70	0.73	0.03	0.18	0.22	2,078

3. Construction Emissions Details

3.1. Site Preparation (2024) - Unmitigated

Location	ROG	NOx	со	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	_	_		—		—	—	_	_	—	—
Daily, Summer (Max)	—	—	—	_	—	—	_	—	_	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—			—	—
Off-Road Equipment	3.82	37.1	34.1	0.05	1.64	—	1.64	1.51		1.51	5,814
Dust From Material Movement						7.67	7.67		3.94	3.94	_
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	1.02	0.93	< 0.005	0.04	_	0.04	0.04	_	0.04	159

Dust From Material Movement	—				—	0.21	0.21		0.11	0.11	_
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	_	_	_	_	_	_	_	_	_	_	_
Off-Road Equipment	0.02	0.19	0.17	< 0.005	0.01	—	0.01	0.01	—	0.01	26.4
Dust From Material Movement						0.04	0.04		0.02	0.02	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.09	0.95	0.00	0.00	0.20	0.20	0.00	0.05	0.05	208
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.05	3.04	1.06	0.02	0.03	3.32	3.35	0.03	0.39	0.42	1,589
Average Daily	_	—	—	—	_	—	_	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	5.86
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.08	0.03	< 0.005	< 0.005	0.08	0.08	< 0.005	0.01	0.01	43.6
Annual	_	_	_	_	_	_	_	_	_	_	_
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.97
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.01	0.01	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	< 0.005	7.22

3.3. Grading (2024) - Unmitigated

Location	ROG	NOx	со	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—	_	—	_	—	—	—	_	—	_	_
Daily, Summer (Max)	_	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.07	19.4	20.0	0.03	0.88	—	0.88	0.81	—	0.81	3,469
Dust From Material Movement	—	_	_	_	_	2.77	2.77	_	1.34	1.34	_
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—		—	—
Off-Road Equipment	0.11	1.06	1.09	< 0.005	0.05	—	0.05	0.04	—	0.04	190
Dust From Material Movement	_	_	—	_	_	0.15	0.15	_	0.07	0.07	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	_
Off-Road Equipment	0.02	0.19	0.20	< 0.005	0.01	—	0.01	0.01	—	0.01	31.5
Dust From Material Movement	—	_	_	_	_	0.03	0.03	_	0.01	0.01	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—		—	—	_	—	_
Daily, Summer (Max)	—	_	—	_	_	_	_	_	—	_	—
Daily, Winter (Max)											
Worker	0.07	0.08	0.83	0.00	0.00	0.18	0.18	0.00	0.04	0.04	182

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	2.83	0.99	0.02	0.03	3.09	3.11	0.03	0.37	0.39	1,478
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	10.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.15	0.05	< 0.005	< 0.005	0.15	0.15	< 0.005	0.02	0.02	81.1
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	1.70
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.03	0.01	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	< 0.005	13.4

3.5. Building Construction (2024) - Unmitigated

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

Location	ROG	NOx	СО	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	_		_		—		_	_	_
Off-Road Equipment	1.20	11.2	13.1	0.02	0.50		0.50	0.46	—	0.46	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	1.10	1.28	< 0.005	0.05	—	0.05	0.04	—	0.04	235
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	_	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.20	0.23	< 0.005	0.01		0.01	0.01		0.01	39.0

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)		_	_	—	—			—	—	—	_
Worker	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	20.3
Vendor	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	30.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	_	—	—	—	_	—	_	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	2.04
Vendor	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	3.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	_	—	_	_	_	_	_	_
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.34
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.50
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2025) - Unmitigated

Location	ROG	NOx	со	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	_	_	_	_	_	_	_	_	_	_	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	_
Off-Road Equipment	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40		0.40	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—			—	—	—	—		—	—	—

Off-Road Equipment	1.13	10.4	13.0	0.02	0.43		0.43	0.40	—	0.40	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	_	—
Off-Road Equipment	0.60	5.56	6.94	0.01	0.23		0.23	0.21	—	0.21	1,281
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	_	_	_	_	_	_	_	_	—		_
Off-Road Equipment	0.11	1.01	1.27	< 0.005	0.04	_	0.04	0.04	_	0.04	212
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)							—		—	—	—
Worker	0.01	0.01	0.12	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	22.4
Vendor	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	30.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	19.9
Vendor	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	30.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	10.9
Vendor	< 0.005	0.03	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	16.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	_	_	_	_	_	_	—	_	_		_
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	1.80
Vendor	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	2.66

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
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3.9. Paving (2025) - Unmitigated

Location	ROG	NOx	СО	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	_	_	_	_	_	_	_	_	_	_	_
Daily, Summer (Max)	—	—	—	—	_	—	_	—	—	—	—
Off-Road Equipment	0.80	7.45	9.98	0.01	0.35	—	0.35	0.32	—	0.32	1,517
Paving	0.20	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	_	_	_			_	_				—
Off-Road Equipment	0.80	7.45	9.98	0.01	0.35	_	0.35	0.32	—	0.32	1,517
Paving	0.20	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	_	—	_	_	_	_	_	_	_	_	—
Off-Road Equipment	0.09	0.82	1.09	< 0.005	0.04	—	0.04	0.04	—	0.04	166
Paving	0.02	_	_	_	_	_	_	_	_	_	_
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	_	—	_	_	_	_	—	_	—	_	_
Off-Road Equipment	0.02	0.15	0.20	< 0.005	0.01	_	0.01	0.01	—	0.01	27.5
Paving	< 0.005	_		_			_	_	_	_	_
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite		_					_				_

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.04	0.90	0.00	0.00	0.15	0.15	0.00	0.04	0.04	173
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.05	3.23	1.25	0.01	0.03	0.46	0.49	0.03	0.12	0.16	1,886
Daily, Winter (Max)	—	_	—	—	—	_	—	_	_	_	—
Worker	0.06	0.06	0.67	0.00	0.00	0.15	0.15	0.00	0.04	0.04	153
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.05	3.47	1.26	0.01	0.03	0.46	0.49	0.03	0.12	0.16	1,882
Average Daily	—	_	_	_	—	_	—	_	_	_	_
Worker	0.01	0.01	0.07	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	17.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.37	0.14	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	206
Annual	_	_	_	_	_	_	_	_		_	_
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	2.85
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	34.2

3.11. Architectural Coating (2025) - Unmitigated

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—		_	—	—		—	—		_	—
Daily, Summer (Max)	_	—	_	_	_	—	—	_	—	_	—
Daily, Winter (Max)	—	_	_	—	—	_	—	_	_	—	—
Off-Road Equipment	0.13	0.88	1.14	< 0.005	0.03		0.03	0.03		0.03	134

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Architectural Coatings	5.02	_	—								—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	_	< 0.005	7.34
Architectural Coatings	0.28		—	—	_	—	_	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	_	_	_	_	_		_	_			
Off-Road Equipment	< 0.005	0.01	0.01	< 0.005	< 0.005		< 0.005	< 0.005		< 0.005	1.22
Architectural Coatings	0.05	—	—	—	—	_	—	—	_	_	
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	
Daily, Summer (Max)	—	—	—	—	—	_	—	—	_	_	
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	3.98
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.22
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	_		_								
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.04
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3											

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Land Use	ROG	NOx	СО	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Automobile Care Center	0.35	19.4	8.04	0.09	0.17	2.59	2.77	0.17	0.70	0.87	10,775
General Office Building	0.76	0.71	7.04	0.02	0.01	1.30	1.31	0.01	0.33	0.34	1,612
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.11	20.1	15.1	0.11	0.19	3.90	4.08	0.18	1.03	1.21	12,387
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Automobile Care Center	0.34	20.8	8.15	0.09	0.18	2.59	2.77	0.17	0.70	0.87	10,752
General Office Building	0.68	0.83	5.91	0.01	0.01	1.30	1.31	0.01	0.33	0.34	1,471
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.02	21.6	14.1	0.11	0.19	3.90	4.08	0.18	1.03	1.21	12,224
Annual	_	_	_		_	_	_		_		_

Automobile Care Center	0.06	3.73	1.48	0.02	0.03	0.46	0.50	0.03	0.13	0.16	1,782
General Office Building	0.12	0.14	1.07	< 0.005	< 0.005	0.23	0.23	< 0.005	0.06	0.06	248
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.19	3.87	2.54	0.02	0.03	0.70	0.73	0.03	0.18	0.22	2,030

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Land Use	ROG	NOx	СО	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—		—	—	—	_	—
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	58.3
General Office Building	—	—	—	—	—	—	—	—	—	—	60.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	135
Other Asphalt Surfaces	_									_	0.00
Total	—	—	—	—	—		—	_	—	_	254
Daily, Winter (Max)	—	—	_	—	—		_		—		—
Automobile Care Center	—										58.3
General Office Building											60.2
Parking Lot	_				_				_		135

Other Asphalt Surfaces		—			—	—	—	—	—	—	0.00
Total	_	_	_	—	—	—	—	_	_	_	254
Annual	—	—	—	—	—	—	_	_	_	_	—
Automobile Care Center	—		—	—	—	—	—	—	_	—	9.65
General Office Building	—		—		—	—	—	—	_	_	9.97
Parking Lot	_	_	_	—	—	—	—	_	_	_	22.4
Other Asphalt Surfaces		_			—	_	—	—	—	—	0.00
Total	_	_	_	_	_	_	_	_	_	_	42.0

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Land Use	ROG	NOx	со	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	_	—	—	_	_	_
Automobile Care Center	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
General Office Building	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Total	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	_	—	—	_	_	_
Automobile Care Center	0.00	0.00	0.00	0.00	0.00		0.00	0.00	—	0.00	0.00

General Office Building	0.00	0.00	0.00	0.00	0.00		0.00	0.00	—	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00		0.00	0.00	_	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00		0.00	0.00	—	0.00	0.00
Total	0.00	0.00	0.00	0.00	0.00		0.00	0.00	—	0.00	0.00
Annual	_	—	_	—	—		_	—	_	_	—
Automobile Care Center	0.00	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00
General Office Building	0.00	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	_	0.00	0.00	—	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	_	0.00	0.00	_	0.00	0.00
Total	0.00	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00

4.3. Area Emissions by Source

4.3.1. Unmitigated

Source	ROG	NOx	СО	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	_	_	_	_	_	_	_	—	—	_	_
Consumer Products	0.15	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.03	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.04	< 0.005	0.26	< 0.005	< 0.005	_	< 0.005	< 0.005	_	< 0.005	1.09
Total	0.22	< 0.005	0.26	< 0.005	< 0.005	_	< 0.005	< 0.005	_	< 0.005	1.09

Daily, Winter (Max)			—					_	_		_
Consumer Products	0.15	—	—	—	—		—	—	—	—	_
Architectural Coatings	0.03		—		—	_	—	_	_	_	_
Total	0.17	_	—	_	_		_	_	_		
Annual	_	_	—	—	—		—	_	_	_	_
Consumer Products	0.03	—	—		—		—	—	—	—	—
Architectural Coatings	0.01	—	—	—	—	_	—	—	—	—	_
Landscape Equipment	0.01	< 0.005	0.03	< 0.005	< 0.005	_	< 0.005	< 0.005	_	< 0.005	0.12
Total	0.04	< 0.005	0.03	< 0.005	< 0.005		< 0.005	< 0.005		< 0.005	0.12

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—		—		—	—	—	—	—	—	_
Automobile Care Center					—		—				3.00
General Office Building	_	_	_	_		_	_		_	_	2.46
Parking Lot	_	_	_	_	_	_	_		_	_	0.00
Other Asphalt Surfaces					—		—				0.00
Total	_	_	_	_	_	_	_		_	_	5.46

Daily, Winter (Max)			—	—	—	_	—	—	—		—
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	3.00
General Office Building			—	—	—	_	—	—	—	_	2.46
Parking Lot	_	—	—	—	—	_	—	_	—		0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	_	0.00
Total	—	—	—	—	—	_	—	—	—	_	5.46
Annual	—	—	—	—	—	—	—	—	—	—	—
Automobile Care Center	—	—	—	—	—	—	—	—	—	_	0.50
General Office Building	—	—	—	—	—	—	—	—	—	—	0.41
Parking Lot	_	_	—	—	—	_	_	_	_	_	0.00
Other Asphalt Surfaces	—	—	—	—	—	_	—	—	—	_	0.00
Total	_	_	_	_	_	_	_	_	_		0.90

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Land Use	ROG	NOx	СО	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	_	_	_	_	_	_	_	_	—	—
Automobile Care Center		—			—						26.6
General Office Building	—		—	—	—	—	—				4.20

Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	0.00
Total	_	_	_	_	_		_		_		30.8
Daily, Winter (Max)							—		—		—
Automobile Care Center	—	—	—	_		_	—	_	—	_	26.6
General Office Building	_	—	_	_		_	—	_	—	_	4.20
Parking Lot	—	—	—	_	—	_	—	_	—	_	0.00
Other Asphalt Surfaces	—	—	—	_	—	—	—	—	—	—	0.00
Total	_	_	_	_	_		—		—		30.8
Annual	—	—	—	—	—	—	—	—	—	—	_
Automobile Care Center	—	—	—	—	—	—	—	—	—		4.41
General Office Building		_				_	_	_	_	_	0.70
Parking Lot	_	_	_	_	_		_		_		0.00
Other Asphalt Surfaces	_	_	_	_	_	_	_	_	_	_	0.00
Total		_									5.10

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Land Use	ROG	NOx	со	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—

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Automobile Care Center	—		_		—		—	_	—		0.00
General Office Building	—	—	—	—	—	—	—	—	_	_	0.01
Total	—	_	—	_	—	_	_	_	_	_	0.01
Daily, Winter (Max)	—	_	_		—	—	—	_	—	_	—
Automobile Care Center	—	_	—	—	—	_	—	_	_	_	0.00
General Office Building	—	_	—	—	—	_	—	_	_	_	0.01
Total	—	—	—	—	—	—	—	_	_	_	0.01
Annual	—	—	—	—	—	—	—	_	_	_	_
Automobile Care Center	_	—	—	—	—	—	—	—	_	_	0.00
General Office Building	_				_		_		—		< 0.005
Total	—	_	—	—	—		—	—	_	_	< 0.005

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Equipment Type											
Daily, Summer (Max)	—				—	—	—			—	—
Total	—	_	—	_	—	—	—	_	_	—	—
Daily, Winter (Max)						_	_	_	_	_	—
Total	_	_	_	_	_	_	_		_	_	_

Annual	—			—	—		—	_	—	—	
Total	_	_	_	_	_	_	—	_	_	_	_

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

Equipment Type											
Daily, Summer (Max)	—	—	—	—	—	—	_	—	—		—
Total	—	—	—	—	—	—	—	—	—	_	—
Daily, Winter (Max)	—		—			—			—		—
Total	—	_	—	—	—	—	—	—	—	_	—
Annual	_	_	_	_	_	_		_	—		—
Total	_	_	_	_	_	_	_	_			_

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Equipment Type											
Daily, Summer (Max)	—	—	—	—	—	_	—	—	—	—	—
Total	—	_	_	—	_	_	—	_		_	_
Daily, Winter (Max)	_	—		—	—	_	—	_		_	—
Total	_	_	_	_	_	_	_	_		_	_

Annual	_	_	_		—	_	—				
Total	—	_	—	_	—	_	—	—	—	—	_

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	_	—	—	—	—	—	—	_	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	_	_		_	_	_	_	_	_	_	_
Total	_			_			_	_	_		

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

Land Use	ROG	NOx	со	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	_	—	—	_	—	—	_	_	—
Total	—	—	—	—	—	—	_	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	_	—	_	—	_	—
Total	—	—	_	—	_	_	—	_	—	_	—
Annual	_	—	_	—	_	_	—	_	_	_	—
Total	_	_	_	_	_	_	_	_	_	_	_

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Species	ROG	NOx	со	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	_	—	—	—	—	—	—	—	—	—
Avoided	_	_	_	_	_	_	_	—	_	—	_
Subtotal	_	_	_	_	_	_	_	—	_	—	_
Sequestered	—	_	_	_	—	—	_	—	_	—	_
Subtotal	—	_	_	_	—	—	—	—	—	—	—
Removed	—	—	_	_	—	—	_	—	—	—	—
Subtotal	—	—	_	_	—	—	_	—	—	—	—
—	—	—	—	_	—	—	—	—	—	—	—
Daily, Winter (Max)	—	-	—	—	—	-	-	_	—	—	—
Avoided	_	_	_	_	_	_	_	_	_	_	_
Subtotal	_	_	_	_	_	_	_	_	_	_	_
Sequestered	—	—	—	_	—	—	—	—	_	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	_	—	—	—	—	—	—	—
Annual	—	—	—	_	—	—	—	—	—	—	—
Avoided	—	—	—	_	—	—	—	—	—	—	—
Subtotal	—	—	—	_	—	—	—	—	—	—	—
Sequestered	_	_	—	_	_	—	_	—	—	—	—
Subtotal	_	_	_	_	_	_	_	—	—	—	—
Removed	_	_	_	_	_	_	_	—	_	—	—
Subtotal	_	_	_	_	_	_	_	_	_	_	_

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 	 _	_	_	_	_	_	—	 —

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	10/1/2024	10/14/2024	5.00	10.0	—
Grading	Grading	10/15/2024	11/11/2024	5.00	20.0	—
Building Construction	Building Construction	11/12/2024	9/29/2025	5.00	230	—
Paving	Paving	9/30/2025	11/24/2025	5.00	40.0	—
Architectural Coating	Architectural Coating	11/25/2025	12/22/2025	5.00	20.0	_

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backh oes	Diesel	Average	4.00	8.00	84.0	0.37
Site Preparation	Off-Highway Trucks	Diesel	Average	1.00	3.00	376	0.38
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backh oes	Diesel	Average	3.00	8.00	84.0	0.37
Grading	Off-Highway Trucks	Diesel	Average	1.00	3.00	376	0.38
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29

Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backh oes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Тгір Туре	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	_	—	—	_
Site Preparation	Worker	20.0	14.3	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.80	HHDT,MHDT
Site Preparation	Hauling	20.0	20.0	HHDT
Site Preparation	Onsite truck	_	_	HHDT
Grading	_	_	_	_
Grading	Worker	17.5	14.3	LDA,LDT1,LDT2
Grading	Vendor	_	8.80	HHDT,MHDT
Grading	Hauling	18.6	20.0	HHDT
Grading	Onsite truck	_	_	HHDT
Building Construction	_	_	—	_
Building Construction	Worker	1.95	14.3	LDA,LDT1,LDT2
Building Construction	Vendor	1.00	8.80	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT

Building Construction	Onsite truck	_		HHDT
Paving	_	_	_	_
Paving	Worker	15.0	14.3	LDA,LDT1,LDT2
Paving	Vendor	_	8.80	HHDT,MHDT
Paving	Hauling	24.2	20.0	HHDT
Paving	Onsite truck	_	_	HHDT
Architectural Coating	_	_	_	_
Architectural Coating	Worker	0.39	14.3	LDA,LDT1,LDT2
Architectural Coating	Vendor	_	8.80	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	_	-	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%

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	9,135	3,045	12,535

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

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Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	_	1,600	15.0	0.00	_
Grading	—	2,970	20.0	0.00	—
Paving	0.00	0.00	0.00	0.00	4.80

5.6.2. Construction Earthmoving Control Strategies

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

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Automobile Care Center	0.00	0%
General Office Building	0.00	0%
Parking Lot	4.62	62%
Other Asphalt Surfaces	0.18	79%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	312	0.01	< 0.005
2025	0.00	295	0.01	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year

Automobile Care Center	255	255	255	93,075	2,772	2,772	2,772	1,011,727
General Office Building	169	169	169	61,685	1,837	1,837	1,837	670,514
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	9,135	3,045	12,535

5.10.3. Landscape Equipment

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

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

	Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
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Automobile Care Center	76,025	279	0.0129	0.0017	0.00
General Office Building	78,528	279	0.0129	0.0017	0.00
Parking Lot	176,293	279	0.0129	0.0017	0.00
Other Asphalt Surfaces	0.00	279	0.0129	0.0017	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Automobile Care Center	347,536	796,961
General Office Building	425,850	0.00
Parking Lot	0.00	0.00
Other Asphalt Surfaces	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Automobile Care Center	14.1	_
General Office Building	2.23	_
Parking Lot	0.00	_
Other Asphalt Surfaces	0.00	_

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

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

Automobile Care Center	Other commercial A/C and heat pumps	R-410A	2,088	0.00	4.00	4.00	18.0
Automobile Care Center	Supermarket refrigeration and condensing units	R-404A	3,922	0.00	16.5	16.5	18.0
General Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
General Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Dav	Hours Per Day	Horsenower	I oad Factor
			ramber per bay	riouro i or Day		

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

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

5.16.2. Process Boilers

Equipment Type Fuel Type Number No Boiler Rating (MMBtu/hr) Daily Heat Input (MMBtu/day) Annual Heat Input (MMBtu	/yr)
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5.17. User Defined

	Equipment Type	Fuel Type
--	----------------	-----------

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
5.18.1. Biomass Cover Type			
5.18.1.1. Unmitigated			
Biomass Cover Type	Initial Acres	Final Acres	
5.18.2. Sequestration			
5.18.2.1. Unmitigated			
Тгее Туре	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	21.8	annual days of extreme heat
Extreme Precipitation	6.35	annual days with precipitation above 20 mm
Sea Level Rise	_	meters of inundation depth
Wildfire	0.00	annual hectares burned

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

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about $\frac{3}{4}$ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

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

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

6.2. Initial Climate Risk Scores

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

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

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

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

6.3. Adjusted Climate Risk Scores

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

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

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

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

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	
AQ-Ozone	57.0
AQ-PM	33.4
AQ-DPM	33.7
Drinking Water	16.8
Lead Risk Housing	43.2
Pesticides	3.66
Toxic Releases	22.7
Traffic	16.0
Effect Indicators	
CleanUp Sites	61.4
Groundwater	2.11

Haz Waste Facilities/Generators	84.2
Impaired Water Bodies	23.9
Solid Waste	0.00
Sensitive Population	
Asthma	97.5
Cardio-vascular	97.9
Low Birth Weights	32.3
Socioeconomic Factor Indicators	
Education	59.6
Housing	62.4
Linguistic	53.9
Poverty	59.1
Unemployment	_

7.2. Healthy Places Index Scores

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

Indicator	Result for Project Census Tract
Economic	
Above Poverty	44.39881945
Employed	43.98819453
Median HI	42.46118311
Education	
Bachelor's or higher	27.48620557
High school enrollment	26.06185038
Preschool enrollment	50.64801745
Transportation	
Auto Access	83.51084306

Active commuting	20.14628513
Social	
2-parent households	49.50596689
Voting	42.91030412
Neighborhood	
Alcohol availability	88.57949442
Park access	33.27345053
Retail density	43.29526498
Supermarket access	4.940331066
Tree canopy	75.20852047
Housing	
Homeownership	79.96920313
Housing habitability	58.20608238
Low-inc homeowner severe housing cost burden	14.01257539
Low-inc renter severe housing cost burden	61.46541768
Uncrowded housing	36.78942641
Health Outcomes	
Insured adults	41.30630053
Arthritis	45.8
Asthma ER Admissions	9.6
High Blood Pressure	41.6
Cancer (excluding skin)	57.8
Asthma	21.6
Coronary Heart Disease	57.7
Chronic Obstructive Pulmonary Disease	29.1
Diagnosed Diabetes	54.0
Life Expectancy at Birth	19.1

Cognitively Disabled	35.0
Physically Disabled	52.4
Heart Attack ER Admissions	3.7
Mental Health Not Good	31.8
Chronic Kidney Disease	64.9
Obesity	34.9
Pedestrian Injuries	19.6
Physical Health Not Good	41.5
Stroke	45.2
Health Risk Behaviors	
Binge Drinking	30.9
Current Smoker	14.6
No Leisure Time for Physical Activity	46.8
Climate Change Exposures	
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	22.0
Elderly	61.3
English Speaking	55.0
Foreign-born	42.4
Outdoor Workers	30.3
Climate Change Adaptive Capacity	
Impervious Surface Cover	80.1
Traffic Density	14.7
Traffic Access	23.0
Other Indices	
Hardship	65.4

Other Decision Support	
2016 Voting	30.3

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	51.0
Healthy Places Index Score for Project Location (b)	46.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Land uses and areas per Preliminary Site Plan (December 12, 2023) and project description. Landscape area per Preliminary Landscape Plan (January 19, 2024).
Construction: Construction Phases	No demolition, paving increased from 20 days to 40 days to account for large parking area, all other construction activities/durations per defaults.
Construction: Off-Road Equipment	Water truck added to site preparation and grading (Off-Highway Truck).

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Construction: Trips and VMT	24.2 paving haul trips per day (484 total truckloads) added to account for import of aggregate, asphalt, and concrete. Based on 4.8 acres of total paved and concrete area (including off-site improvements in the ROW), assuming 12 inches uncompressed aggregate/asphalt depth and 16 CY per tandem trailer load.
Construction: On-Road Fugitive Dust	500 feet of site preparation and grading haul trips assumed to be on unpaved on-site access roads.
Construction: Paving	Percent asphalt per project applicant
Operations: Vehicle Data	Trip rates calculated from the City of San Diego Municipal Code Trip Generation Manual. For a truck parking facility, trips would be 60 ADT per acre, 50% of trips assumed to be client truck trips and 50% assumed to be truck driver commute trips, employees commute trips, and vendor delivery trips. For a truck repair facility, trips would be 140 per site plus 2.396 per 1,000 Sf of office space, 30 trips per day assumed to be from employees, and the remaining from customer trucks. Truck trips assigned to Automobile Care Center (tuck repair shop). Truck driver and employee trips commute trips assigned to the office space. All trips assumed to be 100% primary (no diverted or pass-by reductions).
Operations: Fleet Mix	Truck trips assigned to truck repair facility (Automobile Care Center), assumed to be 100% HHD.
Operations: Refrigerants	No HVAC or refrigeration for the truck repair facility (Automobile Care Center).
Operations: Energy Use	Project would be all-electric. Default natural gas use converted to equivalent electrical energy (1 kBTU = 0.29307 kWh) and added to default electricity use.

Attachment B

Trip Generation Calculations

Raley Boulevard Truck Service and Parking Trip Generation

From the City of San Diego Trip Generation Manual

Truck Parking Facility: 60 trips per acre

Truck Repair Service: 140 trips per site + 2.5 trips per ksf administrative office

Trip Generation

	Units	Area	Rate	Per Site	Daily Trips
Truck Parking Facility	acre	4.62	60	0	277.2
Truck Repair Service	ksf	2.396	2.5	140	146.0
Total Trips			424		
Employee Commute Trips (assumes 6 office employees and 9 shop employees)			30		
Truck Trips			255		
Truck Driver Commute Trips			139		

Peak Hour Truck Trips

	% of Daily	Peak Hour
Daytime Peak Hour	-	-
Truck Repair Service	11%	13
Truck Parking Facility	9%	13
Daytime	26	
Nighttime Peak Hour		
Truck Repair Service	0%	0
Truck Parking Facility	4.5%	7
Nighttime	Peak Hour Total	7

Truck repair service daytime peak hour % from the City of San Diego Trip Generation Manual for an Auto Repair Service. Truck parking facility daytime peak hour % from the City of San Diego Trip Generation Manual for a Truck Terminal. Repair shop assumed to not operate at night; truck parking nighttime peak hour assumed to be 50% of peak daytime hour.