FINAL
ENVIRONMENTAL IMPACT REPORT
NEWLAND SIMPSON ROAD PROJECT
HEMET, CALIFORNIA
STATE CLEARINGHOUSE NO. 2023120462

PREPARED FOR:

CITY OF HEMET
445 E FLORIDA AVENUE
HEMET, CA 92543
CONTACT: MONIQUE ALANIZ-FLEJTER, COMMUNITY DEVELOPMENT DIRECTOR

PREPARED BY:

E | P | D SOLUTIONS, INC

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IRVINE, CA 92612

April 2025

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Appendices

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1. Introduction

This Final Environmental Impact Report (FEIR, or Final EIR) has been prepared by the in conformance with the environmental policy guidelines for the implementation of the California Environmental Quality Act (CEQA) to evaluate the environmental effects that may result from construction and operation of the proposed Newland Simpson Road Project (proposed Project; Project).

According to CEQA Guidelines Section 15132, a FEIR shall consist of:

(a) The Draft Environmental Impact Report (DEIR, or Draft EIR) or a revision of the Draft EIR;
(b) Comments and recommendations received on the Draft EIR, either verbatim or in summary;
(c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
(d) The responses of the lead agency to significant environmental points raised in the review and consultation process;
(e) Any other information added by the lead agency.

This document contains responses to comments received on the Draft EIR during the public review period, which began on May 17, 2024, and ended on July 1, 2024. This document has been prepared in accordance with the State CEQA Guidelines and represents the independent judgment of the lead agency, the City of Hemet. This document and the circulated Draft EIR comprise the Final EIR in accordance with CEQA Guidelines Section 15132.

1.1 FORMAT OF THE FINAL EIR

The following chapters are contained within this document:

Chapter 1, Introduction. This chapter describes CEQA requirements and the contents of the Final EIR.

Chapter 2, Response to Comments. This chapter provides a list of agencies and organizations who commented on the Draft EIR, as well as copies of their comment letters received during and following the public review period, and individual responses to their comments.

Chapter 3, Revisions to the Draft EIR. This chapter contains revisions made to the Draft EIR as a result of the comments received by agencies and organizations as described in Chapter 2, and/or errors and omissions discovered subsequent to release of the Draft EIR for public review.

The City of Hemet has determined that none of this material constitutes significant new information that requires recirculation of the Draft EIR for further public comment under CEQA Guidelines Section 15088.5. The additional material clarifies existing information prepared in the Draft EIR and does not present any new substantive information. None of this new material indicates that the project would result in a significant new environmental impact not previously disclosed in the Draft EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that would not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

Chapter 4, Mitigation, Monitoring, and Reporting Program. This chapter includes the Mitigation Monitoring and Reporting Program (MMRP). CEQA requires lead agencies to "adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment" (CEQA Section 21081.6, CEQA Guidelines Section 15097). The MMRP was prepared based on the mitigation measures included in this Final EIR and has been included as Chapter 4.0.

1.2 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of Draft EIRs should be "*on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible … CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.*"

CEQA Guidelines Section 15204(c) further advises, "*Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.*"

Section 15204(d) also states, "*Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility.*" Section 15204(e) states, "*This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.*"

In accordance with CEQA, Public Resources Code (PRC) Section 21092.5, copies of the written responses to public agencies are being forwarded to those agencies at least 10 days prior to certification of the Final EIR, with copies of this Final EIR document, which conforms to the legal standards established for response to comments on the Draft EIR pursuant to CEQA. Pursuant to CEQA Guidelines Section 15089(b), lead agencies may provide an opportunity for review of the Final EIR by the public or by commenting agencies before a project is approved, but are not required to do so.

2. Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency, the City of Hemet (City), to evaluate comments on environmental issues received from public agencies, organizations, companies, and individuals who reviewed the Draft Environmental Impact Report (EIR) and prepare written responses. This section includes copies of all written comment letters received on the Draft EIR and the City of Hemet's responses to the comment letters. Copies of the comment letters and responses to the comment letters will be provided to City decisionmakers as part of the Final EIR. Comment letters and specific comments are numbered for reference purposes which correspond to the City's response. A summary of each numbered comment in the commenter's letter precedes the City's response.

PUBLIC COMMENTS

The following is a list of public agencies, organizations, and individuals or interested parties that submitted comments on the Draft EIR during the public review and comment period (May 17, 2024, through July 1, 2024). All of the comment letters received on the Draft EIR and responses to those comments are provided on the following pages.

Table 2-1: Comments Received on the Draft EIR

Letter Number	Agency/Organization/Name	Comment Date Received
Agencies		
A1	California Department of Conservation	June 10, 2024
A2	Riverside County Department of Waste Resources	June 24, 2024
A3	South Coast Air Quality Management District	June 28, 2024
A4	Riverside County Flood Control and Water Conservation District	June 27, 2024
A5	Morongo Band of Mission Indians	June 28, 2024
A6	Agua Caliente Band of Cahuilla Indians	July 1, 2024
Organizations		
O1	Adams Broadwell Joseph & Cardozo, on behalf of Coalition for Californians Allied for a Responsible Economy	June 10, 2024
O2	Advocates for the Environment	June 24, 2024
O3	Golden State Environmental Justice Alliance	June 28, 2024
O4	Golden State Environmental Justice Alliance	June 28, 2024

Letter A1: California Department of Conservation (3 pages)

California
Department of Conservation
Division of Land Resource Protection

Gavin Newsom, Governor
David Shabazian, Director

JUNE 10, 2024

VIA EMAIL: MFLEJTER@HEMET.GOV
CITY OF HEMET
COMMUNITY DEVELOPMENT DEPARTMENT
MONIQUE ALANIZ-FLEJTER, DIRECTOR
445 E. FLORIDA AVENUE
HEMET, CA 92543

Dear Ms. Alaniz-Flejter:

NOTICE OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE NEWLAND SIMPSON ROAD PROJECT, SCH# 2023120462

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of a Draft Environmental Impact Report for the Newland Simpson Road Project (Project).

The Division monitors and maps farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. Public Resources Code, section 614, subdivision (b) authorizes the Department to provide soil conservation advisory services to local governments, including review of CEQA documents. **A1.1**

Protection of the state's agricultural land resources is part of the Department's mission and central to many of its programs. The CEQA process gives the Department an opportunity to acknowledge the value of the resource, identify areas of Department interest, and offer information on how to assess potential impacts or mitigation opportunities.

The Department respects local decision-making by informing the CEQA process, and is not taking a position or providing legal or policy interpretation.

We offer the following comments for consideration with respect to the project's potential impacts on agricultural land and resources within the Department's purview.

PROJECT ATTRIBUTES

The proposed project would develop the 74.88-acre project site with two new speculative industrial buildings totaling approximately 1,192,418 square feet (SF) and an ancillary trailer parking lot. Building 1 would be developed with an 883,080 SF speculative high-cube warehouse building including 838,926 SF of warehouse space, 44,154 SF of office space, and 144 dock-high doors. Building 2 would be developed with **A1.2**

State of California Natural Resources Agency | Department of Conservation
715 P Street, MS 1904, Sacramento, CA 95814
conservation.ca.gov | T: (916) 324-0850 | F: (916) 327-3430

a 309,338 SF speculative high-cube warehouse building including 293,871 SF of warehouse space, 15,467 SF of office space, and 50 dock-high doors.

The project would also include an 8.90-acre ancillary trailer parking lot with 160 truck trailer parking stalls in the easternmost lot across Warren Road. The proposed site contains Prime Farmland, and Farmland of Statewide Importance as designated by DOC's Farmland Mapping and Monitoring Program.

A1.2 (Cont.)

PROJECT CONSIDERATIONS

The conversion of agricultural land represents a permanent reduction and impact to California's agricultural land resources. The Department generally advises discussion of the following in any environmental review for the loss or conversion of agricultural land:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.
- Implementation of any City or County Agricultural Mitigation Plans, Programs, or Policies.
- Proposed mitigation measures for impacted agricultural lands within the proposed project area.

A1.3

MITIGATING AGRICULTURAL LAND LOSS OR CONVERSION

Consistent with CEQA Guidelines, the Department advises that the environmental review address mitigation for the loss or conversion of agricultural land. An agricultural conservation easement is one potential method for mitigating loss or conversion of agricultural land. (*See* Cal. Code Regs., tit. 14, § 15370 [mitigation includes "compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements."]; *see also King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814.)

Mitigation through agricultural conservation easements can take at least two forms: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements. The conversion of agricultural land may be viewed as an impact of at least regional significance. Hence, the search for replacement lands may not need to be limited strictly to lands within the project's surrounding area. A helpful source for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland

A1.4

mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

California Council of Land Trusts

Of course, the use of conservation easements is only one form of mitigation, and the Department urges consideration of any other feasible measures necessary to mitigate project impacts.

A1.4 (Cont.)

Thank you for giving us the opportunity to comment on the Notice of a Draft Environmental Impact Report for the Newland Simpson Road Project. Please provide the Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner via email at Farl.Grundy@conservation.ca.gov.

A1.5

Sincerely,

Monique Wilber

Monique Wilber

Conservation Program Support Supervisor

Response to Letter A1: Department of Conservation, dated June 10, 2024

Comment A1.1: This comment introduces the comment letter and states that the Department of Conservation (DOC) has reviewed the Draft EIR. The comment provides a summary of the DOC's responsibilities and their role in the review process of CEQA documents.

Response A1.1: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment A1.2: This comment provides a summary of the proposed Project and states that based on the DOC's Farmland Mapping and Monitoring Program, the Project site is designated as Prime Farmland and Farmland of Statewide Importance.

Response A1.2: This comment is informational in nature and does not provide any substantial evidence of significant environmental impacts not already disclosed in the Draft EIR. As discussed in the Draft EIR Section 5.2, *Agriculture and Forest Resources*, and as shown in Figure 5.2-1 of the Draft EIR, the site contains approximately 9.2 acres of Prime Farmland and 63.9 acres of Farmland of Statewide Importance. This comment does not express any specific concern or question regarding the adequacy of the Draft EIR, and no further response is warranted.

Comment A1.3: This comment states that the conversion of agricultural land is a permanent reduction and impact to California's agricultural land resources. The comment recommends discussion on the type, amount, and location of farmland conversion resulting from the proposed Project. The comment also recommends discussing impacts on any current and future agricultural operation in the vicinity; cumulative impacts on agriculture land; any City or County Agriculture Mitigation Plans, Programs and Policies; and discussion on proposed mitigation measures for impacted agriculture lands within the proposed Project area.

Response A1.3: As discussed in the Draft EIR Section 5.2, *Agriculture and Forest Resources,* the site contains approximately 9.2 acres of Prime Farmland and 63.9 acres of Farmland of Statewide Importance as shown in Figure 5.2-1 of the Draft EIR. Currently, the entirety of the Project site is utilized for farming and row crops Therefore, the Project would result in the direct loss of 9.2 acres of Prime Farmland and 63.9 acres of Farmland of Statewide Importance, which would result in a significant and unavoidable impact.

However, as mentioned in Section 4.0, *Environmental Setting,* of the Draft EIR, the Project site has a General Plan land use designation of Mixed Use (MU) and a zoning designation of Business Park (B-P), both of which are intended for urban uses. The proposed Project is requesting approval of a General Plan Amendment (GPA) to change the existing General Plan land use designation of the site from Mixed Use (MU) to Business Park (B-P); however, the proposed Project's use is permitted under the zoning designation. As evidenced by the site's current land use and zoning designations, urbanization of the site has been anticipated and accounted for since the adoption of the General Plan in 2012. The site is not among the 2,927 acres of land designated for Agriculture within the General Plan. As such, conversion of the site from agricultural uses has been planned by the City's General Plan since 2012 and the Project does not represent an unplanned conversion of agricultural land.

As discussed within Section 5.2.2.3 of the Draft EIR, the City of Hemet does not have specific policies or programs related to farmland beside the City's Right to Farm Ordinance. As the Project site is not zoned for agricultural uses, the Right to Farm Ordinance does not apply to the proposed Project.

This comment does not provide any substantial evidence that the Project would result in a significant environmental impact not previously disclosed in the Draft EIR.

Comment A1.4: This comment states that the DOC advises that the EIR address mitigation for the loss or conversion of agricultural land. The comment states that one potential form of mitigation would be a

conservation easement through the outreach purchase of easements or payment of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements. The comment provides a resource for farmland mitigation strategies and states that the use of conservation easements is only one form of mitigation and the City should consider other mitigation forms as well.

Response A1.4: As discussed on page 5.2-8 within Section 5.2, *Agriculture and Forestry* of the Draft EIR, there are no feasible mitigation measures to reduce impacts associated with the Project's conversion of agricultural lands designated as Prime Farmland and Farmland of Statewide Importance to nonagricultural uses. The entirety of the site is currently in agricultural production. However, retention of onsite agricultural uses would be infeasible as it would prevent the development of onsite buildings, which would inhibit implementation of the Project as a whole. Replacement of agricultural resources offsite would be infeasible as creation of new farmland-status properties within the City is outside of the City and Applicant control. Additional offsite mitigation would be infeasible as it would require the Applicant to purchase replacement acreage for farmland currently not in use elsewhere in California and restore it as viable farmland; however, offsite mitigation would not reduce impacts as the loss of agricultural land occurs within the Project parcels as the Project parcels have no relationship to the loss of agricultural lands within the City or County.

The comment letter proposes additional mitigation measures such as the purchase of easements and application of mitigation fees. However, this would not effectively reduce the Project's impact related to the loss of Prime Farmland and Farmland of Statewide Importance since these mitigation measures would not directly reduce the impacts in relation to the Project site. No feasible mitigation measures exist that would reduce the impact to levels that are less-than-significant; therefore, these recommended measures have not been included. Furthermore, an EIR is not required to adopt a mitigation measure that does not effectively address a significant impact (*Napa Citizens for Honest Gov't v Napa County Bd. of Supervisors* (2001) 91 CA4th 342, 365). Thus, the proposed Project is not required to implement the measures proposed in the comment as they would fail to reduce impact levels.

The Project site is designated for urban development pursuant to the City's General Plan and zoning designation. Existing agricultural uses within the City of Hemet are in various stages of converting to urban uses that are consistent with the General Plan. Existing agricultural uses within the City are becoming economically unsustainable and represent land uses that are increasingly incongruous with continuing urbanization of the City. Furthermore, retention of agricultural uses on the Project site would create or maintain islands of agricultural uses within an urbanized setting, exacerbating potential land use conflicts and land use incompatibilities. Transition of existing agricultural uses and farmland to non-agricultural uses is an unavoidable effect of implementing the previously approved General Plan as detailed in the General Plan EIR. Urbanization of the site has been anticipated and accounted for since the adoption of the General Plan in 2012. The site is not among the 2,927 acres of land designated for Agriculture within the General Plan. As such, conversion of the site from agricultural uses has been planned by the City's General Plan since 2012 and the Project does not represent an unplanned conversion of agricultural land. The commenter does not provide additional data or specific measures for consideration or incorporation when discussing "other feasible mitigation measures". Thus, no further response is warranted.

Comment A1.5: This comment requests that the DOC be notified with future hearing dates as well as staff reports pertaining to the Project. In addition, the comment provides contact information if the City has any questions on DOC's comment letter.

Response A1.5: The DOC will be added to the notification list for the proposed Project. This comment is conclusionary in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted .

Letter A2: Riverside County Department of Waste Resources (3 pages)

RIVERSIDE COUNTY DEPARTMENT OF WASTE RESOURCES

Hans W. Kernkamp, General Manager-Chief Engineer

SENT VIA EMAIL ONLY
mflejter@hemetca.gov

June 24, 2024

Monique Alaniz-Flejter, Community Development Director
City of Hemet (City)
445 E. Florida Avenue
Hemet, CA 92543

RE: Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR) for the Newland Simpson Road Hemet Project (SCH No. 2023120462; CUP 22-006; GPA 22-003 & TPM 38800).

Dear Monique Alaniz-Flejter,

The Riverside County Department of Waste Resources (RCDWR) has reviewed the NOP addressing a DEIR for the proposed Newland Simpson Road Project (Project). The Project includes various applications to develop the 74.88-acre Project site with two new speculative industrial buildings totaling approximately 1,192,418 square feet (SF) and an ancillary trailer parking lot. The Project would provide approximately 483,977 SF of landscaping, covering approximately 24.5 percent of the site. The Project would include infrastructure improvements along Simpson Road and Warren Road, including roadway widening, installation of sidewalks, and installation of a new sewer line. **A2.1**

The RCDWR would like to reiterate and/or provide the following comments for your consideration while preparing the Project's Final EIR:

1. The following information can be useful in the analysis of the solid waste impacts:

   a) The waste hauler may utilize the El Sobrante, Lamb Canyon, and/or the Badlands Landfill for disposal. Updated descriptions of the local landfills, inclusive of 2023-2024 information, are provided below: **A2.2**

      El Sobrante Landfill:

      The El Sobrante Landfill is located east of Interstate 15 and Temescal Canyon Road to the south of the City of Corona and Cajalco Road at 10910 Dawson Canyon Road. The landfill is owned and operated by USA Waste of California, a subsidiary of Waste Management, Inc., and encompasses 1,322 acres, of which 645 acres are permitted for landfill operation. The El Sobrante Landfill has a total disposal capacity of approximately 209.9 million cubic yards and can receive up to 70,000 tons per week (tpw) of refuse. USA Waste must allot at least 28,000 tpw for County refuse. The landfill's permit allows a maximum of 16,054 tons per day (tpd) of waste to be accepted

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www.rcwaste.org

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into the landfill, due to the limits on vehicle trips. If needed, 5,000 tpd must be reserved for County waste, leaving the maximum commitment of Non-County waste at 11,054 tpd. Per the 2023 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 47.2 million tons. In 2023, the El Sobrante Landfill accepted a daily average of 10,341 tons with a period total of approximately 3,184,920 tons. The landfill is expected to reach capacity in approximately 2059.

Lamb Canyon Landfill:

The Lamb Canyon Landfill is located between the City of Beaumont and City of San Jacinto at 16411 Lamb Canyon Road (State Route 79), south of Interstate 10 and north of Highway 74. The landfill is owned and operated by Riverside County. The landfill property encompasses approximately 1,189 acres, of which 703.4 acres encompass the current landfill permit area. Of the 703.4-acre landfill permit area, approximately 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 500 tpd for beneficial reuse. The site has an estimated total disposal capacity of approximately 21.1 million tons. As of January 1, 2024 (beginning of day), the landfill has a total remaining capacity of approximately 6.7 million tons. The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2032. From January 2023 to December 2023, the Lamb Canyon Landfill accepted a daily average of 2,049 tons with a period total of approximately 627,127 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site.

A2.2 cont.

Badlands Landfill:

The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by Riverside County. The existing landfill encompasses 1,168.3 acres, with a total disturbance area of 278 acres, of which 150 acres are for refuse disposal. Landfill expansion potential exists at the Badlands Landfill site. Under the 2022 Solid Waste Facility Permit (SWFP), the permitted disturbance area increases from 278 acres to 811 acres, and the refuse disposal area increases from 150 acres to 409 (in multiple stages). The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 300 tpd for beneficial reuse. The site has an estimated total capacity of approximately 68.6 million tons. As of January 1, 2024 (beginning of day), the landfill had a total remaining disposal capacity of approximately 49.8 million tons. Under the 2022 SWFP, the landfill would have a remaining disposal capacity estimated to last, at a minimum, until approximately 2059. From January 2023 to December 2023, the Badlands Landfill accepted a daily average of 2,848 tons with a period total of approximately 874,450 tons.

2. As indicated in previous correspondence (see attached), you may wish to consider incorporating the following measures to help reduce the Project's anticipated solid waste impacts and enhance efforts to comply with the State's mandate (AB 75) of 50% solid waste diversion from landfilling [1]:

A2.3

[1] A.B. 75, Chapter 764, 1999-2000 Strom-Martin, (Cal. 1999).

- AB 1826 requires businesses and multifamily complexes to arrange for organic waste recycling services.[2] Those subject to AB 1826 shall take at least one of the following actions in order to divert organic waste from disposal:
  - Source separate organic material from all other recyclables and donate or self-haul to a permitted organic waste processing facility.
  - Enter into a contract or work agreement with gardening or landscaping service provider or refuse hauler to ensure the waste generated from those services meet the requirements of AB 1826.
- Demonstrate compliance with SB 1383 which establishes regulations to reduce organics waste disposal and went into effect on January 1, 2022.[3] This law establishes methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants caused by organics waste disposal.

A2.3 cont.

Thank you for including RCDWR in the review process. Please continue to include the RCDWR in future transmittals. Please email me at kaavila@rivco.org if you have any questions regarding the above comments.

A2.4

Sincerely,

Katherine Avila
Assistant Planner

Cc: Kinika Hesterly, RCDWR

DM# 333130

[2] A.B. 1826, Chapter 727, 2013-2014 Chesbro, (Cal. 2014).
[3] A.B 1383, Chapter 395, 2015-2016 Lara, (Cal. 2016).

Response to Letter A2: Riverside County Department of Waste Resources, dated June 24, 2024

Comment A2.1: This comment provides an introduction to the comment letter. The comment provides a summary of the proposed Project.

Response A2.1: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted .

Comment A2.2: This comment lists the surrounding landfills to the Project site. The landfills listed are El Sobrante Landfill, Lamb Canyon Landfill and Badlands Landfill. This comment includes the updated description of these landfills and is inclusive of the 2023-2024 information.

Response A2.2: This comment includes the most updated information regarding the landfills listed within the Draft EIR. The comment includes information on El Sobrante, Lamb Canyon, and Badlands Landfill average daily tonnages as well as their max daily permitted tonnage based on the 2023-2024 reports.

This comment does not provide evidence of a significant impact. However, in response to the comment, page 5.17-15 of the Draft EIR has been revised in Chapter 3, *Errata*, of the Final EIR to state:

Table 5.17-4 below summarizes the characteristics of each landfill. Based on the average daily tonnage, the three landfills have a combined remaining capacity of approximately **10,780** ~~10,779~~ tpd.

Table 2-2: Landfill Capacity

Name	Max Daily Permitted (tpd) [1]	Average Daily Tonnage (tpd)[1]	Available Daily Disposal (tpd)	Closure Date[2]
El Sobrante Landfill	16,054	**10,341** ~~10,646~~	**5,713** ~~5,408~~	11/1/**2059** ~~2052~~
Lamb Canyon Landfill	5,000	**2,049** ~~1,969~~	**2,915** ~~3,031~~	4/1/2032
Badlands Landfill	5,000	**2,848** ~~2,660~~	**2,152** ~~2,340~~	1/1/2059

[1] Source: RCDWR, 2024 (included in Appendix A)
[2] Source: CalRecycle, 2022; CalRecycle, 2023

Comment A2.3: This comment suggests the inclusion of two different measures to reduce the Project's anticipated soil waste impacts and enhance compliance with SB 1383 and AB 1826.

Response A2.3: The Project would already be required to comply with Senate Bill 1383 and Assembly Bill 1826. Section 62-28 of the Hemet Municipal Code would also require the Project to follow AB 1826 stating that if the business generates more than two cubic yards of commercial solid waste per week recycling services must be arranged by subscribing to the City's franchise for the pick-up of organic materials. As the Project would be in compliance with the suggested waste reduction measures no further response is

Comment A2.4: This comment requests that the Department of Waste Resources be notified with future transmittals pertaining to the Project. In addition, the comment provides contact information if the City has any questions on the Department of Waste Resources comment letter.

Response A2.4: The Department of Waste Resources will be added to the notification list for the proposed Project. This comment is conclusionary in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted .

Letter A3: South Coast Air Quality Management District (9 pages)

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

SENT VIA E-MAIL:
mfleiter@hemetca.gov
City of Hemet Community Development Department
Monique Alaniz-Flejter, Community Development Director
445 E Florida Ave
Hemet, CA 92543

June 28, 2024

Draft Environmental Impact Report (EIR) for the Proposed Newland Simpson Road Hemet Project (Proposed Project) (SCH No. 2023120462)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Hemet is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff (Staff) has provided a brief summary of the project information and prepared the following comments. A3.1

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

Based on the Draft EIR, the Proposed Project consists of the construction and operation of two warehouses buildings (Building 1 and Building 2) totaling 1,192,418 square feet (sq ft) of development on 71.11 net acres of currently farmed land within the City of Hemet in Riverside County.[1] Building 1 will be developed as an 883,080 sq ft building on 44.22 acres and will include: 1) 838,926 sq ft of warehouse space; 2) 144 truck loading docks; and 3) the generation of 334 truck trips per day (167 trucks inbound + 167 trucks outbound).[2,3,4] Building 2 will be developed as a 309,338 sq ft building on 18.73 acres and will include: 1) 293,871 sq ft of warehouse space; 2) 50 truck loading docks; and 3) the generation of 118 truck trips per day (59 trucks inbound + 59 trucks outbound).[5,6,7] A3.2

The Proposed Project is expected to operate 24 hours/day, seven days/week, and does not anticipate cold storage facilities.[8] The nearest sensitive receptor, a private residence, is located approximately 930 feet southeast of the Proposed Project site (28744 Warren Road, Hemet, 92545) and the nearest off-site worker is located approximately 405 feet west.[9,10] Construction is anticipated to occur in one phase, commence in the 1st quarter of 2025, and be completed by the 2nd quarter of 2026 (lasting approximately 14 months).[11,12] The Proposed Project is located near the southeast intersection of Simpson Rd and Warren Rd.[13]

South Coast AQMD Staff's Comments

[1] Draft EIR. 3.0. Project Description. Pages 3-1 & 3-14.
[2] *Ibid.* 1.0 Executive Summary. Page 1-2.
[3] *Ibid.* Appendix D. Mobile Source Health Risk Assessment. Page 17.
[4] *Ibid.* Appendix N. Traffic Impact Analysis. Page 16.
[5] *Ibid.* 1.0 Executive Summary. Page 1-2.
[6] *Ibid.* Appendix D. Mobile Source Health Risk Assessment. Page 17.
[7] *Ibid.* Appendix N. Traffic Impact Analysis. Page 16.
[8] *Ibid.* 3.0 Project Description. Page 3-33.
[9] *Ibid.* 5.3. Air Quality. Page 5.3-17.
[10] *Ibid.* Appendix D. Mobile Source Health Risk Assessment. Page 2.
[11] *Ibid.* 3.0 Project Description. Page 3-33.
[12] *Ibid.* 3.0 Appendix C. Air Quality Impact Analysis. Page 41.
[13] *Ibid.* 1.0 Executive Summary. Page 1-1.

Potential Underestimation of Operational Emissions Due to Inaccurate Assumptions for Truck Trip Lengths

The Draft EIR states that in order to determine the emissions from trucks, the operational air quality impact analysis was based, in part, on the assumption that the average daily truck trip length is 39.9 miles for 4+-axle heavy-heavy-duty trucks (HHDT), 15.3 miles for 2-axle trucks (LHDT1, LHDT2), and 14.2 miles for 3-axle trucks (MHDT).[14] The Draft EIR then states that a weighted average trip length of 30.47 miles (based on traffic trip percentages) was used.[15] The Proposed Project site, however, is located approximately 90 miles away from the Ports of Long Beach and Los Angeles (Ports), which means that the air quality analysis underestimated the emissions from trucks traveling from the Ports to the Proposed Project site. For this reason, Staff recommends the Lead Agency revise the calculations in the Final EIR by taking a project-specific approach to the vehicle trip length. Tailoring these parameters and assumptions to be based on project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project. A3.3

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

The Proposed Project covers approximately 71.11 net acres. Appendix C of the Draft EIR states that during construction up to 15 acres/day can be actively disturbed during grading.[16] The Lead Agency uses South Coast AQMD's Mass Rate LST Look-up Table for five acres as a screening tool to determine if the Proposed Project's construction and operational daily emissions of NOx, CO, PM10 and PM2.5 could result in a significant impact to local air quality.[17] South Coast AQMD staff, however, developed the LST methodology for proposed projects that are less than or equal to five acres.[18] For projects that are greater than five acres in size, Staff recommends lead agencies perform project-specific dispersion modeling to determine *operational* localized air quality impacts. For *construction*, if project sites are greater than five acres in size and disturb more than five acres/day during the construction phase, as this Proposed Project is anticipated to do during grading, Staff also recommends lead agencies perform project-specific dispersion modeling to determine *construction* localized air quality impacts. Staff therefore recommends the Lead Agency to: 1) perform project-specific air dispersion modeling for the Proposed Project's construction and operational phase emissions to determine localized air quality impacts; and 2) include the results in the Final EIR. A3.4

Cumulative Impacts during Operation

Table 5-1 of the Draft EIR provides a list of 24 projects that are considered in the cumulative impact analysis of the Proposed Project.[19] Of these 24 projects, four are described as warehouse projects (project #16, #17, #20, and #23). Staff recommends the Lead Agency add another proposed warehouse project to the list, the Hemet Logistics West Project. According to the Notice of Preparation (NOP) for the Hemet Logistics West Project, SCH No. 2024051197 (NOP comment period of 5/29/2024 through 7/12/24), the A3.5

[14] Draft EIR. 5.3 Air Quality. Page 5.3-24.
[15] *Ibid.*
[16] *Ibid.* Appendix C. Air Quality Impact Analysis. Page 50.
[17] South Coast AQMD Appendix C – Mass Rate LST Look-up Table. Access here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf
[18] Final LST Methodology, July 2008. Page 1-1, 3-3, & 3-4. Access here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf
[19] Draft EIR. 5.0 Environmental Impact Analysis. Page 5.5.

Hemet Logistics West Project will consist of developing four industrial buildings with a combined gross floor area of 1,101,894 sq ft. This project is proposed to be built on 60.86 acres of currently vacant and undeveloped land near the southwest intersection of West Acacia Avenue and Cawston Avenue, Hemet, CA. **A3.5 Cont.**

Additionally, Per CEQA Guidelines Section 15065(a)(3), South Coast AQMD staff is primarily concerned with the cumulative air quality impacts from increased concentrations of air toxics in the region. Pursuant to CEQA which requires an analysis of direct, indirect, and cumulative impacts, South Coast AQMD has initiated a public process to develop additional guidance for evaluating cumulative air quality impacts from increased concentrations of air toxics for CEQA projects. As of the date on this comment letter, there have been five public working group meetings (WGMs) allocated to development of this proposed cumulative impact policy. For general information on WGMs #1 through #5 and to gain familiarity with this developing policy, please visit South Coast AQMD's webpage at https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new). **A3.6**

Given the aforementioned, Staff recommends that, at minimum, the Lead Agency perform a qualitative analysis in order to disclose the potential cumulative impacts from air toxics in consideration by listing all surrounding past, present, and probable future projects. The Lead Agency may also perform a more detailed and robust quantitative analysis of cumulative air toxics and its potential health risk implications and include such an analysis in the Final EIR.

Truck Idling Diesel Particulate Matter (DPM) Emissions and Building Downwash Option in Operational Phase Health Risk Assessment (HRA)

Staff reviewed the operational phase HRA air quality modeling files that the Lead Agency provided and notes that the building downwash effect was modeled for a 238-horsepower diesel fire pump's DPM emissions.[20] Staff also notes that the building downwash effect was not modeled for truck idling DPM emissions. By not modeling the building downwash effect for the trucking idling DPM emissions, the dispersion model results in an underestimation of ground-level pollutant concentrations near the building. The effects of building downwash can cause maximum ground level concentrations to more than double.[21] To model the building downwash effect of truck idling DPM emissions, the truck idling emissions must first be classified in AERMOD as a *point* source-type. As stated in South Coast AQMD Risk Assessment Procedures for Rules 1401, 1401.1 and 212, the algorithms used in building downwash only affect *point* source types and do not affect *volume* source types.[22] The Proposed Project's operational HRA modeling file show that the truck idling DPM emissions have been classified as *line volume* source types. Staff therefore recommends: 1) truck idling DPM emissions be modeled as *point* source types; 2) include building downwash effect on such DPM emissions in the model; and 3) include the updated HRA results and air quality analysis in the Final EIR. **A3.7**

Additional Recommended Air Quality and Greenhouse Gases (GHG)Project Design Considerations and Mitigation Measures

In the event that any of the above recommendations for the Proposed Project result in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any such impacts. Staff also notes that the Proposed Project's land use amendment to the City of Hemet General Plan results in the Proposed Project being located **A3.8**

[20] Email communication with Monique Alaniz-Flejter and Meaghan Truman on technical data request, June 5, 2024).
[21] South Coast AQMD Risk Assessment Procedures for Rules 1401, 1401.1 & 212. Page X-2 through X-4. Access here: https://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf
[22] *Ibid.*

Monique Alaniz-Flejter, Community Development Director June 28, 2024

adjacent to land parcels designated as Mixed Use (MU) land uses -with the MU designation intended for commercial, residential, and recreational uses- as well as other residential land use types (see Figure 1 below).[23],[24] Currently much of the land parcels adjacent to the Proposed Project site are utilized for farming activities (see Figure 2 below). South Coast AQMD is concerned about the potential public health impacts of siting new sensitive populations within proximity of existing air pollution sources (DPM emissions from Proposed Project). For the above reasons, prior to approving this Proposed Project, the Lead Agency is recommended to consider additional project design features (PDFs) and/or mitigation measures to further reduce the Proposed Project's air quality and GHG impacts. Staff recommends incorporating the following PDFs and mitigation measures into the Final EIR:

A3.8 Cont.

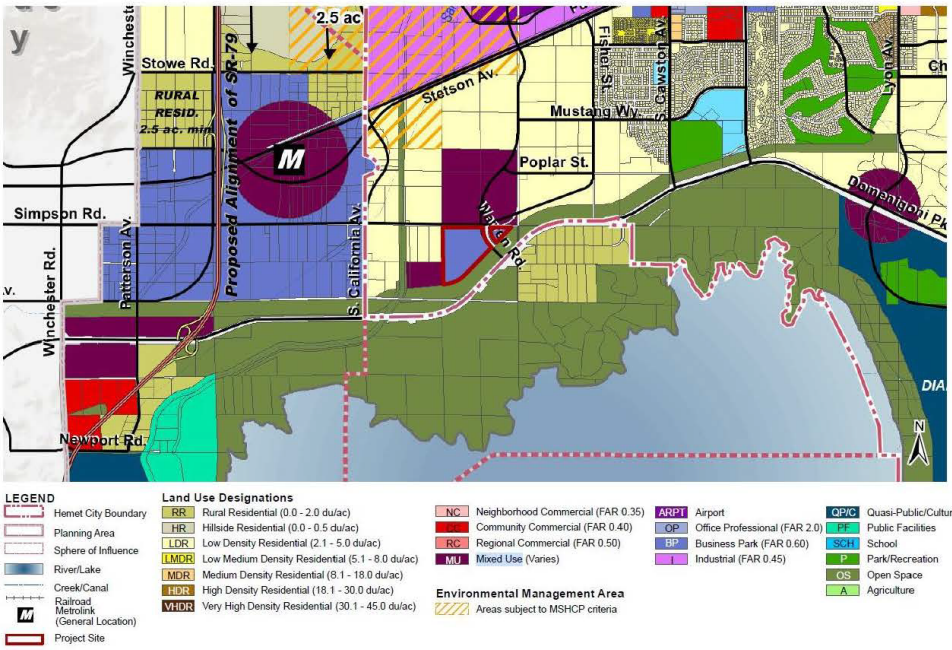

Figure 1. Screenshot of Draft EIR, Proposed General Plan Land Use Map, Page 3-19

[23] Draft EIR. 3.0 Project Description. Page 3-13.
[24] *Ibid.* 1.0 Executive Summary. Page 1-3.

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Figure 2. Screenshot of Draft EIR, Aerial view of Proposed Project site, Page 3-7

A3.8 Cont.

PDFs and Mitigation Measures for Construction and Operational Air Quality Impacts from Mobile Sources

1. Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the California Air Resources Board's (CARB) adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

A3.9

5

Note: Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

   Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.

4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment. Where appropriate, include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document.

A3.9 Cont.

PDFs and Mitigation Measures for Operational Air Quality Impacts from Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.

2. Use light-colored paving and roofing materials.

Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.

2. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.

3. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.

4. Restrict overnight truck parking in sensitive land uses by providing sufficient overnight truck parking inside the Proposed Project site.

Lastly, South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporate additional mitigation measures as applicable to the Proposed Project in the Final EIR: A3.10

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[25]

2. South Coast AQMD 2022 Air Quality Management Plan,[26] specifically:
   a) Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures
   b) Appendix IV-B – CARB's Strategy for South Coast
   c) Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation[27]

A3.10 Cont.

South Coast AQMD Air Permits and Role as a Responsible Agency

The Draft EIR states that the Proposed Project is required to obtain a permit from South Coast AQMD for the anticipated 238-horsepower fire pump.[28,29] If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, etc., air permits from South Coast AQMD will be required and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

A3.11

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

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the

A3.12

[25] State of California Department of Justice. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf

[26] South Coast AQMD, 2022 Air Quality Management Plan. Available at: http://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan

[27] US.EPA. Mobile Source Pollution - Environmental Justice and Transportation. Available at: https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation

[28] Draft EIR 1.0 Executive Summary. Page 1-7.

[29] *Ibid.* 3.0 Project Description. Page 3-36.

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

A3.12 Cont.

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

Sincerely,

Sam Wang

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

SW:EA
RVC240522-11
Control Number

Dear Monique Alaniz-Flejter,

South Coast AQMD staff received the Notice of Availability of a Draft Environmental Impact Report (NOA/DEIR) for the **Proposed Newland Simpson Road Hemet Project** (South Coast AQMD Control Number: RVC240522-11). Staff is currently in the process of reviewing the NOA/DEIR. The public commenting period is from 5/17/2024 – 7/1/2024.

Upon review of the files provided as part of the public review period, I was able to access the Draft EIR and Appendices on the City's website.

Please provide an electronic copy of any live modeling and emission calculation files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

- CalEEMod Input Files (.csv files);
- Live EMFAC output files;
- Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources (i.e. truck operations);
- AERMOD Input and Output files, including AERMOD View file(s) (.isc);
- HARP Input and Output files and/or cancer risk calculation files (live version of excel file(s); no PDF) used to calculate cancer risk, and chronic and acute hazards from the Project;
- Any other files related to post-processing done outside of AERMOD to calculate pollutant-specific concentrations (if applicable).

A3.13

You may send the above-mentioned files via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff by **6/5/24**. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

If you have any questions regarding this request, please contact me.

Thank you,

Evelyn Aguilar
Air Quality Specialist, CEQA-IGR
Planning, Rule Development & Implementation
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
Phone: 909-396-3148
E-mail: eaguilar@aqmd.gov
Hours of operation:
Tuesday - Friday 7:00 AM to 5:30 PM

Response to Letter A3: South Coast Air Quality Management District, dated June 28, 2024

Comment A3.1: This comment states that the South Coast Air Quality Management District (SCAQMD) has reviewed the Draft EIR for the Newland Simpson Road Hemet Project.

Response A3.1: This comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment A3.2: This comment provides a summary of the Project information within the Draft EIR.

Response A3.2: This comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment A3.3: This comment states that the Draft EIR assumed that the average daily truck trip length is 39.9 miles for 4+-axle trucks with a weighted average trip length of 30.47. The comment also states that since the Project site is approximately 90 miles from the Ports of Long Beach and Los Angeles, a project-specific approach to vehicle trip length calculations should be included in the Final EIR.

Response A3.3: The analysis was completed pursuant to SCAQMD's recommended methodology and utilized the average trip length for light-heavy (15.3-miles), medium-heavy (14.2-miles) and heavy-heavy trucks (39.9-miles) which is based on SCAQMD's recommendations outlined in their implementation of the Warehouse Actions and Investments to Reduce Emissions (WAIRE) adopted in 2021. These trip lengths represent averages and therefore would include local trips as well as potential trips that may occur to the applicable port facilities. It would be speculative to assume that all Project truck trips would extend only to the Ports of Los Angeles and Long Beach, and because the percentage of truck trips that would extend to the ports is not known at this time, it is appropriate to be consistent with SCAQMD's recommended methodology, which is based on actual data from similar facilities in the region.

Comment A3.4: This comment states that the Project would disturb up to 15 acres in per day and that the Draft EIR uses SCAQMD's Mass Rate LST Look-up Table for five acres as a screening tool to determine if the proposed Project's emissions could result in a significant impact to air quality. The comment then recommends that since the proposed Project would disturb more than five acres/day during construction, a project-specific dispersion model should be used to determine construction localized air quality impacts.

Response A3.4: As detailed on pages 49-50 of the Draft EIR Appendix C, *Air Quality Impact Analysis*, the LST analysis is based on the equipment-specific grading rates from SCAQMD's *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds* and CalEEMod User's Guide *Appendix C: Emission Calculation Details for CalEEMod* that determined the Project would disturb a maximum of 5.5 acres per day (Table 3-10). The SCAQMD analysis states that if the total acreage disturbed is greater than 5 acres per day, then LST impacts may still be conservatively evaluated using the LST look-up tables for a 5-acre disturbance area. Use of the 5-acre disturbance area thresholds can be used to show that even if the daily emissions from all construction activity were emitted within a 5-acre area, and therefore concentrated over a smaller area would result in greater site adjacent concentrations, however, the impacts would still be less than significant if the applicable 5-acre thresholds are utilized. As detailed on Draft EIR page 5.3-29, the emissions from disturbance of 5.5 acres per day was evaluated against SCAQMD's LSTs for a 5-acre site, which determined that emissions concentrated into a 5-acre area would not exceed LST thresholds, and that no mitigation measures are required. Therefore, impacts would be less than significant pursuant to SCAQMD methodology and project-specific dispersion modeling is not required.

However, in response to the comment from SCAQMD as a Responsible Agency, air dispersion modeling utilizing AERMOD version 23132 was performed for construction and operational emissions. Modeling in

AERMOD was performed consistent with SCAQMD recommendations, with emissions modeled using volume sources covering the Project site. For construction emissions, fugitive dust emissions were modeled as a ground-based area source, while volume sources were used for construction equipment exhaust emissions. As shown below in Tables 1 and 2 for construction and operation, respectively, Project construction and operational emissions would not exceed SCAQMD localized significance thresholds at the maximally exposed receptor location. AERMOD dispersion modeling outputs are presented in Attachment B within Appendix A of this Final EIR.

Table 1: Localized Significance Summary – Peak Construction

Peak Construction	CO		NO_2	PM_{10}	$PM_{2.5}$
	Averaging Time				
	1-Hour	8-Hour	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	0.06	0.01	4.10E-02	0.36	0.50
Background Concentration [A]	0.9	0.8	0.044		
Total Concentration	**0.96**	**0.81**	**0.09**	**0.36**	**0.50**
SCAQMD Localized Significance Threshold	20	9	0.18	10.4	10.4
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**

[A] Highest concentration from the last three years of available data. Per SCAQMD LST guidance, PM_{10} and $PM_{2.5}$ background concentrations are not considered.
Notes: PM_{10} and $PM_{2.5}$ concentrations are expressed in $\mu g/m^3$. All others are expressed in ppm.

Table 2: Localized Significance Summary – Peak Operations

Peak Operations	CO		NO_2	PM_{10}	$PM_{2.5}$
	Averaging Time				
	1-Hour	8-Hour	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	1.27E-02	6.79E-03	9.01E-04	0.24	0.20
Background Concentration [A]	0.9	0.8	0.044		
Total Concentration	**0.91**	**0.81**	**0.04**	**0.24**	**0.07**
SCAQMD Localized Significance Threshold	20	9	0.18	2.5	2.5
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**

[A] Highest concentration from the last three years of available data. Per SCAQMD LST guidance, PM_{10} and $PM_{2.5}$ background concentrations are not considered.
Notes: PM_{10} and $PM_{2.5}$ concentrations are expressed in $\mu g/m^3$. All others are expressed in ppm.

Comment A3.5: This comment states that the Hemet Logistics West Project should be added to the Table 5-1 Cumulative Projects List.

Response A3.5: This Project is included in Table 5-1, *Cumulative Projects List,* as Project No. 23, with the Title Hemet 63.

Comment A3.6: This comment states that SCAQMD has been developing guidance for evaluating cumulative air quality impacts for CEQA projects. The commenter also recommends that the Lead Agency perform a qualitative analysis of cumulative impacts by listing all surrounding past, present, and probable future projects and may also perform a quantitative analysis of cumulative air toxins.

Response A3.6: The comment regarding SCAQMD development of guidance for evaluating cumulative air quality impacts for CEQA projects, has been noted.

The Draft EIR lists the cumulative projects in Draft EIR Table 5-1, *Cumulative Projects List* within Section 5.0, *Environmental Impact Analysis*. Also, as detailed in Draft EIR Section 5.3.7, *Cumulative Impacts*, based on guidance published in SCAQMD's *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*[1], if an individual project does not exceed the SCAQMD's thresholds for project-specific impacts, then it would also not result in a cumulatively considerable impact. As detailed throughout Draft EIR Section 5.3, *Air Quality*, the Project would not exceed any thresholds and impacts would be less than significant.

Impacts related to toxics and health effects are discussed on pages 5.3-30 and 5.3-31 of Section 5.3, *Air Quality* in the Draft EIR, which describes that the SCAQMD states that it has been able to correlate potential health outcomes for very large emissions sources, but that the Project's emissions would equate to 1.45 and 0.73% of NOx and 0.05% of VOC emissions. This therefore has have the potential to correlate to a health risk, which would be less than cumulatively significant. Additionally, based on existing SCAQMD recommendations for Mobile Source Health Risk Assessments, the combined construction and operational impacts of the proposed Project at the closest effected receptor is estimated at 1.29 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be less than0.01, which would not exceed the applicable threshold of 1.0. As such, the Project would result in emissions that are far below existing SCAQMD thresholds. Therefore, the Project's impacts on human health risks would not be cumulatively considerable and would be less than significant.

Furthermore, each of the cumulative projects listed by the comment are located well over 1,000 feet from the proposed Project and proposed Project truck routes.The Kirby Industrial project is located approximately 11,050 feet (2.1 miles) northeast of the proposed Project site, and approximately 7,950 feet (1.5 miles) from a proposed Project truck route on Warren Road.

- The JD Fields & Company project is located approximately 15,000 feet (2.8 miles) northeast of the proposed Project site, and approximately 12,000 feet (2.3 miles) from a proposed Project truck route on Warren Road.
- The National Tube Steel project is located approximately 9,900 feet (1.9 miles) northeast of the proposed Project site, and approximately 6,900 feet (1.3 miles) from a proposed Project truck route on Warren Road.
- The Hemet 63 project is located approximately 9,150 feet (1.7 miles) northeast of the proposed Project site, and approximately 4,000 feet (0.8 miles) from a proposed Project truck route on Warren Road.
- The Hemet Logistics West project is located approximately 6,200 feet (1.2 miles) northeast of the proposed Project site, and approximately 3,900 feet (0.7 miles) from a proposed Project truck route on Warren Road.

As such, TAC emissions from these cumulative projects combined with those from the proposed Project would not have the potential to result in a cumulatively significant health risk impact.

Comment A3.7: This comment states that SCAQMD staff reviewed the operational phase HRA air quality modeling files and states that the building downwash effect was modeled for a 238-horsepower diesel fire pump's DPM emissions, but not modeled for truck idling DPM emissions. The comment states that by not modeling the building downwash effect for the trucking idling DPM emissions, the dispersion model results in an underestimation of ground-level pollutant concentrations near the building. The comment also states that

[1] SCAQMD. (2003). *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution.* http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf

effects of building downwash can cause maximum ground level concentrations to more than double. The comment states that to model the building downwash effect of truck idling DPM emissions, the truck idling emissions must first be classified in AERMOD as a point source-type. As stated in SCAQMD Risk Assessment Procedures for Rules 1401, 1401.1 and 212, the algorithms used in building downwash only affect point source types and do not affect volume source types. The comment states that the proposed Project's operational HRA modeling file shows that the truck idling DPM emissions have been classified as line volume source types. The comment recommends: (1) truck idling DPM emissions be modeled as point source types; (2) include building downwash effect on such DPM emissions in the model; and (3) include the updated HRA results and air quality analysis in the Final EIR.

Response A3.7: Pursuant to the comment, the HRA has been revised to model idling truck exhaust as point sources rather than volume sources, and as such building downwash is now accounted for in the model for these emission sources. Tables 3 and 4 below present the operational risk and combined construction and operational risk, respectively, for the revised modeling.

Table 3: Summary of Operational Cancer and Non-cancer Risks

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
30 Year Exposure	Maximum Exposed Sensitive Receptor (Location R3)	1.47	10	No
25 Year Exposure	Maximum Exposed Worker Receptor (Location R6)	0.08	10	No
Annual Average	Maximum Exposed Sensitive Receptor (Location R3)	<0.01	1.0	No
Annual Average	Maximum Exposed Worker Receptor (Location R6)	<0.01	1.0	No

Table 4: Summary of Construction and Operational Cancer and Non-cancer Risks

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
30 Year Exposure	Maximum Exposed Sensitive Receptor (Location R1)	1.30	10	No
Annual Average	Maximum Exposed Sensitive Receptor (Location R1)	<0.01	1.0	No

As shown above in Table 3, with truck idling emissions modeled as point sources as well as the inclusion of the building downwash option, operational risk at the maximum exposed sensitive receptor remained unchanged at 1.47 in one million, while operational risk at the maximum exposed worker receptor was reduced from 0.09 in one million to 0.08 in one million. As shown in Table 4, the combined construction and operational cancer risk at the maximum exposed sensitive receptor increased slightly from 1.29 in one million to 1.30 in one million. AERMOD modeling outputs are presented in Attachment C, and detailed risk calculations are presented in Attachment D within Appendix A to the Final EIR.

Comment A3.8: This comment states that should the recommended revisions from the comments above result in any new significant adverse air quality impacts, mitigation measures should be included to minimize or eliminate impacts. The comment also states that there are potential health impacts to new sensitive

populations with the buildout of the adjacent Mixed Use parcels. Thus, the commenter has provided additional project design features and/or mitigation measures to further reduce air quality and GHG impacts to be incorporated into the Final EIR.

Response A3.8: As discussed above in Responses A3.3 through A3.7, none of the above comments have resulted in any new adverse impacts, thus no additional mitigation measures beyond what has been proposed in the Draft EIR would be required. As shown on Draft EIR Table 5.3-14, *Summary of Construction and Operational Cancer and Non-Cancer Risks,* in Draft EIR Section 5.3, *Air Quality,* the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction or operational activity. The Project would implement the City of Hemet General Plan policies including Goal C-4, and Policies C-4.1, C-4.2, C-4.5, C-4.6, CSI 5.5, OS-6.1, OS 7.1, OS 7.9, OS 7.10, OS 7.11, OS-7.12, and OS-8.6 which would further minimize impacts. There is a less-than-significant LST impact on nearby sensitive receptors, thus there is no nexus for further mitigation. No further response is warranted.

Comment A3.9: This comment provides a list of additional resources that include PDFs and Mitigation measures to help reduce air quality and GHG impacts.

Response A3.9: As described previously in Response A3.3 through Response A3.8, implementation of the proposed Project would not exceed air quality thresholds related to DPM and LSTs, and impacts related to human health, cancer risks, and localized air quality would be less than significant. Thus, additional mitigation to reduce DMP or localized emissions is not required.

The Project would implement existing regulations and the mitigation measures related to air quality and greenhouse gas emissions, many of which are consistent with the comment's recommended measures. The Table below compares the comment's recommended measure with the measures currently applied to the Project. As detailed below, many of the recommended measures are required to be implemented by existing regulations and/or are included in Draft EIR mitigation measures. The measures that are not included are either not applicable to the Project, not required as Project impacts related to the recommended measure would not occur, or because the Project applicant and the City do not have the authority to require the measure and therefore are infeasible, as detailed below.

Comment's Recommended Measure	Project Inclusion/Applicability
Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the California Air Resources Board's (CARB) adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.	Warehouses in southern California are not required to monitor or limit what types of trucks can enter warehouse properties. To impose such a condition on the Project would highly limit the potential tenants/building operations and implementing the measure would require extensive employee involvement to monitor each truck which enters the Project and refuse entry to non-qualifying trucks. This measure is also not enforceable as there is no known timing for when "cleaner" trucks would be commercially available. Due to the infeasibility and enforceability of this recommended measure, it has not been included.
Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.	The City and the future tenants of the buildings would not be able to enforce the types of technology (i.e., zero-emissions or near-zero emissions) on all of the trucks accessing the Project site as these trucks would be operated by service providers outside of the proposed Project's control. It is infeasible to both implement and enforce the types of vehicles driving to the site that are not owned or contracted by warehouse tenants and/or operators. For example, future tenants would not be able to control the types of FedEx, UPS, postal, or other

Comment's Recommended Measure	Project Inclusion/Applicability
	delivery trucks that access the site. This measure is also not enforceable as there is no known timing for when "cleaner" trucks would be commercially available. Due to the infeasibility and enforceability of this recommended measure, it has not been included.
Limit the daily number of trucks allowed at the proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the proposed Project through CEQA prior to allowing this higher activity level.	The Draft EIR evaluates full occupation/capacity of the proposed building and identifies the maximum daily emissions that would occur from both construction and operation of the Project. Thus, the Project would not exceed the number of daily truck trips that was evaluated in the Draft EIR. Should there be future proposed changes to the Project, such as an increase in square footage, that may have the potential to increase vehicle trips, truck trips, or other sources of air quality emissions, a CEQA analysis would be required evaluate the potential impacts related to the increase. Should additional potential impacts be identified, new mitigation measures would be applied and this particular mitigation measure language has not been included.
Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment. Where appropriate, include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document.	The proposed Project would include 64 EV charging parking spaces. The proposed Project does not include cold storage so trucks accessing the site are not expected to have TRUs that would be needed to be hooked up. Therefore language for this particular mitigation measure language has not been included.
Maximize the use of solar energy by installing solar energy arrays.	The proposed Project would include a 100% solar ready roof. this particular mitigation measure language has not been included.
Use light-colored paving and roofing materials.	As shown in Figure 5.1-1, *Project Renderings,* within Draft EIR Section 5.1, *Aesthetics*, the proposed Project would feature a white roof as well as a mostly white and light gray façade. this particular mitigation measure language has not been included.
Design the proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the proposed Project site.	As discussed in Section 3.0 of the Draft EIR, *Project Description*, the Project would include six driveways along Simpson Road and truck movement to and from the Project site would directly access the City of Hemet truck route utilizing the Simpson Road and Warren Road intersection. Trucks accessing the site via the available truck route on Simpson Road on the north side of the property would not travel past the sensitive land uses to the southeast. No aspect of the proposed Project would require a change to the truck route network. this particular mitigation measure language has not been included.
Design the proposed Project such that any truck check-in point is inside the proposed Project site to ensure no trucks are queuing outside.	As shown on Figure 3-7 of the Draft EIR, C*onceptual Site Plan*, sliding gates would be located on the entrances of each truck court, located within the parking lot of each building and not adjacent to the roadways. this particular mitigation measure language has not been included.

Comment's Recommended Measure	Project Inclusion/Applicability
Design the proposed Project to ensure that truck traffic inside the proposed Project site is as far away as feasible from sensitive receptors.	As shown on Figure 3-7 of the Draft EIR, *Conceptual Site Plan*, truck courts for Building 1 would be located on the west and east sides of the building and the truck court in Building 2 would be facing west towards building 1. Thus, the truck courts and loading docks would be positioned away from any sensitive receptors. this particular mitigation measure language has not been included.
Restrict overnight truck parking in sensitive land uses by providing sufficient overnight truck parking inside the Proposed Project site.	As discussed in Section 3.0 of the Draft EIR, *Project Description*, the proposed Project would provide 419 truck trailer parking stalls which would provide sufficient parking for trucks accessing the site. this particular mitigation measure language has not been included.

Comment A3.10: This comment provides additional resources to incorporate further mitigation measures to the proposed Project.

Response A3.10: As described in the previous responses A3.3 through A3.7, the Project would not exceed thresholds and additional mitigation is not required. The commenter's assertion that the Draft EIR does not provide substantial evidence for the determination that the Project will not be able to achieve any mitigation beyond what was identified in the proposed mitigation measures is unsubstantiated. Moreover, this comment is introductory, and the commenter does not provide additional data or specific measures for consideration or incorporation under this specific comment. As discussed on page 5.8-3 of the Draft EIR, 79% of Project emissions would primarily result from mobile source emissions, both vehicle and truck. There are no available feasible Project measures that would further reduce vehicular and truck emissions to below the GHG threshold, since neither the Project Applicant nor the Lead Agency (City of Hemet) can substantively or materially affect reductions in Project mobile-source emissions and/or available technologies at a cumulative level. As addressed above in Response A3.9, the proposed Project would include 64 EV charging parking spaces and 100% solar-ready roofs to mitigate emissions to the greatest extent feasible. Therefore, no further revisions to the Draft EIR are required. Therefore, no further mitigation measures are required to be developed for the proposed Project.

Comment A3.11: This comment states that if the Project would require the use of new stationary and portable sources, air permits from SCAQMD will be required and the role of SCAQMD would change from a Commenting Agency to a Responsible Agency under CEQA. The comment continues by saying that if SCAQMD is identified as a Responsible Agency, the Lead Agency must consult with SCAQMD and is included in deciding on the adequacy of the CEQA Document. The comment concludes by saying that the Final EIR should include a discussion about any new stationary and portable equipment requiring SCAQMD permits and to identify SCAQMD as a Responsible Agency.

Response A3.11: As discussed in Appendix C of the Draft EIR, the proposed Project was conservatively assumed to include installation of a 238-horsepower diesel-powered fire pump which is estimated to operate for up to 1 hour per day, 1 day per week for up to 50 hours per year for maintenance and testing purposes. Emissions associated with the stationary diesel-powered emergency fire pumps were calculated using CalEEMod. Thus, use of the fire pump was included in the analysis for operational emissions. Building occupants are assumed to be warehouse distribution and logistics operators and light manufacturers; however, specific tenants and uses are currently unknown. Future occupants would be processed through the City and SCAQMD's permitting system. Should future tenants require any stationary equipment such as an emergency generator, fire pump, or other machinery, a permit from SCAQMD would be required, and would be ensured by the City's permitting process. In addition, the SCAQMD has been identified as a CEQA Responsible Agency in Section 3.0, *Project Description*, of the Draft EIR in Table 3-6, *Project Approvals/Permits*.

Comment A3.12: This comment states that the Lead Agency shall evaluate comments and prepare a written response at least 10 days prior to certifying the Final EIR. If the Lead Agency's position is at variance with recommendation provided in the comment letter, detailed reasons supported by substantial evidence in the record to explain why comments are not accepted must be provided.

Response A3.12: This comment is conclusory in nature and does not raise any specific issue with the adequacy of the Draft EIR. According to State CEQA Guidelines, written responses to comments provided throughout the public comment period will be provided at least 10 days prior to the certification of the Final EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment A3.13: This comment includes an email SCAQMD has received the Draft EIR and is being reviewed. The comment requests all technical documents related to air quality, health risk, and GHG analyses, electronic versions of all emission calculation files, and air quality modeling and health risk assessment files (complete files, not summaries), that were used to quantify the air quality impacts from construction and/or operation of the proposed Project to be uploaded to a Dropbox link for SCAQMD review.

Response A3.13: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR. In response to the request for information, the technical documentation was compiled, and a Dropbox link was emailed by the City to SCAQMD staff on June 5, 2024. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

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Letter A4: Riverside County Flood Control and Water Conservation District (2 pages)

JASON E. UHLEY
General Manager-Chief Engineer

1995 MARKET STREET
RIVERSIDE, CA 92501
951.955.1200
951.788.9965 FAX
www.rcflood.org

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

256798

June 27, 2024

City of Hemet
Planning Department
445 E. Florida Avenue
Hemet, CA 92543

Attention: Monique Alaniz-Flejter

Re: CUP 22-006, GPA 22-003 and TPM 38800, Newland Simpson Road Hemet Project (SCH No. 2023120462), APNs 465-140-042 and 465-140-043

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided. **A4.1**

The District's review is based on the above-referenced project transmittal, received May 20, 2024. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

☐ This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed. **A4.2**

☒ This project involves District proposed Master Drainage Plan facilities, namely, Southwest Hemet Master Drainage Plan Line J and Southwest Hemet Master Drainage Plan Lateral B-1, and Southwest Hemet Master Drainage Plan Line I to protect the site as well as provide for an adequate outlet into Salt Creek Channel. The District will accept ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. All regulatory permits (and all documents pertaining thereto, e.g., Habitat Mitigation and Monitoring Plans, Conservation Plans/Easements) that are to be secured by the Applicant for both facility construction and maintenance shall be submitted to the District for review. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety. **A4.3**

☒ If this project proposes channels, storm drains larger than 36 inches in diameter, or other facilities that could be considered regional in nature and/or a logical extension a District's facility, the District would consider accepting ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to **A4.4**

District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety. **A4.4 cont.**

☒ This project is located within the limits of the District's Salt Creek Channel-South Hemet Area Drainage Plan for which drainage fees have been adopted. If the project is proposing to create additional impervious surface area, applicable fees should be paid (in accordance with the Rules and Regulations for Administration of Area Drainage Plans) to the Flood Control District or City prior to issuance of grading or building permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit. **A4.5**

☒ An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, Salt Creek Channel. If a proposed storm drain connection exceeds the hydraulic performance of the existing drainage facilities, mitigation will be required. For further information, contact the District's Encroachment Permit Section at 951.955.1266. **A4.6**

☒ The District's previous comments dated April 11, 2023 are still valid. **A4.7**

GENERAL INFORMATION

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt. **A4.8**

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy. **A4.9**

The project proponent shall bear the responsibility for complying with all applicable mitigation measures defined in the California Environmental Quality Act (CEQA) document (i.e., Negative Declaration, Mitigated Negative Declaration, Environmental Impact Report) and/or Mitigation Monitoring and Reporting Program, if a CEQA document was prepared for the project. The project proponent shall also bear the responsibility for complying with all other federal, state, and local environmental rules and regulations that may apply. **A4.10**

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit. **A4.11**

Very truly yours,

Amy McNeill

AMY MCNEILL
Engineering Project Manager

ec: Riverside County Planning Department
Attn: Timothy Wheeler
EM:blj

Response to Letter A4: Riverside County Flood Control and Water Conservation District, received June 28, 2024

Comment A4.1: This comment discusses the extent of the Riverside County Flood Control and Water Conservation District (District) plan check process. The comment continues in explaining that the District received the NOA related to the Project but did not review the Project in detail. The comment states that the comment letter provides the District's comments.

Response A4.1: This comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment A4.2: The comment states that the Project would not be impacted by District Master Drainage Plan facilities, nor are other facilities proposed in the area.

Response A4.2: This comment is noted for the record and will be forwarded to City decisionmakers as part of the Final EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment A4.3: This comment states that the Project involves proposed Master Drainage Plan facilities, Southwest Hemet Master Drainage Plan Line J and Southwest Hemet Master Drainage Plan Lateral B-1, and Southwest Hemet Master Drainage Plan Line I to protect the site and provide an adequate outlet into Salt Creek Channel and that the District will accept ownership of those facilities upon written request from the City. In addition, the Project Applicant will be required to enter into an agreement establishing terms and conditions with the District and that all fees and permits shall be required.

Response A4.3: As discussed in Draft EIR Chapter 5.10, *Hydrology and Water Quality*, the Project would not modify Master Drainage Plan Line J, Lateral B-1, or Line I. The Project proposes an onsite 36-inch private storm drain which would include a bubble up overland release to Salt Creek Channel. Moreover all proposed Project related development would be required to apply for a MS4 NPDES permit, develop a SWPPP, adhere to all applicable City of Hemet General Plan policies, and observe BMPs in site construction and operation. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment A4.4: This comment continues the checklist and states that if the Project proposes channels, storm drains 36 inches or larger, or other facilities that could be considered regional in nature or an extension of the District's facilities, the District would consider a written request for ownership of such facilities by the City and the Project Applicant would enter into a cooperative Agreement.

Response A4.4: As discussed in Response A4.3, the only storm drain larger than 36 inches in diameter is proposed onsite and would be private. The Project Applicant would pay all necessary development feesand this comment will be forwarded to City decision makers as part of the Final EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment A4.5: This comment continues through the checklist and states that the Project is located within the limits of the Area Salt Creek Channel – Hemet South Drainage Plan and if the Project proposes additional impervious surface area, applicable fees would need to be paid prior to building permit issuance.

Response A4.5: The Project would be required to pay all applicable fees through standard conditions of approval and permitting requirements. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment A4.6: This comment states an encroachment permit shall be obtained for any construction activities occurring within District rights-of-way, specifically Salt Creek Channel. The comment describes that if a storm drain connection exceeds the hydraulic performance of the existing drainage facilities, mitigation would be required.

Response A4.6: The Project does not propose any construction-related activities within District right of way or facilities, including Salt Creek Channel. As discussed above in Responses A4.3 and A4.4, the Project proposes an onsite 36-inch private storm drain which would include a bubble up overland release to Salt Creek Channel. As such, the Project would not include storm drains directly connecting to Salt Creek Channel. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment A4.7: This comment states that the District's comments dated April 11, 2023, are still valid.

Response A4.7: The comments provided in the District's letter dated April 11, 2023, are the same comments provided in Letter A4 herein. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment A4.8: The comment states that the Project would require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board and clearance for grading, recordation, or other final approval should not be given until the City has determined a permit has been granted or the Project is shown exempt.

Response A4.8: As discussed on Draft EIR page 5.10-18 of Section 5.10, *Hydrology and Water Quality* of the Draft EIR, the proposed infiltration basin would capture the 72-hour rainfall depth for a 100-year 3-hour rain event, per the City's LID requirements. Any additional runoff volume would be discharged via an outlet pipe and conveyed downstream to Salt Creek Channel with a maximum outlet flow rate equal or less than the existing condition 100-year and 3-hour storm event. Further, the BMPs identified in the WQMP would reduce the potential for erosion and siltation. As part of the permitting approval process, the proposed drainage, water quality design, and engineering plans would be reviewed by the City's Engineering Department to ensure they meets the City's NPDES Permit requirements and limit the potential for erosion and siltation.

Comment A4.9: The comment states that if the Project involves a Federal Emergency Management Agency (FEMA) mapped floodplain then the City should require the Applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require the Applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the Project and a Letter of Map Revision (LOMR) prior to occupancy.

Response A4.9: As discussed on Draft EIR page 5.10-20 within Section 5.10, *Hydrology and Water Quality*, according to FEMA FIRM Map 06065C2085G, the Project site is located within a "0.2% Annual Chance Flood Hazard, Zone X" flood plain area, defined as areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile. In addition, Zone X flood plain areas are outside the 100-year floodplain. Therefore, the proposed Project is located outside any 100-year flood zones and has low risk due to flooding. As such, the Project would not require a CLOMR or LOMR from FEMA.

Comment A4.10: The comment states that the Project proponent shall bear the responsibility for complying with all mitigation measures in the CEQA document and all other federal, State, and local environmental rules and regulations.

Response A4.10: This comment is informational in nature. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted, However, this comment will be forwarded to City decision makers as part of the Final EIR. .

Comment A4.11: The comment states that if a natural watercourse or flood plain is impacted by the Project, the City should require the Applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife, a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, and/or a Clean Water Act Section 401 Water Quality Certification from the local California Regional Water Quality Control Board.

Response A4.11: The Project would not impact any natural watercourse or mapped floodplain. No further response is warranted.

Letter A5: Morongo Band of Mission Indians (1 page)

TRIBAL HISTORIC PRESERVATION OFFICE

VIA ELECTRONIC MAIL

scarrisoza@hemetca.gov

Soledad Carrisoza
Associate Planner
City of Hemet
445 East Florida Avenue
Hemet CA 92543

June 28, 2024

MORONGO BAND OF MISSION INDIANS
A SOVEREIGN NATION

Re: Notice of Availability of Draft Environmental Impact Report for the Simpson Road Project in the City of Hemet, California

The Morongo Band of Mission Indians (Tribe/MBMI) Tribal Historic Preservation Office (THPO) has reviewed the Draft Environmental Impact Report (DEIR) that City of Hemet (City) has made available for the Simpson Road Project (Project). MBMI THPO has reviewed mitigation measures included in the Project DEIR. At this time, Tribe has no further comments upon the Project. **A5.1**

As the lead agency, the City is responsible for ensuring that the Mitigation Measures agreed upon are carried out by the Project Proponent. As Tribal Monitoring is one of those Mitigation Measures, a Tribal Monitoring Services Agreement (TMSA) must be established with MBMI in advance of the actual beginning of any ground-disturbing activity at the Project site. **A5.2**

Moreover, MBMI reserves the right, under AB 52, to continue Government-to-Government Consultation until the Project is complete and/or if circumstances make further communication and consultation necessary. This ensures that should cultural resources or tribal cultural resources be found at any stage of the Project, consultation mechanisms and policies will already be in place.

MBMI looks forward to continuing to work with the City until the above Project is completed. Please notify Tribe when the Project is scheduled to begin so that Consultation can prepare appropriate Service Agreement Documents for the Project Proponent. **A5.3**

If you have any questions or concerns, please contact Bernadette Ann Brierty, Tribal Historic Preservation Officer (THPO): ABrierty@morongo-nsn.gov, THPO@morongo-nsn.gov or (951) 663-2842.

Bernadette Ann Brierty

Bernadette Ann Brierty

Tribal Historic Preservation Officer

Morongo Band of Mission Indians

CC: Morongo THPO

12700 Pumarra Road – Banning, CA 92220 – (951) 755-5259 – Fax (951) 572-6004 – THPO@morongo-nsn.gov

Response to Letter A5: Morongo Band of Mission Indians, dated June 28, 2024

Comment A5.1: This comment states that the Morongo Band of Mission Indians (MBMI) Tribal Historic Preservation Office has reviewed the Draft EIR and mitigation measures included in the Draft EIR, and the Tribe has no further comments on the Project.

Response A5.1: This comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment A5.2: This comment states that the City is responsible for ensuring that mitigation measures agreed upon are carried out by the Project proponent and a Tribal Monitoring Services Agreement must be established with MBMI prior to the start of Project ground-disturbing construction.

Response A5.2: As discussed in Mitigation Measure TCR-1, prior to the issuance of grading permits, the applicant shall enter into a Tribal Monitoring Services Agreement with the Morongo Band of Mission Indians (MBMI), Soboba Band of Luiseño Indians, or Agua Caliente Band of Cahuilla Indians (ACBCI) for the Project. The City will ensure all listed mitigation measures are adhered to through compliance with a Mitigation Monitoring and Reporting Program, as included in Chapter 4.0 of this Final EIR.

Comment A5.3: This comment states that MBMI reserves the right to continue AB 52 consultation until the Project is complete or if circumstances make further communication necessary, in order to ensure that proper mechanisms are in place should cultural resources or tribal cultural resources be found. The comment requests that the City notify the Tribe when the Project is scheduled to begin and provides contact information for any questions.

Response A5.3: This comment is informational in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is

Letter A6.1: Agua Caliente Band of Cahuilla Indians (4 pages)

From: Salazar, Luz (TRBL)
To: Soledad Carrisoza; Morales, Michael (TRBL)
Cc: Monique Alaniz-Fleiter
Subject: RE: Draft EIR: Simpson Commerce Center Project
Date: Monday, July 1, 2024 10:12:37 AM
Attachments: image001.png
image002.png

Warning: This email originated from outside the City of Hemet. Think before you click!

Good Morning Soledad,

We agree with the mitigation measures and have no further comments on the draft. Thank you for reaching out before the deadline. **A6.1**

Best Regards,

Luz Salazar
Cultural Resources Analyst
lsalazar@aguacaliente.net
C: (760) 423-3148 | D: (760) 883-1137
5401 Dinah Shore Drive, Palm Springs, CA 92264

From: Soledad Carrisoza <SCarrisoza@hemetca.gov>
Sent: Thursday, June 27, 2024 5:23 PM
To: Salazar, Luz (TRBL) <lsalazar@aguacaliente.net>; Morales, Michael (TRBL) <mimorales@aguacaliente.net>
Cc: Monique Alaniz-Flejter <mflejter@hemetca.gov>; Soledad Carrisoza <scarrisoza@hemetca.gov>
Subject: Draft EIR: Simpson Commerce Center Project

** This Email came from an External Source **

Hello Luz,

I'm contacting you to let you know the comment period for the Draft Environmental Impact Report for this project concludes on July 1, 2024.
See the Notice of Availability and Draft Environmental Impact Report at:
https://www.hemetca.gov/797/Environmental-Documents
As stated in the Notice of Availability comments may be emailed to the City's Community Development Director, Monique Alaniz-Flejter at mflejter@hemetca.gov

Feel free to contact me at scarrisoza@hemetca.gov or the Community Development Director,

Monique at mflejter@hemetca.gov.

Cordially,

Soledad Carrisoza | Associate Planner
City of Hemet | Community Development Department
(951) 765-2376 | scarrisoza@hemetca.gov

City Hall Business Hours: Monday – Friday 7:30 a.m. – 5:30 p.m.

**Please note my office hours are Monday – Thursday 7:00 a.m. – 5:30 p.m.*

From: Soledad Carrisoza
Sent: Monday, June 3, 2024 9:16 AM
To: Salazar, Luz (TRBL) <lsalazar@aguacaliente.net>; mimorales@aguacaliente.net
Cc: Soledad Carrisoza <SCarrisoza@hemetca.gov>
Subject: Draft EIR: Simpson Commerce Center Project

Good morning,
The draft Environmental Impact Report for the Newland Simpson Road Hemet Project is available on our website, see link below. The public review starts on May 17, 2024 and will extend to July 1, 2024. See Notice of Availability of Draft EIR.
https://www.hemetca.gov/797/Environmental-Documents

If you have any questions regarding this matter, feel free to contact me.

Soledad Carrisoza | Associate Planner
City of Hemet | Community Development Department
(951) 765-2376 | scarrisoza@hemetca.gov

City Hall Business Hours: Monday – Friday 7:30 a.m. – 5:30 p.m.

Please note my office hours are Monday – Thursday 7:00 a.m. – 5:30 p.m.

From: Salazar, Luz (TRBL) <lsalazar@aguacaliente.net>
Sent: Wednesday, May 1, 2024 11:28 AM
To: Soledad Carrisoza <SCarrisoza@hemetca.gov>
Subject: Simpson Commerce Center Project

Warning: This email originated from outside the City of Hemet. Think before you click!

Hello,

It was nice meeting you today! As requested from the meeting, the phrase mentioned from the Cultural Studies Report stated, "All notes, photographs, and other materials related to this project will be curated at the archaeological laboratory of BFSA in Poway, California." My question was: What are the 'other materials' they are mentioning? The statement can be found in page iv under the Management Summary/Abstract section.

Comments:
-Include a Native American Monitor for all ground disturbances
-Copy of the Mitigation Measures for review
-There are sites near the project area that could potentially lead to discoveries
-If there are cultural materials, the preferred method is to leave the materials alone or rebury

Lastly, here is Michael Morales' (Cultural Resources Supervisor) contact information:
Email: mimorales@aguacaliente.net
Phone: (760) 567-0704

Have a wonderful day!

Best Regards,

Luz Salazar
Cultural Resources Analyst
lsalazar@aguacaliente.net
C: (760) 423-3148 | D: (760) 883-1137
5401 Dinah Shore Drive, Palm Springs, CA 92264

Response to Letter A6: Agua Caliente Band of Cahuilla, dated July 1, 2024

Comment A6.1: This comment states that the Tribe agrees with the mitigation measures and has no further comments on the Draft EIR.

Response A6.1: This comment is informational in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Letter O1: Adams Broadwell Joseph & Cardozo, on behalf of Coalition for Californians Allied for a Responsible Economy (2 pages)

ADAMS BROADWELL JOSEPH & CARDOZO
A PROFESSIONAL CORPORATION
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ANDREW J. GRAF
TANYA A. GULESSERIAN
DARION N. JOHNSTON
RACHAEL E. KOSS
AIDAN P. MARSHALL
TARA C. RENGIFO

Of Counsel
MARC D. JOSEPH
DANIEL L. CARDOZO

June 10, 2024

VIA EMAIL AND U.S. MAIL

Monique Alaniz-Flejter
Community Development Director
City of Hemet Planning Department
445 East Florida Avenue
Hemet, CA 92543
Email: MFlejter@hemetca.gov;
planstaff@hemetca.gov

John Paul Maier, City Clerk
City of Hemet
445 East Florida Avenue
City Hall
Hemet, CA 92543
Email: jmaier@hemetca.gov;
clerkstaff@hemetca.gov

VIA EMAIL ONLY
Agustin Villarreal, Senior Planner
Email: AVillarreal@hemetca.gov

Re: Request for Mailed Notice of Actions and Hearings – Newland Simpson Road Hemet Project (SCH No. 2023120462; CUP 22-006; GPA 22- 003 & TPM 38800)

Dear Ms. Alaniz-Flejter, Mr. Maier, and Mr. Villarreal:

We are writing on behalf of Coalition for Californians Allied for a Responsible **Economy ("CARE CA")** to request mailed notice of the availability of any environmental review document, prepared pursuant to the California Environmental Quality Act, related to the Newland Simpson Road Hemet Project (SCH No. 2023120462; CUP 22-006; GPA 22- 003 & TPM 38800) **("Project"),** proposed by Newland Capital Group **("Applicant")**, as well as a copy of the environmental review document when it is made available for public review. **O1.1**

The Project includes the development of two new speculative industrial buildings totaling approximately 1,192,418 square feet (SF) in the City of Hemet, Riverside County, California. The Project site is located at the southwest corner of the intersection of Warren Road and Simpson Road and is comprised of 2 parcels **identified as Assessor's Parcel Numbers** 465-140-043 and APN 465-140-042. Building 1 would be developed with an 883,080 SF speculative high-cube warehouse building including 838,926 SF of warehouse space, 44,154 SF of office space, and 144 dock-high doors with an FAR of 0.47. Building 2 would be developed with a

309,338 SF speculative high-cube warehouse building including 293,871 SF of warehouse space, 15,467 SF of office space, and 50 dock-high doors with an FAR of 0.39. The Project would also include an 8.90-acre ancillary trailer parking lot with 160 truck trailer parking stalls in the easternmost lot across Warren Road.

We also request mailed notice of any and all hearings and/or actions related to the Project. These requests are made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108, 21152, and 21167(f) and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written req**uest for them with the clerk of the agency's** governing body. **O1.1 cont.**

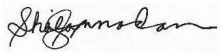
Please send the above requested items by email and U.S. Mail to our San Francisco office as follows:

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

Email
ssannadan@adamsbroadwell.com

Please call me at (650) 589-1660 if you have any questions. Thank you for your assistance with this matter.

Sincerely,



Sheila M. Sannadan
Legal Assistant

SMS:ljl

7288-002j

Response to Letter O1: Adams Broadwell Joseph & Cardozo, on behalf of Coalition for Californians Allied for a Responsible Economy, dated June 10, 2024

Comment O1.1: This comment states that the letter is written on behalf of Coalition for Californians Allied for a Responsible Economy (CARE CA) requesting the notice of availability and Draft EIR for review when it is available. The comment provides a summary of the Project Description. The letter also requests mailed notice of any and all hearings and/or actions related to the Project.

Response O1.1: CARE CA will be added to the notification list and provided future notices for the Project and Hearings. This comment will be provided to City decision makers as part of their review of the Final EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Letter O2: Advocates for the Environment (5 pages)

June 24, 2024

Advocates for the Environment

A non-profit public-interest law firm
and environmental advocacy organization

Monique Alaniz-Flejter
Community Development Director
City of Hemet
445 E Florida Avenue
Hemet, CA 92543

Via U.S. Mail and email to MFlejter@hemetca.gov

Re: Comments on Draft Environmental Impact Report for Newland Simpson Road Project, SCH No. 2023120462

Dear Ms. Alaniz-Flejter:

Advocates for the Environment submits the comments in this letter regarding the Draft Environmental Impact Report (**DEIR**) for Newland Simpson Road Project (**Project**). The Project Site is located near Simpson Road and Warren Road in the City of Hemet (**City**). The Project proposes to develop the 74.88-acre Project Site by constructing two industrial buildings totaling 1,192,418 square feet. We have reviewed the DEIR prepared in May 2024 and submit comments regarding the sufficiency of the DEIR's Greenhouse-Gas (**GHG**) analysis under the California Environmental Quality Act (**CEQA**). **O2.1**

The City Should Require the Project to be Net-Zero

Given the current regulatory context and technological advancements, a net-zero significance threshold is feasible and extensively supportable. GHG emissions from buildings, including indirect emissions from offsite generation of electricity, direct emissions produced onsite, and from construction with cement and steel, amounted to 21% of global GHG emissions in 2019. (IPCC Sixth Assessment Report, Climate Change 2022, WGIII, Mitigation of Climate Change, p. 9-4.) This is a considerable portion of global GHG emissions. It is much more affordable to construct new building projects to be net-zero than to obtain the same level of GHG reductions by expensively retrofitting older buildings to comply with climate change regulations. Climate damages will keep increasing until we reach net zero GHG emissions, and there is a California state policy requiring the state to be net-zero by 2045. It therefore is economically unsound to construct new buildings that are not net-zero. **O2.2**

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

10211 Sunland Blvd., Shadow Hills, CA 91040 (818) 650-0030 X101 dw@aenv.org

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

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

O2.2 Cont.

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

GHG Mitigation is Insufficient under CEQA

The calculated project-related emissions amount to 10,362.39 metric tons of carbon dioxide equivalent (**MTCO2e**) per year (DEIR, p. 5.8-12.). The City adopted a significance threshold based on Appendix G of the CEQA Guidelines. Based on this threshold, the City concluded the Project would have significant GHG emissions. To reduce this identified significant GHG impact, the GHG Analysis offered GHG Mitigation Measures (**MM**) 1-10. (DEIR, p. 5.8-17—5.8-19.)

The DEIR did not include any quantitative estimate of the effectiveness of the proposed mitigation in reducing GHG emissions, nor did it provide evidence that there was no further feasible mitigation, stating the following: "Despite implementation of Mitigation Measures GHG-1 through GHG-10, impacts would remain significant. Therefore, the project would result in considerable GHG impacts, and cumulative GHG impacts would be significant and unavoidable." (DEIR, p. 5.8-17.) The City did not provide any rationale why, in this instance, existing regulations and the adopted mitigation measures would be the only feasible mitigation for this Project, aside from stating "there are no feasible Project measures that would reduce substantial vehicular emissions." (DEIR, p. 5.8-13.) Despite the availability of other GHG mitigation measures, the DEIR declared that the Project's mitigated emissions were unavoidable. However, because this conclusion is not supported by substantial evidence, the DEIR should have included more mitigation to reduce the Project's GHG emissions to the extent required by CEQA.

O2.3

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Infeasibility Finding Lacks Substantial Evidence

The conclusion that the Project will not be able to achieve any mitigation beyond what was identified in the proposed mitigation measures is not supported by substantial evidence. The DEIR should have proposed more mitigation measures to be applied to the maximum feasible extent to justify the conclusion that the Project's GHG impact would be unavoidable due to lack of feasibility of further mitigation. While the proposed mitigation measures are a good start, the City did not demonstrate that these actions would represent the maximum feasible mitigation to support a finding that the Project's impact would be significant and unavoidable. O2.4

CEQA requires that the lead agency identifies specific reasons for the infeasibility of further mitigation when concluding that a significant and unavoidable impact will occur. There are other readily available mitigation measures, and some of the individual proposed mitigation measures could be modified to provide further mitigation especially considering that over 79% of the Project's GHG impact originates from mobile emissions which the mitigation measures were not focused on reducing. (DEIR, p. 5.8-13.). For instance, the DEIR notes that mobile emissions are not controllable, and therefore not feasible to mitigate, stating: "Neither the Project Applicant nor the Lead Agency (City of Hemet) can substantively or materially affect reductions in project mobile-source emissions." (DEIR p. 5.8-13.)

The City has the ability to directly and indirectly control the emissions associated with this project. For instance, the City could mandate that the applicant's lease agreements include clauses limiting the use of heavy-duty diesel trucks, or that tenants' vehicle fleets use non-diesel fuels such as gasoline, ethanol, or biofuels. Additionally, the City could require the applicant to ensure that future tenants use hybrid or zero-emission commercial vehicles when these become reasonably available and to maintain a charging system for the vehicle fleet powered by solar panels on the project site. This kind of mitigation is both feasible and necessary to offset the project's fair share of emissions. O2.5

Thus, the conclusion that further mitigation is infeasible was not supported by substantial evidence.

The Project's GHG Impacts Must be Fully Mitigated

CEQA requires that the Project include fair-share mitigation for all significant cumulative impacts. (*Napa Citizens for Honest Gov't v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 364.) Here, this means mitigation of the full extent of the Project's GHG impacts. O2.6

The amount of GHG emissions that comprises the Project's fair share is clear. The reasonable lifespan this Project is approximately 30 years as indicated by the amortization of

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construction emissions. (DEIR, p. 5.8-12.) Therefore, the Project would likely contribute 310,871.7 MTCO2e during its entire lifespan.[1] This would be a good starting point from which to subtract the effect of additional non-offset mitigation measures, before implementing offset purchases. O2.6 Cont.

In addition to implementing zero-emission vehicle fleets to the extent feasible, several on-site mitigation measures can be incorporated into the project as design features or as mitigation measures, including solar water heaters and automatic light switches, among many other mitigation strategies. The DEIR identifies some of the California Green Building standards that reduce greenhouse gases as applicable to the Project. (DEIR, p. 5.8-4—5.8-5.), but it would be feasible to go beyond the requirements. For example, instead of just facilitating the future installation of Electric Vehicle (**EV**) chargers by requiring empty raceways for future conduit, it is feasible to install a set number of EV chargers now with a plan for the future installations of more chargers.

Solar panel installation or incorporating renewable energy production on-site is also a feasible mitigation measure. The DEIR indicates that the Project will comply with Title 24 requirements, with each building featuring a solar-ready roof. (DEIR, p. 5.8-14.) However, Title 24 mandates only that at minimum of 15 percent of the roof area be solar-ready. Extending this requirement to cover the maximum available surface area rather than just the minimum 15 percent required would be feasible. Additionally, installing solar panels across the entire available roof surface is also feasible. Having solar panels capable of offsetting 100% of the energy demands of the buildings would make the measures more effective and decrease GHG emissions overall. O2.7

Such features could be adopted individually as voluntary mitigation measures or as part of a comprehensive goal of sustainable building certification, such as Leadership and Energy and Environmental Design (**LEED**), that extends beyond CALGreen requirements.

Even after implementing operational emissions reductions to the maximum-feasible extent, the City could also require the Applicant to purchase carbon offsets for the Project's remaining GHG emissions. The City did not provide any evidence for why offsets would be infeasible. Overall, there are more options available to mitigate emissions to the full extent of project emissions.

Conclusion

The DEIR fails to require all feasible mitigation, despite concluding that the significant GHG impact will be unavoidable. The lead agency has not met its burden of showing that such measures are infeasible. The Project should have incorporated all feasible mitigation to the fair- O2.8

[1] 10,362.39 MTCO2e per year × 30 years = 310,871.7 MTCO2e

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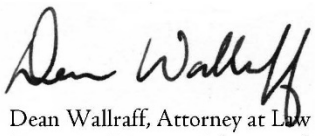
share extent. Please put me on the interest list to receive updates about the progress of this Project. We make this request under Public Resources Code, section 21092.2. **O2.8 Cont.**

Sincerely,



Dean Wallraff, Attorney at Law
Executive Director, Advocates for the Environment

10211 Sunland Blvd., Shadow Hills, CA 91040 (818) 650-0030 X101 dw@aenv.org

Response to Letter O2: Advocates for the Environment, dated June 24, 2024

Comment O2.1: This comment states that Advocates for the Environment submits this comment letter regarding the Draft EIR for the Newland Simpson Road Warehouse Project with comments regarding the sufficiency of the Draft EIR's GHG analysis.

Response O2.1: This comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is

Comment O2.2: This comment states that the proposed Project should utilize a net-zero significance threshold for GHG emissions in order to comply with California's policy to be net-zero by 2045. The comment then lists some examples of two large mixed use projects in California that utilized net-zero thresholds. The comment concludes by stating that the net-zero GHG significance threshold is well-supported by plans such as CARB, and the Project should adopt the threshold.

Response O2.2: The Project proposes industrial development at the site, whereas the examples provided in this comment refer only to non-industrial projects. Therefore, the examples provided in this comment do not necessarily apply to the Project and are not reliable.

Moreover, this Project is located within the jurisdiction of the SCAQMD and was evaluated against SCAQMD's thresholds and supported by substantial evidence. The Project was found to have a significant impact on GHG and the Draft EIR includes Mitigation Measures GHG-1 through GHG-10, which incorporates measures to reduce GHG emissions during Project operation. The application of a net-zero threshold is unprecedented for warehouse projects and would effectively result in a moratorium on such facilities within the city. While the application of a net-zero threshold may be appropriate and feasible for residential projects, such as the two mentioned by the commentor, it is not appropriate to apply such a threshold to warehouse projects where the vast majority of operational GHG emissions result from mobile-source emissions.

Additionally, the 2022 CARB Scoping Plan includes overall state goals, therefore the referenced goal is not a Project specific goal. The Project would provide contemporary, energy-efficient/energy-conserving design features and operational procedures. The proposed Project would not interfere with the State's implementation of AB 1279's target of 85% below 1990 levels and carbon neutrality by 2045 because it does not interfere with implementation of the GHG reduction measures listed in CARB's Updated Scoping Plan (2022), as discussed in Section 5.8, *Greenhouse Gas Emissions*, on page 5.8-13 in the Draft EIR. CARB's 2022 Scoping Plan reflects the 2045 target of a, 85% reduction below 1990 levels, set by Executive Order B-55-18, and codified by AB 1279. Therefore, the Project not being constructed as net zero emissions does not conflict with the GHG significance threshold or any plan, policy, or goal related to GHG. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.

Comment O2.3: This comment states that the Draft EIR does not quantitatively analyze the effectiveness of the proposed mitigation measures for reducing GHG emissions and that the conclusion that there are no other feasible mitigation measures that would reduce emissions is not supported by substantial evidence. The comment concludes that the Draft EIR should include more mitigation to reduce the Projects GHG emissions.

Response O2.3: Draft EIR page 5.8-12 of Section 5.8, *Greenhouse Gas Emissions* describes that GHG emissions generated from the proposed Project at buildout are primarily associated with vehicle and truck trips. Draft EIR Table 5.8-2 shows that the Project would generate a net total of approximately 10,362.39 $MTCO_2e$ per year, and that 8,272 $MTCO_2e$ (79%) is from mobile sources. The Draft EIR also explains how and why there is no way to quantify the reductions from implementation of Mitigation Measures GHG-1 through GHG-10 in the CalEEMod, and that neither the Project Applicant nor the City of Hemet can reduce

emissions from trucks and vehicles; and therefore, impacts related to GHG emissions would be significant and unavoidable.

The commenter's assertion that the Draft EIR does not provide substantial evidence for the determination that GHG impacts of the Project would be significant and unavoidable is unsubstantiated. The commenter does not provide additional data or specific measures for consideration or incorporation. Responses to additional comments provided by the commenter related to this comment are provided below (Response to Comment O2.5 to O2.7). The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.

Comment O2.4: This comment states that the Project did not adequately explore all possible mitigation measures in order to reduce the GHG impacts. The comment states that the City did not demonstrate that the proposed mitigation measures would represent the maximum feasible mitigation to support that the Projects impact would be significant and unavoidable.

Response O2.4: The commenter's assertion that the Draft EIR does not provide substantial evidence for the determination that the Project will not be able to achieve any mitigation beyond what was identified in the proposed mitigation measures is unsubstantiated and vague. As detailed in the previous response, under Response O2.3, approximately 79% of the GHG emissions from the Project would be generated by vehicle and truck emissions. The commenter does not provide additional data or specific measures for consideration or incorporation under this specific comment to reduce these emissions. As detailed previously the Draft EIR includes 10 specific GHG mitigation measures to reduce emissions. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.

Comment O2.5: The comment brings forward additional mitigation such as a mandate limiting the use of heavy-duty diesel trucks or require the applicant to ensure that future tenants use hybrid or zero-emission commercial vehicles when these become reasonably available. The commenter also proposes to maintain a charging system for the vehicle fleet powered by solar panels.

Response O2.5: Neither the Project Applicant nor the City do not have the authority to require all heavy-duty trucks entering or on the project site to be of a certain model year or engine type; or require future tenants and vendors to utilize heavy-duty vehicles for trips to and from the site that are zero-emissions. The future operational permitting requirements may include provision of trucking fleet incentives. However, the Project applicant and the City do not have the authority to require future tenants and vendors to enroll into incentive programs; and fleet upgrades are generally driven by existing SCAG and CARB emissions requirements. Thus, any measures that require zero-emission heavy-duty trucks are infeasible. However, the proposed Project would feature 64 EV charging stations and a 100% solar-ready roof which is beyond Title 24 requirements. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.

Comment O2.6: This comment states that the Project is required to include fair-share mitigation for all significant cumulative impacts. The comment states that since the Project would likely contribute 310,871.7 $MTCO_2e$ over its lifetime, which the commenter states can be used as a starting place for additional non-offset mitigation measures.

Response O2.6: As discussed on page 5.8-3 of Draft EIR Section 5.8, Greenhouse Gas Emissions, 79% of Project emissions would primarily result from mobile source emissions, both vehicle and truck. There are no available feasible Project measures that would further reduce vehicular and truck emissions to below the GHG threshold, since neither the Project Applicant nor the Lead Agency (City of Hemet) can substantively or materially affect reductions in Project mobile-source emissions and/or available technologies. As addressed above in Response O2.5, the proposed Project would include 64 EV charging parking spaces and 100%

solar-ready roofs to mitigate emissions to the greatest extent feasible. The comment does not identify any specific feasible mitigation measures that would reduce vehicle and truck GHG emissions.

Comment O2.7: This comment provides examples of on-site mitigation measures to be incorporated into the Project in order to reduce GHG emissions. The comment suggests measures such as solar water heaters, automatic light switches, and going beyond the California Green Building Code requirements. The comment also suggests the use of solar panels capable of offsetting 100% of the energy demands of the buildings and obtaining a sustainable building certification such as LEED. The comment concludes by stating the City could also require the Applicant to purchase carbon offsets for the Projects remaining emission, which there is no evidence provided as to why offsets would be infeasible.

Response O2.7: The proposed Project would implement Mitigation Measure GHG-1, which requires the use of Energy Star certified light bulbs and light features. In addition, the proposed Project would feature a 100% solar-ready roof which exceeds the Title 24 requirement of 15%. The proposed Project would also include 64 EV charging stations. While the proposed Project would not obtain a sustainable building certification, the proposed Project would go above and beyond the requirements of Title 24. Thus, the proposed Project would implement the measures mentioned in the comment.

While it is true that it may be possible to purchase carbon offsets, recent Court of Appeal decisions have cast considerable doubt on the use of such offsets to mitigate GHG impacts from land use development projects. In *Golden Door Properties, LLC v. County of San Diego (2020)* 50 Cal, Ap.5th 467, the Court of Appeal invalidated a mitigation measure that required the purchase of offsets from a "CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard" (Id. At 510.) Although the court insisted its decision "should not be construed as blanked prohibition on using carbon offsets" to mitigate GHG missions under CEQA, it found numerous flaws with the measure at issue and failed to provide a clear roadmap for how to craft a similar valid measure. The court also declined to express an opinion on a number of issues, including whether offsets could potentially be used to mitigate more than 8% of a project's emissions and the extent to which out-of-country offsets could be used. (Id. At 503, 513, n 27.) Subsequent to *Golden Door* (and within the last year), another measure requiring the purchase of offsets was similarly found to be invalid in an unpublished Court of Appeal decision, with the court finding the measure's inclusion of additional standards for offsets did "not cure the defects found in Golden Door." (*Sierra Club v. County of San Diego* (Dec. 21, 2021, No. D077548) 2021 WL 6050624, at page 11.) In light of such uncertainty, the City finds that the carbon offsets are not feasible methods for mitigating the Project's GHG emissions. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.

Comment O2.8: This comment states the Draft EIR fails to assess all feasible mitigation and has not showed sufficient evidence to show that additional measures would be infeasible. The comment concludes by requesting to receive updates on the progress of the Project pursuant to Public Resources Code, Section 21092.2.

Response O2.8: The comment is conclusory in nature and does not raise a specific issue with the adequacy of the Draft EIR evaluation. The commenters' concerns were addressed above in Responses O2.2 through O2.7. In reviewing the above listed comments and making the appropriate revisions, when necessary, no significant new information was incorporated, and further, the impacts disclosed in the Draft EIR accurately reflect the proposed Project and subsequent potential environmental impacts. Therefore, per CEQA Guidelines and CA Code of Regulations 15088.5, Draft EIR recirculation would not be warranted.

Letter O3: Golden State Environmental Justice Alliance (162 pages)

BLUM, COLLINS & HO LLP
ATTORNEYS AT LAW
AON CENTER
707 WILSHIRE BOULEVARD
SUITE 4880
LOS ANGELES, CALIFORNIA 90017 (213) 572-0400

June 28, 2024

Monique Alaniz-Fleiter
Community Development Director
445 E. Florida Avenue
Hemet, CA 92543
mflejter@hemetca.gov

VIA EMAIL TO:
mfleiter@hemetca.gov

SUBJECT: COMMENTS ON NEWLAND SIMPSON ROAD PROJECT EIR (SCH NO. 2023120462)

Dear Ms. Alaniz-Fleiter,

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Newland Simpson Road Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. **O3.1**

1.0 Summary

The project proposes the construction and operation of two industrial warehouse buildings totaling 1,192,418 square feet (SF) and an ancillary trailer parking lot (160 truck/trailer parking stalls) on an approximately 74.88 gross acre site. Building 1 proposes a 883,080 SF high-cube warehouse designed as a cross-dock fulfillment center building including 838,926 SF of warehouse space, 44,154 SF of office space, and 144 dock-high doors. Building 2 proposes a 309,338 SF speculative high-cube warehouse building including 293,871 SF of warehouse space, 15,467 SF of office space, and 50 dock-high doors. The Project would also include an 8.90-acre ancillary trailer parking lot with 160 truck trailer parking stalls in the easternmost lot across Warren Road. **O3.2**

The Project Applicant is requesting the approval of the following discretionary actions in order to implement the proposed project:

1. General Plan Amendment to change the existing General Plan Land Use designation from Mixed-Use to Business Park.
2. Tentative Parcel Map
3. Site Development Review
4. Conditional Use Permit
5. Variance for building height.

O3.2 cont.

1.1 Project Piecemealing

The EIR does not accurately or adequately describe the project, meaning "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment" (CEQA § 15378). The whole of the project proposed by the Simpson Road Project is a piecemealed portion of a larger overall project to be developed within the larger Newland Industrial Center in Hemet. The whole of the action includes at least one other 850,640 sf warehouse building known as the Newland Kirby Project[1]. It is clear that the development plans for the entirety of the project have been established and split into several smaller development projects in order to artificially reduce environmental impacts.

A project EIR must be prepared that accurately represents the whole of the action without piecemealing the project into separate, smaller development projects to present unduly low environmental impacts. CEQA Section 15161 describes project EIRs as examining "the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation." The specific development project is the construction and operation of all Newland buildings.

O3.3

Additionally, CEQA Section 15146 requires that the degree of specificity in an EIR "will correspond to the degree of specificity involved in the underlying activity which is described in the EIR. (a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy." Because there are multiple proposed buildings as part of a single project, the project EIR must be more detailed in the specific effects of the project. A project EIR must be prepared which

[1] https://ceqanet.opr.ca.gov/2010061088/4

accurately represents the whole of the action without piecemealing the project into separate, smaller development projects or development areas to present unduly low environmental impacts. O3.3 cont.

3.0 Project Description

The EIR does not include a floor plan, detailed site plan, or a conceptual grading plan. The basic components of a Planning Application include a detailed site plan, floor plan, conceptual grading plan, written narrative, and detailed elevations. The site plan provided in Figure 3-7: Conceptual Site plan has been edited for public review to remove meaningful information. Figure 3-7 excludes all of the key notes, legend, and site data such as floor area ratio and site coverage. The EIR has also excluded a grading plan from public review. The EIR states that, "Grading work of soils is expected to result in import of 96,300 cubic yards of soil," yet there is no method for the public to verify this claim. Providing the grading plan and earthwork quantity notes is vital as this directly informs the quantity of necessary truck hauling trips due to soil import/export during the grading phase of construction. A revised EIR must be prepared to include wholly accurate and unedited detailed floor plan, grading plan, site plan, and project narrative for public review. O3.4

Further, the Project Description is inadequate as it does not provide detailed information regarding the requests associated with each of the discretionary actions. For example, the EIR cumulatively states that a Site Plan Review and Conditional Use Permit are required to construct the project, but does not state the specific requests for each application or City requirements that necessitated the request. Also, Table 3-6: Project Approvals/Permits states that the requested Variance is for building height but does not state the quantity in which the project will exceed the maximum height. Table 5.1-1: Development Standard Consistency shows that a Variance is required to permit the project's 1,297 parking stalls, which is less than the required 1,367 parking stalls; this is not listed in Table 3-6. The EIR must be revised to clearly state the request(s) associated with each discretionary action and update its analysis throughout the document to accurately reflect these requests in order to provide an adequate informational document. O3.5

5.3 Air Quality, 5.6 Energy, and 5.8 Greenhouse Gas Emissions

Please refer to the attachment from SWAPE for a full technical commentary and analysis. O3.6

The EIR does not include meaningful analysis of relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. This is in conflict with CEQA Guidelines Section 15131 (c), which requires that "Economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid the O3.7

significant effects on the environment identified in the EIR. If information on these factors is not contained in the EIR, the information must be added to the record in some other manner to allow the agency to consider the factors in reaching a decision on the project." According to CalEnviroScreen 4.0[2], CalEPA's screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project's census tract (6065042723) is highly burdened by pollution. The surrounding community bears the impact of multiple sources of pollution and is more polluted than average in many pollution indicators measured by CalEnviroScreen. For example, the project census tract ranks in the 91st percentile for ozone burden and 46th percentile for particulate matter (PM) 2.5 burden. These environmental factors are attributed to heavy truck/trailer activity and traffic in the area. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure[3]. The census tract also ranks in the 64th percentile for solid waste facility impacts. Solid waste facilities can expose people to hazardous chemicals, release toxic gases into the air (even after these facilites are closed), and chemicals can leach into soil around the facility and pose a health risk to nearby populations[4].

O3.7 cont.

Further, the census tract is a diverse community including 55% Hispanic and 3% African-American residents, whom are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 75% of the census tract over age 25 has not attained a high school diploma, which is an indication that they may lack health insurance or access to medical care. The community has a high rate of poverty, meaning 88% of the households in the census tract have a total income before taxes that is less than the poverty level. Income can affect health when people cannot afford healthy living and working conditions, nutritious food and necessary medical care[5]. Poor communities are often located in areas with high levels of pollution[6]. Poverty can cause stress that weakens the immune system and causes people to become ill from pollution[7]. Living in poverty is also an indication that residents may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 70th percentile for incidence of cardiovascular disease and 54th percentile for incidence of asthma.

The EIR does not adequately or accurately analyze the proposed project's consistency with the AQMP. Due to the required land use changes from MU to BP to accommodate the proposed project, it is not consistent with the growth projections included in the AQMP. The AQMP and

O3.8

[2] CalEnviroScreen 4.0 https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40
[3] OEHHA Ozone https://oehha.ca.gov/calenviroscreen/indicator/air-quality-ozone
[4] OEHHA Solid Waste Facilities https://oehha.ca.gov/calenviroscreen/indicator/solid-waste-sites-and-facilities
[5] OEHHA Poverty https://oehha.ca.gov/calenviroscreen/indicator/poverty
[6] Ibid.
[7] Ibid.

SCAG did not analyze the proposed project site as an industrial land use and therefore it is not included in any growth projections or emissions estimates. The EIR must be revised to include a finding of significance. O3.8 cont.

The State of California lists three approved compliance modeling softwares[8] for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The CalEEMod modeling does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project's significant Energy impacts and fuel consumption to the public and decision makers. Since the EIR did not accurately or adequately model the energy impacts in compliance with Title 24, it cannot conclude the project will generate less than significant impacts and a finding of significance must be made. A revised EIR with modeling using one of the approved software types must be prepared and circulated for public review in order to adequately analyze the project's significant environmental impacts. This is vital as the EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not an approved software. O3.9

5.9 Hazards and Hazardous Materials

The proposed project site is located within the Hemet-Ryan Airport Land Use Compatibility Plan Zone E. The EIR states that, "EIR: Due to the nature of the required City approvals (i.e., the proposed General Plan Amendment), the City of Hemet is required, pursuant to Public Utilities Code Section 21676, to refer the proposed Project to the ALUC for ALUC review. The proposed Project would comply with this ALUC notification and all other applicable rules and regulations as they pertain to the Hemet-Ryan Airport and airport safety. Overall, because the proposed Project is not located within compatibility zones A through D of the Hemet-Ryan Land Use Compatibility Plan or the designated Hemet-Ryan Airport noise contours; and it would not result in hazards related to excessive glare, light, steam, smoke, dust, or electronic interference, the proposed Project would not introduce a safety hazard associated with airport operations for people residing, working, and visiting the Project site. Furthermore, as discussed in Section 5.13, Population and Housing, the GPA would result in a decrease in the onsite population compared to buildout of the Project site under the current Mixed-Use (MU) land use designation under the General Plan. In addition, the proposed Project would implement the City of Hemet General Plan policies PS-4.1, PS-4.2, PS-4.4, PS-4.5, PS-4.8, PS-12, PS-12.3, and PS-12.4 Thus, the Project would not result in a safety hazard or excessive noise for people residing or working within two miles of a public airport, and impacts would be less than significant." O3.10

[8] California Energy Commission 2022 Energy Code Compliance Software https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency-1

However, the EIR does not provide any meaningful evidence to support this conclusion. The EIR is misleading to the public and decision makers by excluding the required review by RCALUC. The proposed project requires a General Plan Amendment to change the land use designations on the project site. Prior to the amendment of a General Plan, the ALUC shall review the plan, ordinance, or regulation for consistency with the ALUCP (PUC Section 21676(b))[9]. While the EIR states that RCALUC review is required, it does not state if the RCALUC review has occurred. Notably, the proposed project is on the June 13, 2024 RCALUC Meeting Agenda[10]. The RCALUC application is dated April 2, 2024, which is approximately 6 weeks prior to the May 16, 2024 published date of the Notice of Availability of this EIR. The EIR specifically misleads the public and decision makers by excluding information regarding the statutorily required/RCALUC review. Delaying RCALUC review until after the public comment period of the CEQA process has begun is implementation of the project prior to CEQA review, deferred mitigation, and does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). A revised EIR must be prepared that includes a review and comment letter regarding the proposed development plans from the RCALUC. This is statutorily required as the project requires a legislative action (General Plan Amendment) to proceed. The EIR must be revised to include a finding of significance due to inconsistency with this General Plan Policy LU 10.1. **O3.10 cont.**

Further, the RCALUC application states that the building heights are lower than the building heights listed in the EIR. The RCALUC application states both buildings have a maximum height of 52 feet and the staff report states that the project that was analyzed is 52 feet tall. Figure 3-8: Building 1 Elevations and Figure 3-9: Building 2 Elevations within the EIR depict the maximum height of each buildings as 60 feet. The project proposed in the EIR differs from the project that was reviewed by the RCALUC and must be resubmitted to the RCALUC for review and analysis. The EIR must be revised to include a finding of significance due to inconsistency with this General Plan Policy LU 10.1.

5.11 Land Use and Planning

A revised EIR must be prepared to provide a quantified analysis of the project's growth within the General Plan buildout scenario to determine if it exceeds the buildout scenario for its Planning Area within General Plan, in accordance with Table 2.3: Development Capacity of the City's **O3.11**

[9] California Airport Planning Land Use Handbook Section 1.3.4. ALUC Review https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlandu seplanninghandbook-a11y.pdf
[10] June 13, 2024 RCALUC Meeting Agenda and Attachments https://rcaluc.org/sites/g/files/aldnop421/files/2024-05/aluc_agenda_6-13-24%20rev.pdf

General Plan Land Use Element, including all cumulative development and projects "in the pipeline." Table 2.3: Development Capacity projects the development intensity, including the maximum amount of dwelling units and square footage for each land use designation. The Mixed Use #4 Planning Area 820,000 sf of non-residential building area. The proposed project is 1,192,418 square feet, which exceeds the established intensity and quantity of building square footage contemplated by the General Plan for the Mixed-Use #4 area. The Business Park land use designation accommodates 5,028,000 sf of non-residential building area within the City limits and 10,277,000 sf of non-residential building area within the General Plan Planning Area (Sphere of Influence), for a total of 15,305,000 sf of non-residential building area. The proposed project is located within the City limits and will increase the quantity of non-residential building area by 23% compared to the General Plan buildout scenario. The project will increase the total quantity of non-residential building area to 16,497,418 sf, which is a 7% increase compared to the General Plan buildout scenario. This was not accounted for in the General Plan or its environmental analysis. The EIR has not provided any analysis of this information and whether the proposed project in combination with cumulative development exceeds the projected buildout scenario. For example, piecemealed project Newland Kirby (850,640 sf) combined with the proposed project totals 2,043,058 square feet, which accounts for 40% of the General Plan buildout for the Business Park land use designations within the City limits and 12.3% of the General Plan buildout for the Business Park land use designations within the General Plan Planning Area attributed to only two recent projects. A revised EIR must be prepared to include this analysis to comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121) and include a finding of significance as the project will conflict with the General Plan buildout scenario which was adopted with the Mixed-Use designation on the project site for the purpose of avoiding or mitigating an environmental effect (reduce VMT/GHG and improve air quality via compact mixed-use development).

O3.11 cont.

Table 5.11-1: SCAG RTP/SCS Consistency Analysis concludes that the project is consistent with the goals of Connect SoCal, resulting in less than significant impacts. In finding consistency with SCAG's goals, the EIR does not provide any meaningful evidence to support this conclusion, in violation of CEQA's requirements for meaningful disclosure. For example, the EIR concludes the project is consistent with Goal 5 to reduce greenhouse gas emissions and improve air quality by stating that the project will mitigate air quality and energy impacts. The EIR does not address the project's significant and unavoidable cumulatively considerable GHG impacts. Due to errors in modeling and modeling without supporting evidence, as noted throughout this comment letter and attachments, and the EIR's determination that the project will have significant and unavoidable impacts to Greenhouse Gas Emissions and Transportation (VMT), the proposed project is directly inconsistent with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to

O3.12

support healthy and equitable communities, and Goal 7 to adapt to a changing climate. The EIR must be revised to include finding of significance due to inconsistency with the RTP/SCS. **O3.12 cont.**

Table 5.11-2: General Plan Consistency and all other sections of the EIR do not provide a consistency analysis with all land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The project has significant potential to conflict with many of these items applicable to the project site, particularly those for the Mixed-Use land use designation, including but not limited to the following from the General Plan:

1. Policy LU 3.9: Incompatible Uses. Prohibit uses that lead to the deterioration of residential neighborhoods, or adversely affect it's safety or residential character.
2. Policy LU 5.5: Public Spaces. Establish interesting and attractive focal points, public spaces or community uses within mixed use and transit oriented developments that are within walking distance and provide a source of activity and identity for the district.
3. Policy LU 5.7: Land Use Flexibility Accommodate flexibility in the overall form and integration of land uses within the mixed use districts provided that the district conforms to the purpose and principles of mixed use and smart growth concepts as embodied in the General Plan and implementing plans and ordinances. **O3.13**
4. Policy LU 5.8: Open Space. Require that adequate open space and for larger projects, recreational or community serving uses, be incorporated in mixed use development to serve the needs of the residents and businesses.
5. Policy LU 10.2: Airport Land Use Compatibility. As part of the development review process, ensure appropriate land use compatibility within airport compatibility zones by utilizing the Hemet-Ryan Airport Land Use Compatibility Plan (2017) and the latest Department of Aeronautics Handbook developed by the State of California, an Airport Compatibility Study may be warranted for projects within the Airport Influence area.
6. Policy LU 11.6: Skilled Labor Force Encourage a variety of businesses and industries to locate in the City including clean high technology industries, innovative start-up companies, and commercial/professional office uses that provide high skill/high-wage job opportunities.
7. Policy LU 11.7: Recruit New Business Pro-actively recruit new businesses that are currently under-represented in the City, and will create synergy in attracting other retailers to locate in the City.

Excluding review of the proposed project in accordance with the policies related to Mixed-Use development envisioned for the project site does not comply with CEQA's requirements for meaningful disclosure (CEQA § 15121). Relying upon approval of the requested General Plan Amendment to determine there will be no environmental impacts circumvents the required process **O3.14**

of CEQA analysis. Significant and unavoidable cumulatively considerable impacts to Agriculture, Noise, Greenhouse Gas Emissions, and Transportation will occur as a result while this may be stated in this section, it is not coherently applied for analysis. The EIR is inadequate as an informational document and must be revised. O3.14 cont.

The EIR must also be revised to remove misleading and erroneous consistency analysis for several items. For example, the EIR concludes the project is consistent with "Policy LU 1.9 Consistency with Land Use Districts. Require new and infill development to be in conformance with the land use character and development intention of each land use District established in the General Plan and implementing specific plans, ordinances, and design guidelines," because "the Project would be within the Page Ranch District, under the City Mixed Area #4 which does not have any specific design features. Further, prior to final design and Project approvals, the Project would have to indicate compliance with applicable design standards and guidelines set forth in the City's Municipal Code." The EIR does not discuss or analyze the land use character and development intention of the Mixed-Use District. The General Plan describes the MU District in stating that, "The MU-Mixed Use designation provides for a mix of residential and compatible office and retail/service uses integrated as a cohesive development, or such uses developed side-by-side in a manner that encourages interaction between uses." The development intention of the MU designation does not envision single use industrial warehouse buildings and/or truck/trailer storage lots. A finding of significance must be made due to the inconsistency with this policy and the project's inconsistency with the land use character and development intention of the Mixed-Use District and smart growth concepts listed in the Land Use Element, including but not limited to: take advantage of compact building design; Create a range of housing opportunities and choices; create walkable communities; and preserve open space, farmland, natural beauty and critical environmental areas. O3.15

Additionally, the EIR concludes the project is consistent with, "Policy LU 1.12 Flexibility Over Time. Require development to occur within the designated range of density and intensity, but allow for flexibility in the types of uses to account for changes in industrial and employment markets, retail commercial enterprises, and housing needs and characteristics; provided that such use are consistent with the overall vision, goals, and policy intentions of the General Plan." However, as discussed above, the project is not consistent with this policy because it exceeds the established intensity and quantity of building square footage contemplated by the General Plan for the Mixed-Use #4 area and will increase the total building square footage in the Business Park designation by 7%, which was not accounted for in the General Plan or its environmental analysis. The EIR states here that, "the surrounding areas are *zoned* for business park and mixed uses." However, as shown in the Existing General Plan Land Use Map, the land surrounding the project site is designated for Mixed Use, Low Density Residential, and Open Space. The nearest Business Park designations O3.16

Monique Alaniz-Fleiter
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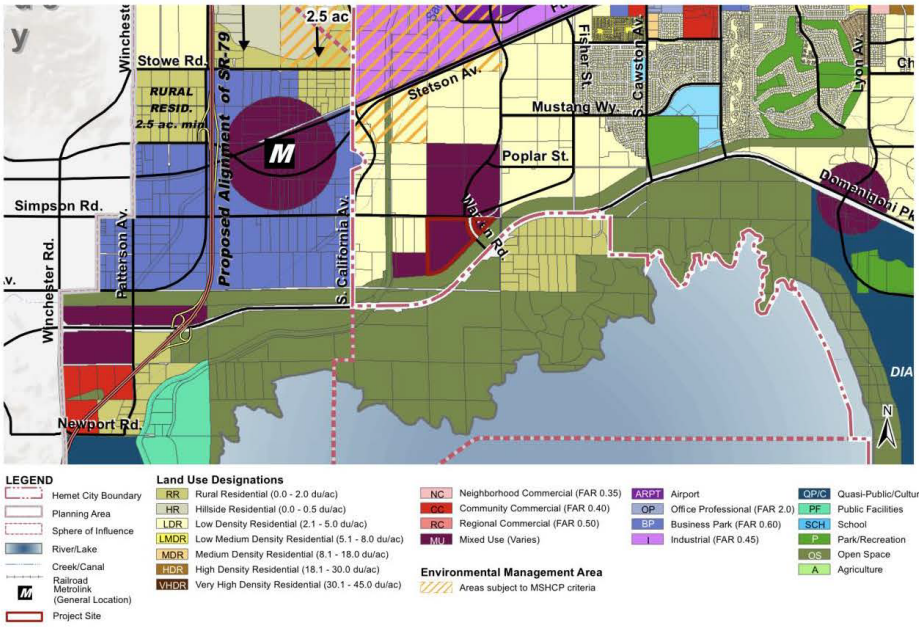
are located east of California Avenue, which is outside of the City boundary and located within unincorporated Riverside County. The EIR avoids discussing or analyzing the surrounding area's General Plan land use designations as the project is not consistent with the overall vision, goals, and policy intentions of the General Plan, and the EIR must be revised to include a finding of significance due to this inconsistency.

O3.16 cont.

Existing General Plan Land Use



The EIR also concludes the project is consistent with "Policy LU 1.13 Build a Strong Community. Support the development of a strong, socially connected and ethnically diverse community, by working to provide a balance of jobs and housing within the City, reducing commute times, promoting community involvement and attractiveness, enhancing public safety, and providing a wealth of educational, cultural and recreational opportunities." The EIR does not provide any information regarding the City's jobs/housing balance. The project will also increase VMT, which inherently increases commute times as employees travel farther distances to work. The basis of the project is inherently contrary to the principles of smart growth concepts and Mixed Use design that emphasize a cohesive mix of uses that integrates residential and retail/services to reduce VMT

O3.17

and thereby improve air quality and reduce GHG emissions. The EIR must be revised to include a finding of significance due to inconsistency with this policy. O3.17 cont.

The EIR also concludes the project is consistent with "Goal LU-3 Avoid land use conflict and provide for compatible development," because "The surrounding area contains agricultural and vacant parcels. However, the surrounding areas are zoned for business park and mixed uses and is within Mixed Use Area #4 which is intended for a retail/business park node at Warren Avenue and the Domenigoni Corridor." The EIR again avoids discussing or analyzing the surrounding area's General Plan land use designations as the project will conflict with surround land uses and is not a compatible development with the surrounding area. Additionally, the EIR misleads the public and decision makers by stating that "Mixed Use Area #4 which is intended for a retail/business park node at Warren Avenue and the Domenigoni Corridor," and excluding details from the General Plan. Mixed Use Area #4 states verbatim, "Mixed-Use Area #4 (MU-4) is a mixed-use area intended to serve Hemet and surrounding county residents and create a retail/business park node at Warren Avenue and the Domenigoni Corridor. The area will focus on providing retail and commercial services such as grocery stores, specialty shops, medical and dental offices. The area would also be suitable for clean technology and light industrial uses as a component of the overall plan, particularly the Metropolitan Water District owned parcels adjacent to Salt Creek and Domenigoni Parkway. Residential development is also contemplated as an integral part of MU-4." The EIR specifically envisions clean technology and light industrial on parcels owned by the Metropolitan Water District, which does not apply to the project site, the project does not propose clean technology or light industrial, and the project will result in significant and unavoidable cumulatively considerable impacts to Agriculture, Noise, Greenhouse Gas Emissions, and Transportation will occur as a result. The project will conflict with surround land uses and is not a compatible development with the surrounding area. The EIR must be revised to include a finding of significance due to inconsistency with this policy. O3.18

The EIR concludes the project is consistent with, "Policy LU 2.4 Concentrate Land Uses. Promote efficient use of land resources through compact building design, infill development, and land use patterns that reduce infrastructure costs and make more effective use of existing and planned transportation systems and public facilities, and minimize impacts to natural environmental resources." However, as shown below, nearly all of the land within a 1 mile radius of the project site is not urbanized, which makes the project a "leapfrog" development that spot zones non-infill parcels. The building designs are rectangular concrete boxes to house a single industrial use and utilizes 8.5 acres to create a parking area for 160 truck/trailers, which is the opposite of the Mixed-

Use intent and smart growth concepts envisioned by the General Plan for the project site. The EIR must be revised to include a finding of significance due to inconsistency with this policy. O3.18 cont.

The EIR concludes the project is consistent with, "Policy LU 10.1 Airport Influence Area. Ensure that legislative land use decisions within the airport influence area are consistent with the Airport Land Use Compatibility Plan (ALUCP) and General Plan policies. All legislative land use proposals, i.e. General Plan amendments, zone changes, Specific Plans, Specific Plan amendments, and ordinance amendments, that are citywide or located within the Airport Influence Area shall be reviewed by the Riverside County Airport Land Use Commission for consistency with the adopted ALUCP. All non-legislative land use proposals located within the Airport Influence Area will be reviewed by City staff as to consistency with the Compatibility Plan and considered by the City's approving body," because "the Project falls within the Hemet-Ryan Airport Land Use Compatibility Plan Zone E and is consistent with allowable land uses within the ALUCP." However, the EIR does not provide any meaningful evidence to support this conclusion. The EIR is misleading to the public and decision makers by excluding the required review by RCALUC. The proposed project requires a General Plan Amendment to change the land use designations on the project site. Prior to the amendment of a General Plan, the ALUC shall review O3.19

the plan, ordinance, or regulation for consistency with the ALUCP (PUC Section 21676(b))[11]. The EIR must be revised to include this fact and provide applicable analysis relating to the RCALUC's review of the proposed project.

Notably, the proposed project is on the June 13, 2024 RCALUC Meeting Agenda[12]. The RCALUC application is dated April 2, 2024, which is approximately 6 weeks prior to the May 16, 2024 published date of the Notice of Availability of this EIR. The EIR specifically misleads the public and decision makers by excluding information regarding the statutorily required/RCALUC review. Delaying RCALUC review until after the public comment period of the CEQA process has begun is implementation of the project prior to CEQA review and deferred mitigation in violation of CEQA. A revised EIR must be prepared that includes a review and comment letter regarding the proposed development plans from the RCALUC. This is statutorily required as the project requires a legislative action (General Plan Amendment) to proceed. The EIR must be revised to include a finding of significance due to inconsistency with this General Plan Policy LU 10.1. **O3.19 cont.**

Further, the RCALUC application states that the building heights are lower than the building heights listed in the EIR. The RCALUC application states both buildings have a maximum height of 52 feet and the staff report states that the project that was analyzed is 52 feet tall. Figure 3-8: Building 1 Elevations and Figure 3-9: Building 2 Elevations within the EIR depict the maximum height of each buildings as 60 feet. The project proposed in the EIR differs from the project that was reviewed by the RCALUC and must be resubmitted to the RCALUC for review and analysis. The EIR must be revised to include a finding of significance due to inconsistency with this General Plan Policy LU 10.1.

The EIR concludes the project is consistent with "Policy LU 11.1 Attract New Businesses. Support existing businesses and seek to attract new business and industries which strengthen and diversify Hemet's tax revenue base, improve wage- and salary levels, increase the variety of job opportunities, and employ the resident labor force," because "The Project would generate approximately 1,158 jobs that would be filled by residents within the City and provide tax revenue to the City of Hemet." However, the EIR has not provided any meaningful evidence to support this claim. There is no information provided regarding the employee wages during project construction or operation, and if those wages/salaries would improve current wages in the City. Additionally, there is no information regarding how the project will provide tax revenue to the City. There is also no analysis regarding the current unemployment rates in the City or evidence **O3.20**

[11] California Airport Planning Land Use Handbook Section 1.3.4. ALUC Review https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf
[12] June 13, 2024 RCALUC Meeting Agenda and Attachments https://rcaluc.org/sites/g/files/aldnop421/files/2024-05/aluc_agenda_6-13-24%20rev.pdf

that the unemployed population is qualified for or interested in work in the industrial sector. The EIR has not providing any meaningful analysis or supporting evidence to support a consistency conclusion and must be revised to include a finding of significance as the project is directly inconsistent with it. **O3.20 cont.**

The EIR concludes the project is consistent with "Policy LU 11.9 Consider Industrial Use Locations. Discourage the provision of industrial uses in prime locations that are land intensive, generate few job opportunities and contribute minimal revenue or benefit to the City," because, "The Project would develop two industrial warehouses and associated truck trailer parking in a prime location in that provides easy access from existing roadways, intensive uses would be concentrated to the existing approximately 64 acres parcel to the west of Warren Road. As discussed in Section 5.12, Population and Housing, the Project would generate approximately 1,158 jobs for the City of Hemet which is consistent with the City's estimated growth." Since the proposed industrial project is located in a prime location, it should be discouraged. Since it requires a GPA to proceed, it should be denied. The project is also land intensive as it constructs two concrete, rectangular buildings to house a single use within each and also requires a separate 8.5 acre parcel solely dedicated to truck/trailer parking. There is no information regarding the revenue or benefits provided to the City; however, the project will provide the City with significant and unavoidable cumulatively considerable impacts to Agriculture, Noise, Greenhouse Gas Emissions, and Transportation as a result of the GPA and project implementation. The EIR has not providing any meaningful analysis or supporting evidence to support a consistency conclusion and must be revised to include a finding of significance as the project is directly inconsistent with this policy. **O3.21**

The EIR concludes the project is consistent with, "Policy C 1.3 Traffic Flow. Maintain Level of Service (LOS) C or better for roadway segment operations, and LOS D or better for peak-hour intersection movements. Portions of Florida Avenue and Sanderson Avenue may operate at or below LOS D on a case-by-case basis," because "Implementation of the proposed Project would result in three intersections operating at an unsatisfactory LOS, however the Project would be required to pay fair share for road improvements that would achieve a satisfactory intersection LOS D." Table 5.15-6: Project Completion Conditions Peak Hour Levels of Service concludes the following intersection outside of the Lead Agency's jurisdiction requires improvements to address the peak hour deficiencies per the applicable thresholds of significance: **O3.22**

1. #3: SR 79/Domenigoni Pkwy

The EIR states that, "the Project would be required to pay fair share for the following improvements to achieve a satisfactory intersection LOS D," resulting in less than significant impacts. It must be noted that SR-79 is a Caltrans facility. Any improvements planned/constructed or in-lieu fees/fair share fees paid for Caltrans facilities are beyond the control/scope of the lead agency. An assessment of fees is appropriate when linked to a specific mitigation program. (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, *Save our Peninsula Comm. v. Monterey County Bd. Of Supers.* (2001) 87 Cal.App.4th 99, 141.) Payment of fees is not sufficient where there is no evidence mitigation will actually result. (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099,1122.) The assessment of fees here is not adequate as there is no evidence mitigation will actually result. The improvements associated with the fair-share fees are not planned to occur at all or by any certain date, whether by the City of Hemet or Caltrans. Any improvements recommended or fees paid to mitigate impacts for Caltrans facilities are beyond the control of the lead agency and evidence that these improvements will be completed or approved by Caltrans has not been provided. A revised EIR must be prepared to include the LOS analysis as cumulatively considerable significant impact as the project conflicts with Transportation Impact Threshold 1 and Land Use and Planning Impact Threshold 2 because it is not consistent with the following General Plan Policy: **O3.22 cont.**

1. Policy C 1.3 Traffic Flow. Maintain Level of Service (LOS) C or better for roadway segment operations, and LOS D or better for peak-hour intersection movements. Portions of Florida Avenue and Sanderson Avenue may operate at or below LOS D on a case-by-case basis.

The EIR concludes the project is consistent with, "Policy C 4.6 Vehicle Mile Reduction. Encourage and promote the reduction of vehicle miles traveled for all vehicles and for carbon-based fueled vehicles, and reduce the use of gasoline and diesel fuel for on-road vehicles in accordance with Senate Bill 375 regional and/or subregional targets established by the California Air Resources Board. Create and implement programs that will aid in improving air quality by reducing motor vehicle trips, such as those programs recommended by the Regional Transportation Plan, Riverside County Integrated Project, and the Southern California Air Quality Management Board." The EIR acknowledges that the project " would result in a significant and unavoidable impact on VMT," but then misleads the public and decision makers in stating that, "the Project would implement CAPCOA measures T-6 and T-18 that are included as Mitigation Measure GHG-10 and Project Design Feature TR-1, which would reduce the Project VMT by approximately 13.82 percent." While mitigated VMT may be reduced compared to the baseline project VMT, the efficacy of the proposed mitigation measures and reduction of VMT impacts below the applicable thresholds cannot be assured, and the project's VMT impact therefore remains significant and unavoidable. The EIR must be revised to include a finding of significance as the project is directly inconsistent with this policy. **O3.23**

Monique Alaniz-Fleiter
June 28, 2024
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5.13 Population and Housing

The project faces significant inconsistencies with statutory requirements of the Housing Crisis Act (HCA) of 2019/Senate Bill (SB) 330[13]/SB 8[14]. The HCA/SB 330/SB 8 require replacement housing sites when land designated for housing development experience land use changes to ensure no net loss of housing capacity. The project site has a General Plan land use designation of Mixed-Use that allows development in accordance with the R-4 (High Density Multiple Family) Zoning district (per Table 2.2: Relationship Between Hemet's Zone Districts and the General Plan Land Use Designation of the Land Use Element). The R-4 Zoning district permits the development up to 45 dwelling units per acre[15]. The 71.11 net acre project site can accommodate the development of up to 3,199 dwelling units.

Government Code Section 66300(b)(1)(A) requires that agencies shall not "change the general plan land use designation, specific plan land use designation, or zoning to a less intensive use below what was allowed under the land use designation and zoning ordinances in effect at the time of the proposed change." Under Government Code Section 66300(b)(1)(A), a "less intensive use" includes, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, or new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or any other action that would individually or cumulatively reduce residential development capacity. Pursuant to SB 330, replacement capacity for any displaced residential units must be provided **concurrently** at the **time of project approval**. O3.24

Government Code Section 66300 (h)(i)(1) states that, "this section does not prohibit an affected county or an affected city, including the local electorate acting through the initiative process, from changing a land use designation or zoning ordinance to a less intensive use, or reducing the intensity of land use, if the city or county concurrently changes the development standards, policies, and conditions applicable to other parcels within the jurisdiction to ensure that there is no net loss in residential capacity." As calculated above, the project site's Mixed Use designation provides development capacity for 3,199 residential units. Adoption of the proposed General Plan Amendment as part of the proposed project will result in a reduction of the existing residential development capacity by 3,199 units to a decreased development capacity of 0 residential units.

[13] Housing Crisis Act of 2019/SB 330
https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB330
[14] SB 8 https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220SB8
[15] Hemet Municipal Code Section 90-382(c)
https://library.municode.com/ca/hemet/codes/code_of_ordinances?nodeId=CO_CH90ZO_ARTXIIIMUMIZO_S90-382ZOES

This is in conflict with SB 8 that expanded the provisions of the HCA to include Government Code Section 66300 (h)(i)(1) requiring concurrent approval of replacement sites to ensure no net loss in residential capacity, and Section 66300 (h)(2)(A) defining "concurrently" to mean the action is approved at the same meeting of the legislative body. The EIR has not identified replacement sites for the net loss in residential capacity for 3,199 units as a result of project implementation. The loss in residential capacity must be included as a finding of significance as part of a revised EIR. The EIR does not act in conformance with the HCA/SB 330/SB 8 and the lost zoning capacity of any dwelling units is a significant environmental impact in violation of the HCA/SB 330/SB 8. The EIR must be revised to include a finding of significance due to this inconsistency.

O3.24 cont.

Additionally, deferring the environmental analysis of construction and operation of replacement sites to a later date is project piecemealing in violation of CEQA. The EIR does not accurately or adequately describe the project, meaning "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment" (CEQA § 15378). The whole of the action must statutorily and legally include the identification of replacement sites and all associated actions required to implement development of at least 3,199 residential units.

O3.25

The EIR must be prepared to provide a quantified analysis of the project's growth within the General Plan buildout scenario to determine if it exceeds the buildout scenario for its Planning Area within General Plan, in accordance with Table 2.3: Development Capacity of the City's General Plan Land Use Element, including all cumulative development and projects "in the pipeline." Table 2.3: Development Capacity projects the development intensity, including the maximum amount of dwelling units and square footage for each land use designation. The Mixed Use #4 Planning Area 820,000 sf of non-residential building area. The proposed project is 1,192,418 square feet, which exceeds the established intensity and quantity of building square footage contemplated by the General Plan for the Mixed-Use #4 area. The Business Park land use designation accommodates 5,028,000 sf of non-residential building area within the City limits and 10,277,000 sf of non-residential building area within the General Plan Planning Area (Sphere of Influence), for a total of 15,305,000 sf of non-residential building area. The proposed project is located within the City limits and will increase the quantity of non-residential building area by 23% compared to the General Plan buildout scenario. The project will increase the total quantity of non-residential building area to 16,497,418 sf, which is a 7% increase compared to the General Plan buildout scenario. This was not accounted for in the General Plan or its environmental analysis. The EIR has not provided any analysis of this information and whether the proposed project in combination with cumulative development exceeds the projected buildout scenario. For example, piecemealed project Newland Kirby (850,640 sf) combined with the proposed project totals 2,043,058 square feet, which accounts for 40% of the General Plan buildout for the Business

O3.26

Park land use designations within the City limits and 12.3% of the General Plan buildout for the Business Park land use designations within the General Plan Planning Area attributed to only two recent projects. A revised EIR must be prepared to include this analysis to comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121) and include a finding of significance as the project will induce substantial unplanned population growth in the area either directly or indirectly and exceeds the General Plan buildout scenario which was adopted with the Mixed-Use designation on the project site for the purpose of avoiding or mitigating an environmental effect (reduce VMT/GHG and improve air quality via compact mixed-use development). **O3.26 cont.**

Additionally, the EIR relies upon the regional SCAG jobs-housing balance to conclude the project will have less than significant impacts. This does not address the impacts of the project to the City. Notably, Table 5.13-5: Jobs - Housing Trends in the City of Hemet shows that the City has a jobs-housing balance of 2.47 (2016) and is projected to have a jobs-housing balance of 2.26 (2045). As stated in the EIR, "SCAG considers an area balanced when the jobs-housing balance is 1.36; communities with more than 1.36 jobs per dwelling unit are considered jobs-rich, while those with fewer than 1.36 are housing-rich." The approval of the proposed project will exacerbate the City's imbalance of jobs and housing by adding more jobs without providing the residential capacity of 1,240 residential units to help achieve a jobs-housing balance in accordance with SCAG's threshold. The EIR must be revised to include a finding of significance due to this. **O3.27**

SCAG's 2020-2045 RTP/SCS Connect SoCal Demographics and Growth Forecast[16] notes that the City will add 18,500 jobs between 2016 - 2045. The EIR utilizes uncertain and misleading language in stating generally that SCAG anticipates the City to add approximately "19,074 jobs between 2021 and 2045. Based on these growth projections, full buildout of the Project would represent approximately 6.1 percent of projected employment growth within the City of Hemet. Thus, the employment growth that would occur from the proposed Project is within the growth projections used to prepare SCAG's 2020-2045 RTP/SCS. The EIR does not provide any cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" to determine if the project will exceed the employment/population growth forecasts by SCAG and/or the General Plan. For example, other recent industrial projects such as Newland Kirby[17] (550 employees) combined with the proposed project will cumulatively generate 1,708 employees, which is 9.2% of the City's employment growth forecast over 29 years accounted for only by a single (piecemealed) industrial project. This total increases exponentially when other industrial **O3.28**

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

[17] Newland Kirby Project Addendum https://www.hemetca.gov/DocumentCenter/View/9591/Kirby-Street-Final-Addendum_112723

and commercial development activity is added to the calculation. A revised EIR must be prepared to include this information for analysis, and also provide a cumulative analysis discussion of projects approved since 2016 (SCAG), General Plan adoption, and projects "in the pipeline" to determine if the proposed project will exceed the employment/population growth forecasts by SCAG and/or the General Plan. O3.28 cont.

The EIR finds that impacts to population and housing will not be significant without providing any quantified analysis or meaningful evidence to support this conclusion. The EIR utilizes uncertain and misleading statements in its analysis of the project's workforce in stating that, "The employees that would fill these roles are *anticipated* to come from within the City or the *region*, as the unemployment rate of the City of Hemet as of August 2023 was 6.3 percent, and the County of Riverside was 5.4 percent (BLS, 2023)." However, the EIR has not provided any meaningful evidence to support this claim, such as the quantity of the available workforce that is qualified for or interested in work in the industrial sector. The EIR continues by stating that, "Due to these levels of unemployment, it is anticipated that new employees at the Project site would already reside within *commuting distance* and would not generate substantial needs for any housing." The "commuting distance" of the project site is undefined and relying on the entire labor force within an undefined distance, notably the greater SCAG region, to fill the project's construction and operational jobs will increase rates of VMT and emissions during all phases of construction and operations and an EIR must be prepared to account for longer worker trip distances. O3.29

5.15 Transportation

Table 5.15-6: Project Completion Conditions Peak Hour Levels of Service concludes the following intersection outside of the Lead Agency's jurisdiction requires improvements to address the peak hour deficiencies per the applicable thresholds of significance.

1. #3: SR 79/Domenigoni Pkwy

The EIR states that, "the Project would be required to pay fair share for the following improvements to achieve a satisfactory intersection LOS D," resulting in less than significant impacts. It must be noted that SR-79 is a Caltrans facility. Any improvements planned/constructed or in-lieu fees/fair share fees paid for Caltrans facilities are beyond the control/scope of the lead agency. An assessment of fees is appropriate when linked to a specific mitigation program. (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, *Save our Peninsula Comm. v. Monterey County Bd. Of Supers.* (2001) 87 Cal.App.4th 99, 141.) Payment of fees is not sufficient where there is no evidence mitigation will actually result. (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099,1122.) The assessment of fees here is not adequate as there is no O3.30

evidence mitigation will actually result. The improvements associated with the fair-share fees are not planned to occur at all or by any certain date, whether by the City of Hemet or Caltrans. Any improvements recommended or fees paid to mitigate impacts for Caltrans facilities are beyond the control of the lead agency and evidence that these improvements will be completed or approved by Caltrans has not been provided. A revised EIR must be prepared to include the LOS analysis as cumulatively considerable significant impact as the project conflicts with Transportation Impact Threshold 1 and Land Use and Planning Impact Threshold 2 because it is not consistent with the following General Plan Policy:

1. Policy C 1.3 Traffic Flow. Maintain Level of Service (LOS) C or better for roadway segment operations, and LOS D or better for peak-hour intersection movements. Portions of Florida Avenue and Sanderson Avenue may operate at or below LOS D on a case-by-case basis.

O3.30 cont.

The EIR states that payment of fees for the following improvements at Intersection #3 will mitigate impacts to less than significant levels: "Add right-turn overlap to northbound right, add eastbound thru-lane." However, this list does not include all of the recommended improvements provided by the Traffic Analysis for the proposed project. Table 6.1: Project Completion Conditions Recommended Improvements and Table 6.2: Cumulative Conditions Recommended Improvements within Appendix N provides the following improvements to reduce impacts to less than significant: "Add right-turn overlap to all approaches, add eastbound thru-lane. Restrict U-turn on all approaches. Accommodate an additional WBT receiving lane by expanding the width of WB intersection departure section by 4 feet." The EIR must be revised to include the complete list of improvements as stated in Appendix N.

Further, the VMT analysis has underestimated the proposed projects VMT generation. The EIR has not analyzed the project's truck/trailer/delivery van activity. A revised EIR must be prepared to include all truck/trailer/delivery van activity for quantified VMT analysis. The operational nature of industrial/warehouse uses involves high rates of truck/trailer/delivery van VMT due to traveling from large import hubs to regional distribution centers to smaller industrial parks and then to their final delivery destinations. Once employees arrive at the warehouses for work, they will conduct their jobs by driving truck/trailer/delivery vans across the region as part of the daily operations as a warehouse, which will drastically increase project-generated VMT. The project's truck/trailer and delivery van activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. A revised EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer and delivery van activity.

O3.31

The EIR has not adequately analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; or the project's potential to result in inadequate emergency access. There are no exhibits adequately depicting the available maneuvering and queueing space for trucks/trailers at the intersection of the project driveways and the adjacent streets. There are also no exhibits adequately depicting the onsite turning radius available for trucks maneuvering throughout the site. This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents. A revised EIR must be prepared to include a complete truck turning template and geometric hazards analysis for review, analysis, and comment by the public and decision makers in order to provide an adequate and accurate environmental analysis. **O3.32**

Several areas for potential conflicts between trucks/trailers and passenger cars exist throughout the project site. For example, truck/trailer parking stalls are arranged in a tandem configuration on the east side of Building 2, adjacent to passenger car parking stalls. These parking stalls may be in use at any time and further restrict truck/trailer movement, including increasing truck idling times as tandem parked trucks require additional time to maneuver, which will also result in increased queuing duration and associated need for increased queuing area for trucks/trailers. The EIR has not provided any exhibits demonstrating that there is sufficient backup space for trucks/trailers to utilize these spaces. Additionally, the eastern parcel for 160 truck/trailer parking stalls is arranged in a circular design and has not provided dimensions for each backup area required for all stalls. A revised EIR must be prepared to include a finding of significance due to these significant and unavoidable impacts.

The EIR states regarding emergency access that "The Hemet Fire Protection District would review the development plans prior to approval to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9)," but the HFPD review and determination of the project application materials is not included for public review as part of the EIR. This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents. A revised EIR must be prepared to include the HFPD determination/review of the project and its Site Plan for review, analysis, and comment by the public and decision makers in order to provide an adequate and accurate environmental analysis. **O3.33**

The EIR makes a similar statement regarding sight distance at the project's access points, stating that, "sight distance at the Project's access points would be reviewed with respect to City standards at the time of final grading, landscape, and street improvement plan reviews. Additionally, Project frontage improvements and site access points would be constructed to be consistent with the identified roadway classifications and respective cross-sections in accordance with the Hemet General Plan Circulation Element. Compliance with existing regulations would be ensured through the City's construction permitting process." This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents. The EIR has not provided any analysis of the available horizontal and vertical sight distance at the intersection of the project driveways and adjacent streets. Sight distance is the continuous length of street ahead visible to the driver. At unsignalized intersections, corner sight distance must provide a substantially clear line of sight between the driver of the vehicle waiting on the minor road (driveway) and the driver of an approaching vehicle. A revised EIR must be prepared with this analysis based on the American Association of State Highway and Transportation Officials (AASHTO) Stopping Sight Distance requirements. O3.34

6.2 Growth Inducement and 6.3 Significant Irreversible Effects

The EIR has not provided an adequate or accurate cumulative analysis discussion to demonstrate the impact of the proposed project in a cumulative setting. SCAG's 2020-2045 RTP/SCS Connect SoCal Demographics and Growth Forecast[18] notes that the City will add 18,500 jobs between 2016 - 2045. The EIR utilizes uncertain and misleading language in stating generally that SCAG anticipates the City to add approximately "19,074 jobs between 2021 and 2045. Based on these growth projections, full buildout of the Project would represent approximately 6.1 percent of projected employment growth within the City of Hemet. Thus, the employment growth that would occur from the proposed Project is within the growth projections used to prepare SCAG's 2020-2045 RTP/SCS. The EIR does not provide any cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" to determine if the project will exceed the employment/population growth forecasts by SCAG and/or the General Plan. For example, other recent industrial projects such as Newland Kirby[19] (550 employees) combined with the proposed project will cumulatively generate 1,708 employees, which is 9.2% of the City's employment O3.35

[18] SCAG Connect SoCal Demographics and Growth Forecast adopted September 3, 2020 https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579
[19] Newland Kirby Project Addendum https://www.hemetca.gov/DocumentCenter/View/9591/Kirby-Street-Final-Addendum_112723

growth forecast over 29 years accounted for only by a single (piecemealed) industrial project. This total increases exponentially when other industrial and commercial development activity is added to the calculation. A revised EIR must be prepared to include this information for analysis, and also provide a cumulative analysis discussion of projects approved since 2016 (SCAG), General Plan adoption, and projects "in the pipeline" to determine if the proposed project will exceed the employment/population growth forecasts by SCAG and/or the General Plan.

The EIR finds that impacts will not be significant without providing any quantified analysis or meaningful evidence to support this conclusion. The EIR adds new uncertain and misleading statements in its analysis of the project's workforce that contradicts its statements elsewhere, which does not comply with CEQA's requirements for adequate informational documents (CEQA 15121). Here, the EIR states that, "*most* of the new jobs that would be created by the Project would be positions that do not require a specialized workforce, and this type of workforce exists in the City of Hemet and surrounding communities." The EIR maintains throughout the document that, "At the current time the specific tenants and uses of the proposed industrial building are unknown, (Section 5.3 Air Quality)" and "Because the future tenant of the proposed warehouse is unknown, the number of jobs generated from operation of the proposed Project cannot be precisely determined," (Section 5.13 Population and Housing). Since the tenants are unknown, there is no possible assurance that "*most* of the new jobs that would be created by the Project would be positions that do not require a *specialized* workforce," as the type of work to be conducted is unknown. The EIR must be revised to include a finding of significance. **O3.35 cont.**

The EIR must be prepared to provide a quantified analysis of the project's growth within the General Plan buildout scenario to determine if it exceeds the buildout scenario for its Planning Area within General Plan, in accordance with Table 2.3: Development Capacity of the City's General Plan Land Use Element, including all cumulative development and projects "in the pipeline." Table 2.3: Development Capacity projects the development intensity, including the maximum amount of dwelling units and square footage for each land use designation. The Mixed Use #4 Planning Area 820,000 sf of non-residential building area. The proposed project is 1,192,418 square feet, which exceeds the established intensity and quantity of building square footage contemplated by the General Plan for the Mixed-Use #4 area. The Business Park land use designation accommodates 5,028,000 sf of non-residential building area within the City limits and 10,277,000 sf of non-residential building area within the General Plan Planning Area (Sphere of Influence), for a total of 15,305,000 sf of non-residential building area. The proposed project is located within the City limits and will increase the quantity of non-residential building area by 23% compared to the General Plan buildout scenario. The project will increase the total quantity of non-residential building area to 16,497,418 sf, which is a 7% increase compared to the General Plan buildout scenario. This was not accounted for in the General Plan or its environmental **O3.36**

analysis. The EIR has not provided any analysis of this information and whether the proposed project in combination with cumulative development exceeds the projected buildout scenario. For example, piecemealed project Newland Kirby (850,640 sf) combined with the proposed project totals 2,043,058 square feet, which accounts for 40% of the General Plan buildout for the Business Park land use designations within the City limits and 12.3% of the General Plan buildout for the Business Park land use designations within the General Plan Planning Area attributed to only two recent projects. A revised EIR must be prepared to include this analysis to comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121) and include a finding of significance as the project will induce growth in the area and exceeds the General Plan buildout scenario which was adopted with the Mixed-Use designation on the project site for the purpose of avoiding or mitigating an environmental effect (reduce VMT/GHG and improve air quality via compact mixed-use development). **O3.36 cont.**

The EIR has excluded for discussion for the precedence setting action that approval of the required General Plan Amendment set for future changes in the area. The EIR must be revised to include a finding of significance as the required GPA to implement the project will result in significant and unavoidable cumulatively considerable impacts to Agriculture, Noise, Greenhouse Gas Emissions, and Transportation (VMT), and approval of the proposed project will set precedent for approval of other projects with SU impacts that require changes in land use designations. Removal of the Mixed-Use land use designation applied on the project site for the purpose of avoiding or mitigating an environmental effect (reduce VMT/GHG and improve air quality via compact mixed-use development) is a precedent-setting action that will encourage and facilitate other activities that could significantly affect the environment. **O3.37**

8.0 Alternatives

The EIR is required to evaluate a reasonable range of alternatives to the proposed project which will avoid or substantially lessen any of the significant effects of the project (CEQA § 15126.6.) The alternatives chosen for analysis include the CEQA required "No Project/No Development" alternative and only two others - Reduced Project Alternative and No Project/Buildout of Existing Land Use Alternative. The EIR does not include an alternative that meets the project objectives and also eliminates all of the project's significant and unavoidable impacts. The EIR must be revised to include analysis of a reasonable range of alternatives and foster informed decision making (CEQA § 15126.6). Notably, the analysis for the Reduced Project Alternative and the No Project/Buildout of Existing Land Use Alternative only provide narrative assumptions and exclude quantified analysis to support the impact claims. For example, analysis of the Reduced Project Alternative's GHG impacts states that, "approximately 81 percent less building area would be developed within the Project site. Therefore, a reduced volume of construction activities and related production of GHG emissions would occur. In addition, the reduced amount of **O3.38**

development by this alternative would result in less stationary source emissions from onsite equipment, and less traffic associated GHG emissions than the proposed Project. Therefore, the overall volume of GHG emissions would be reduced in comparison to the proposed Project and would reduce the significant and unavoidable impact to a less than significant impact." The narrative assumes that because less building area will be developed, less than significant impacts will be achieved without providing any meaningful or quantified evidence to support this claim. The EIR must be revised to include meaningful and quantified evidence/modeling for each proposed alternative in order to comply with CEQA's requirements for meaningful disclosure, adequate informational documents, and evaluate a reasonable range of alternatives.

O3.38 cont.

Conclusion

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

O3.39

Sincerely,

Gary Ho
Blum, Collins & Ho LLP

Attachment: SWAPE Analysis

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

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June 25, 2024

Gary Ho
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707 Wilshire Blvd, Ste. 4880
Los Angeles, CA 90017

Subject: Comments on the Newland Simpson Road Project (SCH No. 2023120462)

Dear Mr. Ho,

We have reviewed the May 2024 Draft Impact Report ("DEIR") for the Newland Simpson Road Project ("Project") located in the City of Hemet ("City"). The Project proposes to construct a total of 1,192,418-square-feet ("SF") of industrial space and 1,717 parking spaces on the 74.88-acre site.

Our review concludes that the DEIR fails to adequately evaluate the Project's hazards, hazardous materials, air quality, and health risk impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project may be underestimated and inadequately addressed. A revised Environmental Impact Report ("EIR") should be prepared to adequately assess and mitigate the potential hazards, hazardous materials, air quality, and health risk impacts that the project may have on the environment. **O3.40**

Hazards and Hazardous Materials

Inadequate Disclosure and Analysis of Impacts

The DEIR relies on a 2022 Phase I Environmental Site Assessment (Phase I ESA, included as Appendix K) to determine hazardous and hazardous materials impacts. The Phase I ESA found that the Project site has been utilized for agricultural purposes from as early as 1949.

The DEIR concluded (p. 5.9-14): **O3.41**

> "the Project site is currently and has historically been used for agricultural purposes, and there is a potential that agricultural chemicals, such as pesticides, herbicides, and fertilizers were used onsite. However, as discussed in the Phase I ESA (Appendix K), no evidence of excessive

pesticide, herbicide, or fertilizer use was seen onsite, and concentrations of these substances were recorded to be below regulatory thresholds and/or regional background concentrations."

Neither the DEIR nor the Phase I document the actual recording of pesticide concentrations at levels below regulatory thresholds. To record such concentrations of pesticides in soil, sampling would need to be conducted. No documentation that sampling was conducted was included in the DEIR or the Phase I ESA.

Because they are persistent in the environment, pesticides - including DDT and DDE - may be present in Project site soils. Exposure to DDT can result in headaches, nausea, and seizures.[1] The U.S. EPA identifies DDT and DDE as probable human carcinogens.[2]

O3.41 cont.

To provide an adequate basis for determining impacts, a revised DEIR needs to be prepared to include the results of a soil sampling program for residual concentrations of pesticides at the Project site. Any contamination that is identified above regulatory screening levels, including California Office of Environmental Health Hazard Assessment's Soil Screening Numbers[3], should be further evaluated and cleaned up, if necessary, in coordination with the Regional Water Quality Control Board and the California Department of Toxics Substances Control.

Air Quality

Failure to Provide Complete CalEEMod Output Files

Land use development projects under the California Environmental Quality Act ("CEQA") typically evaluate air quality impacts and calculate potential criteria air pollutant emissions using the California Emissions Estimator Model ("CalEEMod").[4] CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but CEQA requires that such changes be justified by substantial evidence. Once all of the values are inputted into the model, the Project's construction and operational emissions are calculated, and "output files" are generated. These output files disclose to the reader what parameters are used in calculating the Project's air pollutant emissions and demonstrate which default values are changed. Justifications are provided for the selected values.

O3.42

According to the Air Quality Impact Analysis ("AQIA"), included as Appendix C to the DEIR, CalEEMod Version 2022.1 is relied upon to estimate Project emissions (p. 39). However, this poses a problem, as the currently available version of CalEEMod 2022.1 is described as a "soft release" which fails to provide complete output files.[5] Specifically, the "User Changes to Default Data" table no longer provides the

O3.43

[1] https://www.atsdr.cdc.gov/toxfaqs/tfacts35.pdf
[2] Ibid.
[3] https://dtsc.ca.gov/human-health-risk-hero/
[4] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide.
[5] "CalEEMod California Emissions Estimator Model Soft Release." California Air Pollution Control Officers Association (CAPCOA), 2022, *available at:* https://caleemod.com/.

quantitative counterparts to the changes to the default values (see excerpt below) (Appendix C, pp. 167, 211, 247, 283):

8. User Changes to Default Data

Screen	Justification
Land Use	Total Project area is 72.95 acres
Construction: Construction Phases	Construction anticipated to begin May 2025 and end June 2026
Construction: Off-Road Equipment	Pieces of equipment adjusted based on the changes made to the Construction Schedule
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Site Preparation, Grading, Building Construction, and Architectural Coating
Construction: Architectural Coatings	Rule 1113

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

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

O3.43 cont.

The output files associated with CalEEMod Version 2022.1 fail to present the exact parameters used to calculate Project emissions. To remedy this issue, the DEIR should have provided access to the model's ".JSON" output files, which allow third parties to review the model's revised input parameters.[6] Without access to the complete output files, including the specific numeric changes to the default values, we cannot verify that the DEIR's air modeling and subsequent analysis is an accurate reflection of the proposed Project. As a result, a revised EIR should be prepared to include an updated air quality analysis that correctly provides the complete output files for CalEEMod Version 2022.1, or includes an updated air model using an older release of CalEEMod.[7]

Unsubstantiated Input Parameters Used to Estimate Project Emissions

As previously discussed, the DEIR relies on CalEEMod Version 2022.1 to estimate the Project's air quality emissions and fails to provide the complete output files required to adequately evaluate model's analysis (AQIA, p. 39). Regardless, when reviewing the Project's CalEEMod output files, provided in the AQIA, we were able to identify several model inputs that are inconsistent with information disclosed in the DEIR. As such, the Project's construction-related and operational emissions may be underestimated.

O3.44

[6] "Video Tutorials for CalEEMod Version 2022.1." California Air Pollution Control Officers Association (CAPCOA), May 2022, *available at:* https://www.caleemod.com/tutorials.
[7] "CalEEMod Version 2020.4.0." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* http://www.aqmd.gov/caleemod/download-model.

A revised EIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality. O3.44 cont.

Failure to Consider Potential Cold Storage Requirements

Review of the CalEEMod output files demonstrates that the Simpson Road Warehouse (Operations) Detailed Report" model includes 883,080-SF and 309,338-SF of the "Unrefrigerated Warehouse-No Rail" land use (see excerpt below) (Appendix C, pp. 219, 220, 255, 256).

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Unrefrigerated Warehouse-No Rail	883	1000sqft	31.4	883,080	483,977	—	—	Building 1 PC
User Defined Industrial	883	User Defined Unit	0.00	0.00	0.00	—	—	Building 1 Trucks
Unrefrigerated Warehouse-No Rail	309	1000sqft	7.10	309,338	0.00	—	—	Building 2 PC
User Defined Industrial	309	User Defined Unit	0.00	0.00	0.00	—	—	Building 2 Trucks
Parking Lot	1,717	Space	10.6	0.00	0.00	—	—	—
Other Asphalt Surfaces	1,039	1000sqft	23.9	0.00	0.00	—	—	—

As demonstrated above, the model does not include any refrigerated warehouse space whatsoever. This may be incorrect, as the DEIR indicates that the future tenants of the proposed warehouse are currently unknown. Specifically, the DEIR states: O3.45

> "There are currently no known tenants for the proposed warehouse buildings" (p. 3-13).

As future site tenants are unknown, the proposed warehouse may require cold storage for operation. As discussed by the South Coast Air Quality Management District ("SCAQMD"), "CEQA requires the use of 'conservative analysis' to afford 'fullest possible protection of the environment.'"[8] The DEIR must provide substantial evidence for not including any of the warehouse as cold storage space. Otherwise, an updated model should be prepared to include the entire warehouse land use as refrigerated in order to account for the additional emissions that refrigeration requirements may generate.

This presents an issue, as refrigerated warehouses release more criteria air pollutant and GHG emissions when compared to unrefrigerated land uses for three reasons. First, warehouses equipped with cold storage, such as refrigerators and freezers, are known to consume more energy when compared to warehouses without cold storage.[9] Second, warehouses equipped with cold storage typically require refrigerated trucks, which are known to idle for much longer when compared to unrefrigerated hauling trucks.[10] Lastly, according to a July 2014 *Warehouse Truck Trip Study Data Results and Usage*

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

presentation prepared by the SCAQMD hauling trucks that require refrigeration result in greater truck trip rates when compared to non-refrigerated hauling trucks.[11]

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

O3.45 cont.

Unsubstantiated Changes to Operational Fleet Mix Values

Review of the CalEEMod output files demonstrates that the "Simpson Road Warehouse (Operations) Detailed Report" model includes changes to the default operational vehicle fleet mix percentages (see excerpt below) (Appendix C, pp. 247, 283).

Screen	Justification
Land Use	Total Project area is 72.95 acres
Operations: Vehicle Data	Trip characteristics based on information provided in the Traffic analysis
Operations: Fleet Mix	Passenger Car Mix estimated based on the CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, & MCY). Truck Mix based on information in the Traffic analysis
Operations: Energy Use	No natural gas

As previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified. According to the "User Entered Comments & Non-Default Data" table, the justification provided for these changes is:

O3.46

> "Passenger Car Mix estimated based on the CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, & MCY). Truck Mix based on information in the Traffic analysis" (pp. 247, 283).

However, these changes remain unsubstantiated. As previously discussed, the output files for CalEEMod 2022.1 do not present the numeric changes to any model defaults. Upon further review of the output files, changes to fleet mix percentages are not mentioned outside of the "User Changes to Default Data" table. Until the DEIR verifies the breakdown of heavy-heavy duty ("HHD"), medium-heavy duty ("MHD"), light-heavy duty ("LHD1, LDH2"), trucks used by the Project, we cannot verify that the values included in the model are accurate.[12]

These unsubstantiated changes present an issue, as CalEEMod uses operational vehicle fleet mix percentages to calculate the Project's operational emissions associated with on-road vehicles.[13] By including several unsubstantiated changes to the default operational vehicle fleet mix percentages, the

[11] "Warehouse Truck Trip Study Data Results and Usage" Presentation. SCAQMD Mobile Source Committee, July 2014, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-quality-analysis/finaltrucktripstudymsc072514.pdf?sfvrsn=2, p. 7, 9.
[12] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 38.
[13] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 36.

model may underestimate the Project's mobile-source operational emissions and should not be relied upon to determine Project significance. O3.46 cont.

Updated Analysis Indicates Potentially Significant Air Quality Impact

In an effort to more accurately estimate the Project's construction-related emissions, we prepared an updated CalEEMod model using CalEEMod Version 2020.4.0, using the Project-specific information provided by the DEIR. In our updated model, we omitted the unsubstantiated changes to operational fleet mix values.[14] All other values were left as default.

Our updated analysis estimates that the nitrogen oxide ("NO_X") emissions associated with Project construction exceed the applicable SCAQMD threshold of 100 pounds per day ("lbs/day"), as referenced by the DEIR (p. 5.3-21) (see table below).[15]

SWAPE Criteria Air Pollutant Emissions

Construction	NOx (lbs/day)
DEIR	96.5
SWAPE	122.9
% Increase	27.4%
SCAQMD Threshold	**100**
Exceeds?	***Yes***

O3.47

As demonstrated above, construction-related NO_X emissions, as estimated by SWAPE, increase by approximately 27% and exceed the applicable SCAQMD significance threshold. Our updated modeling demonstrates that the Project would result in a potentially significant air quality impact that was not previously identified or addressed by the DEIR. As a result, a revised EIR should be prepared to adequately assess and mitigate the potential air quality impacts that the Project may have on the environment.

Diesel Particulate Matter Emissions Inadequately Evaluated

The DEIR concludes that the proposed Project would result in a less-than-significant health risk impact based on a quantified construction and operational Health Risk Analysis ("HRA"), as detailed in the Mobile Health Risk Assessment ("HRA Report"), provided as Appendix D to the DEIR. Specifically, the HRA Report estimates that the cumulative maximum cancer risk posed to nearby, existing residential sensitive receptors associated with construction would be 1.29 in one million, which would not exceed the SCAQMD significance threshold of 10 in one million (see image below) (p. 5.3-41, Table 5.3-14). O3.48

[14] See Attachment A for updated CalEEMod model.
[15] "South Coast AQMD Air Quality Significance Thresholds." SCAQMD, April 2019, *available at*: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25.

Table 5.3-14: Summary of Construction and Operational Cancer and Non-Cancer Risks

Time Period	Location	Maximum Lifetime Cancer Risk (per million)	Significance Threshold (per million)	Exceeds Significance Threshold?
30 Year Exposure	Maximum Exposed Sensitive Receptor	1.29	10	No
Time Period	**Location**	**Maximum Hazard Index**	**Significance Threshold**	**Exceeds Significance Threshold?**
Annual Average	Maximum Exposed Sensitive Receptor	<0.01	1.0	No

Source: Urban, 2024b (Appendix D)

O3.48 cont.

However, the DEIR's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, is incorrect for two reasons.

First, the DEIR's HRA is unreliable, as it relies upon emissions estimates from a flawed air model, as discussed above in the section titled "Unsubstantiated Input Parameters Used to Estimate Project Emissions." As such, the HRA is based on potentially underestimated diesel particulate matter ("DPM") concentrations to calculate the health risk associated with Project operation. As a result, the DEIR's HRA and resulting cancer risk should not be relied upon to determine Project significance.

O3.49

Second, the DEIR's operational HRA underestimates the Fraction of Time At Home ("FAH") values for the third trimester, infant, and child receptors. Specifically, the HRA Report utilizes an FAH value of 0.85 for the third trimester (age -0.25 to 0) and infant (age 0 to 2) receptors, an FAH value of 0.72 for the child receptors (age 2 to 16), and an FAH value of 0.73 for the adult receptors (age 16 to 30) (see image below) (Appendix D, p. 22).

TABLE 2-7: EXPOSURE ASSUMPTIONS FOR INDIVIDUAL CANCER RISK (30 YEAR RESIDENTIAL)

Age	Daily Breathing Rate (L/kg-day)	Age Specific Factor	Exposure Duration (years)	Fraction of Time at Home	Exposure Frequency (days/year)	Exposure Time (hours/day)
-0.25 to 0	361	10	0.25	0.85	350	24
0 to 2	1,090	10	2	0.85	350	24
2 to 16	572	3	14	0.72	350	24
16 to 30	261	1	14	0.73	350	24

O3.50

However, the FAH values used for the third trimester, infant, and childhood receptors are incorrect, as SCAQMD guidance clearly states:

> "For Tiers 1, 2, and 3 screening purposes, the FAH is assumed to be 1 for ages third trimester to 16. As a default, children are assumed to attend a daycare or school in close proximity to their home and no discount should be taken for time spent outside of the area affected by the facility's emissions. People older than age 16 are assumed to spend only 73 percent of their time at home."[16]

[16] "Risk Assessment Procedures." SCAQMD, August 2017, available at: http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf, p. 7.

Per SCAQMD guidance, the HRA Report should have used an FAH of 1 for the third trimester, infant, child, and adult receptors. By relying on incorrect FAH values, the DEIR may underestimate the cancer risk posed to nearby, existing sensitive receptors as a result of Project construction and operation. O3.50 cont.

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

According to California Environmental Quality Act ("CEQA") Guidelines § 15096(g)(2):

> "When an updated EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment."

The DEIR is consequently required under CEQA to implement all feasible mitigation to reduce the Project's potential impacts. As demonstrated in the sections above, the Project would result in potentially significant health risk impacts that should be mitigated further. O3.51

The EPA explains that NO_x emissions originate from "motor vehicle internal combustion engines and fossil fuel-fired electric utility and industrial boilers".[17,18] As NO_x is emitted from mobile source engines we will provide mitigation measure that apply to both pollutants. In order to reduce the NO_x emissions associated with Project construction and operation, we recommend the DEIR consider incorporating several mitigation measures (see list below).

Southern California Association of Governments ("SCAG")'s 2020 *RTP/SCS* Program Environmental Impact Report ("PEIR") recommends the following Air Quality Project Level Mitigation Measures ("PMM-AQ-1"), which are applicable to the Project: [19]

- Minimize unnecessary vehicular and machinery activities;
- Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available, low-emission heavy-duty engines to achieve near-term reduction of NO_x emissions from in-use off-road diesel vehicles.

[17] "Proposed Revisions to the National Ambient Air Quality Standards for Nitrogen Dioxide." EPA, July 2009, *available at*: https://www.gpo.gov/fdsys/pkg/FR-2009-07-15/pdf/E9-15944.pdf.
[18] "Particle Pollution and your Health." EPA, September 2003, *available at*: https://www.airnow.gov/sites/default/files/2018-03/pm-color.pdf.
[19] "4.0 Mitigation Measures." Connect SoCal Program Environmental Impact Report Addendum #1, September 2020, available at: https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_addendum_4_mitigationmeasures.pdf?1606004420, p. 4.0-2 – 4.0-10; 4.0-19 – 4.0-23; See also: "Certified Final Connect SoCal Program Environmental Impact Report." SCAG, May 2020, *available at:* https://scag.ca.gov/peir.

The Department of Justice ("DOJ") recommends:[20]

- Limiting the amount of daily grading disturbance area;
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use; and
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.

The CalEEMod User's Guide confirms that the methods for mitigating DPM emissions include the use of "alternative fuel, electric equipment, diesel particulate filters (DPF), oxidation catalysts, newer tier engines, and dust suppression."[21] O3.51

As demonstrated above, we have provided several mitigation measures that would reduce Project-related NO_x emissions developed from sources including SCAG, the DOJ and others. These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently reduce emissions released during Project construction and operation.

A revised EIR should be prepared that includes *all* feasible mitigation measures, as well as updated analyses of hazards, hazardous materials, air quality, and health risk impacts to ensure that the necessary mitigation measures are implemented to reduce emissions to the maximum extent feasible. The revised EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's potentially significant emissions are reduced to the maximum extent possible.

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties. O3.52

[20] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, *available at*: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf, p. 8 – 10.
[21] "Calculation Details for CalEEMod." CAPCOA, May 2021, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-a2020-4-0.pdf?sfvrsn=6, Appendix A, p. 60.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

Attachment A: SWAPE's CalEEMod Output Files
Attachment B: Matt Hagemann CV
Attachment C: Paul Rosenfeld CV

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Simpson Road Warehouse Detailed Repo

Riverside-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	1,192.00	1000sqft	38.50	1,192,418.00	0
Other Asphalt Surfaces	1,039.00	1000sqft	23.90	0.00	0
Parking Lot	1,717.00	Space	10.60	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.4	**Precipitation Freq (Days)**	28
Climate Zone	10			**Operational Year**	2026
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with DEIR's model.

Land Use - Consistent with DEIR's model.

Construction Phase - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Trips and VMT - Consistent with DEIR's model.

Grading - Consistent with DEIR's model.

Architectural Coating - Consistent with DEIR's model.

Simpson Road Warehouse Detailed Repo - Riverside-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Vehicle Trips - Consistent with DEIR's model.

Water And Wastewater - Consistent with DEIR's model.

Construction Off-road Equipment Mitigation - Consistent with DEIR's model.

Fleet Mix - See comment on: "Unsubstantiated Changes to Fleet Mix Values".

Energy Use - Consistent with DEIR's model.

Table Name	Column Name	Default Value	New Value
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblEnergyUse	NT24E	0.82	0.00
tblEnergyUse	NT24NG	0.03	0.00
tblEnergyUse	T24E	0.33	0.00
tblEnergyUse	T24NG	1.98	0.00
tblGrading	AcresOfGrading	1,650.00	750.00
tblGrading	AcresOfGrading	80.00	60.00
tblLandUse	LandUseSquareFeet	1,192,000.00	1,192,418.00
tblLandUse	LandUseSquareFeet	1,039,000.00	0.00
tblLandUse	LandUseSquareFeet	686,800.00	0.00
tblLandUse	LotAcreage	27.36	38.50
tblLandUse	LotAcreage	23.85	23.90
tblLandUse	LotAcreage	15.45	10.60

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblOffRoadEquipment	HorsePower	212.00	97.00
tblOffRoadEquipment	LoadFactor	0.43	0.37
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	6.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblTripsAndVMT	HaulingTripNumber	0.00	241.00
tblTripsAndVMT	VendorTripLength	6.90	10.20
tblTripsAndVMT	VendorTripLength	6.90	10.20
tblTripsAndVMT	VendorTripLength	6.90	10.20
tblTripsAndVMT	VendorTripLength	6.90	10.20
tblTripsAndVMT	VendorTripNumber	0.00	10.00
tblTripsAndVMT	VendorTripNumber	0.00	32.00
tblTripsAndVMT	VendorTripNumber	195.00	117.00
tblTripsAndVMT	VendorTripNumber	0.00	37.00
tblTripsAndVMT	WorkerTripLength	14.70	18.50
tblTripsAndVMT	WorkerTripLength	14.70	18.50
tblTripsAndVMT	WorkerTripLength	14.70	18.50
tblTripsAndVMT	WorkerTripLength	14.70	18.50
tblVehicleTrips	ST_TR	1.74	2.13
tblVehicleTrips	SU_TR	1.74	2.13
tblVehicleTrips	WD_TR	1.74	2.13
tblWater	OutdoorWaterUseRate	0.00	7,673,799.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2025	0.8125	7.7066	6.2512	0.0161	3.0737	0.3337	3.4074	1.4508	0.3072	1.7580	0.0000	1,426.2512	1,426.2512	0.4023	0.0147	1,440.6734
2026	0.4913	3.3565	5.4577	0.0158	1.0466	0.1184	1.1650	0.2811	0.1106	0.3917	0.0000	1,441.7368	1,441.7368	0.1412	0.0653	1,464.7197
2027	0.4795	3.3366	5.3381	0.0156	1.0466	0.1181	1.1648	0.2811	0.1104	0.3915	0.0000	1,417.0989	1,417.0989	0.1403	0.0634	1,439.5101
2028	0.4671	3.3076	5.2184	0.0153	1.0426	0.1174	1.1600	0.2801	0.1097	0.3898	0.0000	1,389.4669	1,389.4669	0.1390	0.0615	1,411.2752
2029	0.4587	3.3061	5.1518	0.0151	1.0466	0.1176	1.1642	0.2811	0.1099	0.3910	0.0000	1,374.7269	1,374.7269	0.1389	0.0602	1,396.1504
2030	5.6397	0.6217	1.3322	3.9300e-003	0.2412	0.0113	0.2526	0.0649	0.0112	0.0761	0.0000	353.7690	353.7690	8.7300e-003	0.0149	358.4211
Maximum	**5.6397**	**7.7066**	**6.2512**	**0.0161**	**3.0737**	**0.3337**	**3.4074**	**1.4508**	**0.3072**	**1.7580**	**0.0000**	**1,441.7368**	**1,441.7368**	**0.4023**	**0.0653**	**1,464.7197**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2025	0.8125	7.7066	6.2512	0.0161	3.0737	0.3337	3.4074	1.4508	0.3072	1.7580	0.0000	1,426.2497	1,426.2497	0.4023	0.0147	1,440.6719
2026	0.4913	3.3565	5.4577	0.0158	1.0466	0.1184	1.1650	0.2811	0.1106	0.3917	0.0000	1,441.7362	1,441.7362	0.1412	0.0653	1,464.7191
2027	0.4795	3.3366	5.3381	0.0156	1.0466	0.1181	1.1648	0.2811	0.1104	0.3915	0.0000	1,417.0983	1,417.0983	0.1403	0.0634	1,439.5095
2028	0.4671	3.3076	5.2184	0.0153	1.0426	0.1174	1.1600	0.2801	0.1097	0.3898	0.0000	1,389.4664	1,389.4664	0.1390	0.0615	1,411.2746
2029	0.4587	3.3061	5.1518	0.0151	1.0466	0.1176	1.1642	0.2811	0.1099	0.3910	0.0000	1,374.7264	1,374.7264	0.1389	0.0602	1,396.1498
2030	5.6397	0.6217	1.3322	3.9300e-003	0.2412	0.0113	0.2526	0.0649	0.0112	0.0761	0.0000	353.7689	353.7689	8.7300e-003	0.0149	358.4209
Maximum	**5.6397**	**7.7066**	**6.2512**	**0.0161**	**3.0737**	**0.3337**	**3.4074**	**1.4508**	**0.3072**	**1.7580**	**0.0000**	**1,441.7362**	**1,441.7362**	**0.4023**	**0.0653**	**1,464.7191**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	5-4-2025	8-3-2025	2.4909	2.4909
2	8-4-2025	11-3-2025	4.4591	4.4591
3	11-4-2025	2-3-2026	1.9234	1.9234
4	2-4-2026	5-3-2026	0.9376	0.9376
5	5-4-2026	8-3-2026	0.9641	0.9641

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6	8-4-2026	11-3-2026	0.9671	0.9671
7	11-4-2026	2-3-2027	0.9693	0.9693
8	2-4-2027	5-3-2027	0.9299	0.9299
9	5-4-2027	8-3-2027	0.9560	0.9560
10	8-4-2027	11-3-2027	0.9591	0.9591
11	11-4-2027	2-3-2028	0.9618	0.9618
12	2-4-2028	5-3-2028	0.9337	0.9337
13	5-4-2028	8-3-2028	0.9492	0.9492
14	8-4-2028	11-3-2028	0.9522	0.9522
15	11-4-2028	2-3-2029	0.9552	0.9552
16	2-4-2029	5-3-2029	0.9173	0.9173
17	5-4-2029	8-3-2029	0.9429	0.9429
18	8-4-2029	11-3-2029	0.9460	0.9460
19	11-4-2029	2-3-2030	0.8562	0.8562
20	2-4-2030	5-3-2030	3.6751	3.6751
21	5-4-2030	8-3-2030	2.3188	2.3188
		Highest	4.4591	4.4591

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	4.8661	4.6000e-004	0.0503	0.0000		1.8000e-004	1.8000e-004		1.8000e-004	1.8000e-004	0.0000	0.0980	0.0980	2.5000e-004	0.0000	0.1044
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	247.4199	247.4199	0.0209	2.5300e-003	248.6963
Mobile	1.2802	2.1283	14.2066	0.0361	4.1141	0.0284	4.1425	1.0989	0.0266	1.1255	0.0000	3,335.2734	3,335.2734	0.1586	0.1585	3,386.4774
Waste						0.0000	0.0000		0.0000	0.0000	227.4473	0.0000	227.4473	13.4418	0.0000	563.4911
Water						0.0000	0.0000		0.0000	0.0000	87.4510	651.6552	739.1063	9.0371	0.2188	1,030.2211
Total	**6.1463**	**2.1288**	**14.2568**	**0.0361**	**4.1141**	**0.0286**	**4.1427**	**1.0989**	**0.0268**	**1.1257**	**314.8983**	**4,234.4465**	**4,549.3449**	**22.6585**	**0.3798**	**5,228.9902**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	4.8661	4.6000e-004	0.0503	0.0000		1.8000e-004	1.8000e-004		1.8000e-004	1.8000e-004	0.0000	0.0980	0.0980	2.5000e-004	0.0000	0.1044
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	247.4199	247.4199	0.0209	2.5300e-003	248.6963
Mobile	1.2802	2.1283	14.2066	0.0361	4.1141	0.0284	4.1425	1.0989	0.0266	1.1255	0.0000	3,335.2734	3,335.2734	0.1586	0.1585	3,386.4774
Waste						0.0000	0.0000		0.0000	0.0000	227.4473	0.0000	227.4473	13.4418	0.0000	563.4911
Water						0.0000	0.0000		0.0000	0.0000	87.4510	651.6552	739.1063	9.0371	0.2188	1,030.2211
Total	**6.1463**	**2.1288**	**14.2568**	**0.0361**	**4.1141**	**0.0286**	**4.1427**	**1.0989**	**0.0268**	**1.1257**	**314.8983**	**4,234.4465**	**4,549.3449**	**22.6585**	**0.3798**	**5,228.9902**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	5/4/2025	6/27/2025	5	40	
2	Grading	Grading	6/28/2025	11/28/2025	5	110	
3	Building Construction	Building Construction	11/29/2025	3/1/2030	5	1110	

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4	Architectural Coating	Architectural Coating	3/2/2030	6/14/2030	5	75	

Acres of Grading (Site Preparation Phase): 60

Acres of Grading (Grading Phase): 750

Acres of Paving: 34.5

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 1,788,627; Non-Residential Outdoor: 596,209; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	4	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Crawler Tractors	6	8.00	97	0.37
Grading	Excavators	6	8.00	158	0.38
Grading	Graders	6	8.00	187	0.41
Grading	Rubber Tired Dozers	6	8.00	247	0.40
Grading	Scrapers	6	8.00	367	0.48
Building Construction	Cranes	2	7.00	231	0.29
Building Construction	Forklifts	4	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	6	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Architectural Coating	Air Compressors	4	8.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	8	20.00	10.00	0.00	18.50	10.20	20.00	LD_Mix	HDT_Mix	HHDT
Grading	30	75.00	32.00	241.00	18.50	10.20	20.00	LD_Mix	HDT_Mix	HHDT

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Building Construction	14	501.00	117.00	0.00	18.50	10.20	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	4	100.00	37.00	0.00	18.50	10.20	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

3.2 Site Preparation - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.5136	0.0000	0.5136	0.2683	0.0000	0.2683	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0624	0.6373	0.4182	9.3000e-004		0.0275	0.0275		0.0253	0.0253	0.0000	81.9381	81.9381	0.0265	0.0000	82.6006
Total	**0.0624**	**0.6373**	**0.4182**	**9.3000e-004**	**0.5136**	**0.0275**	**0.5411**	**0.2683**	**0.0253**	**0.2936**	**0.0000**	**81.9381**	**81.9381**	**0.0265**	**0.0000**	**82.6006**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2025

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.4000e-004	8.8400e-003	2.9300e-003	5.0000e-005	1.8700e-003	8.0000e-005	1.9500e-003	5.4000e-004	8.0000e-005	6.2000e-004	0.0000	4.6569	4.6569	5.0000e-005	6.8000e-004	4.8621
Worker	1.3100e-003	9.2000e-004	0.0132	4.0000e-005	5.5300e-003	2.0000e-005	5.5600e-003	1.4700e-003	2.0000e-005	1.4900e-003	0.0000	3.9197	3.9197	8.0000e-005	9.0000e-005	3.9489
Total	**1.5500e-003**	**9.7600e-003**	**0.0162**	**9.0000e-005**	**7.4000e-003**	**1.0000e-004**	**7.5100e-003**	**2.0100e-003**	**1.0000e-004**	**2.1100e-003**	**0.0000**	**8.5765**	**8.5765**	**1.3000e-004**	**7.7000e-004**	**8.8110**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.5136	0.0000	0.5136	0.2683	0.0000	0.2683	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0624	0.6373	0.4182	9.3000e-004		0.0275	0.0275		0.0253	0.0253	0.0000	81.9380	81.9380	0.0265	0.0000	82.6005
Total	**0.0624**	**0.6373**	**0.4182**	**9.3000e-004**	**0.5136**	**0.0275**	**0.5411**	**0.2683**	**0.0253**	**0.2936**	**0.0000**	**81.9380**	**81.9380**	**0.0265**	**0.0000**	**82.6005**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2025

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.4000e-004	8.8400e-003	2.9300e-003	5.0000e-005	1.8700e-003	8.0000e-005	1.9500e-003	5.4000e-004	8.0000e-005	6.2000e-004	0.0000	4.6569	4.6569	5.0000e-005	6.8000e-004	4.8621
Worker	1.3100e-003	9.2000e-004	0.0132	4.0000e-005	5.5300e-003	2.0000e-005	5.5600e-003	1.4700e-003	2.0000e-005	1.4900e-003	0.0000	3.9197	3.9197	8.0000e-005	9.0000e-005	3.9489
Total	**1.5500e-003**	**9.7600e-003**	**0.0162**	**9.0000e-005**	**7.4000e-003**	**1.0000e-004**	**7.5100e-003**	**2.0100e-003**	**1.0000e-004**	**2.1100e-003**	**0.0000**	**8.5765**	**8.5765**	**1.3000e-004**	**7.7000e-004**	**8.8110**

3.3 Grading - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.3850	0.0000	2.3850	1.1353	0.0000	1.1353	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.6882	6.6620	5.1578	0.0127		0.2945	0.2945		0.2709	0.2709	0.0000	1,118.7712	1,118.7712	0.3618	0.0000	1,127.8170
Total	**0.6882**	**6.6620**	**5.1578**	**0.0127**	**2.3850**	**0.2945**	**2.6794**	**1.1353**	**0.2709**	**1.4062**	**0.0000**	**1,118.7712**	**1,118.7712**	**0.3618**	**0.0000**	**1,127.8170**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.5000e-004	0.0126	3.4000e-003	6.0000e-005	2.0800e-003	1.4000e-004	2.2200e-003	5.7000e-004	1.4000e-004	7.1000e-004	0.0000	6.1879	6.1879	1.0000e-004	9.8000e-004	6.4811
Vendor	2.1400e-003	0.0778	0.0258	4.3000e-004	0.0164	7.3000e-004	0.0171	4.7300e-003	7.0000e-004	5.4300e-003	0.0000	40.9804	40.9804	4.4000e-004	6.0200e-003	42.7862
Worker	0.0136	9.5100e-003	0.1386	4.4000e-004	0.0571	2.4000e-004	0.0573	0.0152	2.2000e-004	0.0154	0.0000	40.4217	40.4217	7.9000e-004	9.5000e-004	40.7231
Total	**0.0159**	**0.0999**	**0.1658**	**9.3000e-004**	**0.0755**	**1.1100e-003**	**0.0767**	**0.0205**	**1.0600e-003**	**0.0215**	**0.0000**	**87.5899**	**87.5899**	**1.3300e-003**	**7.9500e-003**	**89.9904**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.3850	0.0000	2.3850	1.1353	0.0000	1.1353	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.6882	6.6619	5.1578	0.0127		0.2945	0.2945		0.2709	0.2709	0.0000	1,118.7699	1,118.7699	0.3618	0.0000	1,127.8157
Total	**0.6882**	**6.6619**	**5.1578**	**0.0127**	**2.3850**	**0.2945**	**2.6794**	**1.1353**	**0.2709**	**1.4062**	**0.0000**	**1,118.7699**	**1,118.7699**	**0.3618**	**0.0000**	**1,127.8157**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.5000e-004	0.0126	3.4000e-003	6.0000e-005	2.0800e-003	1.4000e-004	2.2200e-003	5.7000e-004	1.4000e-004	7.1000e-004	0.0000	6.1879	6.1879	1.0000e-004	9.8000e-004	6.4811
Vendor	2.1400e-003	0.0778	0.0258	4.3000e-004	0.0164	7.3000e-004	0.0171	4.7300e-003	7.0000e-004	5.4300e-003	0.0000	40.9804	40.9804	4.4000e-004	6.0200e-003	42.7862
Worker	0.0136	9.5100e-003	0.1386	4.4000e-004	0.0571	2.4000e-004	0.0573	0.0152	2.2000e-004	0.0154	0.0000	40.4217	40.4217	7.9000e-004	9.5000e-004	40.7231
Total	**0.0159**	**0.0999**	**0.1658**	**9.3000e-004**	**0.0755**	**1.1100e-003**	**0.0767**	**0.0205**	**1.0600e-003**	**0.0215**	**0.0000**	**87.5899**	**87.5899**	**1.3300e-003**	**7.9500e-003**	**89.9904**

3.4 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0239	0.2250	0.2828	4.8000e-004		9.5600e-003	9.5600e-003		8.9200e-003	8.9200e-003	0.0000	41.5884	41.5884	0.0111	0.0000	41.8657
Total	**0.0239**	**0.2250**	**0.2828**	**4.8000e-004**		**9.5600e-003**	**9.5600e-003**		**8.9200e-003**	**8.9200e-003**	**0.0000**	**41.5884**	**41.5884**	**0.0111**	**0.0000**	**41.8657**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.6400e-003	0.0594	0.0197	3.3000e-004	0.0126	5.6000e-004	0.0131	3.6200e-003	5.3000e-004	4.1500e-003	0.0000	31.3291	31.3291	3.4000e-004	4.6000e-003	32.7096
Worker	0.0189	0.0133	0.1907	6.2000e-004	0.0797	3.4000e-004	0.0800	0.0212	3.1000e-004	0.0215	0.0000	56.4580	56.4580	1.1000e-003	1.3200e-003	56.8791
Total	**0.0206**	**0.0727**	**0.2105**	**9.5000e-004**	**0.0922**	**9.0000e-004**	**0.0931**	**0.0248**	**8.4000e-004**	**0.0256**	**0.0000**	**87.7871**	**87.7871**	**1.4400e-003**	**5.9200e-003**	**89.5887**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0239	0.2250	0.2828	4.8000e-004		9.5600e-003	9.5600e-003		8.9200e-003	8.9200e-003	0.0000	41.5883	41.5883	0.0111	0.0000	41.8657
Total	**0.0239**	**0.2250**	**0.2828**	**4.8000e-004**		**9.5600e-003**	**9.5600e-003**		**8.9200e-003**	**8.9200e-003**	**0.0000**	**41.5883**	**41.5883**	**0.0111**	**0.0000**	**41.8657**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.6400e-003	0.0594	0.0197	3.3000e-004	0.0126	5.6000e-004	0.0131	3.6200e-003	5.3000e-004	4.1500e-003	0.0000	31.3291	31.3291	3.4000e-004	4.6000e-003	32.7096
Worker	0.0189	0.0133	0.1907	6.2000e-004	0.0797	3.4000e-004	0.0800	0.0212	3.1000e-004	0.0215	0.0000	56.4580	56.4580	1.1000e-003	1.3200e-003	56.8791
Total	**0.0206**	**0.0727**	**0.2105**	**9.5000e-004**	**0.0922**	**9.0000e-004**	**0.0931**	**0.0248**	**8.4000e-004**	**0.0256**	**0.0000**	**87.7871**	**87.7871**	**1.4400e-003**	**5.9200e-003**	**89.5887**

3.4 Building Construction - 2026

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2708	2.5532	3.2091	5.4500e-003		0.1085	0.1085		0.1012	0.1012	0.0000	471.9374	471.9374	0.1259	0.0000	475.0847
Total	**0.2708**	**2.5532**	**3.2091**	**5.4500e-003**		**0.1085**	**0.1085**		**0.1012**	**0.1012**	**0.0000**	**471.9374**	**471.9374**	**0.1259**	**0.0000**	**475.0847**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2026

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0183	0.6671	0.2215	3.6200e-003	0.1424	6.3100e-003	0.1487	0.0411	6.0400e-003	0.0471	0.0000	349.0627	349.0627	3.9700e-003	0.0512	364.4184
Worker	0.2022	0.1362	2.0272	6.7700e-003	0.9042	3.6200e-003	0.9078	0.2401	3.3300e-003	0.2434	0.0000	620.7367	620.7367	0.0113	0.0141	625.2166
Total	**0.2205**	**0.8033**	**2.2486**	**0.0104**	**1.0466**	**9.9300e-003**	**1.0565**	**0.2811**	**9.3700e-003**	**0.2905**	**0.0000**	**969.7994**	**969.7994**	**0.0153**	**0.0653**	**989.6350**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2708	2.5532	3.2091	5.4500e-003		0.1085	0.1085		0.1012	0.1012	0.0000	471.9368	471.9368	0.1259	0.0000	475.0842
Total	**0.2708**	**2.5532**	**3.2091**	**5.4500e-003**		**0.1085**	**0.1085**		**0.1012**	**0.1012**	**0.0000**	**471.9368**	**471.9368**	**0.1259**	**0.0000**	**475.0842**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2026

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0183	0.6671	0.2215	3.6200e-003	0.1424	6.3100e-003	0.1487	0.0411	6.0400e-003	0.0471	0.0000	349.0627	349.0627	3.9700e-003	0.0512	364.4184
Worker	0.2022	0.1362	2.0272	6.7700e-003	0.9042	3.6200e-003	0.9078	0.2401	3.3300e-003	0.2434	0.0000	620.7367	620.7367	0.0113	0.0141	625.2166
Total	**0.2205**	**0.8033**	**2.2486**	**0.0104**	**1.0466**	**9.9300e-003**	**1.0565**	**0.2811**	**9.3700e-003**	**0.2905**	**0.0000**	**969.7994**	**969.7994**	**0.0153**	**0.0653**	**989.6350**

3.4 Building Construction - 2027

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2708	2.5532	3.2091	5.4500e-003		0.1085	0.1085		0.1012	0.1012	0.0000	471.9374	471.9374	0.1259	0.0000	475.0847
Total	**0.2708**	**2.5532**	**3.2091**	**5.4500e-003**		**0.1085**	**0.1085**		**0.1012**	**0.1012**	**0.0000**	**471.9374**	**471.9374**	**0.1259**	**0.0000**	**475.0847**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2027

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0181	0.6596	0.2195	3.5500e-003	0.1424	6.2800e-003	0.1487	0.0411	6.0100e-003	0.0471	0.0000	342.2577	342.2577	4.1000e-003	0.0501	357.2926
Worker	0.1906	0.1239	1.9095	6.5700e-003	0.9042	3.3900e-003	0.9076	0.2401	3.1200e-003	0.2432	0.0000	602.9038	602.9038	0.0103	0.0133	607.1327
Total	**0.2087**	**0.7834**	**2.1290**	**0.0101**	**1.0466**	**9.6700e-003**	**1.0563**	**0.2811**	**9.1300e-003**	**0.2903**	**0.0000**	**945.1615**	**945.1615**	**0.0144**	**0.0634**	**964.4253**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2708	2.5532	3.2091	5.4500e-003		0.1085	0.1085		0.1012	0.1012	0.0000	471.9368	471.9368	0.1259	0.0000	475.0842
Total	**0.2708**	**2.5532**	**3.2091**	**5.4500e-003**		**0.1085**	**0.1085**		**0.1012**	**0.1012**	**0.0000**	**471.9368**	**471.9368**	**0.1259**	**0.0000**	**475.0842**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2027

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0181	0.6596	0.2195	3.5500e-003	0.1424	6.2800e-003	0.1487	0.0411	6.0100e-003	0.0471	0.0000	342.2577	342.2577	4.1000e-003	0.0501	357.2926
Worker	0.1906	0.1239	1.9095	6.5700e-003	0.9042	3.3900e-003	0.9076	0.2401	3.1200e-003	0.2432	0.0000	602.9038	602.9038	0.0103	0.0133	607.1327
Total	**0.2087**	**0.7834**	**2.1290**	**0.0101**	**1.0466**	**9.6700e-003**	**1.0563**	**0.2811**	**9.1300e-003**	**0.2903**	**0.0000**	**945.1615**	**945.1615**	**0.0144**	**0.0634**	**964.4253**

3.4 Building Construction - 2028

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2697	2.5434	3.1968	5.4300e-003		0.1081	0.1081		0.1008	0.1008	0.0000	470.1292	470.1292	0.1254	0.0000	473.2645
Total	**0.2697**	**2.5434**	**3.1968**	**5.4300e-003**		**0.1081**	**0.1081**		**0.1008**	**0.1008**	**0.0000**	**470.1292**	**470.1292**	**0.1254**	**0.0000**	**473.2645**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2028

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0179	0.6511	0.2173	3.4700e-003	0.1418	6.2300e-003	0.1481	0.0409	5.9600e-003	0.0469	0.0000	334.4455	334.4455	4.2200e-003	0.0489	349.1145
Worker	0.1795	0.1131	1.8044	6.3800e-003	0.9008	3.1500e-003	0.9039	0.2392	2.9000e-003	0.2421	0.0000	584.8922	584.8922	9.3900e-003	0.0127	588.8962
Total	**0.1973**	**0.7642**	**2.0216**	**9.8500e-003**	**1.0426**	**9.3800e-003**	**1.0520**	**0.2801**	**8.8600e-003**	**0.2889**	**0.0000**	**919.3378**	**919.3378**	**0.0136**	**0.0615**	**938.0107**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2697	2.5434	3.1968	5.4300e-003		0.1081	0.1081		0.1008	0.1008	0.0000	470.1286	470.1286	0.1254	0.0000	473.2639
Total	**0.2697**	**2.5434**	**3.1968**	**5.4300e-003**		**0.1081**	**0.1081**		**0.1008**	**0.1008**	**0.0000**	**470.1286**	**470.1286**	**0.1254**	**0.0000**	**473.2639**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2028

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0179	0.6511	0.2173	3.4700e-003	0.1418	6.2300e-003	0.1481	0.0409	5.9600e-003	0.0469	0.0000	334.4455	334.4455	4.2200e-003	0.0489	349.1145
Worker	0.1795	0.1131	1.8044	6.3800e-003	0.9008	3.1500e-003	0.9039	0.2392	2.9000e-003	0.2421	0.0000	584.8922	584.8922	9.3900e-003	0.0127	588.8962
Total	**0.1973**	**0.7642**	**2.0216**	**9.8500e-003**	**1.0426**	**9.3800e-003**	**1.0520**	**0.2801**	**8.8600e-003**	**0.2889**	**0.0000**	**919.3378**	**919.3378**	**0.0136**	**0.0615**	**938.0107**

3.4 Building Construction - 2029

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2708	2.5532	3.2091	5.4500e-003		0.1085	0.1085		0.1012	0.1012	0.0000	471.9374	471.9374	0.1259	0.0000	475.0847
Total	**0.2708**	**2.5532**	**3.2091**	**5.4500e-003**		**0.1085**	**0.1085**		**0.1012**	**0.1012**	**0.0000**	**471.9374**	**471.9374**	**0.1259**	**0.0000**	**475.0847**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2029

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0178	0.6482	0.2170	3.4200e-003	0.1424	6.2200e-003	0.1486	0.0411	5.9500e-003	0.0470	0.0000	329.5955	329.5955	4.3700e-003	0.0481	344.0305
Worker	0.1702	0.1047	1.7257	6.2500e-003	0.9042	2.9500e-003	0.9072	0.2401	2.7100e-003	0.2428	0.0000	573.1941	573.1941	8.6700e-003	0.0122	577.0351
Total	**0.1880**	**0.7529**	**1.9428**	**9.6700e-003**	**1.0466**	**9.1700e-003**	**1.0558**	**0.2811**	**8.6600e-003**	**0.2898**	**0.0000**	**902.7896**	**902.7896**	**0.0130**	**0.0602**	**921.0656**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2708	2.5532	3.2091	5.4500e-003		0.1085	0.1085		0.1012	0.1012	0.0000	471.9368	471.9368	0.1259	0.0000	475.0842
Total	**0.2708**	**2.5532**	**3.2091**	**5.4500e-003**		**0.1085**	**0.1085**		**0.1012**	**0.1012**	**0.0000**	**471.9368**	**471.9368**	**0.1259**	**0.0000**	**475.0842**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2029

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0178	0.6482	0.2170	3.4200e-003	0.1424	6.2200e-003	0.1486	0.0411	5.9500e-003	0.0470	0.0000	329.5955	329.5955	4.3700e-003	0.0481	344.0305
Worker	0.1702	0.1047	1.7257	6.2500e-003	0.9042	2.9500e-003	0.9072	0.2401	2.7100e-003	0.2428	0.0000	573.1941	573.1941	8.6700e-003	0.0122	577.0351
Total	**0.1880**	**0.7529**	**1.9428**	**9.6700e-003**	**1.0466**	**9.1700e-003**	**1.0558**	**0.2811**	**8.6600e-003**	**0.2898**	**0.0000**	**902.7896**	**902.7896**	**0.0130**	**0.0602**	**921.0656**

3.4 Building Construction - 2030

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0458	0.2617	0.5432	1.0800e-003		5.0500e-003	5.0500e-003		5.0500e-003	5.0500e-003	0.0000	91.9620	91.9620	3.6900e-003	0.0000	92.0541
Total	**0.0458**	**0.2617**	**0.5432**	**1.0800e-003**		**5.0500e-003**	**5.0500e-003**		**5.0500e-003**	**5.0500e-003**	**0.0000**	**91.9620**	**91.9620**	**3.6900e-003**	**0.0000**	**92.0541**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2030

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.9800e-003	0.1084	0.0365	5.7000e-004	0.0240	1.0400e-003	0.0251	6.9200e-003	1.0000e-003	7.9200e-003	0.0000	54.5908	54.5908	7.6000e-004	7.9500e-003	56.9784
Worker	0.0271	0.0164	0.2786	1.0300e-003	0.1524	4.6000e-004	0.1529	0.0405	4.3000e-004	0.0409	0.0000	94.5543	94.5543	1.3500e-003	1.9700e-003	95.1763
Total	**0.0301**	**0.1248**	**0.3150**	**1.6000e-003**	**0.1764**	**1.5000e-003**	**0.1780**	**0.0474**	**1.4300e-003**	**0.0488**	**0.0000**	**149.1451**	**149.1451**	**2.1100e-003**	**9.9200e-003**	**152.1547**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0458	0.2617	0.5432	1.0800e-003		5.0500e-003	5.0500e-003		5.0500e-003	5.0500e-003	0.0000	91.9619	91.9619	3.6900e-003	0.0000	92.0540
Total	**0.0458**	**0.2617**	**0.5432**	**1.0800e-003**		**5.0500e-003**	**5.0500e-003**		**5.0500e-003**	**5.0500e-003**	**0.0000**	**91.9619**	**91.9619**	**3.6900e-003**	**0.0000**	**92.0540**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2030

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.9800e-003	0.1084	0.0365	5.7000e-004	0.0240	1.0400e-003	0.0251	6.9200e-003	1.0000e-003	7.9200e-003	0.0000	54.5908	54.5908	7.6000e-004	7.9500e-003	56.9784
Worker	0.0271	0.0164	0.2786	1.0300e-003	0.1524	4.6000e-004	0.1529	0.0405	4.3000e-004	0.0409	0.0000	94.5543	94.5543	1.3500e-003	1.9700e-003	95.1763
Total	**0.0301**	**0.1248**	**0.3150**	**1.6000e-003**	**0.1764**	**1.5000e-003**	**0.1780**	**0.0474**	**1.4300e-003**	**0.0488**	**0.0000**	**149.1451**	**149.1451**	**2.1100e-003**	**9.9200e-003**	**152.1547**

3.5 Architectural Coating - 2030

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	5.5269					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0262	0.1713	0.3596	5.9000e-004		4.0600e-003	4.0600e-003		4.0600e-003	4.0600e-003	0.0000	51.0651	51.0651	2.0700e-003	0.0000	51.1167
Total	**5.5530**	**0.1713**	**0.3596**	**5.9000e-004**		**4.0600e-003**	**4.0600e-003**		**4.0600e-003**	**4.0600e-003**	**0.0000**	**51.0651**	**51.0651**	**2.0700e-003**	**0.0000**	**51.1167**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2030

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.6100e-003	0.0584	0.0197	3.1000e-004	0.0129	5.6000e-004	0.0135	3.7300e-003	5.4000e-004	4.2700e-003	0.0000	29.4269	29.4269	4.1000e-004	4.2800e-003	30.7139
Worker	9.2300e-003	5.5700e-003	0.0948	3.5000e-004	0.0519	1.6000e-004	0.0520	0.0138	1.5000e-004	0.0139	0.0000	32.1701	32.1701	4.6000e-004	6.7000e-004	32.3817
Total	**0.0108**	**0.0640**	**0.1144**	**6.6000e-004**	**0.0648**	**7.2000e-004**	**0.0655**	**0.0175**	**6.9000e-004**	**0.0182**	**0.0000**	**61.5969**	**61.5969**	**8.7000e-004**	**4.9500e-003**	**63.0956**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	5.5269					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0262	0.1713	0.3596	5.9000e-004		4.0600e-003	4.0600e-003		4.0600e-003	4.0600e-003	0.0000	51.0650	51.0650	2.0700e-003	0.0000	51.1167
Total	**5.5530**	**0.1713**	**0.3596**	**5.9000e-004**		**4.0600e-003**	**4.0600e-003**		**4.0600e-003**	**4.0600e-003**	**0.0000**	**51.0650**	**51.0650**	**2.0700e-003**	**0.0000**	**51.1167**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2030

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.6100e-003	0.0584	0.0197	3.1000e-004	0.0129	5.6000e-004	0.0135	3.7300e-003	5.4000e-004	4.2700e-003	0.0000	29.4269	29.4269	4.1000e-004	4.2800e-003	30.7139
Worker	9.2300e-003	5.5700e-003	0.0948	3.5000e-004	0.0519	1.6000e-004	0.0520	0.0138	1.5000e-004	0.0139	0.0000	32.1701	32.1701	4.6000e-004	6.7000e-004	32.3817
Total	**0.0108**	**0.0640**	**0.1144**	**6.6000e-004**	**0.0648**	**7.2000e-004**	**0.0655**	**0.0175**	**6.9000e-004**	**0.0182**	**0.0000**	**61.5969**	**61.5969**	**8.7000e-004**	**4.9500e-003**	**63.0956**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.2802	2.1283	14.2066	0.0361	4.1141	0.0284	4.1425	1.0989	0.0266	1.1255	0.0000	3,335.2734	3,335.2734	0.1586	0.1585	3,386.4774
Unmitigated	1.2802	2.1283	14.2066	0.0361	4.1141	0.0284	4.1425	1.0989	0.0266	1.1255	0.0000	3,335.2734	3,335.2734	0.1586	0.1585	3,386.4774

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	2,538.96	2,538.96	2538.96	10,881,264	10,881,264
Total	2,538.96	2,538.96	2,538.96	10,881,264	10,881,264

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.542916	0.056689	0.174450	0.134041	0.024680	0.006960	0.011589	0.018600	0.000608	0.000298	0.023389	0.001091	0.004689
Parking Lot	0.542916	0.056689	0.174450	0.134041	0.024680	0.006960	0.011589	0.018600	0.000608	0.000298	0.023389	0.001091	0.004689

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Unrefrigerated Warehouse-No Rail	0.542916	0.056689	0.174450	0.134041	0.024680	0.006960	0.011589	0.018600	0.000608	0.000298	0.023389	0.001091	0.004689

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	247.4199	247.4199	0.0209	2.5300e-003	248.6963
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	247.4199	247.4199	0.0209	2.5300e-003	248.6963
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.39513e+006	247.4199	0.0209	2.5300e-003	248.6963
Total		**247.4199**	**0.0209**	**2.5300e-003**	**248.6963**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.39513e+006	247.4199	0.0209	2.5300e-003	248.6963
Total		**247.4199**	**0.0209**	**2.5300e-003**	**248.6963**

6.0 Area Detail

6.1 Mitigation Measures Area

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	4.8661	4.6000e-004	0.0503	0.0000		1.8000e-004	1.8000e-004		1.8000e-004	1.8000e-004	0.0000	0.0980	0.0980	2.5000e-004	0.0000	0.1044
Unmitigated	4.8661	4.6000e-004	0.0503	0.0000		1.8000e-004	1.8000e-004		1.8000e-004	1.8000e-004	0.0000	0.0980	0.0980	2.5000e-004	0.0000	0.1044

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.5527					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3088					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	4.6300e-003	4.6000e-004	0.0503	0.0000		1.8000e-004	1.8000e-004		1.8000e-004	1.8000e-004	0.0000	0.0980	0.0980	2.5000e-004	0.0000	0.1044
Total	**4.8661**	**4.6000e-004**	**0.0503**	**0.0000**		**1.8000e-004**	**1.8000e-004**		**1.8000e-004**	**1.8000e-004**	**0.0000**	**0.0980**	**0.0980**	**2.5000e-004**	**0.0000**	**0.1044**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.5527					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3088					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	4.6300e-003	4.6000e-004	0.0503	0.0000		1.8000e-004	1.8000e-004		1.8000e-004	1.8000e-004	0.0000	0.0980	0.0980	2.5000e-004	0.0000	0.1044
Total	**4.8661**	**4.6000e-004**	**0.0503**	**0.0000**		**1.8000e-004**	**1.8000e-004**		**1.8000e-004**	**1.8000e-004**	**0.0000**	**0.0980**	**0.0980**	**2.5000e-004**	**0.0000**	**0.1044**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	739.1063	9.0371	0.2188	1,030.2211
Unmitigated	739.1063	9.0371	0.2188	1,030.2211

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	275.65 / 7.6738	739.1063	9.0371	0.2188	1,030.2211
Total		**739.1063**	**9.0371**	**0.2188**	**1,030.2211**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	275.65 / 7.6738	739.1063	9.0371	0.2188	1,030.2211
Total		**739.1063**	**9.0371**	**0.2188**	**1,030.2211**

8.0 Waste Detail

8.1 Mitigation Measures Waste

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	227.4473	13.4418	0.0000	563.4911
Unmitigated	227.4473	13.4418	0.0000	563.4911

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1120.48	227.4473	13.4418	0.0000	563.4911
Total		**227.4473**	**13.4418**	**0.0000**	**563.4911**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1120.48	227.4473	13.4418	0.0000	563.4911
Total		**227.4473**	**13.4418**	**0.0000**	**563.4911**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Simpson Road Warehouse Detailed Repo

Riverside-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	1,192.00	1000sqft	38.50	1,192,418.00	0
Other Asphalt Surfaces	1,039.00	1000sqft	23.90	0.00	0
Parking Lot	1,717.00	Space	10.60	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.4	**Precipitation Freq (Days)**	28
Climate Zone	10			**Operational Year**	2026
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with DEIR's model.

Land Use - Consistent with DEIR's model.

Construction Phase - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Trips and VMT - Consistent with DEIR's model.

Grading - Consistent with DEIR's model.

Architectural Coating - Consistent with DEIR's model.

Simpson Road Warehouse Detailed Repo - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Vehicle Trips - Consistent with DEIR's model.

Water And Wastewater - Consistent with DEIR's model.

Construction Off-road Equipment Mitigation - Consistent with DEIR's model.

Fleet Mix - See comment on: "Unsubstantiated Changes to Fleet Mix Values".

Energy Use - Consistent with DEIR's model.

Table Name	Column Name	Default Value	New Value
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblEnergyUse	NT24E	0.82	0.00
tblEnergyUse	NT24NG	0.03	0.00
tblEnergyUse	T24E	0.33	0.00
tblEnergyUse	T24NG	1.98	0.00
tblGrading	AcresOfGrading	1,650.00	750.00
tblGrading	AcresOfGrading	80.00	60.00
tblLandUse	LandUseSquareFeet	1,192,000.00	1,192,418.00
tblLandUse	LandUseSquareFeet	1,039,000.00	0.00
tblLandUse	LandUseSquareFeet	686,800.00	0.00
tblLandUse	LotAcreage	27.36	38.50
tblLandUse	LotAcreage	23.85	23.90
tblLandUse	LotAcreage	15.45	10.60

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblOffRoadEquipment	HorsePower	212.00	97.00
tblOffRoadEquipment	LoadFactor	0.43	0.37
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	6.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblTripsAndVMT	HaulingTripNumber	0.00	241.00
tblTripsAndVMT	VendorTripLength	6.90	10.20
tblTripsAndVMT	VendorTripLength	6.90	10.20
tblTripsAndVMT	VendorTripLength	6.90	10.20
tblTripsAndVMT	VendorTripLength	6.90	10.20
tblTripsAndVMT	VendorTripNumber	0.00	10.00
tblTripsAndVMT	VendorTripNumber	0.00	32.00
tblTripsAndVMT	VendorTripNumber	195.00	117.00
tblTripsAndVMT	VendorTripNumber	0.00	37.00
tblTripsAndVMT	WorkerTripLength	14.70	18.50
tblTripsAndVMT	WorkerTripLength	14.70	18.50
tblTripsAndVMT	WorkerTripLength	14.70	18.50
tblTripsAndVMT	WorkerTripLength	14.70	18.50
tblVehicleTrips	ST_TR	1.74	2.13
tblVehicleTrips	SU_TR	1.74	2.13
tblVehicleTrips	WD_TR	1.74	2.13
tblWater	OutdoorWaterUseRate	0.00	7,673,799.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2025	12.8311	122.8499	97.2244	0.2491	44.7590	5.3740	50.1330	21.0194	4.9447	25.9641	0.0000	24,240.7409	24,240.7409	7.2787	0.5621	24,469.8685
2026	3.9359	25.4051	44.5335	0.1254	8.1526	0.9073	9.0599	2.1869	0.8474	3.0343	0.0000	12,586.1059	12,586.1059	1.1933	0.5460	12,778.6348
2027	3.8337	25.2625	43.4509	0.1233	8.1526	0.9053	9.0579	2.1869	0.8455	3.0324	0.0000	12,365.6115	12,365.6115	1.1857	0.5307	12,553.3962
2028	3.7422	25.1455	42.5503	0.1213	8.1526	0.9033	9.0559	2.1869	0.8437	3.0306	0.0000	12,166.5362	12,166.5362	1.1794	0.5167	12,350.0076
2029	3.6550	25.0427	41.7677	0.1195	8.1526	0.9014	9.0540	2.1869	0.8419	3.0288	0.0000	11,987.4443	11,987.4443	1.1740	0.5041	12,167.0175
2030	148.3957	17.2811	41.2009	0.1262	8.1525	0.2978	8.4504	2.1869	0.2941	2.4810	0.0000	12,447.7980	12,447.7980	0.2906	0.4927	12,601.8764
Maximum	**148.3957**	**122.8499**	**97.2244**	**0.2491**	**44.7590**	**5.3740**	**50.1330**	**21.0194**	**4.9447**	**25.9641**	**0.0000**	**24,240.7409**	**24,240.7409**	**7.2787**	**0.5621**	**24,469.8685**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2025	12.8311	122.8499	97.2244	0.2491	44.7590	5.3740	50.1330	21.0194	4.9447	25.9641	0.0000	24,240.7408	24,240.7408	7.2787	0.5621	24,469.8684
2026	3.9359	25.4051	44.5335	0.1254	8.1526	0.9073	9.0599	2.1869	0.8474	3.0343	0.0000	12,586.1059	12,586.1059	1.1933	0.5460	12,778.6348
2027	3.8337	25.2625	43.4509	0.1233	8.1526	0.9053	9.0579	2.1869	0.8455	3.0324	0.0000	12,365.6115	12,365.6115	1.1857	0.5307	12,553.3962
2028	3.7422	25.1455	42.5503	0.1213	8.1526	0.9033	9.0559	2.1869	0.8437	3.0306	0.0000	12,166.5362	12,166.5362	1.1794	0.5167	12,350.0076
2029	3.6550	25.0427	41.7677	0.1195	8.1526	0.9014	9.0540	2.1869	0.8419	3.0288	0.0000	11,987.4443	11,987.4443	1.1740	0.5041	12,167.0175
2030	148.3957	17.2811	41.2009	0.1252	8.1525	0.2978	8.4504	2.1869	0.2941	2.4810	0.0000	12,447.7980	12,447.7980	0.2906	0.4927	12,601.8764
Maximum	**148.3957**	**122.8499**	**97.2244**	**0.2491**	**44.7590**	**5.3740**	**50.1330**	**21.0194**	**4.9447**	**25.9641**	**0.0000**	**24,240.7408**	**24,240.7408**	**7.2787**	**0.5621**	**24,469.8684**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	26.6753	3.6400e-003	0.4020	3.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003		0.8640	0.8640	2.2500e-003		0.9202
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	8.0528	10.9420	85.8945	0.2102	22.9840	0.1561	23.1401	6.1308	0.1463	6.2771		21,411.4512	21,411.4512	0.9479	0.9358	21,714.0129
Total	**34.7282**	**10.9456**	**86.2965**	**0.2102**	**22.9840**	**0.1575**	**23.1415**	**6.1308**	**0.1477**	**6.2785**		**21,412.3153**	**21,412.3153**	**0.9502**	**0.9358**	**21,714.9331**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	26.6753	3.6400e-003	0.4020	3.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003		0.8640	0.8640	2.2500e-003		0.9202
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	8.0528	10.9420	85.8945	0.2102	22.9840	0.1561	23.1401	6.1308	0.1463	6.2771		21,411.4512	21,411.4512	0.9479	0.9358	21,714.0129
Total	**34.7282**	**10.9456**	**86.2965**	**0.2102**	**22.9840**	**0.1575**	**23.1415**	**6.1308**	**0.1477**	**6.2785**		**21,412.3153**	**21,412.3153**	**0.9502**	**0.9358**	**21,714.9331**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	5/4/2025	6/27/2025	5	40	
2	Grading	Grading	6/28/2025	11/28/2025	5	110	
3	Building Construction	Building Construction	11/29/2025	3/1/2030	5	1110	
4	Architectural Coating	Architectural Coating	3/2/2030	6/14/2030	5	75	

Acres of Grading (Site Preparation Phase): 60

Acres of Grading (Grading Phase): 750

Acres of Paving: 34.5

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 1,788,627; Non-Residential Outdoor: 596,209; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	4	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Crawler Tractors	6	8.00	97	0.37
Grading	Excavators	6	8.00	158	0.38
Grading	Graders	6	8.00	187	0.41
Grading	Rubber Tired Dozers	6	8.00	247	0.40
Grading	Scrapers	6	8.00	367	0.48

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Building Construction	Cranes	2	7.00	231	0.29
Building Construction	Forklifts	4	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	6	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Architectural Coating	Air Compressors	4	8.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	8	20.00	10.00	0.00	18.50	10.20	20.00	LD_Mix	HDT_Mix	HHDT
Grading	30	75.00	32.00	241.00	18.50	10.20	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	14	501.00	117.00	0.00	18.50	10.20	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	4	100.00	37.00	0.00	18.50	10.20	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					25.6791	0.0000	25.6791	13.4127	0.0000	13.4127			0.0000			0.0000
Off-Road	3.1208	31.8650	20.9095	0.0466		1.3769	1.3769		1.2668	1.2668		4,516.0638	4,516.0638	1.4606		4,552.5785
Total	**3.1208**	**31.8650**	**20.9095**	**0.0466**	**25.6791**	**1.3769**	**27.0560**	**13.4127**	**1.2668**	**14.6794**		**4,516.0638**	**4,516.0638**	**1.4606**		**4,552.5785**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0126	0.4200	0.1446	2.4200e-003	0.0946	4.1500e-003	0.0987	0.0272	3.9700e-003	0.0312		256.4763	256.4763	2.7800e-003	0.0377	267.7720
Worker	0.0729	0.0433	0.7791	2.3000e-003	0.2813	1.1700e-003	0.2825	0.0746	1.0800e-003	0.0757		232.9714	232.9714	4.2500e-003	4.8400e-003	234.5212
Total	**0.0855**	**0.4633**	**0.9237**	**4.7200e-003**	**0.3758**	**5.3200e-003**	**0.3812**	**0.1018**	**5.0500e-003**	**0.1069**		**489.4477**	**489.4477**	**7.0300e-003**	**0.0425**	**502.2931**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					25.6791	0.0000	25.6791	13.4127	0.0000	13.4127			0.0000			0.0000
Off-Road	3.1208	31.8650	20.9095	0.0466		1.3769	1.3769		1.2668	1.2668	0.0000	4,516.0638	4,516.0638	1.4606		4,552.5785
Total	**3.1208**	**31.8650**	**20.9095**	**0.0466**	**25.6791**	**1.3769**	**27.0560**	**13.4127**	**1.2668**	**14.6794**	**0.0000**	**4,516.0638**	**4,516.0638**	**1.4606**		**4,552.5785**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0126	0.4200	0.1446	2.4200e-003	0.0946	4.1500e-003	0.0987	0.0272	3.9700e-003	0.0312		256.4763	256.4763	2.7800e-003	0.0377	267.7720
Worker	0.0729	0.0433	0.7791	2.3000e-003	0.2813	1.1700e-003	0.2825	0.0746	1.0800e-003	0.0757		232.9714	232.9714	4.2500e-003	4.8400e-003	234.5212
Total	**0.0855**	**0.4633**	**0.9237**	**4.7200e-003**	**0.3758**	**5.3200e-003**	**0.3812**	**0.1018**	**5.0500e-003**	**0.1069**		**489.4477**	**489.4477**	**7.0300e-003**	**0.0425**	**502.2931**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					43.3632	0.0000	43.3632	20.6421	0.0000	20.6421			0.0000			0.0000
Off-Road	12.5127	121.1263	93.7789	0.2316		5.3538	5.3538		4.9255	4.9255		22,422.4387	22,422.4387	7.2519		22,603.7355
Total	**12.5127**	**121.1263**	**93.7789**	**0.2316**	**43.3632**	**5.3538**	**48.7170**	**20.6421**	**4.9255**	**25.5676**		**22,422.4387**	**22,422.4387**	**7.2519**		**22,603.7355**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	4.7700e-003	0.2173	0.0613	1.1600e-003	0.0383	2.6200e-003	0.0410	0.0105	2.5100e-003	0.0130		123.9353	123.9353	2.0300e-003	0.0195	129.8084
Vendor	0.0403	1.3439	0.4628	7.7300e-003	0.3026	0.0133	0.3158	0.0871	0.0127	0.0998		820.7242	820.7242	8.8800e-003	0.1206	856.8703
Worker	0.2733	0.1624	2.9214	8.6400e-003	1.0548	4.3800e-003	1.0592	0.2797	4.0400e-003	0.2838		873.6426	873.6426	0.0159	0.0182	879.4543
Total	**0.3184**	**1.7236**	**3.4455**	**0.0175**	**1.3958**	**0.0203**	**1.4160**	**0.3773**	**0.0193**	**0.3966**		**1,818.3021**	**1,818.3021**	**0.0268**	**0.1583**	**1,866.1330**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					43.3632	0.0000	43.3632	20.6421	0.0000	20.6421			0.0000			0.0000
Off-Road	12.5127	121.1263	93.7789	0.2316		5.3538	5.3538		4.9255	4.9255	0.0000	22,422.4387	22,422.4387	7.2519		22,603.7355
Total	**12.5127**	**121.1263**	**93.7789**	**0.2316**	**43.3632**	**5.3538**	**48.7170**	**20.6421**	**4.9255**	**25.5676**	**0.0000**	**22,422.4387**	**22,422.4387**	**7.2519**		**22,603.7355**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	4.7700e-003	0.2173	0.0613	1.1600e-003	0.0383	2.6200e-003	0.0410	0.0105	2.5100e-003	0.0130		123.9353	123.9353	2.0300e-003	0.0195	129.8084
Vendor	0.0403	1.3439	0.4628	7.7300e-003	0.3026	0.0133	0.3158	0.0871	0.0127	0.0998		820.7242	820.7242	8.8800e-003	0.1206	856.8703
Worker	0.2733	0.1624	2.9214	8.6400e-003	1.0548	4.3800e-003	1.0592	0.2797	4.0400e-003	0.2838		873.6426	873.6426	0.0159	0.0182	879.4543
Total	**0.3184**	**1.7236**	**3.4455**	**0.0175**	**1.3958**	**0.0203**	**1.4160**	**0.3773**	**0.0193**	**0.3966**		**1,818.3021**	**1,818.3021**	**0.0268**	**0.1583**	**1,866.1330**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756		3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**		**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1473	4.9138	1.6923	0.0283	1.1063	0.0485	1.1548	0.3184	0.0464	0.3648		3,000.7729	3,000.7729	0.0325	0.4408	3,132.9319
Worker	1.8255	1.0846	19.5153	0.0577	7.0463	0.0293	7.0756	1.8686	0.0270	1.8955		5,835.9325	5,835.9325	0.1064	0.1214	5,874.7547
Total	**1.9728**	**5.9983**	**21.2075**	**0.0860**	**8.1526**	**0.0778**	**8.2304**	**2.1869**	**0.0734**	**2.2603**		**8,836.7053**	**8,836.7053**	**0.1388**	**0.5621**	**9,007.6866**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756	0.0000	3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**	**0.0000**	**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1473	4.9138	1.6923	0.0283	1.1063	0.0485	1.1548	0.3184	0.0464	0.3648		3,000.7729	3,000.7729	0.0325	0.4408	3,132.9319
Worker	1.8255	1.0846	19.5153	0.0577	7.0463	0.0293	7.0756	1.8686	0.0270	1.8955		5,835.9325	5,835.9325	0.1064	0.1214	5,874.7547
Total	**1.9728**	**5.9983**	**21.2075**	**0.0860**	**8.1526**	**0.0778**	**8.2304**	**2.1869**	**0.0734**	**2.2603**		**8,836.7053**	**8,836.7053**	**0.1388**	**0.5621**	**9,007.6866**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2026

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756		3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**		**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1453	4.8602	1.6737	0.0278	1.1063	0.0483	1.1546	0.3184	0.0462	0.3646		2,946.2886	2,946.2886	0.0337	0.4319	3,075.8340
Worker	1.7157	0.9801	18.2691	0.0559	7.0463	0.0277	7.0741	1.8686	0.0255	1.8941		5,653.4425	5,653.4425	0.0962	0.1141	5,689.8409
Total	**1.8610**	**5.8403**	**19.9429**	**0.0837**	**8.1526**	**0.0761**	**8.2286**	**2.1869**	**0.0717**	**2.2587**		**8,599.7311**	**8,599.7311**	**0.1299**	**0.5460**	**8,765.6749**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2026

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756	0.0000	3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**	**0.0000**	**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1453	4.8602	1.6737	0.0278	1.1063	0.0483	1.1546	0.3184	0.0462	0.3646		2,946.2886	2,946.2886	0.0337	0.4319	3,075.8340
Worker	1.7157	0.9801	18.2691	0.0559	7.0463	0.0277	7.0741	1.8686	0.0255	1.8941		5,653.4425	5,653.4425	0.0962	0.1141	5,689.8409
Total	**1.8610**	**5.8403**	**19.9429**	**0.0837**	**8.1526**	**0.0761**	**8.2286**	**2.1869**	**0.0717**	**2.2587**		**8,599.7311**	**8,599.7311**	**0.1299**	**0.5460**	**8,765.6749**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2027

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756		3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**		**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1436	4.8059	1.6584	0.0272	1.1062	0.0481	1.1543	0.3184	0.0460	0.3643		2,888.8385	2,888.8385	0.0348	0.4227	3,015.6803
Worker	1.6153	0.8918	17.2017	0.0543	7.0463	0.0260	7.0723	1.8686	0.0239	1.8925		5,490.3983	5,490.3983	0.0874	0.1080	5,524.7559
Total	**1.7589**	**5.6977**	**18.8602**	**0.0815**	**8.1526**	**0.0741**	**8.2266**	**2.1869**	**0.0699**	**2.2568**		**8,379.2368**	**8,379.2368**	**0.1222**	**0.5307**	**8,540.4363**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2027

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756	0.0000	3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**	**0.0000**	**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1436	4.8059	1.6584	0.0272	1.1062	0.0481	1.1543	0.3184	0.0460	0.3643		2,888.8385	2,888.8385	0.0348	0.4227	3,015.6803
Worker	1.6153	0.8918	17.2017	0.0543	7.0463	0.0260	7.0723	1.8686	0.0239	1.8925		5,490.3983	5,490.3983	0.0874	0.1080	5,524.7559
Total	**1.7589**	**5.6977**	**18.8602**	**0.0815**	**8.1526**	**0.0741**	**8.2266**	**2.1869**	**0.0699**	**2.2568**		**8,379.2368**	**8,379.2368**	**0.1222**	**0.5307**	**8,540.4363**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2028

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756		3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**		**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1423	4.7627	1.6478	0.0267	1.1062	0.0478	1.1541	0.3184	0.0458	0.3641		2,833.7498	2,833.7498	0.0360	0.4139	2,957.9811
Worker	1.5251	0.8180	16.3118	0.0529	7.0463	0.0242	7.0706	1.8686	0.0223	1.8909		5,346.4116	5,346.4116	0.0800	0.1029	5,379.0666
Total	**1.6673**	**5.5807**	**17.9596**	**0.0796**	**8.1526**	**0.0721**	**8.2247**	**2.1869**	**0.0681**	**2.2550**		**8,180.1614**	**8,180.1614**	**0.1160**	**0.5167**	**8,337.0477**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2028

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756	0.0000	3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**	**0.0000**	**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1423	4.7627	1.6478	0.0267	1.1062	0.0478	1.1541	0.3184	0.0458	0.3641		2,833.7498	2,833.7498	0.0360	0.4139	2,957.9811
Worker	1.5251	0.8180	16.3118	0.0529	7.0463	0.0242	7.0706	1.8686	0.0223	1.8909		5,346.4116	5,346.4116	0.0800	0.1029	5,379.0666
Total	**1.6673**	**5.5807**	**17.9596**	**0.0796**	**8.1526**	**0.0721**	**8.2247**	**2.1869**	**0.0681**	**2.2550**		**8,180.1614**	**8,180.1614**	**0.1160**	**0.5167**	**8,337.0477**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2029

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756		3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**		**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1412	4.7233	1.6396	0.0262	1.1062	0.0476	1.1538	0.3184	0.0455	0.3639		2,781.9508	2,781.9508	0.0371	0.4056	2,903.7332
Worker	1.4389	0.7545	15.5375	0.0516	7.0463	0.0226	7.0689	1.8686	0.0208	1.8893		5,219.1188	5,219.1188	0.0735	0.0986	5,250.3244
Total	**1.5801**	**5.4779**	**17.1770**	**0.0778**	**8.1526**	**0.0702**	**8.2227**	**2.1869**	**0.0663**	**2.2532**		**8,001.0695**	**8,001.0695**	**0.1106**	**0.5041**	**8,154.0576**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2029

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756	0.0000	3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**	**0.0000**	**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1412	4.7233	1.6396	0.0262	1.1062	0.0476	1.1538	0.3184	0.0455	0.3639		2,781.9508	2,781.9508	0.0371	0.4056	2,903.7332
Worker	1.4389	0.7545	15.5375	0.0516	7.0463	0.0226	7.0689	1.8686	0.0208	1.8893		5,219.1188	5,219.1188	0.0735	0.0986	5,250.3244
Total	**1.5801**	**5.4779**	**17.1770**	**0.0778**	**8.1526**	**0.0702**	**8.2227**	**2.1869**	**0.0663**	**2.2532**		**8,001.0695**	**8,001.0695**	**0.1106**	**0.5041**	**8,154.0576**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2030

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0815	11.8945	24.6917	0.0490		0.2294	0.2294		0.2294	0.2294		4,607.7596	4,607.7596	0.1847		4,612.3758
Total	**2.0815**	**11.8945**	**24.6917**	**0.0490**		**0.2294**	**0.2294**		**0.2294**	**0.2294**		**4,607.7596**	**4,607.7596**	**0.1847**		**4,612.3758**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1404	4.6864	1.6336	0.0257	1.1062	0.0474	1.1536	0.3184	0.0453	0.3637		2,733.2209	2,733.2209	0.0382	0.3978	2,852.7057
Worker	1.3586	0.7002	14.8757	0.0505	7.0463	0.0211	7.0674	1.8686	0.0194	1.8879		5,106.8175	5,106.8175	0.0678	0.0949	5,136.7949
Total	**1.4990**	**5.3866**	**16.5093**	**0.0762**	**8.1525**	**0.0684**	**8.2210**	**2.1869**	**0.0647**	**2.2516**		**7,840.0384**	**7,840.0384**	**0.1060**	**0.4927**	**7,989.5006**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2030

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0815	11.8945	24.6917	0.0490		0.2294	0.2294		0.2294	0.2294	0.0000	4,607.7596	4,607.7596	0.1847		4,612.3758
Total	**2.0815**	**11.8945**	**24.6917**	**0.0490**		**0.2294**	**0.2294**		**0.2294**	**0.2294**	**0.0000**	**4,607.7596**	**4,607.7596**	**0.1847**		**4,612.3758**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1404	4.6864	1.6336	0.0257	1.1062	0.0474	1.1536	0.3184	0.0453	0.3637		2,733.2209	2,733.2209	0.0382	0.3978	2,852.7057
Worker	1.3586	0.7002	14.8757	0.0505	7.0463	0.0211	7.0674	1.8686	0.0194	1.8879		5,106.8175	5,106.8175	0.0678	0.0949	5,136.7949
Total	**1.4990**	**5.3866**	**16.5093**	**0.0762**	**8.1525**	**0.0684**	**8.2210**	**2.1869**	**0.0647**	**2.2516**		**7,840.0384**	**7,840.0384**	**0.1060**	**0.4927**	**7,989.5006**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2030

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	147.3829					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.6973	4.5668	9.5880	0.0159		0.1083	0.1083		0.1083	0.1083		1,501.0563	1,501.0563	0.0608		1,502.5750
Total	**148.0802**	**4.5668**	**9.5880**	**0.0159**		**0.1083**	**0.1083**		**0.1083**	**0.1083**		**1,501.0563**	**1,501.0563**	**0.0608**		**1,502.5750**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0444	1.4820	0.5166	8.1300e-003	0.3498	0.0150	0.3648	0.1007	0.0143	0.1150		864.3519	864.3519	0.0121	0.1258	902.1377
Worker	0.2712	0.1398	2.9692	0.0101	1.4065	4.2000e-003	1.4107	0.3730	3.8700e-003	0.3768		1,019.3248	1,019.3248	0.0135	0.0189	1,025.3084
Total	**0.3156**	**1.6218**	**3.4858**	**0.0182**	**1.7563**	**0.0192**	**1.7755**	**0.4736**	**0.0182**	**0.4918**		**1,883.6768**	**1,883.6768**	**0.0256**	**0.1447**	**1,927.4461**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2030

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	147.3829					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.6973	4.5668	9.5880	0.0159		0.1083	0.1083		0.1083	0.1083	0.0000	1,501.0563	1,501.0563	0.0608		1,502.5750
Total	**148.0802**	**4.5668**	**9.5880**	**0.0159**		**0.1083**	**0.1083**		**0.1083**	**0.1083**	**0.0000**	**1,501.0563**	**1,501.0563**	**0.0608**		**1,502.5750**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0444	1.4820	0.5166	8.1300e-003	0.3498	0.0150	0.3648	0.1007	0.0143	0.1150		864.3519	864.3519	0.0121	0.1258	902.1377
Worker	0.2712	0.1398	2.9692	0.0101	1.4065	4.2000e-003	1.4107	0.3730	3.8700e-003	0.3768		1,019.3248	1,019.3248	0.0135	0.0189	1,025.3084
Total	**0.3156**	**1.6218**	**3.4858**	**0.0182**	**1.7563**	**0.0192**	**1.7755**	**0.4736**	**0.0182**	**0.4918**		**1,883.6768**	**1,883.6768**	**0.0256**	**0.1447**	**1,927.4461**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	8.0528	10.9420	85.8945	0.2102	22.9840	0.1561	23.1401	6.1308	0.1463	6.2771		21,411.4512	21,411.4512	0.9479	0.9358	21,714.0129
Unmitigated	8.0528	10.9420	85.8945	0.2102	22.9840	0.1561	23.1401	6.1308	0.1463	6.2771		21,411.4512	21,411.4512	0.9479	0.9358	21,714.0129

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	2,538.96	2,538.96	2538.96	10,881,264	10,881,264
Total	2,538.96	2,538.96	2,538.96	10,881,264	10,881,264

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.542916	0.056689	0.174450	0.134041	0.024680	0.006960	0.011589	0.018600	0.000608	0.000298	0.023389	0.001091	0.004689
Parking Lot	0.542916	0.056689	0.174450	0.134041	0.024680	0.006960	0.011589	0.018600	0.000608	0.000298	0.023389	0.001091	0.004689
Unrefrigerated Warehouse-No Rail	0.542916	0.056689	0.174450	0.134041	0.024680	0.006960	0.011589	0.018600	0.000608	0.000298	0.023389	0.001091	0.004689

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	26.6753	3.6400e-003	0.4020	3.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003		0.8640	0.8640	2.2500e-003		0.9202
Unmitigated	26.6753	3.6400e-003	0.4020	3.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003		0.8640	0.8640	2.2500e-003		0.9202

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	3.0284					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	23.6099					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0370	3.6400e-003	0.4020	3.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003		0.8640	0.8640	2.2500e-003		0.9202
Total	**26.6753**	**3.6400e-003**	**0.4020**	**3.0000e-005**		**1.4300e-003**	**1.4300e-003**		**1.4300e-003**	**1.4300e-003**		**0.8640**	**0.8640**	**2.2500e-003**		**0.9202**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	3.0284					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	23.6099					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0370	3.6400e-003	0.4020	3.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003		0.8640	0.8640	2.2500e-003		0.9202
Total	**26.6753**	**3.6400e-003**	**0.4020**	**3.0000e-005**		**1.4300e-003**	**1.4300e-003**		**1.4300e-003**	**1.4300e-003**		**0.8640**	**0.8640**	**2.2500e-003**		**0.9202**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Simpson Road Warehouse Detailed Repo

Riverside-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	1,192.00	1000sqft	38.50	1,192,418.00	0
Other Asphalt Surfaces	1,039.00	1000sqft	23.90	0.00	0
Parking Lot	1,717.00	Space	10.60	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.4	**Precipitation Freq (Days)**	28
Climate Zone	10			**Operational Year**	2026
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with DEIR's model.

Land Use - Consistent with DEIR's model.

Construction Phase - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Trips and VMT - Consistent with DEIR's model.

Grading - Consistent with DEIR's model.

Architectural Coating - Consistent with DEIR's model.

Simpson Road Warehouse Detailed Repo - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Vehicle Trips - Consistent with DEIR's model.

Water And Wastewater - Consistent with DEIR's model.

Construction Off-road Equipment Mitigation - Consistent with DEIR's model.

Fleet Mix - See comment on: "Unsubstantiated Changes to Fleet Mix Values".

Energy Use - Consistent with DEIR's model.

Table Name	Column Name	Default Value	New Value
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblEnergyUse	NT24E	0.82	0.00
tblEnergyUse	NT24NG	0.03	0.00
tblEnergyUse	T24E	0.33	0.00
tblEnergyUse	T24NG	1.98	0.00
tblGrading	AcresOfGrading	1,650.00	750.00
tblGrading	AcresOfGrading	80.00	60.00
tblLandUse	LandUseSquareFeet	1,192,000.00	1,192,418.00
tblLandUse	LandUseSquareFeet	1,039,000.00	0.00
tblLandUse	LandUseSquareFeet	686,800.00	0.00
tblLandUse	LotAcreage	27.36	38.50
tblLandUse	LotAcreage	23.85	23.90
tblLandUse	LotAcreage	15.45	10.60

Simpson Road Warehouse Detailed Repo - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblOffRoadEquipment	HorsePower	212.00	97.00
tblOffRoadEquipment	LoadFactor	0.43	0.37
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	6.00
tblOffRoadEquipment	UsageHours	6.00	8.00
tblTripsAndVMT	HaulingTripNumber	0.00	241.00
tblTripsAndVMT	VendorTripLength	6.90	10.20
tblTripsAndVMT	VendorTripLength	6.90	10.20
tblTripsAndVMT	VendorTripLength	6.90	10.20
tblTripsAndVMT	VendorTripLength	6.90	10.20
tblTripsAndVMT	VendorTripNumber	0.00	10.00
tblTripsAndVMT	VendorTripNumber	0.00	32.00
tblTripsAndVMT	VendorTripNumber	195.00	117.00
tblTripsAndVMT	VendorTripNumber	0.00	37.00
tblTripsAndVMT	WorkerTripLength	14.70	18.50
tblTripsAndVMT	WorkerTripLength	14.70	18.50
tblTripsAndVMT	WorkerTripLength	14.70	18.50
tblTripsAndVMT	WorkerTripLength	14.70	18.50
tblVehicleTrips	ST_TR	1.74	2.13
tblVehicleTrips	SU_TR	1.74	2.13
tblVehicleTrips	WD_TR	1.74	2.13
tblWater	OutdoorWaterUseRate	0.00	7,673,799.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2025	12.8174	122.9479	96.6687	0.2483	44.7590	5.3741	50.1330	21.0194	4.9447	25.9641	0.0000	24,160.4623	24,160.4623	7.2783	0.5660	24,389.8005
2026	3.8649	25.7266	41.0246	0.1202	8.1526	0.9074	9.0600	2.1869	0.8475	3.0344	0.0000	12,062.2965	12,062.2965	1.1915	0.5496	12,255.8583
2027	3.7711	25.5775	40.1585	0.1182	8.1526	0.9054	9.0580	2.1869	0.8456	3.0325	0.0000	11,857.7727	11,857.7727	1.1842	0.5341	12,046.5434
2028	3.6864	25.4552	39.4371	0.1164	8.1526	0.9034	9.0560	2.1869	0.8438	3.0307	0.0000	11,672.6342	11,672.6342	1.1782	0.5200	11,857.0510
2029	3.6055	25.3478	38.8091	0.1148	8.1526	0.9015	9.0541	2.1869	0.8420	3.0289	0.0000	11,505.7120	11,505.7120	1.1730	0.5073	11,686.1954
2030	148.3859	17.5821	38.3736	0.1206	8.1525	0.2979	8.4505	2.1869	0.2942	2.4811	0.0000	11,976.6885	11,976.6885	0.2897	0.4957	12,131.6461
Maximum	**148.3859**	**122.9479**	**96.6687**	**0.2483**	**44.7590**	**5.3741**	**50.1330**	**21.0194**	**4.9447**	**25.9641**	**0.0000**	**24,160.4623**	**24,160.4623**	**7.2783**	**0.5660**	**24,389.8005**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2025	12.8174	122.9479	96.6687	0.2483	44.7590	5.3741	50.1330	21.0194	4.9447	25.9641	0.0000	24,160.4623	24,160.4623	7.2783	0.5660	24,389.8005
2026	3.8649	25.7266	41.0246	0.1202	8.1526	0.9074	9.0600	2.1869	0.8475	3.0344	0.0000	12,062.2965	12,062.2965	1.1915	0.5496	12,255.8583
2027	3.7711	25.5775	40.1585	0.1182	8.1526	0.9054	9.0580	2.1869	0.8456	3.0325	0.0000	11,857.7727	11,857.7727	1.1842	0.5341	12,046.5434
2028	3.6864	25.4552	39.4371	0.1164	8.1526	0.9034	9.0560	2.1869	0.8438	3.0307	0.0000	11,672.6342	11,672.6342	1.1782	0.5200	11,857.0510
2029	3.6055	25.3478	38.8091	0.1148	8.1526	0.9015	9.0541	2.1869	0.8420	3.0289	0.0000	11,505.7120	11,505.7120	1.1730	0.5073	11,686.1954
2030	148.3859	17.5821	38.3736	0.1206	8.1525	0.2979	8.4505	2.1869	0.2942	2.4811	0.0000	11,976.6885	11,976.6885	0.2897	0.4957	12,131.6461
Maximum	**148.3859**	**122.9479**	**96.6687**	**0.2483**	**44.7590**	**5.3741**	**50.1330**	**21.0194**	**4.9447**	**25.9641**	**0.0000**	**24,160.4623**	**24,160.4623**	**7.2783**	**0.5660**	**24,389.8005**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	26.6753	3.6400e-003	0.4020	3.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003		0.8640	0.8640	2.2500e-003		0.9202
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	6.9533	11.6258	75.4402	0.1951	22.9840	0.1562	23.1401	6.1308	0.1464	6.2772		19,886.0993	19,886.0993	0.9612	0.9549	20,194.6966
Total	**33.6286**	**11.6295**	**75.8423**	**0.1951**	**22.9840**	**0.1576**	**23.1416**	**6.1308**	**0.1478**	**6.2786**		**19,886.9634**	**19,886.9634**	**0.9634**	**0.9549**	**20,195.6168**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	26.6753	3.6400e-003	0.4020	3.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003		0.8640	0.8640	2.2500e-003		0.9202
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	6.9533	11.6258	75.4402	0.1951	22.9840	0.1562	23.1401	6.1308	0.1464	6.2772		19,886.0993	19,886.0993	0.9612	0.9549	20,194.6966
Total	**33.6286**	**11.6295**	**75.8423**	**0.1951**	**22.9840**	**0.1576**	**23.1416**	**6.1308**	**0.1478**	**6.2786**		**19,886.9634**	**19,886.9634**	**0.9634**	**0.9549**	**20,195.6168**

Simpson Road Warehouse Detailed Repo - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	5/4/2025	6/27/2025	5	40	
2	Grading	Grading	6/28/2025	11/28/2025	5	110	
3	Building Construction	Building Construction	11/29/2025	3/1/2030	5	1110	
4	Architectural Coating	Architectural Coating	3/2/2030	6/14/2030	5	75	

Acres of Grading (Site Preparation Phase): 60

Acres of Grading (Grading Phase): 750

Acres of Paving: 34.5

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 1,788,627; Non-Residential Outdoor: 596,209; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	4	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Crawler Tractors	6	8.00	97	0.37
Grading	Excavators	6	8.00	158	0.38
Grading	Graders	6	8.00	187	0.41
Grading	Rubber Tired Dozers	6	8.00	247	0.40
Grading	Scrapers	6	8.00	367	0.48

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Building Construction	Cranes	2	7.00	231	0.29
Building Construction	Forklifts	4	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	6	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Architectural Coating	Air Compressors	4	8.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	8	20.00	10.00	0.00	18.50	10.20	20.00	LD_Mix	HDT_Mix	HHDT
Grading	30	75.00	32.00	241.00	18.50	10.20	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	14	501.00	117.00	0.00	18.50	10.20	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	4	100.00	37.00	0.00	18.50	10.20	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					25.6791	0.0000	25.6791	13.4127	0.0000	13.4127			0.0000			0.0000
Off-Road	3.1208	31.8650	20.9095	0.0466		1.3769	1.3769		1.2668	1.2668		4,516.0638	4,516.0638	1.4606		4,552.5785
Total	**3.1208**	**31.8650**	**20.9095**	**0.0466**	**25.6791**	**1.3769**	**27.0560**	**13.4127**	**1.2668**	**14.6794**		**4,516.0638**	**4,516.0638**	**1.4606**		**4,552.5785**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0118	0.4447	0.1490	2.4200e-003	0.0946	4.1600e-003	0.0987	0.0272	3.9800e-003	0.0312		256.9266	256.9266	2.7400e-003	0.0378	268.2491
Worker	0.0700	0.0449	0.6268	2.0900e-003	0.2813	1.1700e-003	0.2825	0.0746	1.0800e-003	0.0757		211.1274	211.1274	4.1800e-003	4.9500e-003	212.7081
Total	**0.0818**	**0.4896**	**0.7758**	**4.5100e-003**	**0.3758**	**5.3300e-003**	**0.3812**	**0.1018**	**5.0600e-003**	**0.1069**		**468.0540**	**468.0540**	**6.9200e-003**	**0.0427**	**480.9572**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					25.6791	0.0000	25.6791	13.4127	0.0000	13.4127			0.0000			0.0000
Off-Road	3.1208	31.8650	20.9095	0.0466		1.3769	1.3769		1.2668	1.2668	0.0000	4,516.0638	4,516.0638	1.4606		4,552.5785
Total	**3.1208**	**31.8650**	**20.9095**	**0.0466**	**25.6791**	**1.3769**	**27.0560**	**13.4127**	**1.2668**	**14.6794**	**0.0000**	**4,516.0638**	**4,516.0638**	**1.4606**		**4,552.5785**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0118	0.4447	0.1490	2.4200e-003	0.0946	4.1600e-003	0.0987	0.0272	3.9800e-003	0.0312		256.9266	256.9266	2.7400e-003	0.0378	268.2491
Worker	0.0700	0.0449	0.6268	2.0900e-003	0.2813	1.1700e-003	0.2825	0.0746	1.0800e-003	0.0757		211.1274	211.1274	4.1800e-003	4.9500e-003	212.7081
Total	**0.0818**	**0.4896**	**0.7758**	**4.5100e-003**	**0.3758**	**5.3300e-003**	**0.3812**	**0.1018**	**5.0600e-003**	**0.1069**		**468.0540**	**468.0540**	**6.9200e-003**	**0.0427**	**480.9572**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					43.3632	0.0000	43.3632	20.6421	0.0000	20.6421			0.0000			0.0000
Off-Road	12.5127	121.1263	93.7789	0.2316		5.3538	5.3538		4.9255	4.9255		22,422.4387	22,422.4387	7.2519		22,603.7355
Total	**12.5127**	**121.1263**	**93.7789**	**0.2316**	**43.3632**	**5.3538**	**48.7170**	**20.6421**	**4.9255**	**25.5676**		**22,422.4387**	**22,422.4387**	**7.2519**		**22,603.7355**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	4.3800e-003	0.2303	0.0625	1.1600e-003	0.0383	2.6200e-003	0.0410	0.0105	2.5100e-003	0.0130		124.1307	124.1307	2.0100e-003	0.0196	130.0125
Vendor	0.0377	1.4230	0.4769	7.7500e-003	0.3026	0.0133	0.3159	0.0871	0.0127	0.0998		822.1650	822.1650	8.7600e-003	0.1209	858.3973
Worker	0.2626	0.1683	2.3504	7.8300e-003	1.0548	4.3800e-003	1.0592	0.2797	4.0400e-003	0.2838		791.7279	791.7279	0.0157	0.0186	797.6552
Total	**0.3047**	**1.8216**	**2.8898**	**0.0167**	**1.3958**	**0.0203**	**1.4161**	**0.3773**	**0.0193**	**0.3966**		**1,738.0236**	**1,738.0236**	**0.0264**	**0.1590**	**1,786.0650**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					43.3632	0.0000	43.3632	20.6421	0.0000	20.6421			0.0000			0.0000
Off-Road	12.5127	121.1263	93.7789	0.2316		5.3538	5.3538		4.9255	4.9255	0.0000	22,422.4387	22,422.4387	7.2519		22,603.7355
Total	**12.5127**	**121.1263**	**93.7789**	**0.2316**	**43.3632**	**5.3538**	**48.7170**	**20.6421**	**4.9255**	**25.5676**	**0.0000**	**22,422.4387**	**22,422.4387**	**7.2519**		**22,603.7355**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	4.3800e-003	0.2303	0.0625	1.1600e-003	0.0383	2.6200e-003	0.0410	0.0105	2.5100e-003	0.0130		124.1307	124.1307	2.0100e-003	0.0196	130.0125
Vendor	0.0377	1.4230	0.4769	7.7500e-003	0.3026	0.0133	0.3159	0.0871	0.0127	0.0998		822.1650	822.1650	8.7600e-003	0.1209	858.3973
Worker	0.2626	0.1683	2.3504	7.8300e-003	1.0548	4.3800e-003	1.0592	0.2797	4.0400e-003	0.2838		791.7279	791.7279	0.0157	0.0186	797.6552
Total	**0.3047**	**1.8216**	**2.8898**	**0.0167**	**1.3958**	**0.0203**	**1.4161**	**0.3773**	**0.0193**	**0.3966**		**1,738.0236**	**1,738.0236**	**0.0264**	**0.1590**	**1,786.0650**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756		3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**		**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1380	5.2028	1.7438	0.0283	1.1063	0.0486	1.1549	0.3184	0.0465	0.3649		3,006.0407	3,006.0407	0.0320	0.4419	3,138.5149
Worker	1.7539	1.1243	15.7005	0.0523	7.0463	0.0293	7.0756	1.8686	0.0270	1.8955		5,288.7423	5,288.7423	0.1046	0.1241	5,328.3369
Total	**1.8919**	**6.3271**	**17.4443**	**0.0807**	**8.1526**	**0.0779**	**8.2305**	**2.1869**	**0.0735**	**2.2604**		**8,294.7830**	**8,294.7830**	**0.1366**	**0.5660**	**8,466.8519**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756	0.0000	3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**	**0.0000**	**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1380	5.2028	1.7438	0.0283	1.1063	0.0486	1.1549	0.3184	0.0465	0.3649		3,006.0407	3,006.0407	0.0320	0.4419	3,138.5149
Worker	1.7539	1.1243	15.7005	0.0523	7.0463	0.0293	7.0756	1.8686	0.0270	1.8955		5,288.7423	5,288.7423	0.1046	0.1241	5,328.3369
Total	**1.8919**	**6.3271**	**17.4443**	**0.0807**	**8.1526**	**0.0779**	**8.2305**	**2.1869**	**0.0735**	**2.2604**		**8,294.7830**	**8,294.7830**	**0.1366**	**0.5660**	**8,466.8519**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2026

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756		3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**		**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1360	5.1462	1.7253	0.0278	1.1063	0.0484	1.1547	0.3184	0.0463	0.3647		2,951.4832	2,951.4832	0.0333	0.4330	3,081.3353
Worker	1.6540	1.0157	14.7086	0.0507	7.0463	0.0277	7.0741	1.8686	0.0255	1.8941		5,124.4385	5,124.4385	0.0948	0.1166	5,161.5630
Total	**1.7900**	**6.1618**	**16.4339**	**0.0785**	**8.1526**	**0.0762**	**8.2287**	**2.1869**	**0.0718**	**2.2588**		**8,075.9217**	**8,075.9217**	**0.1281**	**0.5496**	**8,242.8984**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2026

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756	0.0000	3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**	**0.0000**	**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1360	5.1462	1.7253	0.0278	1.1063	0.0484	1.1547	0.3184	0.0463	0.3647		2,951.4832	2,951.4832	0.0333	0.4330	3,081.3353
Worker	1.6540	1.0157	14.7086	0.0507	7.0463	0.0277	7.0741	1.8686	0.0255	1.8941		5,124.4385	5,124.4385	0.0948	0.1166	5,161.5630
Total	**1.7900**	**6.1618**	**16.4339**	**0.0785**	**8.1526**	**0.0762**	**8.2287**	**2.1869**	**0.0718**	**2.2588**		**8,075.9217**	**8,075.9217**	**0.1281**	**0.5496**	**8,242.8984**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2027

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756		3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**		**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1343	5.0888	1.7102	0.0273	1.1062	0.0482	1.1544	0.3184	0.0461	0.3644		2,893.9591	2,893.9591	0.0344	0.4238	3,021.0997
Worker	1.5619	0.9239	13.8577	0.0492	7.0463	0.0260	7.0723	1.8686	0.0239	1.8925		4,977.4389	4,977.4389	0.0864	0.1104	5,012.4838
Total	**1.6962**	**6.0127**	**15.5678**	**0.0765**	**8.1526**	**0.0742**	**8.2267**	**2.1869**	**0.0700**	**2.2569**		**7,871.3979**	**7,871.3979**	**0.1208**	**0.5341**	**8,033.5835**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2027

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756	0.0000	3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**	**0.0000**	**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1343	5.0888	1.7102	0.0273	1.1062	0.0482	1.1544	0.3184	0.0461	0.3644		2,893.9591	2,893.9591	0.0344	0.4238	3,021.0997
Worker	1.5619	0.9239	13.8577	0.0492	7.0463	0.0260	7.0723	1.8686	0.0239	1.8925		4,977.4389	4,977.4389	0.0864	0.1104	5,012.4838
Total	**1.6962**	**6.0127**	**15.5678**	**0.0765**	**8.1526**	**0.0742**	**8.2267**	**2.1869**	**0.0700**	**2.2569**		**7,871.3979**	**7,871.3979**	**0.1208**	**0.5341**	**8,033.5835**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2028

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756		3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**		**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1330	5.0433	1.6997	0.0267	1.1062	0.0479	1.1542	0.3184	0.0459	0.3642		2,838.7904	2,838.7904	0.0355	0.4149	2,963.3132
Worker	1.4785	0.8472	13.1467	0.0480	7.0463	0.0242	7.0706	1.8686	0.0223	1.8909		4,847.4691	4,847.4691	0.0792	0.1051	4,880.7778
Total	**1.6115**	**5.8904**	**14.8464**	**0.0747**	**8.1526**	**0.0722**	**8.2248**	**2.1869**	**0.0682**	**2.2551**		**7,686.2595**	**7,686.2595**	**0.1147**	**0.5200**	**7,844.0910**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2028

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756	0.0000	3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**	**0.0000**	**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1330	5.0433	1.6997	0.0267	1.1062	0.0479	1.1542	0.3184	0.0459	0.3642		2,838.7904	2,838.7904	0.0355	0.4149	2,963.3132
Worker	1.4785	0.8472	13.1467	0.0480	7.0463	0.0242	7.0706	1.8686	0.0223	1.8909		4,847.4691	4,847.4691	0.0792	0.1051	4,880.7778
Total	**1.6115**	**5.8904**	**14.8464**	**0.0747**	**8.1526**	**0.0722**	**8.2248**	**2.1869**	**0.0682**	**2.2551**		**7,686.2595**	**7,686.2595**	**0.1147**	**0.5200**	**7,844.0910**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2029

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756		3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**		**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1320	5.0018	1.6916	0.0262	1.1062	0.0477	1.1539	0.3184	0.0456	0.3640		2,786.9111	2,786.9111	0.0367	0.4066	2,908.9786
Worker	1.3987	0.7811	12.5268	0.0468	7.0463	0.0226	7.0689	1.8686	0.0208	1.8893		4,732.4261	4,732.4261	0.0729	0.1007	4,764.2568
Total	**1.5306**	**5.7830**	**14.2184**	**0.0731**	**8.1526**	**0.0703**	**8.2228**	**2.1869**	**0.0664**	**2.2533**		**7,519.3372**	**7,519.3372**	**0.1096**	**0.5073**	**7,673.2354**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2029

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0748	19.5648	24.5907	0.0417		0.8312	0.8312		0.7756	0.7756	0.0000	3,986.3748	3,986.3748	1.0634		4,012.9599
Total	**2.0748**	**19.5648**	**24.5907**	**0.0417**		**0.8312**	**0.8312**		**0.7756**	**0.7756**	**0.0000**	**3,986.3748**	**3,986.3748**	**1.0634**		**4,012.9599**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1320	5.0018	1.6916	0.0262	1.1062	0.0477	1.1539	0.3184	0.0456	0.3640		2,786.9111	2,786.9111	0.0367	0.4066	2,908.9786
Worker	1.3987	0.7811	12.5268	0.0468	7.0463	0.0226	7.0689	1.8686	0.0208	1.8893		4,732.4261	4,732.4261	0.0729	0.1007	4,764.2568
Total	**1.5306**	**5.7830**	**14.2184**	**0.0731**	**8.1526**	**0.0703**	**8.2228**	**2.1869**	**0.0664**	**2.2533**		**7,519.3372**	**7,519.3372**	**0.1096**	**0.5073**	**7,673.2354**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2030

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0815	11.8945	24.6917	0.0490		0.2294	0.2294		0.2294	0.2294		4,607.7596	4,607.7596	0.1847		4,612.3758
Total	**2.0815**	**11.8945**	**24.6917**	**0.0490**		**0.2294**	**0.2294**		**0.2294**	**0.2294**		**4,607.7596**	**4,607.7596**	**0.1847**		**4,612.3758**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1312	4.9630	1.6858	0.0258	1.1062	0.0475	1.1537	0.3184	0.0454	0.3638		2,738.1052	2,738.1052	0.0378	0.3987	2,857.8694
Worker	1.3238	0.7246	11.9961	0.0458	7.0463	0.0211	7.0674	1.8686	0.0194	1.8879		4,630.8237	4,630.8237	0.0673	0.0970	4,661.4009
Total	**1.4550**	**5.6876**	**13.6819**	**0.0716**	**8.1525**	**0.0685**	**8.2211**	**2.1869**	**0.0648**	**2.2517**		**7,368.9289**	**7,368.9289**	**0.1051**	**0.4957**	**7,519.2703**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Building Construction - 2030

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.0815	11.8945	24.6917	0.0490		0.2294	0.2294		0.2294	0.2294	0.0000	4,607.7596	4,607.7596	0.1847		4,612.3758
Total	**2.0815**	**11.8945**	**24.6917**	**0.0490**		**0.2294**	**0.2294**		**0.2294**	**0.2294**	**0.0000**	**4,607.7596**	**4,607.7596**	**0.1847**		**4,612.3758**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.1312	4.9630	1.6858	0.0258	1.1062	0.0475	1.1537	0.3184	0.0454	0.3638		2,738.1052	2,738.1052	0.0378	0.3987	2,857.8694
Worker	1.3238	0.7246	11.9961	0.0458	7.0463	0.0211	7.0674	1.8686	0.0194	1.8879		4,630.8237	4,630.8237	0.0673	0.0970	4,661.4009
Total	**1.4550**	**5.6876**	**13.6819**	**0.0716**	**8.1525**	**0.0685**	**8.2211**	**2.1869**	**0.0648**	**2.2517**		**7,368.9289**	**7,368.9289**	**0.1051**	**0.4957**	**7,519.2703**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2030

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	147.3829					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.6973	4.5668	9.5880	0.0159		0.1083	0.1083		0.1083	0.1083		1,501.0563	1,501.0563	0.0608		1,502.5750
Total	**148.0802**	**4.5668**	**9.5880**	**0.0159**		**0.1083**	**0.1083**		**0.1083**	**0.1083**		**1,501.0563**	**1,501.0563**	**0.0608**		**1,502.5750**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0415	1.5695	0.5331	8.1500e-003	0.3498	0.0150	0.3648	0.1007	0.0144	0.1150		865.8965	865.8965	0.0119	0.1261	903.7707
Worker	0.2642	0.1446	2.3944	9.1400e-003	1.4065	4.2000e-003	1.4107	0.3730	3.8700e-003	0.3768		924.3161	924.3161	0.0134	0.0194	930.4193
Total	**0.3057**	**1.7141**	**2.9276**	**0.0173**	**1.7563**	**0.0192**	**1.7755**	**0.4736**	**0.0182**	**0.4919**		**1,790.2126**	**1,790.2126**	**0.0254**	**0.1454**	**1,834.1900**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Architectural Coating - 2030

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	147.3829					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.6973	4.5668	9.5880	0.0159		0.1083	0.1083		0.1083	0.1083	0.0000	1,501.0563	1,501.0563	0.0608		1,502.5750
Total	**148.0802**	**4.5668**	**9.5880**	**0.0159**		**0.1083**	**0.1083**		**0.1083**	**0.1083**	**0.0000**	**1,501.0563**	**1,501.0563**	**0.0608**		**1,502.5750**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0415	1.5695	0.5331	8.1500e-003	0.3498	0.0150	0.3648	0.1007	0.0144	0.1150		865.8965	865.8965	0.0119	0.1261	903.7707
Worker	0.2642	0.1446	2.3944	9.1400e-003	1.4065	4.2000e-003	1.4107	0.3730	3.8700e-003	0.3768		924.3161	924.3161	0.0134	0.0194	930.4193
Total	**0.3057**	**1.7141**	**2.9276**	**0.0173**	**1.7563**	**0.0192**	**1.7755**	**0.4736**	**0.0182**	**0.4919**		**1,790.2126**	**1,790.2126**	**0.0254**	**0.1454**	**1,834.1900**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	6.9533	11.6258	75.4402	0.1951	22.9840	0.1562	23.1401	6.1308	0.1464	6.2772		19,886.0993	19,886.0993	0.9612	0.9549	20,194.6966
Unmitigated	6.9533	11.6258	75.4402	0.1951	22.9840	0.1562	23.1401	6.1308	0.1464	6.2772		19,886.0993	19,886.0993	0.9612	0.9549	20,194.6966

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	2,538.96	2,538.96	2538.96	10,881,264	10,881,264
Total	2,538.96	2,538.96	2,538.96	10,881,264	10,881,264

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.542916	0.056689	0.174450	0.134041	0.024680	0.006960	0.011589	0.018600	0.000608	0.000298	0.023389	0.001091	0.004689
Parking Lot	0.542916	0.056689	0.174450	0.134041	0.024680	0.006960	0.011589	0.018600	0.000608	0.000298	0.023389	0.001091	0.004689
Unrefrigerated Warehouse-No Rail	0.542916	0.056689	0.174450	0.134041	0.024680	0.006960	0.011589	0.018600	0.000608	0.000298	0.023389	0.001091	0.004689

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	26.6753	3.6400e-003	0.4020	3.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003		0.8640	0.8640	2.2500e-003		0.9202
Unmitigated	26.6753	3.6400e-003	0.4020	3.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003		0.8640	0.8640	2.2500e-003		0.9202

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	3.0284					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	23.6099					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0370	3.6400e-003	0.4020	3.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003		0.8640	0.8640	2.2500e-003		0.9202
Total	**26.6753**	**3.6400e-003**	**0.4020**	**3.0000e-005**		**1.4300e-003**	**1.4300e-003**		**1.4300e-003**	**1.4300e-003**		**0.8640**	**0.8640**	**2.2500e-003**		**0.9202**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	3.0284					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	23.6099					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0370	3.6400e-003	0.4020	3.0000e-005		1.4300e-003	1.4300e-003		1.4300e-003	1.4300e-003		0.8640	0.8640	2.2500e-003		0.9202
Total	**26.6753**	**3.6400e-003**	**0.4020**	**3.0000e-005**		**1.4300e-003**	**1.4300e-003**		**1.4300e-003**	**1.4300e-003**		**0.8640**	**0.8640**	**2.2500e-003**		**0.9202**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Attachment B

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

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Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
Industrial Stormwater Compliance
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2104, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.
- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:
- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:
- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:
- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.

Attachment C

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

SOIL WATER AIR PROTECTION ENTERPRISE
2656 29th Street, Suite 201
Santa Monica, California 90405
Attn: Paul Rosenfeld, Ph.D.
Mobil: (310) 795-2335
Office: (310) 452-5555
Fax: (310) 452-5550
Email: prosenfeld@swape.com

Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Rosenfeld P. E., Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution.* **233,** 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004.* New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants.*. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division
Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation
Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois
Joseph Ruepke vs. BNSF
Case No. 2019 L 007730
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska
Steven Gillett vs. BNSF
Case No. 4:20-cv-03120
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County
James Eadus vs. Soo Line Railroad and BNSF
Case No. DV 19-1056
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al.cvs. Cerro Flow Products, Inc.
Case No. 0i9-L-2295
Rosenfeld Deposition 5-14-2021
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a AMTRAK,
Case No. 18-L-6845
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois
Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail
Case No. 17-cv-8517
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case No. CV20127-094749
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al vs. CNA Insurance Company et al.
Case No. 1:17-cv-000508
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.
Case No. 1716-CV10006
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintifs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the County Court of Dallas County Texas
Lisa Parr et al, Plaintiff, vs. Aruba et al, Defendant.
Case No. cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.
Civil Action No. 2:09-cv-232-WHA-TFM
Rosenfeld Deposition July 2010, June 2011

In the Circuit Court of Jefferson County Alabama
Jaeanette Moss Anthony, et al., Plaintiffs, vs. Drummond Company Inc., et al., Defendants
Civil Action No. CV 2008-2076
Rosenfeld Deposition September 2010

In the United States District Court, Western District Lafayette Division
Ackle et al., Plaintiffs, vs. Citgo Petroleum Corporation, et al., Defendants.
Case No. 2:07CV1052
Rosenfeld Deposition July 2009

Response to Letter O3: Golden State Environmental Justice Alliance, dated June 28, 2024

Comment O3.1: This comment provides an introduction to the comment letter and states that the comment is submitted on behalf of the Golden State Environmental Justice Alliance (GSEJA). Additionally, it states that GSEJA requests to be notified regarding any subsequent environmental documents, public notices, and public hearings for the Project.

Response O3.1 GSEJA will be added to the City of Hemet's notification list and will be notified of any subsequent environmental documents, public notices, and public hearings regarding the proposed Project. The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment O3.2: This comment includes a project summary of the proposed Project. The comment also lists the discretionary actions needed to complete the Project.

Response O3.2: The comment provides a summary of the proposed Project and does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is required or provided.

Comment O3.3: The comment states that the EIR does not accurately describe the Project. This comment expresses concern that the Project is a piecemealed portion of a larger project that includes the Newland Kirby Project, which is an 850,640 square foot warehouse project in the City of Hemet, and states that the proposed Project should be analyzed along with the Newland Kirby Project. The comment states that the Project includes the construction and operation of all Newland buildings.

Response O3.3: The comment does not provide any substantial evidence of an environmental impact or substantial evidence that the Newland Kirby Project is directly tied to the Newland Simpson Project, and therefore the commenter's assertions that the Project is part of a larger piecemealed project are based on speculation.

The commenter's explanation of piecemealing is inaccurate. The City disagrees with the assertion that the Project is a piecemealed portion of a larger Newland development. Activities that would operate independently of one another and can be implemented separately may be treated as separate projects under CEQA if one activity is not a foreseeable consequence of the other (see *Aptos Council v. County of Santa Cruz* (2017) 10 Cal.App.5th 266, 281). Generally, courts have considered distinct activities as one CEQA project and required them to be reviewed together: (1) when the project under review is designed to provide the necessary first step toward a larger development; and (2) when development of the project under review requires or presumes completion of another activity. Neither scenario is appliable here. Instead, each of the projects identified have independent utility. That is, the approval or denial of one project has no effect on the other projects, and none of the projects are dependent upon the existence of any of the other projects. The Newland Kirby Project was submitted separately from the proposed Project and is not a phase of the proposed Project. Further, the Newland Kirby Project and associated EIR Addendum was approved on December 5, 2023, by the Planning Commission. Therefore, the Draft EIR accurately represents the whole of the action and evaluates the potential environmental impacts pursuant to CEQA. The proposed Project is limited to development and operation of the Project site and is not part of other development projects.

Comment O3.4: The comment states that the Project Description does not provide a floor plan, detailed site plan, conceptual grading plan, written narrative, grading plans or detailed elevations. The comment states that a few figures have been edited to remove meaningful information. The comment requests that the EIR must be revised to include an unedited floor plan, grading plan, site plan, and project narrative for public review.

Response O3.4: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Pursuant to CEQA Guidelines Section 15124, the Project Description "should not supply extensive detail beyond that needed for the evaluation and review of the environmental impact." The proposed Project is thoroughly described within Draft EIR Section 3.0, *Project Description*. In addition, a Conceptual Site Plan, Building Elevations, a Conceptual Landscape Plan, and Project Renderings are provided as Figures 3-7, 3-8, 3-9, 3-10, and 5.1-1, in Section 3.0, *Project Description* and Section 5.1, *Aesthetics* respectively. Analysis under this DEIR have all utilized these same graphics and plans. As such, the level of detail needed for the evaluation of the Project by the public and decision makers and for the review of the Project's environmental impacts is adequate within the Project Description, and extensively detailed figures are not needed. Details including the floor area ratio are provided in the Project Description as well as on Table 5.1-1. As demonstrated by *Citizens for a Sustainable Treasure Island v. City & County of San Francisco (2014) 227 CA4th 1036, 1053,* the EIR's description of the proposed Project should identify the Project's main features and other information needed for an analysis of the Project's environmental impacts. As long as the requirements set forth in CEQA Guidelines Section 15124 are met, the Project Description may allow for the flexibility needed to respond to changing conditions that could impact the Project's final design. As such, detailed grading plans for all buildings are not required to be included in the Draft EIR's Project Description and a general description of the Project and conceptual plans are allowed. Should the Project be approved, design level civil engineering plans would be prepared and reviewed by the appropriate City departments prior to any construction on the Project site.

Comment O3.5: The comment states that the Project Description does not provide detailed information regarding each discretionary action including the Site Plan Review, Conditional Use Permit, and Variances for both parking and building height. The comment concludes in stating that the EIR must be revised to include the City's requests associated with each discretionary action.

Response O3.5: As stated previously in Response O3.4, pursuant to CEQA Guidelines Section 15124, the Project Description "should not supply extensive detail beyond that needed for the evaluation and review of the environmental impact." The proposed Project is thoroughly described within Draft EIR Section 3.0, *Project Description*. As such, the level of detail needed for the evaluation of the Project by the public and decision makers and for the review of the Project's environmental impacts is adequate within the Project Description, and extensively detailed figures are not needed. As demonstrated by *Citizens for a Sustainable Treasure Island v. City & County of San Francisco (2014) 227 CA4th 1036, 1053,* the EIR's description of the proposed Project should identify the Project's main features and other information needed for an analysis of the Project's environmental impacts. As long as the requirements set forth in CEQA Guidelines Section 15124 are met, the Project Description may allow for the flexibility needed to respond to changing conditions that could impact the Project's final design.

However, in response to the comment, Table 3-6 from the Draft EIR has been revised, as provided below and captured within Chapter 3, *Revisions to the Draft EIR*, of this Final EIR:

Table 2-3: Project Approvals/Permits

Public Agency	Approval and Decisions
City of Hemet	
Project – Discretionary Approvals	
City of Hemet Planning Commission	• Recommend approval, conditional approval, or denial of the Project, including the General Plan Amendment, Conditional Use Permit, Site Plan Review, and Tentative Parcel Map • Recommend that the City Council reject or certify this EIR along with appropriate CEQA Findings and Mitigation Monitoring and Reporting Program

Public Agency	Approval and Decisions
City of Hemet City Council	• Approve, conditionally approve, or deny the Project, including the General Plan Amendment, Conditional Use Permit, and Tentative Parcel Map • Reject or certify this EIR along with appropriate CEQA Findings and Mitigation Monitoring and Reporting Program
Subsequent City of Hemet and Ministerial Approvals	
City of Hemet Implementing Approvals	• Approval of a variance for building height **(5-foot height increase)** • **Approval of a variance for parking spaces (70 spaces below required amount)** • Approve Final Parcel Maps, lot line adjustments, or parcel mergers, as may be appropriate • Approve precise site plan(s) and landscaping/irrigation plan(s), as may be appropriate • Issue Grading Permits • Issue Building Permits • Issue Occupancy Permits • Approve Road Improvements Plans • Issue Encroachment Permits • Accept public right-of-way dedications • Approve Water Quality Management Plan (WQMP)
Other Agencies – Subsequent Approvals and Permits	
Santa Ana Regional Water Quality Control Board	• Issuance of a Construction Activity General Construction Permit • Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit
South Coast Air Quality Management District	• Permits and approvals associated with the operation of stationary equipment, if required
Eastern Municipal Water District	• Approval of design conditions, water, and sewer improvement plans
Riverside County Flood Control & Water Conservation District	• Approval of storm drain connections, if applicable

Comment O3.6: The comment refers to comments provided by SWAPE, which are included as an attachment to the comment letter.

Response O3.6: Refer to Responses O3.40 through O3.52 in which the comments presented by SWAPE are addressed.

Comment O3.7: This comment states that the Draft EIR does not include analysis of relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed Project to the surrounding community. The comment states that according to the CalEnviroScreen 4.0. The proposed Project's census tract ranks in the 91st percentile for ozone burden, the 46th percentile for particulate matter 2.5 burden, and the 65th percentile for solid waste facility impacts. The comment also states that the census tract consists of a diverse community that is especially vulnerable to impacts of pollution.

Response O3.7: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. CEQA is an environmental protection statute that is concerned with physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water,

minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). Moreover, CEQA also requires a project evaluate its impacts in relation to changes in an area's population, housing needs and coverage under adequate public services. The Project's potential environmental justice effects are social issues that are not considered effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Thus, consistent with CEQA, the Draft EIR includes an analysis of the Project's potentially significant physical impacts on the environment and does not include substantial discussion of environmental justice.

CalEnviroScreen is a general policy tool. It is generally inappropriate for CEQA review. However, the Draft EIR provides a detailed evaluation of the potential cumulative air quality related impacts of the proposed Project upon the surrounding community (localized impacts) pursuant to SCAQMD methodology and thresholds, which is the appropriate due to the Project's location within the South Coast Air Basin.

The Draft EIR also provides a detailed evaluation of the potential cumulative water supply, water quality, hazardous waste, and solid waste impacts of the proposed Project. Regarding the existing pollution burden, the existing air quality in the Project area is described in Draft EIR Section 5.3, *Air Quality*. Table 5.3-2 provides data from the closest air quality monitoring station to the Project site (SRA 24 Perris Valley, SRA 25 Elsinore valley, and SRA 23 Metropolitan Riverside County). Data from the air quality monitoring stations indicates that the $PM_{2.5}$ federal standard had 5 exceedances in 2020, 13 exceedances in 2021, and 0 exceedances in 2022. While the Project vicinity has experienced exceedances of State and federal standards, the thresholds set forth by the SCAQMD are intended to be health protective and are based on Clean Air Act standards and recommendations by the EPA. Although there has been an increase in development in the South Coast Area Basin, emissions concentrations have declined, and air quality has generally improved over the last 30 years largely due to cleaner air vehicles and fuel requirements.

As detailed under Impact AQ-2 in Section 5.3, *Air Quality*, of the Draft EIR, pollutant emissions associated with operation of the Project would be below SCAQMD thresholds and the Project would not result in a net increase of a pollutant for which the region in in non-attainment. Construction of the proposed Project would generate regional emissions that would exceed the applicable SCAQMD threshold for VOCs and NO_x. The Project would implement Mitigation Measures AQ-1 and AQ-2 to reduce the construction NO_x and VOCs emissions. These measures would be sufficient enough to reduce the NO_x and VOCs emissions to below the SCAQMD thresholds. Therefore, criteria emissions impacts related to construction and operation of the proposed Project would be less than significant with the implementation of Mitigation Measures AQ-1 and AQ-2.

Also, a Mobile Source Health Risk Assessment (included as Appendix D to the Draft EIR) was prepared to evaluate the health risk impacts as a result of exposure to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks and equipment activities from Project construction. The results of the health risk assessment determined that at the maximum incremental cancer risk attributable to construction DPM source emissions from the proposed Project is 0.55 in one million, which would not exceed the SCAQMD cancer risk threshold of 10 in one million. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity.

An operational diesel mobile source health risk (included as Appendix D to the Draft EIR) was also prepared to evaluate the operational health risk impacts as a result of exposure to DPM from heavy-duty diesel trucks traveling to and from the Project site, maneuvering onsite, and entering and leaving the site during operation of the Project. The Draft EIR details that the results of the operational health risk assessment identified that the maximum cancer risk would be 1.47 in one million for the nearby residential land uses, which is below the SCAQMD threshold of 10 in one million. The worker receptor risk would be lower at 0.09 in one million. Maximum non-cancer risks at this same location were estimated to be less than0.01, which would not exceed the applicable significance threshold of 1.0. In addition, the Draft EIR determined that the maximum incremental cancer risk impact attributable to the Project for both construction and operation is calculated to

be1.29, below the threshold of 10. Therefore, all health risk levels to nearby residents from construction and operation-related emissions of TACs would be well below the SCAQMD's HRA thresholds and impacts would be less than significant.

The Draft EIR also included a long-term microscale (CO Hot Spot) analysis on page 5.3-28 which determined Project-related vehicles are not expected to contribute significantly to result in the CO concentrations exceeding the State or federal CO standards. Therefore, as concluded in the Draft EIR, the Project would not impact nearby residences or schools.

Comment O3.8: This comment states that the EIR does not adequately analyze the Projects consistency with the AQMP as the Project requires a land use change from Mixed Use (MU) to Business Park (B-P) which was not analyzed by SCAG.

Response O3.8: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. The General Plan Amendment was discussed in the Draft EIR on pages 3-13, 3-35, 5.11-19, and 5.13-6. As discussed in Section 3.0, *Project Description*, the proposed Project site has an existing zoning designation of Business Park, and the General Plan Amendment is required for the sites General Plan Land Use designation to be consistent with the existing zoning. Pursuant to state law, a general plan and zoning designation require consistency and any inconsistency be brought into conformance in a prompt manner. Accordingly, the Applicant is simply seeking compliance with state law to harmonize the land use designations. According to SCAG's 2020-2045 RTP/SCS population and household growth forecast for the city of Hemet, between 2016 and 2045, SCAG anticipates an employment increase of 18,500 additional jobs (from 21,700 to 40,200), yielding an 85% growth rate. SCAG also anticipates a population increase of 42,500 between 2016 and 2045 (from 81,500 to 124,000). The proposed Project would generate the need for approximately 1,158 employees, which represents approximately 2.72% of the forecasted population growth between 2016 and 2045 and approximately 6.26% of the forecasted employment growth between 2016 and 2045 for the City. According to the Employment Development Department, as of August 2023, Hemet's unemployment rate was approximately 6.3%. Thus, although the Project would generate additional long-term employment in the Project area, the new employment opportunities would be within the forecasted and planned growth of the City under its buildout conditions.

Comment O3.9: This comment states that CalEEMod is not listed as an approved energy compliance modeling software. The comment states that since the EIR did not accurately or adequately model impacts in compliance with Title 24, a finding of significance must be made and a revised EIR with modeling in one of the three approved software types must be circulated for public review in order to adequately analyze the Project's potentially significant environmental impacts.

Response O3.9: The commenter incorrectly assumes the purpose of Title 24 and California Energy Commission approved software programs. The approved programs serve the purpose of being used under the performance approach (energy budget) method of compliance for Energy Standards. The programs mentioned are not intended to be utilized for CEQA analysis. CalEEMod, the California Emissions Estimator Model, 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 and GHG emissions associated with both construction and operations from a variety of land use projects. The model was developed for the California Air Pollution Officers Association (CAPCOA) in collaboration with the California Air Districts. Additionally, the Project would be compliant with measures set forth in Title 24, which would be verified through the plan check process. The comment does not contain any information requiring changes to the EIR. No further response is warranted.

Comment O3.10: The comment states that the EIR does not have meaningful evidence to support its conclusions that there would be a less than significant impact related to a safety hazard or excessive noise within two miles of a public airport. The comment explains that the Project is required to be reviewed by the

Riverside County Airport Land Use Commission (RCALUC) after the EIR public review period, which is deferred mitigation. The comment also notes that the building heights listed in the EIR (60 feet) are different from those in the RCALUC application (52 feet).

Response O3.10: The proposed Project was approved by the Riverside County Airport Land Use Commission on June 13, 2024. The following revisions has been included in Chapter 3, Errata:

> Due to the nature of the required City approvals (i.e., the proposed General Plan Amendment), the City of Hemet is required, pursuant to Public Utilities Code Section 21676, to refer the proposed Project to the ALUC for ALUC review. **On June 13, 2024, the proposed Project was found to be consistent with the 2017 Hemet-Ryan Airport Land Use Compatibility Plan by RCALUC.** The proposed Project would comply with this ALUC notification and all other applicable rules and regulations as they pertain to the Hemet-Ryan Airport and airport safety. Overall, because the proposed Project is not located within compatibility zones A through D of the Hemet-Ryan Land Use Compatibility Plan or the designated Hemet-Ryan Airport noise contours; and it would not result in hazards related to excessive glare, light, steam, smoke, dust, or electronic interference, the proposed Project would not introduce a safety hazard associated with airport operations for people residing, working, and visiting the Project site.

The Draft EIR analyzed the proposed Project buildings at a height of 60 feet in order to include the most conservative analysis. In accordance with the Conditions of Approval provided by the RCALUC, any changes to building area or intensity are subject to an amended review to evaluate consistency with the ALUCP compatibility criteria. Thus, this comment does not contain any information requiring further changes to the EIR. No further response is warranted.

Comment O3.11: The comment states that the proposed Project must provide a quantified analysis of the Project's growth compared to the General Plan's buildout. The comment requests that a revised EIR include an analysis of buildout of the Project and projects "in the pipeline" and their development intensity to determine if they would exceed the projected buildout scenario.

Response O3.11: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Development assumptions and scenarios presented in the General Plan and its program-level EIR should not be considered a "cap" on permissible acreage or square footage buildout, but simply serve as a framework upon which future project-level environmental analyses may be based. Cumulative projects are properly included in Table 5-1 of the Draft EIR and accounted for throughout the analysis of the Draft EIR, including the Newland Kirby project. All previously-constructed projects (i.e., completed prior to issuance of the 2023 Notice of Preparation for the Draft EIR) are considered part of the environmental baseline and have therefore been accounted for as part of the existing conditions.

Growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in master plans, land use plans, or in projections made by regional planning agencies, such as SCAG. According to SCAG's 2020-2045 RTP/SCS population and household growth forecast for Hemet, between 2016 and 2045, SCAG anticipates an employment increase of 18,500 additional jobs (from 21,700 to 40,200), yielding a 85% growth rate. SCAG also anticipates a population increase of 42,500 between 2016 and 2045 (from 81,500 to 124,000). The proposed Project would generate the need for approximately 1,158 employees, which represents approximately 2.72% of the forecasted population growth between 2016 and 2045 and approximately 6.26% of the forecasted employment growth between 2016 and 2045 for the City. According to the Employment Development Department, as of August 2023, Hemet's unemployment rate was approximately 6.3%. Additionally, as detailed on Draft EIR page 5.11-21, Building 1 would result in a FAR of 0.47 and Building 2 would result in a FAR of 0.39 which is below the maximum FAR of 0.60 allowed by the Business Park zoning, and related employment projections. Thus, although the Project would generate additional long-term employment in the

Project area, the new employment opportunities would be within the forecasted and planned growth of the City.

Comment O3.12: This comment states that the EIR does not provide any meaningful evidence to support the Projects consistency with the SCAG RTP/SCS. The comment also mentions that there are errors in modeling and states that the Project is inconsistent with Goal 5, Goal 6, and Goal 7 of Table 5.11-1. The comment states that the EIR must be revised to include a finding of significance due to inconsistency with the 2020-2045 RTP/SCS Connect SoCal document.

Response O3.12: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. As discussed in Responses O3.42 through O3.50 below, appropriate CalEEMod defaults were utilized and there are no errors in modeling. Substantial evidence supporting the SCAG RTP/SCS consistency analysis is provided in Section 5.3, *Air Quality*, and Section 5.8, *Greenhouse Gas Emissions*. The SCAG RTP/SCS provides overall regional goals, therefore the referenced goal is not a Project specific goal. As stated in the Draft EIR, the proposed Project would not prevent SCAG from implementing actions that would reduce greenhouse gas emissions and the Project includes measures related to building design, landscaping, and energy systems pursuant to Title 24 guidelines that would be consistent with SCAG's goals. The Project consistency discussion within Table 5.11-1 provides justification for consistency with each goal. Thus, the Draft EIR does not need to be revised due to an inconsistency with the 2020-2045 RTP/SCS Connect SoCal document.

Comment O3.13: The comment states that the Draft EIR does not include any analysis regarding the inconsistency of the proposed Project with some of the General Plan goals and policies, and lists Policies which the Project has potential to conflict with.

Response O3.13: The Draft EIR is a public disclosure document that serves to provide information to the City's decisionmakers and elected officials when deciding whether or not to approve a project. The goal of the consistency analysis is to provide the reader with a general overview of whether a project is in harmony with the overall intent of the applicable goals and policies. It is within the City's purview to decide if the Project is consistent or inconsistent with applicable goals or policies. CEQA case law recognizes that "it is nearly, if not absolutely, impossible for a project to be in perfect conformity with each and every policy set forth in the applicable [general] plan." (*Pfeiffer v. City of Sunnyvale City Council* (2011) 200 Cal.App.4th 1552, 1563.) A compiled table of applicable Hemet General Plan goals and policies, along with the Project's consistency is included in Section 5.11, *Land Use and Planning*. In addition, the policies mentioned throughout this comment letter are not mandatory policies for the purpose of mitigating an environmental effect. In the case of *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) Cal.App.4th 704, 719, the courts found that "none of the policies on which appellant relies is mandatory, and [the] project need not be in perfect conformity with each and every policy." Thus, CEQA does not require the Project to be consistent with each comment mentioned by the commenter. However, for the purposes of this response, a consistency analysis between the Project and the relevant goals and policies that were listed by the comment is provided below. As shown in the Table below (also included as Table 5.11-2 in Section 5.11, *Land Use and Planning* of the Draft EIR), the proposed Project would be consistent with the relevant policies, and no environmental effect would result from Project and General Plan policy inconsistency.

Policy	Project Consistency
Policy LU 3.9: Incompatible Uses. Prohibit uses that lead to the deterioration of residential neighborhoods, or adversely affect it's safety or residential character.	**Consistent.** The Project proposes to develop two industrial warehouse buildings and a truck trailer parking lot on a site that is currently utilized for agricultural purposes. The nearest residential receptor to the Project site would be residences located approximately 930 feet southeast of the Project site. The Project would be consistent with the sites existing Business Park zoning and

	would include a General Plan Amendment to make the General Plan Land Use designation consistent with the existing zoning.
Policy LU 5.5: Public Spaces. Establish interesting and attractive focal points, public spaces or community uses within mixed use and transit oriented developments that are within walking distance and provide a source of activity and identity for the district.	**Not Applicable.** The proposed Project does not include any public spaces or community uses. The project is not a mixed use or transit-oriented development. Further, the Project site and adjacent areas do not provide a source of activity and identity for the district.
Policy LU 5.7: Land Use Flexibility Accommodate flexibility in the overall form and integration of land uses within the mixed use districts provided that the district conforms to the purpose and principles of mixed use and smart growth concepts as embodied in the General Plan and implementing plans and ordinances.	**Consistent.** The Project proposes to develop two industrial warehouse buildings and a truck trailer parking lot that would provide for flexibility in tenants and future uses. However, the Project does not include and is not adjacent to mixed uses. The Project site is zoned for Business Park uses and located adjacent to two truck routes designated by the General Plan and conveniently located in proximity to Highway 74 and Highway 79 and has access to available infrastructure, including roads and utilities to accommodate the growing need for goods movement within Southern California. Thus, the Project would be consistent with the smart growth concepts envisions by the General Plan.
Policy LU 5.8: Open Space. Require that adequate open space and for larger projects, recreational or community serving uses, be incorporated in mixed use development to serve the needs of the residents and businesses.	**Not Applicable.** The proposed Project does not consist of a larger project or mixed use project that would generate the need for open space. As detailed on page 5.13-7 of the Draft EIR, the proposed Project would create jobs that would be filled by residents in the Cities of Hemet, San Jacinto, and the surrounding unincorporated Riverside County areas; and that population growth that would result in the need for open space would not result from the Project.
Policy LU 10.2: Airport Land Use Compatibility. As part of the development review process, ensure appropriate land use compatibility within airport compatibility zones by utilizing the Hemet-Ryan Airport Land Use Compatibility Plan (2017) and the latest Department of Aeronautics Handbook developed by the State of California, an Airport Compatibility Study may be warranted for Projects within the Airport Influence area.	**Consistent.** As discussed above in Response O3.10, the proposed Project was found to be consistent with the 2017 Hemet-Ryan Airport Land Use Compatibility Plan by RCALUC on June 13, 2024.
Policy LU 11.6: Skilled Labor Force Encourage a variety of businesses and industries to locate in the City including clean high technology industries, innovative start-up companies, and commercial/professional office uses that provide high skill/high-wage job opportunities.	**Consistent.** The proposed Project is consistent with providing for new businesses and industries to generate employment opportunities for skilled labor. As detailed on page 6-3 of the Draft EIR, the proposed Project would create jobs that a majority of which could likely be filled by residents in the Cities of Hemet, San Jacinto, and the surrounding unincorporated Riverside County areas. The City of Hemet has had unemployment rates ranging between 5.1 and 20.2% from 2014 to 2024
Policy LU 11.7: Recruit New Business Pro-actively recruit new businesses that are currently under-represented in the City, and will create synergy in attracting other retailers to locate in the City	**Consistent.** The proposed Project is consistent with providing for new businesses and industries in the City.

Comment O3.14: The comment states that the Draft EIR does not include any analysis regarding the inconsistency of the proposed Project with some of the General Plan goals and policies related to Mixed Use and does not comply with CEQA's requirements for meaningful disclosure, including the potentially significant impacts.

Response O3.14: The comment is introductory in nature and does not raise a specific issue with the adequacy of the Draft EIR. The Project includes a General Plan Amendment to change the site's Mixed Use designation to Business Park. Thus, the EIR appropriately evaluates the proposed Project, which is the proposed development and the proposed Business Park General Plan designation that would be consistent with the existing zoning designation. Pursuant to state law, a general plan and zoning designation require consistency and any inconsistency be brought into conformance in a prompt manner. Accordingly, the Applicant is simply seeking compliance with state law to harmonize the land use designations. The proposed General Plan Amendment would result in consistency with the existing zoning and would not result in an environmental effect. Further, a land use designation in and of itself does not constitute a "land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect." It is a designation to provide development standards for projects. Therefore, the Project's proposed General Plan Amendment does not constitute a conflict with the policies of the General Plan.

Additionally, the Draft EIR does provide an analysis of buildout of the Project site pursuant to the existing Mixed Use Land Use designation. As detailed on page 8-21 of the Draft EIR, implementation of this alternative would bring more occupants and vehicle trips to the Project site that would result in an increase in air quality emissions, energy, and noise.

The Draft EIR also identifies all potentially significant as well as significant and unavoidable impacts in relation to the proposed Project. The reader is referred to Section 1.0 *Executive Summary* of the DEIR and Chapter 4 *MMRP* of this Final EIR for a description of the potential impacts and related mitigation.

Comment O3.15: The comment states that the proposed Project would not be consistent with the General Plan and its visions for the Mixed Use Area #4. The comment states that the EIR must be revised to show the inconsistencies with the Land Use District.

Response O3.15: As detailed in the previous response, the EIR appropriately evaluates the proposed Project, which is the proposed development and the proposed Business Park General Plan designation that would be consistent with the existing zoning designation. The proposed General Plan Amendment would result in consistency with the existing zoning. Development assumptions and scenarios presented in the General Plan and its program-level EIR should not be considered a "cap" on permissible acreage or square footage buildout, but simply serve as a framework upon which future project-level environmental analyses may be based. The General Amendment was discussed in the Draft EIR on pages 3-13, 3-35, 5.11-19, and 5.13-6. Potential General Plan inconsistencies that could result in an environmental effect are detailed within Table 5.11-2.

In addition, CEQA case law recognizes that the Lead Agency has the responsibility of determining whether any project is consistent with the lead agencies general plan, "the body which adopted the general plan policies in its legislative capacity has unique competence to interpret those policies when applying them in its adjudicatory capacity." (*Save Our Peninsula Com. v. County of Monterey* (2001) 87 Cal.App.4th 99, 142.) Thus, the Lead Agency has decided that the proposed Project is consistent with the policy mentioned in the comment due to the reasons mentioned above.

Comment O3.16: The comment states that the proposed Project is not consistent with General Plan Policy LU 1.12 Flexibility Over Time. The comment explains that the project would exceed the established intensity allowed in the general Plan and increase building square footage by 7%. The comment also states that the

EIR does not analyze the surrounding land use designations and must be revised to show inconsistency with the surrounding area.

Response O3.16: The comment confuses the General Plan Land Use and zoning designations. The site and surrounding areas are zoned for business park and mixed uses. There are different and sometimes inconsistent land use designations. As detailed on Draft EIR page 5.11-21, Building 1 would result in a FAR of 0.47 and Building 2 would result in a FAR of 0.39 which is below the maximum FAR of 0.60 allowed by the Business Park zoning. The General Amendment was discussed in the Draft EIR on page 3-13, 3-35, 5.11-19, and 5.13-6. As discussed in Section 3.0, *Project Description*, the proposed Project site has an existing zoning designation of Business Park and pursuant to state law, a general plan and zoning designation require consistency and any inconsistency be brought into conformance in a prompt manner. Accordingly, the Applicant is simply seeking compliance with state law to harmonize the land use designations.

The comment also incorrectly states that there are no other parcels zoned for Business Park uses surrounding the Project site. However, two parcels, one adjacent to the southwest and one across Simpson Road to the northeast of the proposed Project site are each zoned for Business Park uses. In addition, the City of Hemet is a housing rich City. Thus, the inclusion of additional industrial jobs into the City due to employment markets would be consistent with the General Plan Policy mentioned in the comment.

CEQA case law recognizes that the Lead Agency has the responsibility of determining whether any project is consistent with the lead agencies General Plan, "the body which adopted the general plan policies in its legislative capacity has unique competence to interpret those policies when applying them in its adjudicatory capacity." (*Save Our Peninsula Com. v. County of Monterey* (2001) 87 Cal.App.4th 99, 142.) Thus, the Lead Agency has decided that the proposed Project is consistent with the Policy mentioned in the comment due to the reasons mentioned above.

Comment O3.17: The comment states that the proposed Project would be inconsistent with General Plan Policy LU 1.13 Build a Strong Community as the Draft EIR does not provide any information of the City's jobs/housing balance and would have a significant and unavoidable VMT impact.

Response O3.17: The comment incorrectly states that the EIR does not provide any information regarding the City's job/housing balance. The City's jobs/housing balance is laid out in Table 5.13-5 in Section 5.13, *Population and Housing*. Both the table and the analysis within the section illustrate that the City is housing rich. Thus, additional employment from the Project would provide a benefit. As discussed in Section 5.15.7 *Cumulative Impacts*, while the proposed Project would result in a significant and unavoidable Project specific VMT impact, implementation of the proposed Project would reduce VMT on a City-wide basis due to the City's current lack of jobs for citizens residing in the area and that the Project would provide employment for local residents. Thus, the Project would not be inconsistent with the General Plan Policy mentioned in the comment and no further response is warranted.

Comment O3.18: The comment states that the proposed Project would be inconsistent with General Plan Goal LU-3 Avoid Land Use Conflict and provide compatible development, as the Project's proposed business park land use is not compatible with the surrounding mixed uses surrounding the site. The comment states that Mixed Use Area #4 is envisioned to create a residential and retail/business park node and the proposed Project does not align with this vision. The comment also notes that the proposed Project would not be consistent with General Plan Policy LU 2.4, *Concentrate Land Uses*, as the Project site is located in an isolated part of the city surrounded by rural land.

Response O3.18: As discussed in Section 3.0, *Project Description*, the proposed Project site has an existing zoning designation of Business Park, and a General Plan Amendment would be required for the site's General Plan Land Use designation to be consistent with the existing zoning. Approval of the proposed amendment would resolve the inconsistency with the existing Zoning Map. As discussed above, there are two

parcels, one adjacent to the southwest and one across Simpson Road to the Northeast that are each zoned for Business Park uses. In addition, parcels surrounding the Project are currently vacant or used for agricultural purposes. There are currently no proposed projects within the Project vicinity, including within the adjacent parcels which have a Business Park zoning designation and Mixed Use General Plan Land Use designation.

The Project proposes the development of two industrial warehouses on a site that is currently zoned for Business Park uses. The General Plan does not limit light industrial uses to parcels owned by the Metropolitan Water District, as inferred by the comment. In addition, residential land uses are allowed under the mixed-use land use designation but they are not required. Thus, the proposed industrial uses onsite would be consistent with the existing MU land use designation of the site as it is listed as an allowed use. The Project site is zoned for Business Park uses and located adjacent to two truck routes designated by the General Plan and conveniently located in proximity to Highway 74 and Highway 79 and has access to available infrastructure, including roads and utilities to accommodate the growing need for goods movement within southern California. Thus, the Project site is located in a prime location for the proposed industrial uses and is consistent with the smart growth concepts envisioned by the General Plan.

Contrary to the comment's assumption that the change in land use would increase impacts in comparison to the Project, the Draft EIR provides an analysis of buildout of the Project site pursuant to the existing Mixed Use Land Use designation. As detailed on page 8-21 of Section 8.0, *Alternatives* of the Draft EIR, implementation of this alternative would result in the same impacts to agriculture and would bring more occupants and vehicle trips to the Project site that would result in an increase in air quality emissions, energy, and noise. Further, development of the site consistent with the existing zoning designation would not result in an incompatible development.

Comment O3.19: The comment states that the EIR does not have meaningful evidence to support its conclusions that there would be a less than significant impact related to a safety hazard or excessive noise within two miles of a public airport. The comment explains that the Project is required to be reviewed by the Riverside County Airport Land Use Commission (RCALUC) after the EIR public Review period, which is deferred mitigation. The comment also notes that the building heights listed in the EIR (60 feet) are different from those in the RCALUC application (52 feet).

Response O3.19: As discussed above in Response O3.10, the proposed Project was approved by the Riverside County Airport Land Use Commission on June 13, 2024. This information has been included in Chapter 3.0, *Errata*. Thus, the proposed Project would be consistent with the General Plan Policy mentioned in the comment. In addition, the Draft EIR analyzed the proposed Project buildings at a height of 60 feet in order to include the most conservative analysis. In accordance with the Conditions of Approval provided by the RCALUC, any changes to building area or intensity are subject to an amended review to evaluate consistency with the ALUCP compatibility criteria. Thus, this comment does not contain any information requiring further changes to the EIR. No further response is warranted.

Comment O3.20: The comment states that the Draft EIR does not support the conclusions the proposed Project would be consistent with General Plan Policy LU 11.1, *Attract New Businesses*, as the Draft EIR does not provide any information about the wages of the employees, the tax revenue generated from the Project, or evidence that the unemployed population is qualified or interested in work in the industrial sector.

Response O3.20: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. CEQA is an environmental protection statute that is concerned with the physical changes to the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The project merits, including any economic and social effects of the project are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the project's potentially significant physical impacts

on the environment and does not include a discussion of tax revenue or employee wages. Furthermore, CEQA Guidelines Section 15204(a) states that when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers. Thus, information related to employee wages and tax revenue is not provided.

An analysis of the City's unemployment rate was discussed in Section 5.13, *Population and Housing*. The Draft EIR stated "the employees that would fill these roles are anticipated to come from within the City or the region, as the unemployment rate of the City of Hemet as of August 2023 was 6.3%, and the County of Riverside was 5.4% (BLS, 2023). Due to these levels of unemployment, it is anticipated that new employees at the Project site would already reside within commuting distance and would not generate substantial needs for any housing." Draft EIR page 6-3 describes that most of the new jobs that would be created by the Project would be positions that do not require a specialized workforce, and this type of workforce exists in the City of Hemet and surrounding communities. As discussed in further detail in Section 5.13, *Population and Housing,* on Table 5.13-4*,* the transportation and warehousing and utilities industries account for the third largest employment sector within the City of Hemet. Due to existing unemployment and the availability of a workforce, it is anticipated that new jobs that would be generated from Project implementation would be filled by people within the City of Hemet and surrounding communities. Thus, the proposed Project would bring jobs to the community that would be filled by members of the community, consistent with the General Plan Policy mentioned in the comment. No further response is warranted.

Comment O3.21: The comment states that the proposed Project would be inconsistent with General Plan Policy LU 11.9, C*onsider Industrial Use Locations*, because the Project site is located in a prime location and would require a General Plan Amendment. The comment concludes that the revenue or benefits provided to the City is not discussed in the EIR and the Project would result in significant and unavoidable impacts and thus the Project is inconsistent with the Policy.

Response O3.21: The commenter incorrectly equates the use of prime location in the General Plan referring to sensitive sites used in the General Plan with the use in the Draft EIR which describes the Project site. The Project site is located adjacent to two truck routes designated by the General Plan and conveniently located in proximity to Highway 74 and Highway 79 and has access to available infrastructure, including roads and utilities to accommodate the growing need for goods movement within southern California. Thus, the Project site is located in a prime location for the proposed industrial uses that are consistent with the site's existing Business Park zoning designation. As stated previously, the General Plan Amendment is required for the Project site to be consistent with the site's Business Park zoning designation.

As described previously, the Draft EIR includes an analysis of the buildout of the Project site pursuant to the existing Mixed Use Land Use designation. As detailed on page 8-21 of Section 8.0, *Alternatives* of the Draft EIR, implementation of this alternative would result in the same impacts to agriculture and would bring more occupants and vehicle trips to the Project site that would result in an increase in air quality emissions, energy, and noise in comparison to the proposed Project.

Ultimately, it is up to the City to determine what the Project benefits are and if they would outweigh any potential significant and unavoidable impacts. In accordance with CEQA Section 21081(b) and CEQA Guideline Section 15093, in order to approve the Project, the City is required to determine that the unavoidable adverse environmental impacts identified above may be considered acceptable due to specific considerations which outweigh the unavoidable, adverse environmental impacts of the Project. If the City approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the City shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. This Statement of Overriding Considerations (SOC) shall be supported by substantial evidence in the record. If the City decides to approve the project and makes a SOC, the statement will be included in the record of the project approval and will be mentioned in the notice of determination.

Per Public Resources Code § 21002.1 (a), the purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." Therefore, the Draft EIR is not intended to serve as the justification for adopting a SOC or as basis for the approval or denial of the Project, but to disclose the environmental consequences of approving the Project and a SOC. Through the public hearing process, the decision-makers within the City will take into consideration the environmental impacts caused by the Project in if it decides to approve the Project, a SOC will be required.

Comment O3.22: The comment states that the proposed Project would be inconsistent with General Plan Policy C 1.3, *Traffic Flow*, as implementation of the proposed Project would result in an unsatisfactory service level for 3 intersections, one of which is a Caltrans intersection. The comment states that the paying of fair share for road improvement does not count as mitigation as the improvements associated with the fees are not planned to occur at any certain time.

Response O3.22: As part of the 2019 amendments to the CEQA Guidelines, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion as it shall not be considered an impact on the environment. Thus, Policy C 1.3 does not warrant a consistency analysis related to a potential environmental impact.

The comment states that identification of the Project's fair share of identified improvements is not adequate if the improvement is not included in an existing DIF/TUMF program. As noted in above, level of service is not considered an environmental impact under CEQA, and therefore any recommended roadway improvements, as well as Project fair-share payments, would not be part of the CEQA process or subject to the mitigation measures or mitigation monitoring as part of the Draft EIR. No further response is required.

Comment O3.23: The comment states that the proposed Project would be inconsistent with General Plan Policy C 4.6, *Vehicle Mile Reduction*, as the proposed Project would result in a significant and unavoidable VMT impact.

Response O3.23: While the proposed Project would result in a project specific significant and unavoidable VMT impacts, the proposed Project would reduce VMT on a City-wide basis due to the provision of employment for City residents. The Project would include California Air Pollution Control Officers Association (CAPCOA) measures with the goal of reducing VMT in accordance with Senate Bill 375 and CARB, consistent with the General Plan Policy mentioned in the comment. Thus, while the Project would result in a significant and unavoidable impact to Project specific VMT, the Project would be consistent with General Plan Policy O 3.23 in implementing measures to reduce VMT at a Citywide level. No further response warranted.

Comment O3.24: The comment states that the proposed Project fails to comply with the Housing Crisis Act/ Senate Bill (SB) 330/SB 8 as the Project does not provide replacement capacity for the reduced residential development as a result of the proposed Project. The comment supports this by stating the R-4 Zoning district permits the development of 3,199 dwelling units. The comment concludes that the Project must provide 3,199 replacement units elsewhere in the city in accordance with SB 330 and the loss of residential capacity should be included as a finding of significance.

Response O3.24: The commenter erroneously applies the requirements of SB 330 to the proposed Project. As discussed on page 3-13 of the Draft EIR, the Project site has a zoning of Business Park (B-P) and not R-4. Thus, there is no residential density assigned to the Project site. The General Plan Amendment is required in

order for the site's General Plan Designation to be consistent with its existing zoning. As set forth in Government Code Section 65860, a jurisdiction's zoning ordinance is required to be consistent with the General Plan. As such, the proposed Project would be consistent with the provisions of Government Code Section 65860 and is not required to upzone a different site or identify a replacement housing site pursuant to SB 330. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.

Comment O3.25: This comment states that the Draft EIR failed to analyze the construction and operation of replacement housing that is required by SB 330 and thus is piecemealed. The comment concludes by stating that the ERI must analyze the whole of an action and include the analysis of the replacement units.

Response O3.25: As discussed above in Response O3.24, implementation of the proposed Project would not require the construction or operation of replacement sites, therefore they do not need to be included within the CEQA analysis. No further response is warranted.

Comment O3.26: The comment states that the proposed Project must provide a quantified analysis of the Project's growth compared to the General Plan's buildout. The comment requests that a revised EIR include an analysis of buildout of the Project and projects "in the pipeline" and their development intensity to determine if they would exceed the projected buildout scenario.

Response O3.26: This comment is a dupicate of Comment O3.11, please see Response O3.11.

Comment O3.27: The comment states that the proposed Project would result in an imbalance of jobs housing by adding additional jobs in a job-rich community.

Response O3.27: The commenter incorrectly states that the projected jobs/housing ratio in the City of Hemet is 2.47 in 2016 and projected to be 2.26 in 2045. As seen in Table 5.13-5 of the Draft EIR, as of 2021, the City of Hemet has a jobs/housing ratio of 0.59 and is projected to have a jobs-housing ratio of 0.75. As stated in Section 5.13, *Population and Housing*, communities with a jobs-housing ratio of less than 1.19 are considered to be housing rich, thus the proposed Project would help the City reach a better job/housing balance by creating additional jobs in the community.

Comment O3.28: The comment states that the Draft EIR must include a cumulative analysis of the impact of the proposed Project in combination with previous projects since 2016 and projects "in the pipeline" to determine if the Project would result in a cumulative exceedance of employment and population growth forecasts.

Response O3.28: Development assumptions and scenarios presented in the General Plan and its program-level EIR should not be considered a "cap" on permissible acreage or square footage buildout, but simply serve as a framework upon which future project-level environmental analyses may be based. Cumulative projects, including the Newland Kirby project, are properly included in Table 5-1 of the Draft EIR and accounted for throughout the analysis of the Draft EIR,. All previously constructed projects (i.e., completed prior to issuance of the 2023 Notice of Preparation for the Draft EIR) are considered part of the environmental baseline and have therefore been accounted for as part of the existing conditions.

Growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in master plans, land use plans, or in projections made by regional planning agencies, such as SCAG. According to SCAG's 2020-2045 RTP/SCS population and household growth forecast for Hemet, between 2016 and 2045, SCAG anticipates an employment increase of 18,500 additional jobs (from 21,700 to 40,200), yielding an 85% growth rate. SCAG also anticipates a population increase of 42,500 between 2016 and 2045 (from 81,500 to 124,000). The proposed Project would generate the need for approximately 1,158 employees, which represents approximately 2.72% of the forecasted population growth between 2016 and 2045 and approximately 6.26% of the forecasted

employment growth between 2016 and 2045 for the City. According to the Employment Development Department, as of August 2023, Hemet's unemployment rate was approximately 6.3%. Additionally, as detailed on Draft EIR page 5.11-21, Building 1 would result in a FAR of 0.47 and Building 2 would result in a FAR of 0.39 which is below the maximum FAR of 0.60 allowed by the Business Park zoning, and related employment projections. Thus, although the Project would generate additional long-term employment in the Project area, the new employment opportunities would be within the forecasted and planned growth of the City.

Comment O3.29: The comment states that the Draft EIR does not provide sufficient evidence to support the claim that the employees are expected to come from within the City or region, and the Draft EIR should be revised to support this claim with evidence of the available workforce and provide a definition for "commuting distance."

Response O3.29: See previous Response O3.20. Despite the fact that the proposed Project would require a General Plan Amendment, these actions are not considered to be precedent setting actions (defined as any act, decision, or case that serves as a guide or justification for subsequent situations), as they are commonly undertaken on a regular basis by many jurisdictions and relate specifically to the Project site. Further, as elaborated above and throughout the Draft EIR in Section 5.3, *Air Quality*, 5.11, *Land Use and Planning*, and Section 5.13, *Population and Housing*, the Project would not induce substantial population growth in an area beyond what is forecasted, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

Draft EIR page 6-3 describes that most of the new jobs that would be created by the Project would be positions that do not require a specialized workforce, and this type of workforce exists in the City of Hemet and surrounding communities. As discussed in further detail in Section 5.13, *Population and Housing,* on Table 5.13-4, the transportation and warehousing and utilities industries account for the third largest employment sector within the City of Hemet. Thus, due to existing unemployment and the availability of a workforce, it is anticipated that new jobs that would be generated from Project implementation would be filled by people within the City of Hemet and surrounding communities.

Comment O3.30: The comment states that the proposed Project would be inconsistent with General Plan Policy C 1.3, *Traffic Flow*, as implementation of the proposed Project would result in an unsatisfactory service level for 3 intersections. The comment states that the paying of fair share for road improvement does not count as mitigation as the improvements associated with the fees are not planned to occur at any certain time. The comment notes that some improvements associated with the fair share fees are listed in the Draft EIR, however some of the recommendations from Appendix N have been excluded and the Draft EIR should be revised to include all traffic improvements recommended in the report.

Response O3.30: As stated above in Response O3.22, SB 743 directed that the revised CEQA Guidelines "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]); and that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099[b][2]). As such, pursuant to Public Resources Code Section 21099(b)(2), the Draft EIR is not required to analyze impacts related to traffic congestion, as it does not constitute a potential impact to the environment. Thus, Policy C 1.3 does not warrant a consistency analysis related to potential environmental impacts.

The comment states that identification of the Project's fair share of identified improvements is not adequate if the improvement is not included in an existing DIF/TUMF program. As noted in above, level of service is not considered an environmental impact under CEQA, and therefore any recommended roadway improvements, as well as Project fair-share payments, would not be part of the CEQA process or subject to the mitigation measures or mitigation monitoring as part of the Draft EIR. No further response is warranted.

Comment O3.31: The comment states that the Projects VMT analysis was underestimated as it did not include truck/trailer/delivery van activity. The comment concludes in saying that a revised EIR must be prepared to with a revised VMT analysis to include truck/trailer/and delivery van activity.

Response O3.31: Based on local and State guidance as well as the State CEQA Guidelines Section 15064.3, VMT is an evaluation of passenger cars, not truck trips. The VMT analysis conducted therefore, only analyzed VMT/Employee for home-based-work trips as per the County Guidelines. This is consistent with State CEQA Guidelines Section 15064.3(a) which states "For the purpose of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project." Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. Hence the VMT analysis only includes and represents the impacts of automobile travel as a result of the proposed Project using RIVCOM and is not required to include truck trips as a part of the VMT analysis. Nevertheless, a Traffic Impact Analysis was prepared for the Project and is publicly available on the City's Project website included as Appendix N to the Draft EIR. The comment does not contain any information requiring changes to the Draft EIR. No further response is warranted.

Comment O3.32: This comment states that the Draft EIR does not adequately analyze the Projects potential impacts regarding hazards due to a geometric design feature. The comment explains that there are areas of overlap between truck movements and an inadequate depiction of the onsite turning radius for truck moving through the site.

Response O3.32: Building 1 would be accessible via Simpson Road from two driveways for trucks and passenger vehicles, each 40 feet in width, and one 26-foot-wide driveway for passenger vehicles. Internal circulation would be provided by 26-foot to 40-foot drive aisles. Building 2 would be accessible via Simpson Road from a 40-foot-wide driveway for trucks and passenger vehicles and 26-foot-wide driveway for passenger vehicles. Internal circulation would be provided by 26-foot to 70-foot drive aisles. Access to the proposed trailer parking lot beyond Warren Road to the east would be via Simpson Road from a 40-foot driveway. The proposed trailer parking lot would include 70-foot-wide drive aisles. There are no unique bends or obstacles along Simpson Road and Warren Road. The onsite circulation design provides truck accessibility and turning ability throughout the site. Therefore, there is no geometric design feature that would prevent trucks or result in impacts from trucks accessing the site. In addition, the plans provided in the Draft EIR are conceptual plans. Should the Project be approved, design level civil engineering plans would be prepared and reviewed by the City's engineering staff prior to issuance of construction related permitting to ensure that all applicable turning and access standards are met, which include both California Fire Code and California Building Code requirements, as included in the City's Municipal Code (Sections14-75 and 14-40).

Comment O3.33: The comment states that the Draft EIR is deterring analysis by stating that development plans would be reviewed by the Hemet Fire Protection District prior to approval. The comment concludes that the Draft EIR should be revised to include the HFPD determination/review of the Project site.

Response O3.33: Figure 3-7, *Proposed Conceptual Site Plan*, of the Draft EIR, depicts emergency vehicle access to the site. As detailed in Section 3.0, *Project Description*, the proposed Project would provide emergency access to the site from six driveways located along Simpson Road. Building 1 would be accessible via Simpson Road from two driveways for trucks and passenger vehicles, each 40 feet in width, and one 26-foot-wide driveway for passenger vehicles. Internal circulation would be provided by 26-foot to 40-foot drive aisles. Building 2 would be accessible via Simpson Road from a 40-foot-wide driveway for trucks and passenger vehicles and 26-foot-wide driveway for passenger vehicles. As detailed in Response O1.32, the proposed onsite conceptual circulation design provides emergency vehicle accessibility and turning ability throughout the site and does not identify potential significant environmental impacts. Should the Project be approved, design level civil engineering plans would be prepared and reviewed by the City's engineering staff prior to issuance of construction related permitting to ensure that all applicable emergency access

standards are met, which include both California Fire Code and California Building Code requirements, as included in the City's Municipal Code (Sections 14-75 and 14-40). This is not a deferral of analysis, but the City's standard development review and permitting process to ensure that all applicable design requirements are met, including emergency access.

Comment O3.34: This comment states that the Project has not provided any analysis of horizontal and vertical sight distance at the intersection of Project driveways and adjacent streets.

Response O3.34: Issues related to horizontal and vertical sight distance are design level civil engineering issues that are to be verified by the City's engineering division during permitting of development projects and are regulated by the California Fire and Building Codes, which are included in the City's Municipal Code as detailed previously. As detailed on Figure 3-7, *Proposed Conceptual Site Plan*, the proposed Project would include a landscape setback of approximately 20 feet along the northern border of the site along Simpson Road, building setbacks of approximately 185 feet from the east and west property lines, a landscape setback of approximately 20 feet along the western property line, and a landscape setback of approximately 5 feet along the southern property line. This proposed conceptual design does not identify potential significant environmental impacts. The City's traffic engineering division would review and approve plans prior to issuance of construction-related permitting to ensure that all applicable sight distance standards are met. Thus, potential impacts related to geometric designs that involve site distance would not occur.

Comment O3.35: The comment states that the Draft EIR must include a cumulative analysis of the impact of the proposed Project in combination with previous projects since 2016 and projects "in the pipeline" to determine if the Project would result in a cumulative exceedance of employment and population growth forecasts. The comment also states that since there is no known tenant for the proposed buildings, there is no assurance that the new jobs associated with the Project would not require a specialized workforce, and a finding of significance must be made.

Response O3.35: Development assumptions and scenarios presented in the General Plan and its program-level EIR should not be considered a "cap" on permissible acreage or square footage buildout, but simply serve as a framework upon which future project-level environmental analyses may be based. Cumulative projects are properly included in Table 5-1 of the Draft EIR and accounted for throughout the analysis of the Draft EIR, including the Newland Kirby project. All previously constructed projects (i.e., completed prior to issuance of the 2023 Notice of Preparation for the Draft EIR) are considered part of the environmental baseline and have therefore been accounted for as part of the existing conditions.

Growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in master plans, land use plans, or in projections made by regional planning agencies, such as SCAG. According to SCAG's 2020-2045 RTP/SCS population and household growth forecast for Hemet, between 2016 and 2045, SCAG anticipates an employment increase of 18,500 additional jobs (from 21,700 to 40,200), yielding a 85% growth rate. SCAG also anticipates a population increase of 42,500 between 2016 and 2045 (from 81,500 to 124,000). The proposed Project would generate the need for approximately 1,158 employees, which represents approximately 2.72% of the forecasted population growth between 2016 and 2045 and approximately 6.26% of the forecasted employment growth between 2016 and 2045 for the City. According to the Employment Development Department, as of August 2023, the City of Hemet's unemployment rate was approximately 6.3%. As discussed in further detail in Section 5.13, *Population and Housing*, on Table 5.13-4, the transportation and warehousing and utilities industries account for the third largest employment sector within the City of Hemet. Additionally, as detailed on Draft EIR page 5.11-21, Building 1 would result in a FAR of 0.47 and Building 2 would result in a FAR of 0.39 which is below the maximum FAR of 0.60 allowed by the Business Park zoning, and related employment projections. Thus, although the Project would generate additional long-term

employment in the Project area, the new employment opportunities would be within the forecasted and planned growth of the City.

Comment O3.36: The comment states that the proposed Project must provide a quantified analysis of the Project's growth compared to the General Plan's buildout. The comment requests that a revised EIR include an analysis of buildout of the Project and projects "in the pipeline" and their development intensity to determine if they would exceed the projected buildout scenario.

Response O3.36: This comment is a dupicate of Comment O3.11, please see Response O3.11.

Comment O3.37: The comment states that the Draft EIR must be revised to include a Significant and Unavoidable impact for the removal of the Mixed Use land use designation for the purpose of avoiding or mitigating an environmental effect.

Response O3.37: This comment is conclusive in nature and does not provide any substantial evidence that the Project would result in a new significant environmental impact. Despite the fact that the proposed Project would require a General Plan Amendment, these actions are not considered to be precedent setting actions (defined as any act, decision, or case that serves as a guide or justification for subsequent situations), as they are commonly undertaken on a regular basis by many jurisdictions and relate specifically to a particular Project site. The Project includes a General Plan Amendment to change the site's Mixed Use designation to Business park; however, a land use designation in and of itself does not constitute a "land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect." It is a designation to provide development standards for projects. Therefore, the Project's proposed General Plan Amendment does not constitute a conflict with the policies of the General Plan. Significant and unavoidable impacts under the proposed Project are only related to agriculture, noise, greenhouse gas emissions, and transportation and are disclosed in the Draft EIR. As described previously, the Draft EIR includes an analysis of the buildout of the Project site pursuant to the existing Mixed Use land use designation. As detailed on page 8-21 of the Draft EIR, buildout of the existing Mixed Use land use designation would result in the same impacts to agriculture and would bring more occupants and vehicle trips to the Project site that would result in an increase in air quality emissions, energy, and noise in comparison to the proposed Project.

Comment O3.38: The comment states that a revised Draft EIR must be completed that includes an alternative that evaluate an alternative that meets the Projects objectives and eliminates all the Project's significant and unavoidable impacts. The comment also states that the Draft EIR must also be revised to provide a quantitative analysis of the alternatives for impacts such as GHG.

Response O3.38: The Draft EIR included a comprehensive analysis of Project Alternatives as required by CEQA Guidelines Section 15126.6. The "range of alternatives" to be evaluated is governed by the "rule of reason" and feasibility, which requires the EIR to set forth only those alternatives that are feasible and necessary to permit an informed and reasoned choice by the Lead Agency and to foster meaningful public participation (CEQA Guidelines Section 15126.6(f)). Additionally, State CEQA Guidelines Section 15126.6(b) emphasizes that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project.

As detailed in Draft EIR Section 8.0, *Alternatives*, the proposed Project is consistent with the current zoning of the site and would result in significant and unavoidable impacts related to agriculture, greenhouse gas emissions, noise and transportation. One alternative (Alternate Site Alternative) was considered but rejected due to its infeasibility and lack of ability to meaningfully reduce Project impacts while meeting Project objectives. Instead, a No Project/ No Development Alternative, a Reduced Project alternative, and a No Project/ Buildout of Existing Land Use Alternative. As such, the alternatives utilized by the EIR provide a reasonable range of alternatives pursuant to CEQA Guidelines Section 15126.6.

Draft EIR Page 8-1 states that a pursuant to State CEQA Guidelines Section 15126.6(d), discussion of each alternative presented in this Draft EIR section is intended "to allow meaningful evaluation, analysis, and comparison with the proposed project." As permitted by CEQA, the significant effects of each alternative are discussed in less detail than those of the proposed Project, but in enough detail to provide perspective and allow for a reasoned choice among alternatives to the proposed Project. The qualitative analysis provided is sufficient to support the impacts claims.

As shown on Table 8-1, Alternative 2 is expected to generate approximately 479 daily trips, compared to the proposed Projects 2,539. Since trips are calculated based on building square footage, an 81% decrease in building area with the same proposed use would result in an 81% decrease in trips. Given that a majority of GHG emissions are from mobile emissions, it is expected that this reduction would be greatly reduced compared to the proposed Project.

Comment O3.39: This comment states that GSEJA believes the EIR is flawed and must be revised and recirculated for public review. GSEJA also requests to be added to the public interest list for the proposed Project.

Response O3.39: The comment is conclusionary in nature and as stated above GSEJA will be added to the public interest list for the proposed Project. As substantiated by the previous responses above and below, none of the conditions arise which would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Therefore, no further response is warranted.

Comment O3.40: This comment states that SWAPE has reviewed the Draft EIR and states that the EIR fails to adequately evaluate the air quality, health risk, and greenhouse gas impacts and suggests that a revised EIR be prepared.

Response O3.40: This comment is introductory in nature and introduces the inadequacies of the Draft EIR that will be further discussed within the comment. Because the comment does not raise any specific concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Thus, no further response is warranted.

Comment O3.41: The comment states that since the Project site is located on a site that has historically been used for agricultural purposes, a revised EIR including soil sampling for residual concentrations of pesticides must be included.

Response O3.41: As detailed by the comment, the Phase I Environmental Site Assessment prepared for the site did not identify any evidence of excessive pesticide use and concentrations were recorded below regulatory levels and background concentrations. This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Section 152049(c) of the CEQA Guidelines advises that comments should be accompanied by factual support, stating "[r]eviewers should explain the basis for their comments and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence." Where comments provide no facts or other substantial evidence to support an assertion, or where comments do not explain why the evidence supporting a conclusion in the Draft EIR is not substantial evidence, the Final EIR is not required to alter a significance determination of the Draft EIR. While CEQA permits disagreements of opinion with respect to environmental issues addressed in the EIR (see Section 15151 of the CEQA Guidelines ["disagreement among experts does not make an EIR inadequate… the courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure"].) The Draft EIR for the proposed Project provides an adequate, complete, and good faith effort at full disclosure of the physical environmental impacts of the proposed Project and the conclusions are based upon substantial evidence in light of the whole record. Thus, no further response is warranted.

Comment O3.42: This comment states that the CalEEMod default data was changed for modeling of the proposed Project and that CEQA requires such changes be justified by substantial evidence. The comment states that when default values in the program are changed, output files are produced which disclose to the reader which values within the program have been changed.

Response O3.42: The comment is informational in nature and does not raise any specific concerns with the adequacy of the Draft EIR or raise any other specific CEQA issue. It is typical in the modelling method, that default CalEEMod data is revised, so that the modeling accurately depicts construction and/or operation of each proposed Project. No revisions per this comment are required and no further response is warranted..

Comment O3.43: This comment states that CalEEMod provides recommended default values based on site-specific information and that the user can change the default values and input project-specific values, but CEQA requires that such changes be justified by substantial evidence. The comment states that once all of the values are inputted into the model, the project's construction and operational emissions are calculated, and "output files" are generated that disclose what parameters are utilized in calculating the project's air pollutant emissions and make known which default values are changed as well as provide justification for the values selected. The comment claims that CalEEMod version 2022.1 is relied upon to estimate project emissions, which poses a problem as the currently available version of CalEEMod 2022.1 is described as a "soft release" which fails to provide complete output files. Further, the comment states that the "User Changes to Default Data" table no longer provides the quantitative counterparts to the changes to the default values and that previous CalEEMod Versions, such as 2020.4.0, include the specific numeric changes to the model's default values. The commenter claims that to remedy this issue, the Draft EIR should have provided access to the model's ".JSON" output files, which allow third parties to review the model's revised input parameters.

Response O3.43: The commenter is incorrect that CalEEMod 2022.1 is a "soft release." As indicated in the CalEEMod release notes, CalEEMod version 2022.1 was approved for full launch on 12/21/2022 and the "soft release" message was removed.[2] As such, CalEEMod version 2022.1 is appropriate for use and the analysis is adequate as presented.

In addition, as discussed on pages 10 and 11 of the CalEEMod User's Guide for CalEEMod version 2022.1, CalEEMod was designed to allow the user to change the defaults to reflect site- or project-specific information when available. Thus, modifications to CalEEMod defaults are used when more detailed information is known about a project such as the construction timeline and the mix of equipment use. Modifications made to the CalEEMod defaults as a part of this Project were done in order to provide an accurate snapshot of the Project's construction and operational details. Modifications to defaults and the explanations are noted in the output report. Pages 43 of the CalEEMod outputs (Appendix 3.1 of the Air Quality Impact Analysis) identifies the user changes that were made CalEEMod. The ".JSON" files are input files, not output files. As such, all output files were included in Appendix 3.1 of the Air Quality Impact Analysis.

Comment O3.44: The comment states that the comments discovered inconsistencies between the model inputs and the information within the Draft EIR, thus a revised Draft EIR must be prepared to include an updated air quality analysis.

Response O3.44: The comment does not raise any specific concerns with the adequacy of the Draft EIR or raise any other CEQA issue. As discussed throughout these responses and the Air Quality Report and Health Risk Analysis (Appendix C and D of the Draft EIR), the Project was properly modeled and analyzed and the

[2] California Air Pollution Control Officers Association (CAPCOA). Release Notes. Retrieved September 2022 from https://www.caleemod.com/release-notes

proposed Project would not result in potentially significant air quality or health risk impacts. No further response is warranted.

Comment O3.45: The comment states that since there are no known tenants for the proposed buildings, the modeling should include refrigerated warehouse space, which would result in increased emissions or provide substantial evidence for not including cold storage in the analysis.

Response O3.45: As identified on page 3-33 of Section 3.0, *Project Description* Draft EIR, the building is not designed to accommodate and would not include any warehouse cold storage or refrigerated uses. As such, cold storage is not included as part of this Project. Additionally, the Project would be conditioned to prohibit future cold storage uses. Should the Project later be modified to propose cold storage, the analysis would be revised under subsequent CEQA evaluation to evaluate the Project change, including air toxic emissions and health impacts from cold storage and TRUs.

Comment O3.46: The comment states that the CalEEMod output files show unsubstantiated changes to the default operational vehicle fleet mix, and they must be revised to show the percentages used to calculate the Project's operational emissions.

Response O3.46: This comment does not provide any substantial evidence that the Project would result in a significant environmental impact. Section 152049(c) of the CEQA Guidelines advises that comments should be accompanied by factual support, stating "[r]eviewers should explain the basis for their comments and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence." Where comments provide no facts or other substantial evidence to support an assertion, or where comments do not explain why the evidence supporting a conclusion in the Draft EIR is not substantial evidence, the Final EIR is not required to alter a significance determination of the Draft EIR. While CEQA permits disagreements of opinion with respect to environmental issues addressed in the EIR (see Section 15151 of the CEQA Guidelines ["disagreement among experts does not make an EIR inadequate . . . the courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure"].) The Draft EIR for the proposed Project provides an adequate, complete, and good faith effort at full disclosure of the physical environmental impacts of the proposed project and the conclusions are based upon substantial evidence in light of the whole record.

As discussed on page 34 of Appendix 3.2 of the Air Quality Impact Analysis (Appendix B of the Draft EIR), trip generation rates used in CalEEMod for the Project were based on the Project's VMT Analysis (Appendix O of the Draft EIR), which identifies that the proposed Project would generate approximately 2,539 average daily trips, including 2,087 passenger vehicle trips, 96 two-axle truck trips, 61 three-axle truck trips, 33 four-axle truck trips, and 259 five+-axle truck trips.

Therefore, the modeling is conservative as it increases the percentage of medium duty truck trips from the default 1.73% to 2.5% and increases the percentage of heavy heavy duty (HHD) truck trips from the default of 1.76% to assume 11.50% consistent with the VMT Analysis prepared for the proposed Project. As such, the commenter is incorrect that the modeling included unsubstantiated changes that may underestimate the Project's mobile source emissions. Therefore, no further response is warranted.

Comment O3.47: This comment states that the commenter prepared an updated CalEEMod model, using the Project-specific information provided by the Draft EIR, omitting the changes to operational fleet mixes and states that NOx emissions would increase by approximately 27.4% and exceed the applicable significance threshold resulting in a potentially significant air quality impact that was not previously identified or addressed in the Draft EIR.

Response O3.47: The comment does not raise any specific concerns with the adequacy of the Draft EIR or raise any other issue related to requirements under State CEQA Guidelines. As discussed throughout

responses O3.40 to O3.46, and the Air Quality Report and Health Risk Analysis (Appendix C and D of the Draft EIR), the Project has been properly modeled and analyzed and the analysis has determined that the proposed Project would not result in potentially significant air quality or health risk impacts. The modeling provided by the comment included default operational fleet mix values that are not specific to the proposed Project as determined by the Lead Agency. As these values do not represent the Project, the increased emissions that result from them are also not applicable. No further response is warranted.

Comment O3.48: This comment states that the less than significant health risk impact based on the Mobile Health Risk Assessment in Appendix D to the Draft EIR is incorrect based off two reasons.

Response O3.48: The comment is introductory in nature and does not identify the specific issue with the adequacy of the Draft EIR. Because the comment does not express the specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

Comment O3.49: This comment states that the first reason the Health Risk Assessment is flawed is that it relies upon a flawed air model based on the comments mentioned above (in Comment O3.46) and thus should not be relied upon.

Response O3.49: Refer to Response O3.46. As discussed throughout these responses, and the Air Quality Report and Health Risk Analysis (Appendix C and D of the Draft EIR), the Project was properly modeled and analyzed, and the proposed Project would not result in potentially significant air quality or health risk impacts. No further response is warranted.

Comment O3.50: This comment states that the Draft EIR underestimates the exposure assumptions for fraction of time at home.

Response O3.50: As detailed in Section 5.3, *Air Quality*, of the Draft EIR, the HRA that was completed for the Project provides the appropriate conservative analysis pursuant to SCAQMD, CARB, and OEHHA recommended methodology. Per OEHHA methodology, the HRA included refinements to identify potential effects to smaller human body weights and breathing rates to assess risk to children, which was done as detailed in the methodology provided on page 22 and 23 of the HRA (Appendix D of the Draft EIR). In addition, the HRA provides a conservative analysis by evaluating the closest receptors with the maximum potential emissions and continuous exposure (24-hours per day). Thus, stringent significance thresholds and methodology that is consistent with resource agency direction was utilized in the Draft EIR to determine potential impacts to residents and school children, which determined that impacts would be less than significant, and mitigation is not required. The thresholds utilized were based on the City's discretion (as Lead Agency) and are supported by substantial evidence from SCAQMD, CARB, and OEHHA.

Comment O3.51: This comment states that the Draft EIR fails to implement all feasible mitigation measures related to the Projects significant and unavoidable impacts related to NOx emissions and provides a list of mitigation measures found in the 2020 SCAG RTP/SCS Program EIR and the Department of Justice that incorporate feasible ways to include lower-emitting design features into the Project.

Response O3.51: As discussed throughout these responses, and the Air Quality Report and Health Risk Analysis (Appendix C and D of the Draft EIR), the Project was properly modeled and analyzed and the proposed Project would not result in significant air quality or health risk impacts with implementation of identified mitigation. Significant and unavoidable impacts related to NOx would not occur. Thus, there is no nexus to provide additional mitigation measures such as limiting the amount of grading surface area to reduce NOx emissions. Thus, no further response is warranted.

Comment O3.52: This comment states that the commenter has received limited discovery regarding the Project, additional information may become available in the future; and the commentor retains the right to revise or amend this report when additional information becomes available.

Response O3.52: This comment is advisory in nature and disclaims that the commenter has the right to revise the report as additional information becomes available. The comment does not raise any specific concerns with the adequacy of the Draft EIR or raise any other CEQA issue. Therefore, no further response is warranted.

Letter O4: Golden State Environmental Justice Alliance (1 page)

From: Adam Salcido
To: Monique Alaniz-Fleiter
Cc: Executive Director; Assistant Executive Director; Josh Bourgeois; Steven Piepkorn; Ramon Amaya; Pete Sheehan; Stanley Saltzman
Subject: Newland Simpson Road Project
Date: Friday, June 28, 2024 4:58:17 PM

Warning: This email originated from outside the City of Hemet. Think before you click!

Good Afternoon Ms. Flejter,

Please provide any updates to the above mentioned project.

I am requesting under Public Resource Code Section 21092.2 to add the email addresses and mailing address below to the notification list, regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project.

executivedirector@goldenstateeja.com

assistantexecutivedirector@goldenstateeja.com

jbourgeois@goldenstateeja.com

asalcido@goldenstateeja.com

spiepkorn@goldenstateeja.com

ramaya@goldenstateeja.com

psheehan@goldenstateeja.com

ssaltzman@goldenstateeja.com

O4.1

Mailing Address:

P.O. Box 79222

Corona, CA 92877

Please confirm receipt of this email.

Response to Letter O4: Golden State Environmental Justice Alliance, dated June 28, 2024

Comment O4.1: This comment states that Golden State Environmental Justice Alliance would like to be added to the notification list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for the Project. The comment included eight email addresses and one mailing address.

Response O4.1: Golden State Environmental Justice Alliance will be added to the notification list and provided future notices for the Project and Hearings. Because the comment does not express any specific concern or question regarding the adequacy of the Draft EIR, no further response is warranted.

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3. Revisions to the Draft EIR

This section contains revisions to the Draft EIR based on: (1) clarifications required to prepare a response to a specific comment; and/or (2) typographical errors. The revisions do not alter any of the significance conclusions that were previously disclosed in the Draft EIR. Changes made to the Draft EIR are identified here in ~~strikeout~~ text to indicate deletions and in **bold and double underlined** text to indicate additions.

3.1 REVISIONS IN RESPONSE TO WRITTEN COMMENTS AND CITY CHANGES TO TEXT

The following text, organized by Draft EIR Chapters and Sections, have been revised based on response to comments received on the Draft EIR and corrections identified by the City of Hemet.

Chapter 3.0, Project Description

The second paragraph on page 3-16, in Section 3.0, *Project Description*, is revised as follows:

The proposed Project would include approximately 483,977 SF (or 11.11 acres) of landscaping that would cover about 24.5-percent of the Project site. Proposed landscaping would include 24-inch box and 15-gallon trees along with various shrubs, and groundcover to screen the proposed buildings, parking, and loading areas from off-site viewpoints. Landscaping would be provided along the perimeter of each building and throughout the parking areas and site boundaries as shown in Figure 3-10, *Conceptual Landscape Plan*. The Project would also include lighting throughout the parking areas, which would be hooded or oriented away from the property boundaries pursuant to City of Hemet Municipal Code Section 90-1046(e).

The Project would include fencing surrounding proposed buildings and the truck trailer lot**, and a six-foot-high concrete screen wall along the western property line.**

Chapter 5.1, Aesthetics

The first paragraph on page 5.1-8, in Section 5.1, *Aesthetics*, is revised as follows:

The Project would develop two industrial warehouse buildings that would be approximately 60-feet tall and would be set back from the adjacent streets so as not to encroach into the existing public long-distance views. The proposed Project has a minimum landscaped setback of 30-feet along Simpson Road and 20 feet from Warren Road, building setbacks of approximately 185-feet from the east and west property lines, and a landscape setback of approximately 10-feet along the southern property line. The building setbacks would ensure that public views along the nearby roads would not be impacted, and landscaping would ensure that views of the site would be broken up and avoid monotonous views of the large walls of the buildings. In addition, the Project would also install a 12-foot-wide sidewalk on all Project frontages on Warren Road and Simpson Road. **The proposed Project's six-foot-high concrete wall along the western property line would be perpendicular to any public views facing south on Simpson Road and would therefore not interfere with any long-range views.** The building height, massing, setbacks, new sidewalks and layered landscaping along Simpson Road and Warren would ensure that public views of the Domenigoni Mountains remain visible to vehicles and pedestrians traveling along Warren Road and Simpson Road, as shown in Figure 5.1-1.

Chapter 5.6, Energy

The first listed reference on page 5.6-14, in Section 5.6, *Energy*, is revised as follows:

California Energy Commission. (Updated December 23, 2022). *2022 Title 24 Building Energy Standards*. Retrieved December 4, 2023 from ~~https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency~~ **https://www.energy.ca.gov/sites/default/files/2022-08/CEC-400-2022-010_CMF.pdf**

Chapter 5.7, Geology and Soils

Paragraph 2 from Mitigation Measure PAL-1: Paleontological Monitoring on Page 5.7-14, in Section 5.7, *Geology and Soils*, is revised as follows:

The PRIMP shall also require that in areas mapped as late to middle Pleistocene old alluvial fan deposits, monitoring ~~will~~ **shall** be conducted full-time in undisturbed alluvium starting at the surface. In areas mapped as Holocene to late Pleistocene young alluvial valley deposits, monitoring shall be conducted full-time in undisturbed alluvium starting at a depth of five feet below the surface during grading or excavation activities. In the event paleontological resources are encountered, ground disturbing activity within 50 feet of the area shall cease. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered pursuant to the guidelines of the Society of Vertebrate Paleontology (SVP, 2010).

Chapter 5.8, Greenhouse Gas Emissions

Mitigation Measure GHG-7 on page 5.8-18, in Section 5.8, *Greenhouse Gas Emissions*, is revised as follows:

Prior to issuance of an occupancy permit, the City shall confirm that **the Applicant has fully funded** signs **to be** ~~clearly identifying approved truck routes have been~~ installed on Simpson Road and Warren Road **to clearly identify approved truck routes.**

Mitigation Measure GHG-10 on page 5.8-18, in Section 5.8, *Greenhouse Gas Emissions*, is revised as follows:

Prior to **tenant occupancy for each building/occupancy,** ~~issuance of a Certificate of Occupancy for each building/occupancy providing for 250 or more employees~~, each owner/tenant shall develop a use/occupant-specific transportation demand management (TDM) program. The TDM program shall be submitted to the City Planning Division and City Building & Safety Division for review and approval as part of tenant improvements plan(s) documentation. Recommended California Air Pollution Control Officers Association (CAPCOA) TDM program elements are listed below:

- Provide pedestrian and bicycle network improvements within the development connecting to existing off-site facilities.
- Where applicable ensure design of key intersections and roadways encourage the use of walking, biking and where applicable transit.
- Commute trip reduction (CTR) programs offered to encourage the use of vanpools, carpooling, public transit, and biking.
- Provide CTR program marketing including information sharing and marketing to promote and educate employees about their travel choices to the employment location.
- CTR programs may also provide for alternative work or compressed work schedules to reduce the number of days an employee commutes to work.
- Provision of on-site facilities to provide end of trip services for bicycling such as secure bike parking and storage lockers.

- Provide reserved preferential parking spaces for car-share, carpool, and ultra-low or zero emission vehicles.

Chapter 5.9, Hazards and Hazardous Materials

Page 5.9-16, in Section 5.9, Hazards and Hazardous Materials, is revised as follows:

Due to the nature of the required City approvals (i.e., the proposed General Plan Amendment), the City of Hemet is required, pursuant to Public Utilities Code Section 21676, to refer the proposed Project to the ALUC for ALUC review. **On June 13, 2024, the proposed Project was found to be consistent with the 2017 Hemet-Ryan Airport Land Use Compatibility Plan by RCALUC.** The proposed Project would comply with this ALUC notification and all other applicable rules and regulations as they pertain to the Hemet-Ryan Airport and airport safety. Overall, because the proposed Project is not located within compatibility zones A through D of the Hemet-Ryan Land Use Compatibility Plan or the designated Hemet-Ryan Airport noise contours; and it would not result in hazards related to excessive glare, light, steam, smoke, dust, or electronic interference, the proposed Project would not introduce a safety hazard associated with airport operations for people residing, working, and visiting the Project site.

Chapter 5.10, Hydrology and Water Quality

Page 5.10-27, in Section 5.10, *Hydrology and Water Quality*, is revised as follows:

FEMA (Federal Emergency Management Agency). (October 2020). Flood Insurance Rate Map (FIRM) 06065C1430H. ~~https://hazards-fema.maps.arcgis.com/apps/webappviewer/ index. html?id = 8b0adb51996444d4879338b5529aa9cd.~~ **https://www.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd**

Chapter 5.12, Noise

PDF NOI-1, on page 5.12-36, Section 5.12, *Noise*, is revised as follows:

All construction activities shall comply with HMC Section 30-32[a][43], restricting construction activities to the approved hours of construction as set forth on a permit or other city entitlement as issued **by** the **City's** building official, **P**~~p~~lanning **C**ommission, or **C**~~c~~ity **C**ouncil, or as otherwise prohibited by the Hemet Building Code.

Chapter 5.13, Population and Housing

The follow references on page 5.13-9 in Section 5.13, *Population and Housing*, are revised as follows:

BLS (U.S. Bureau of Labor Statistics). August 2023. *BLS Data Viewer*. Retrieved August 2023 from: ~~https://beta.bls.gov/dataQuery/search~~ **https://www.bls.gov/data/home.htm#**

City of Hemet. January 2012. *General Plan 2030*. Retrieved October 2023 from: https://www.hemetca.gov/534/Final-General-Plan-2030

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Chapter 5.15, Transportation

Table 5.15-1: Existing Roadway Characteristics within project Aera, in Section 5.15, *Transportation*, is revised as follows:

Table 5.15-1: Existing Roadway Characteristics within Project Area

Roadway	Classification[1]	Direction	Existing Travel Lanes	Median Type[2]	Speed Limit
SR 79	Expressway	North-South	**2**~~4~~	NM, TWLTL	**Varies from 35 to 55**~~50~~
SR 74	Expressway	East-West	**4**~~2~~	NM	**55**~~40~~
Warren Road	~~Arterial 6D~~ **Divided Secondary-B 4D**	~~East-West~~ **North-South**	2	TWLTL	**55**~~45~~
Simpson Road	Secondary 4U	East-West	2	NM	**50**~~40~~
Domenigoni Parkway	Arterial 6D	North-South	**4**~~2~~	NM	**65**~~25~~
Stetson Avenue	Collector **2U**	**East-West** ~~North-South~~	2	NM	**30**~~35~~
Mustang Way	~~Interstate Freeway~~ **Secondary 4U**	**East-West** ~~North-South~~	~~4~~6	NM	**35**~~65~~

Table 5.15-6: Project Completion Conditions Peak Hour Levels of Service, in Section 5.15, *Transportation,* is revised as follows:

Table 5.15-2: Project Completion Conditions Peak Hour Levels of Service

		AM Peak		PM Peak	
Intersection	**Control Type**	**Delay**	**LOS**	**Delay**	**LOS**
1. SR 79/SR 74	Signal	36.3	D	50.8	D
2. SR 79/Simpson Rd	Signal	27.0	C	21.7	C
3. SR 79/Domenigoni Pkwy	Signal	93.5	F	122.2	F
4. Warren Rd/Simpson Rd	AWSC	20.5	C	21.4	C
5. Warren Rd/Domenigoni Pkwy	Signal	67.2	E	44.8	D
6. Warren Rd/SR 74	Signal	37.7	D	~~39.0~~ **38.9**	D
7. Warren Rd/Stetson Ave	AWSC	105.1	F	~~121.5~~ **121.2**	F
8. Warren Rd/Mustang Way	Signal	11.6	B	~~12.9~~ **9.6**	A
9. Project Dwy-1/Simpson Rd	TWSC	12.3	B	~~9.0~~ **12.9**	~~A~~ B
10. Project Dwy-2/Simpson Rd	TWSC	9.1	A	9.3	A
11. Project Dwy-3/Simpson Rd	TWSC	9.2	A	9.7	A
12. Project Dwy-4/Simpson Rd	TWSC	12.7	B	13.6	B

		AM Peak		PM Peak	
Intersection	**Control Type**	**Delay**	**LOS**	**Delay**	**LOS**
13. Project Dwy-5/Simpson Rd	TWSC	9.1	A	9.7	A
14. Project Dwy-6/Simpson Rd	TWSC	16.7	C	20.1	C

Source: EPD Solutions, 2024a (Appendix N)
AWSC = All Way Stop Control
TWSC = Two Way Stop Control
Delay Reported in Seconds per Vehicle
LOS = Level of Service

The third paragraph on page 5.15-15, in Section 5.15, *Transportation,* is revised as follows:

It should also be noted that intersection #1 (SR 79/SR 74) would operate at an unsatisfactory LOS F during the PM peak hour under cumulative conditions. As such, the Project would be required to pay fair share for the following improvements to achieve a satisfactory intersection LOS D:

- #1- SR 79/SR 74: Restripe the northbound-left to **an exclusive left-turn lane, exclusive thru lane, and exclusive right-turn lane** ~~northbound left-thru lane, restripe northbound thru-right lane to exclusive right-turn lane~~, add right-turn overlap phasing.
- #3- SR 79/Domenigoni Parkway: Add right-turn overlap to northbound right, add eastbound thru-lane. **Restrict U-turn on all approaches. Accommodate an additional westbound turn receiving lane by expanding the width of westbound intersection departure section by four feet.**
- #5- Warren Road/Domenigoni Parkway: Restripe the westbound right-turn lane to a shared thru-right lane.
- #7- Warren Road/Stetson Avenue: Install traffic signal**, add northbound, southbound, and eastbound left-turn lane.**
    - **Left-turn lanes are required for safety reasons on the southbound approach, due to the high southbound left-turn volume.**

Left-turn lanes are recommended for better intersection operations on the northbound and eastbound approaches.

Chapter 8.0, Alternatives

The third paragraph on page 8-9, in Section 8.0, *Alternatives*, is revised as follows:

This alternative would also avoid the significant and unavoidable impacts to air quality, agriculture, greenhouse gas emissions, noise, and vehicle miles traveled. This alternative would result in lessened impacts to all ~~16~~ **18** of the ~~16~~ **18** environmental topics analyzed in this Draft EIR (see Table 8-3).

The third paragraph on page 8-15, in Section 8.0, *Alternatives*, is revised as follows:

Many of the mitigation measures would still be applicable to this alternative; however, this alternative would result in lessened impacts to ~~14~~ **16** of the ~~16~~ **18** environmental topics analyzed in this Draft EIR (see Table 8-3).

The fourth paragraph on page 8-21, in Section 8.0, *Alternatives*, is revised as follows:

While some impacts would be reduced, many of the impacts under this alternative would increase. All mitigation measures would still be applicable to this alternative; however, this alternative would result in lessened impacts to 4 of the ~~16~~ **18** environmental topics analyzed in this Draft EIR (see Table 8-3).

The fifth paragraph on page 8-22, in Section 8.0, *Alternatives*, is revised as follows:

This alternative would result in lessened impacts to ~~14~~ **16** of the ~~16~~ **18** environmental topics analyzed in this EIR.

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4. Mitigation Monitoring and Reporting Program

4.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires a lead or public agency that approves or carries out a project for which an Environmental Impact Report has been certified which identifies one or more significant adverse environmental effects and where findings with respect to changes or alterations in the project have been made, to adopt a "…reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment" (Public Resources Code Sections 21081, 21081.6).

A Mitigation Monitoring and Reporting Program (MMRP) was prepared to ensure that adopted mitigation measures are successfully implemented for the Newland Simpson Road Project (Project). The City of Hemet (City) is the Lead Agency for the Project and is responsible for implementation of the MMRP. This report describes the MMRP for the Project and identifies the parties that will be responsible for monitoring implementation of the individual mitigation measures in the MMRP.

4.2 MITIGATION MONITORING AND REPORTING PROGRAM

The MMRP for the Project will be active through all phases of the Project, including design, construction, and operation. The attached table identifies the mitigation program that would be required to be implemented by the City for the Newland Simpson Road Project. The table identifies the Project Design Features (PDFs), Plans, Programs, or Policies (PPPs), and Mitigation Measures (MMs) required by the City to mitigate or avoid significant adverse impacts associated with the implementation of the Project; the timing of implementation; and the responsible party or parties for monitoring compliance.

The MMRP also includes a column that will be used by the compliance monitor (individual responsible for monitoring compliance) to document when implementation of the measure is completed. As the PDFs, PPPs, and Mitigation Measures are completed, the compliance monitor will sign and date the MMRP, indicating that the required actions have been completed.

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Table 4-1: Mitigation Monitoring and Reporting Program
Newland Simpson Road Project Final EIR

Project Design Feature / Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
AESTHETICS			
Plan, Program, or Policy PPP AE-1: Exterior Lighting. All lighting shall be directed or shielded away from nearby residential zones and contained within the boundaries of the site. Adequate lighting shall be provided to maintain a safe, on-site environment consistent with California Building Code (CBC) standards.	Prior to building permits	City of Hemet Building & Safety Division, & Community Development, Planning Division	
AIR QUALITY			
Plan, Program, or Policy PPP AQ-1: SCAQMD Rule 403. The following measures shall be incorporated into construction plans and specifications as implementation of SCAQMD Rule 403: • All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions. • The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day. • The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 miles per hour or less.	Prior to demolition, grading, and construction permits	City of Hemet Engineering Department & Building & Safety Division	
Plan, Program, or Policy PPP AQ-2: SCAQMD Rule 1113. The Project is required to comply with the provisions of South Coast Air Quality Management District Rule (SCAQMD) Rule 1113. Only "Low-Volatile Organic Compounds" paints (no more than 50 gram/liter of Volatile Organic Compound (VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.	Prior to demolition and construction permits	City of Hemet Building & Safety Division	
Plan, Program, or Policy PPP AQ-3: Rule 402. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or	Prior to demolition and construction permits	City of Hemet Building & Safety Division	

Project Design Feature / Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.			
Plan, Program, or Policy PPP AQ-4: Rule 1470. The Project is required to obtain a permit from SCAQMD for the proposed diesel fire pump and would be required to comply with Rule 1470, regulating the use of diesel-fueled internal combustion engines.	Prior to issuance of certificates of occupancy	City of Hemet Building & Safety Division	
Mitigation Measure AQ-1: The Project shall utilize "Super-Compliant" low VOC paints for nonresidential interior and exterior surfaces and low VOC paint for parking lot surfaces. Super-Compliant low VOC paints have been reformulated to be more stringent than the regulatory VOC limits put forth by South Coast Air Quality Management District (SCAQMD)'s Rule 1113. Super-Compliant low VOC paints shall be no more than 10g/L of VOC. Alternatively, the applicant may utilize tilt-up concrete buildings that do not require the use of architectural coatings.	Prior to building permit	City of Hemet Building & Safety Division	
Mitigation Measure AQ-2: Prior to the start of construction activities, the Project Applicant, or the Applicant designee, shall ensure that all diesel-powered equipment is powered with California Air Resources Board (CARB)-certified Tier 4 Final engines, except where the Project Applicant establishes to the satisfaction of the City of Hemet that Tier 4 Final equipment is not available. An exemption from these requirements may be granted by the City if the City documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment to the maximum extent feasible. Before an exemption may be considered by the City, the Project Applicant shall be required to demonstrate that at least two construction fleet owners/operators were contacted and that those owners/operators confirmed Tier 4 Final equipment is not/would not be available. In order to meet this requirement to demonstrate that such equipment is not available, the Applicant must seek bids/proposals from contractors of large fleets, defined by the CARB as, "A fleet with a total max hp (as defined below) greater than 5,000 hp." In the event that Tier 4 Final equipment is not available, Tier 4 interim equipment shall be required. In the event that Tier 4 Interim equipment is not available, Tier 3 equipment shall be used. All construction equipment shall be tuned and maintained in accordance with the manufacturer's specifications.	Prior to grading permit and building permit	City of Hemet Engineering Department, Building & Safety Division	

Project Design Feature / Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
BIOLOGICAL RESOURCES			
Plan, Program, or Policy PPP BIO-1: MSHCP Fees. Prior to the issuance of any grading permits, fees required pursuant to the Western Riverside MSHCP implemented under Hemet Municipal Code (HMC) Section 58-98 shall be submitted to the Western Riverside County MSHCP. The Western Riverside MSHCP requires a per-acre local development impact and mitigation fee payment prior to the issuance of a grading permit.	Prior to the issuance of grading permits	City of Hemet Engineering Department & Building & Safety Division	
Mitigation Measure BIO-1: A pre-construction/ clearance burrowing owl survey shall be performed not more than 30 days prior to initial ground disturbance activity to determine presence/absence of the species. A qualified biologist shall survey the Project site and a buffer zone, 500-feet outside the Project limits for burrows that could be used by burrowing owls. If the burrow is determined to be occupied, the burrow shall be flagged, and a 160-foot diameter buffer shall be established during nonbreeding season or a 250-foot diameter buffer during the breeding season. If burrows onsite are unoccupied, construction may proceed. If the site survey determines the presence of burrowing owl, mitigation in accordance with the California Department of Fish and Wildlife (CDFW) shall be implemented as follows: • If burrowing owls are identified as being resident on-site outside the breeding season (September 1 to February 14) they may be relocated to other sites by a permitted biologist (permitted by CDFW), as allowed in the CDFW Staff Report on Burrowing Owl Mitigation (March 2012). • If an active burrow is found during the breeding season, the burrow shall be treated as a nest site and temporary fencing shall be installed at a distance from the active burrow, to be determined by the biologist, to prevent disturbance during grading or construction. Installation and removal of the fencing shall be done with a biological monitor present. • Active relocation and eviction/passive relocation shall require the preservation and maintenance of suitable burrowing owl habitat determined through coordination with the Wildlife Agencies.	Prior to the issuance of grading permits	City of Hemet Community Development, Division and Engineering Department	
Mitigation Measure BIO-2: Nesting Bird Survey. Vegetation removal should occur outside of the nesting bird season (generally between February 1 and August 31). If vegetation removal is required during the nesting bird season, the applicant shall conduct take avoidance surveys for nesting birds prior to initiating vegetation removal/clearing. Surveys shall be conducted by a	Prior to the issuance of grading permits	City of Hemet Community Development Department, Planning Division and Engineering Department	

Project Design Feature / Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
qualified biologist(s) within three days of vegetation removal. If active nests are observed, a qualified biologist shall determine appropriate minimum disturbance buffers and other adaptive mitigation techniques (e.g., biological monitoring of active nests during construction-related activities, staggered schedules, etc.) to ensure that impacts to nesting birds are avoided until the nest is no longer active. At a minimum, construction activities shall stay outside of a 200-foot buffer around the active nests. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist and Riverside County Environmental Programs Department verify that the nests are no longer occupied, and the juvenile birds can survive independently from the nests. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, normal construction activities may occur.			
CULTURAL RESOURCES			
Mitigation Measure CUL-1: Cultural Resources Monitoring Program. Prior to issuance of grading permits the applicant/developer shall provide evidence to the City of Hemet Planning Division that a qualified professional archeologist meeting the Secretary of Interior's PQS for Archaeology (as defined in the Code of Federal Regulations, 36 CFR Part 61) has been retained to prepare a Cultural Resource Monitoring Program (CRMP) and to conduct monitoring of rough grading activities. The CRMP shall be developed in coordination with the consulting tribe(s) and address the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural, tribal cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this Project. The Archaeologist shall conduct a Cultural Resource Sensitivity Training, in conjunction with the Tribe(s) Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session shall focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event. The retained Qualified archeologist and Consulting Trib(s) representative shall attend the pre-grade meeting with the grading contractors to explain and coordinate the requirements of the monitoring plan.	Prior to issuance of grading permits	City of Hemet Community Development Department, Planning Division;	

Project Design Feature / Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
In the event that a resource is inadvertently discovered during ground-disturbing activities, work shall be halted within 60 feet of the find until it can be evaluated by the qualified archaeologist. Construction activities can continue in other areas. If the find is considered a "resource" the archaeologist shall pursue either protection in place or recovery, salvage and treatment of the deposits. Recovery, salvage and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and State CEQA Guidelines 15064.5 and 15126.4 in consultation with the City. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if unique archaeological resources cannot be preserved in place or left in an undisturbed state, recovery, salvage, and treatment shall be required at the developer/applicant's expense. If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to consulting tribe(s) for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the Project and implement the Plan accordingly.			
Mitigation Measure CUL-2: Final Monitoring Report. A final monitoring report shall be prepared by the qualified archaeologist prior to issuance of any certificate of occupancy. The final monitoring report(s) created as a part of the Project (AMTP), isolate records, site records, survey reports, testing reports, etc.) shall be submitted to the Lead Agency and Consulting Tribe(s) for review and comment. After approval of all parties, the final reports are to be submitted to the Eastern Information Center, and the Consulting Tribe(s).	Prior to issuance of certificate of occupancy	City of Hemet Community Development Department, Planning Division & Building & Safety Division	
Mitigation Measure CUL-3: Inadvertent Discovery of Human Remains. A. Should human remains and/or cremations be encountered on the surface or during any and all ground-disturbing activities (i.e., clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all water supply, electrical, and irrigation lines, and landscaping phases of any kind), and work in the immediate vicinity of the discovery shall immediately stop within a 100-foot perimeter of the discovery. The area shall be protected; Project personnel/observers will be restricted. The County Coroner shall be contacted within 24 hours of discovery. The County Coroner has 48 hours to make	During ground-disturbing activities	City of Hemet Community Development Department, Planning Division & Building & Safety Division	

Project Design Feature / Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
his/her determination pursuant to State and Safety Code §7050.5. and Public Resources Code (PRC) § 5097.98. No photographs shall be taken except by the coroner, with written approval by the consulting Tribe(s). B. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5. C. The Native American Heritage Commission shall immediately notify the person or persons it believes to be the Most Likely Descendant (MLD). The MLD has 48 hours, upon being granted access to the Project site, to inspect the site of discovery and make his/her recommendation for final treatment and disposition, with appropriate dignity, of the remains and all associated grave goods pursuant to PRC §5097.98 D. If the Morongo Band of Mission Indians has been named the Most Likely Descendant (MLD), the Tribe may wish to rebury the human remains and/or cremation and sacred items in their place of discovery with no further disturbance where they will reside in perpetuity. The place(s) of reburial shall not be disclosed by any party and is exempt from the California Public Records Act (California Government Code § 6254[r]). Reburial location of human remains and/or cremations shall be determined by the Tribe's Most Likely Descendant (MLD), the landowner, and the City Planning Division.			
ENERGY			
Plan, Program, or Policy PPP E-1: CalGreen Compliance: The Project is required to comply with the CalGreen Building Code (CBC) to ensure efficient use of energy. CalGreen specifications are required to be incorporated into building plans as a condition of building permit approval.	Prior to issuance of building permits	City of Hemet Building & Safety Division	
GEOLOGY AND SOILS			
PPP GEO-1: CBC Compliance. The Project is required to comply with the California Building Standards Code (CBC) as included in Chapter 14, Article II, Division 3, Section 14-40 of the HMC to preclude significant adverse effects associated with seismic and soils hazards. CBC related and geologist and/or civil engineer specifications for the proposed Project are required to be incorporated into grading plans and building specifications as a condition of construction permit approval.	Prior to issuance of grading and building permits	City of Hemet Building & Safety Division	

Project Design Feature / Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
Mitigation Measure PAL-1: Paleontological Monitoring. Prior to the issuance of grading permits, the Applicant shall provide a letter to the City, or City designee, from a professional paleontologist, stating that a qualified paleontologist (who meets the Society of Vertebrate Paleontology's (SVP, 2020) definition for qualified profession paleontologist) has been retained to provide services for the proposed Project. The paleontologist shall develop a Paleontological Resources Impact Mitigation Plan (PRIMP) to mitigate the potential impacts to unknown buried paleontological resources that may exist onsite. The PRIMP shall be provided to the City for review and approval. The PRIMP shall require that the paleontologist be present at the pre-grading conference to establish procedures for paleontological resource surveillance. Prior to commencement of grading activities, the City of Hemet Planning Division, or designee, shall verify that all Project grading and construction plans specify the requirements herein related to the PRIMP and the unanticipated discovery of paleontological resources. The PRIMP shall also require that in areas mapped as late to middle Pleistocene old alluvial fan deposits, monitoringshall be conducted full-time in undisturbed alluvium starting at the surface. In areas mapped as Holocene to late Pleistocene young alluvial valley deposits, monitoring shall be conducted full-time in undisturbed alluvium starting at a depth of five feet below the surface during grading or excavation activities. In the event paleontological resources are encountered, ground disturbing activity within 50 feet of the area shall cease. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered pursuant to the guidelines of the Society of Vertebrate Paleontology (SVP, 2010). Criteria for discarding specific fossil specimens shall be made explicit in the PRIMP. If the qualified paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by Project construction, then recovery techniques shall be applied. Actions include recovering a sample of the fossiliferous material prior to construction, monitoring construction activities and halting construction if an important fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. Recovery, salvage, and treatment shall be done at the Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified	Prior to issuance of grading permits	City of Hemet Community Development Department, Planning & Engineering Department y Division	

Project Design Feature / Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
and curated into an established accredited professional repository. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource. If no institution accepts the fossil(s), they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school. A report documenting the results of the monitoring, including any salvage activities and the significance of any fossils, shall be prepared and submitted to the City, or City designee. The report and inventory, when submitted to the City of Hemet Planning Division, shall signify completion of the program to mitigate impacts to paleontological resources.			
GREENHOUSE GAS EMISSIONS			
Mitigation Measure GHG-1: Prior to the issuance of each building permit, the Project Applicant shall provide the City of Hemet with sufficient evidence demonstrating all light bulbs and light features within the Project are Energy Star certified.	Prior to issuance of building permit	City of Hemet Building & Safety Division	
Mitigation Measure GHG-2: Prior to the issuance of each building permit, the Project Applicant shall provide the City of Hemet with sufficient evidence demonstrating the building will provide water efficient toilets (1.5 gallons per minute [gpm]).	Prior to issuance of building permits	City of Hemet Building & Safety Division	
Mitigation Measure GHG-3: Prior to the issuance of each building permit, the Project Applicant shall provide the City of Hemet with sufficient evidence demonstrating the building will provide waterless urinals.	Prior to issuance of building permits	City of Hemet Building & Safety Division	
Mitigation Measure GHG-4: Prior to the issuance of each building permit, the Project Applicant shall provide the City of Hemet with sufficient evidence demonstrating the building will provide water efficient faucets (1.28 gpm).	Prior to issuance of building permits	City of Hemet Building & Safety Division	
Mitigation Measure GHG-5: Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas of the warehouse portion of the Project that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than five (5) minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and 3) telephone numbers of the building facilities manager and the CARB to report violations. Prior to the	Prior to issuance of certificates of occupancy	City of Hemet Community Development Department, Planning Division & Building & Safety Division	

Project Design Feature / Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
issuance of an occupancy permit, the City shall conduct a site inspection to ensure that the signs are in place.			
Mitigation Measure GHG-6: Prior to issuance of a building permit, the Project Applicant shall provide the City with an onsite signage program that clearly identifies the required onsite circulation system. This shall be accomplished through posted signs and painting on driveways and internal roadways.	Prior to issuance of building permits	City of Hemet Community Development Department, Planning Division & Building & Safety Division	
Mitigation Measure GHG-7: Prior to issuance of an occupancy permit, the City shall confirm that signs clearly identifying approved truck routes have been installed on Simpson Road and Warren Road.	Prior to issuance of certificates of occupancy	City of Hemet Community Development Department, Planning Division & Building & Safety Division	
Mitigation Measure GHG-8: Prior to issuance of an occupancy permit, the Project Applicant shall install a sign on the property with telephone, email, and regular mail contact information for a designated representative of the tenant who would receive complaints about excessive noise, dust, fumes, or odors. The sign shall also identify contact data for the City for perceived Code violations. The tenant's representative shall keep records of any complaints received and actions taken to communicate with the complainant and resolve the complaint. The tenant's representative shall endeavor to resolve complaints within 72 hours.	Prior to issuance of certificates of occupancy	City of Hemet Community Development Department, Planning Division & Building & Safety Division	
Mitigation Measure GHG-9: All on-site outdoor cargo-handling equipment (including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment) shall be electric or non-diesel fueled. All on-site indoor forklifts shall be powered by electricity.	Prior to issuance of certificates of occupancy	City of Hemet Community Development Department, Planning Division & Building & Safety Division	
Mitigation Measure GHG-10: Prior to issuance of an occupancy permit for each building/occupancy each owner/tenant shall develop a use/occupant-specific transportation demand management (TDM) program. The TDM program shall be submitted to the City Planning Division and City Building & Safety Division for review and approval as part of the certificate of occupancy. Recommended California Air Pollution Control Officers Association (CAPCOA) TDM program elements are listed below: • Provide pedestrian and bicycle network improvements within the development connecting to existing off-site facilities. • Where applicable ensure design of key intersections and roadways encourage the use of walking, biking and where applicable transit.	Prior to issuance of certificates of occupancy	City of Hemet Community Development Department, Planning Division, and Building & Safety Division	

Project Design Feature / Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
• Commute trip reduction (CTR) programs offered to encourage the use of vanpools, carpooling, public transit, and biking.			
HYDROLOGY AND WATER QUALITY			
Plan, Program, or Policy PPP HYD-1: NPDES/SWPPP. Since this Project is one acre or more, the permit holder shall comply with all of the applicable requirements of the National Pollutant Discharge Elimination System (NPDES) and shall conform to NPDES Best Management Practices for Stormwater Pollution Prevention Plans (SWPPP) during the life of this permit. Prior to issuance of any grading or construction permits - whichever comes first - the Applicant shall provide the Building and Safety Department evidence of submitting a Notice of Intent (NOI), develop and implement a SWPPP and a monitoring program and reporting plan for the construction site.	Prior to issuance of a grading permit	City of Hemet Engineering Department	
Plan, Program, or Policy PPP HYD-2: WQMP. Prior to the approval of the Grading Plan and issuance of Grading Permits a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the City Building and Safety Department. The WQMP shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.	Prior to issuance of a grading permit	City of Hemet Engineering Department	
NOISE			
Plan, Program, or Policy PPP NOI-1: Construction Noise. Chapter 30, Article II, Section 30-32(33) of the HMC permits construction activities between the hours of 6:00 a.m. and 6:00 p.m. during the months of June through September and between the hours of 7:00 a.m. and 6:00 p.m. during the months of October through May. Exceptions to these standards may be granted only by the City's building official and/or the City Council. Construction occurring consistent with these provisions is exempt from regulation.	Prior to issuance of grading and/or building permits During grading/excavation and construction activities	City of Hemet Building & Safety Division	
PDF NOI-1: All construction activities shall comply with HMC Section 30-32[a][43], restricting construction activities to the approved hours of construction as set forth on a permit or other city entitlement as issued by the City's building official, Planning Commission, or City Council, or as otherwise prohibited by the Hemet Building Code.	Prior to issuance of grading and/or building permits During grading/excavation and construction activities	City of Hemet Building & Safety Division	

Project Design Feature / Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
PDF NOI-2: Construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards).	Prior to issuance of grading and/or building permits During grading/excavation and construction activities	City of Hemet Building & Safety Division, & Engineering Department	
PDF NOI-3: All stationary construction equipment shall be placed in such a manner so that the emitted noise is directed away from any sensitive receivers.	Prior to issuance of grading and/or building permits During grading/excavation and construction activities	City of Hemet Building & Safety Division, & Engineering Department	
PDF NOI-4: Construction equipment staging areas shall be located at the greatest feasible distance between the staging area and the nearest sensitive receivers.	Prior to issuance of grading and/or building permits During grading/excavation and construction activities	City of Hemet Building & Safety Division, & Engineering Department	
PDF NOI-5: The construction contractor shall limit equipment and material deliveries to the same hours specified for construction equipment.	Prior to issuance of grading and/or building permits During grading/excavation and construction activities	City of Hemet Building & Safety Division, & Engineering Department	
PDF NOI-6: Electrically powered air compressors and similar power tools shall be used, when feasible, in place of diesel equipment.	Prior to issuance of grading and/or building permits During grading/excavation and construction activities	City of Hemet Building & Safety Division, & Engineering Department	
PDF NOI-7: No music or electronically reinforced speech from construction workers shall be allowed.	Prior to issuance of grading and/or building permits	City of Hemet Building & Safety Division. Engineering Department	

Project Design Feature / Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
	During grading/excavation and construction activities		
PUBLIC SERVICES			
Plans, Program, or Policy PPP PS-1: School Impact Fees. Prior to the issuance of either a certificate of occupancy or prior to building permit final inspection, the applicant shall provide payment of the appropriate fees set forth by the Hemet Unified School District related to the funding of school facilities pursuant to Government Code Section 65995 et seq.	Prior to issuance of certificates of occupancy or prior to building permit final inspection	City of Hemet Building & Safety Division	
TRANSPORTATION			
PDF TR-1: Sidewalks. The Project would construct sidewalks along the Project's frontage on Simpson Road and Warren Road.	Prior to issuance of certificates of occupancy	City of Hemet Building & Safety Division	
TRIBAL CULTURAL RESOURCES			
Mitigation Measure TCR-1: Tribal Monitoring Services Agreement. Prior to the issuance of grading permits, the applicant shall enter into a Tribal Monitoring Services Agreement with the Morongo Band of Mission Indians (MBMI), Soboba Band of Luiseño Indians, or Agua Caliente Band of Cahuilla Indians (ACBCI) for the Project. The Tribal Monitor shall be on-site during all ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind). The Tribal Monitor shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources.	Prior to issuance of permits associated with ground-disturbing activities Monitoring during ground-disturbing activities	City of Hemet Building & Safety Division	
Mitigation Measure TCR-2: Inadvertent Discovery of Cultural Resources. In the event that previously unidentified cultural resources are unearthed during construction, the Qualified Archaeologist and the Tribal Monitor shall have the authority to temporarily divert and/or temporarily halt ground-disturbance operations in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.	During ground disturbing activities	City of Hemet Building & Safety Division	

Project Design Feature / Plan, Program, Policy / Mitigation Measure	Timing	Responsible for Ensuring Compliance / Verification	Date Completed and Initials
If a potentially significant cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find, so that the find can be evaluated by the Qualified Archaeologist and Tribal Monitor[s]. The Archaeologist shall notify the Lead Agency and consulting Tribe[s] of said discovery. The Qualified Archaeologist, in consultation with the Lead Agency, the consulting Tribe[s], and the Tribal Monitor, shall determine the significance of the discovered resource. A recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the Qualified Archaeologist in consultation with the Tribe[s] and the Tribal Monitor[s] and shall be submitted to the Lead Agency for review and approval. Below are the possible treatments and dispositions of significant cultural resources in order of CEQA preference: A. Full avoidance. B. If avoidance is not feasible, Preservation in place. C. If Preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction. D. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (Code of Federal Regulations (CFR) 79.1)			

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