**Greenhouse Gases Study** 

# **Roxford Street Warehouses Project**

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## 1. Introduction

This report evaluates the direct and indirect impacts of the Roxford Street Warehouses Project (Project) related to greenhouse gas (GHG) emissions and global climate change. Supporting documents – such as calculation worksheets and modeling outputs—are included in the appendix to this report.

# 2. Project Description

Addressed at 15825 Roxford Street in the Sylmar Community Plan Area of the City of Los Angeles, the Project proposes to construct two new industrial buildings containing a total of 589,600 square feet of warehouse uses and 15,000 square feet of ancillary office uses. Building 1 would consist of 430,000 square feet of warehouse space and 10,000 square feet of office space. Building 2 would consist of 159,600 square feet of warehouse space and 5,000 square feet of office space. The 27.93-acre Project site is located in the heart of an existing industrial/manufacturing district and is therefore bounded by a number of similar industrial/manufacturing uses. An eastern portion of the Project site has frontage along Telfair Avenue, and a long driveway also connects the site to Roxford Street. To the west, the Project site borders the Golden State Freeway.

The Project site is currently improved with 182,230 square feet of warehouse uses, as well as surface parking area and driveways in support of these uses. Ancillary uses include four athletic courts for tennis and basketball. Most of these uses would be demolished or extensively modified for the Project.

# 3. Environmental Setting

# 3.1 Climate Change Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHG emissions in the atmosphere. GHG emissions are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHG emissions keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, it is believed that excessive concentrations of anthropogenic GHG emissions in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.

# 3.2 GHG emissions background

GHG emissions include  $CO_2$ , methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride (NF<sub>3</sub>).<sup>1</sup> Carbon dioxide is the most abundant GHG. Other GHG emissions are less abundant but have greater global warming potential than  $CO_2$ . Thus, emissions of other GHGs are frequently expressed in their equivalent mass of  $CO_2$ , denoted as  $CO_2$ e. Forest fires, decomposition, industrial

As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

processes, landfills, and the consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

## 3.3 Existing conditions

There are any number of agreements, strategies, policies, regulations, and standards that relate to GHG emissions – from international climate accords to local climate action plans. The following plans, policies, and regulations are fundamental to the Project's determination of significance with respect to its GHG emissions and consistency with these documents.

#### 3.3.1 State

#### 3.3.1.1 AB 32 (California Global Warming Solutions Act of 2006) and SB 32

In September 2005, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, AB 32, into law. AB 32 committed the State to achieving the following:

- By 2010, reduce statewide GHG emissions to 2000 levels.<sup>2</sup>
- By 2020, reduce statewide GHG emissions to 1990 levels.

The California Air Resources Board (CARB) was tasked with determining what the statewide GHG emissions level was in 1990 and approving a statewide GHG emissions limit equivalent to that level, to be achieved by 2020. AB 32 further requires CARB to adopt rules and regulations that achieve the maximum technologically feasible and cost-effective GHG emissions reductions.

Signed in September 2016 by Governor Jerry Brown, SB 32 updates AB 32 to include an emissions reductions goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030.

It should be noted that the State Legislature has not yet adopted a target for the 2050 horizon year, though Executive Order S-3-05 issued by Governor Schwarzenegger and Executive Order B-30-15 issued by Governor Jerry Brown each establish a GHG target of 80 percent below 1990 levels for this year.

#### 3.3.1.2 Climate Change Scoping Plan

In 2008 CARB approved a Climate Change Scoping Plan (2008 Scoping Plan) detailing the approach that California would take to reduce its GHG emissions to 1990 levels by 2020, as required by AB 32. To achieve this, CARB determined that an approximate 28.5 percent reduction in GHG emissions would be necessary. That is, projected 2020 GHG emissions (i.e. emissions that would occur in 2020, absent any GHG-reducing laws and regulations) would have to be reduced by 28.5 percent.

However, shortly after the adoption of the 2008 Scoping Plan, a lawsuit was filed challenging CARB's approval of the Climate Change Scoping Plan Functional Equivalent Document (FED to the Climate Change Scoping Plan). In May 2011, it was found that the environmental analysis of this document's alternatives was not sufficient under CEQA. In response to this ruling, CARB prepared a revised and expanded document, the Supplemental FED to the Climate Change Scoping Plan (Supplemental FED), approved in August 2011.

The 2010 target to reduce GHG emissions to 2000 levels was not met.

As part of the Supplemental FED, CARB updated the projected 2020 emissions inventory based on then-current economic forecasts (i.e. as influenced by the economic downturn) and GHG emissions reduction measures already in place.<sup>3</sup> Ultimately, CARB determined that achieving the 1990 emissions levels by 2020 would require a reduction in GHG emissions of 16 percent from BAU conditions, down from the previous 28.5 percent figure.

CARB adopted the First Update to the Climate Change Scoping Plan: Building on the Framework (First Update) in 2014. The First Update found that California is on track to meet AB 32's 2020 emissions reduction mandate and determined that, by 2030, the State could reduce its GHG emissions to levels on course with those needed to achieve the 2050 target<sup>4</sup> if it realizes the expected benefits of its existing policy goals. CARB further identified and developed recommended actions for six focus areas key to achieving the 2050 target: (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands.

In December 2017, CARB adopted the 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target (2017 Update). The 2017 Update builds upon the successful framework established by the 2008 Scoping Plan and the First Update and identifies new, technologically feasible, and cost-effective strategies to ensure that the state meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. It includes policies to require direct GHG reductions at some of the state's largest stationary sources and mobile sources, such as use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constraints and reduces emissions at covered sources.

#### 3.3.1.3 SB 97

Passed in August 2007, SB 97 required the State Office of Planning and Research (OPR) to prepare and develop CEQA guidelines for the effects and/or mitigation of GHG emissions, including effects associated with transportation and energy consumption. Subsequently, the Draft Guidelines Amendments for Greenhouse Gas Emissions (Guidelines Amendments) were adopted in December 2009 to address the specific obligations of public agencies when analyzing GHG emissions to determine a project's effect on the environment, as pursuant to CEQA.

However, the Guidelines Amendments provide no thresholds of significance or any specific mitigation measures; rather, they require a lead agency to make a good-faith effort to describe, calculate, or estimate the amount of GHG emissions that would result from a Project, to the extent possible based on scientific and factual data. The Guidelines Amendments give discretion to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. Additionally, three factors that should be considered in the evaluation of the significance of GHG emissions are identified:

(1) The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

E.g. the million-solar-roofs program, AB 1493 (Pavley I) motor vehicle GHG emissions standards, and the Low Carbon Fuel Standard (LCFS). Pavley I, the first GHG standard in the nation for passenger vehicles, took effect for model years starting in 2009 to 2016. Pavley I could potentially result in a 27.7 million metric tons CO<sub>2</sub>e reduction of GHG emissions by 2020. Pavley II covers models years 2017 to 2025 and could result in additional reductions of 4.1 million metric tons CO<sub>2</sub>e.

The 2050 goal of reducing GHG emissions to 80 percent below 1990 levels was originally established by Executive Order S-3-05, issued by Governor Schwarzenegger in June 2005. However, the 2050 goal was not codified by either AB 32 or SB 32.

- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The administrative record for the Guidelines Amendments also clarifies "that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA's requirements for the cumulative impact analysis." 5

The California Natural Resources Agency is required to periodically update the Guidelines Amendments to incorporate new information or criteria established by CARB pursuant to AB 32. SB 97 applies to any environmental impact report (EIR), negative declaration, mitigated negative declaration, or other document requirement by CEQA.

#### 3.3.2 Regional

#### 3.3.2.1 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

In September 2008 Governor Arnold Schwarzenegger signed the Sustainable Communities and Climate Protection Act of 2008, also known as SB 375, to align regional planning for housing and transportation with the GHG reduction goals outlined by AB 32. SB 375 requires each Metropolitan Planning Organization (MPO) to adopt a Sustainable Community Strategy (SCS) encouraging compact development that reduces passenger Vehicle Miles Traveled (VMT) and trips, all for the purpose of meeting CARB-determined regional GHG emissions reduction targets.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. As the federally designated MPO for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. SCAG is also a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP.

CARB set GHG reduction targets of 8 percent by 2020 and 19 percent by 2035 (compared with 2005 levels) for the SCAG region, effective as of October 1, 2018. Adopted on September 3, 2020, SCAG's long-range plan, the 2020-2045 RTP/SCS (Connect SoCal), serves as the roadmap to fulfilling the region's compliance with these latest GHG reduction targets. To this end, the 2020-2045 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and it acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. The 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment growth in the region's High Quality Transit Areas (HQTAs) and aims to enhance and build out the region's transit network. At the time of the previous 2016-2040 RTP/SCS, HQTAs accounted for just 3 percent of total land in the SCAG region, but they are projected to accommodate 46 percent of the region's future household growth and 55 percent of the region's future employment growth by 2040. HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the USEPA, and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including

Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research, to Mike Chrisman, California Secretary for Natural Resources, dated 13 April 2009.

SCAG, Final 2016-2040 RTP/SCS, April 2017. HQTAs are defined as areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.

reduced air pollution and energy consumption. In addition, HQTAs concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. As a result, HQTAs are vital to the attainment of regional GHG emissions reduction targets: successful implementation of the 2020-2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, reducing automobile use and, crucially, associated GHG emissions.

#### 3.3.3 Local

#### 3.3.3.1 City of Los Angeles Green LA Action Plan/Sustainability pLAn

The City began addressing the issue of global climate change by publishing Green LA: An Action Plan to Lead the Nation in Fighting Global Warming (LA Green Plan) in 2007. This document outlines goals and actions the City has established to reduce GHG emissions from both public and private activities. To facilitate implementation of the LA Green Plan, the City adopted the Los Angeles Green Code, as discussed below. In 2008 the City released an implementation program for the LA Green Plan referred to as ClimateLA, which provides detailed information about each action item discussed in the LA Green Plan framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in City buildings, to converting the City's fleet vehicles to cleaner and more efficient models, and reducing water consumption.

The Sustainable City pLAn was a mayoral initiative in 2015 and includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. Specific targets include the construction of new housing units within 1,500 feet of transit by 2017, reducing VMT per capita by five percent by 2025, and increasing trips made by walking, biking, or transit by at least 35 percent by 2025. The Sustainable City pLAn is to be updated every four years.

In 2019 the first four-year update to the 2015 Sustainability pLAn was released. This updated document, known as L.A.'s Green New Deal, expands upon the City's vision for a sustainable future and provides accelerated targets and new goals. L.A.'s Green New Deal has established targets such as 100 percent renewable energy by 2045, installation of 10,000 publicly available EV chargers by 2022 and 28,000 by 2028, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035. The City's commitments related to renewable energy usage, water conservation, waste reduction, and other initiatives would all benefit the Project.

#### 3.3.3.2 City of Los Angeles Green Building Code

In December 2019, the Los Angeles City Council approved Ordinance No. 186,488, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various provisions of the 2019 CALGreen Code. Projects filed on or after January 1, 2020, must comply with the provisions of the Los Angeles Green Building Code.

## 3.4 Existing Conditions

#### 3.4.1 Existing statewide GHG emissions

As reported by the California Energy Commission (CEC), California contributes approximately one percent of global and 6.4 percent of national GHG emissions. California contains approximately 12 percent of the national population. CARB reports that in 2019, emissions from GHG emissions statewide were 418 million MT of  $CO_2e$ , 7 million MT of  $CO_2e$  lower than 2018 levels and nearly 13 million MT of  $CO_2e$  below the State's 2020 GHG limit of 431 million MT of  $CO_2e$ . 48 percent of the State's total electricity generation (in-state generation plus imported electricity) came from zero-GHG generation sources (e.g. solar, wind, hydropower, nuclear, etc.). Per capita GHG emissions have dropped from a 2001 peak of 14.0 MT per person to 10.5 MT per person in 2019, a 25 percent decrease. The transportation sector remains the largest source of GHG emissions, accounting for almost 40 percent of the State's GHG inventory (though when emissions from extracting, refining, and moving transportation fuels are included, this figure increases to over 50 percent of statewide emissions for 2019.

#### 3.4.2 Existing Project site emissions

The Project site is currently occupied by 182,230 square feet of warehouse uses. Existing tenants include an aerospace/manufacturing company and a trucking school. Emissions associated with the Project site's existing usage were estimated for informational purposes, and it was determined that existing uses may generate about 2,028 MT of  $CO_2e$  annually. Due to the omission of the trucking school use in the CalEEMod 2020.4.0 modeling, it is possible that this figure is conservative and underestimates GHG emissions associated with the Project site's existing uses.

# 4. Project Impacts

# 4.1 Methodology

Section 15064.4 of the CEQA Guidelines recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project: the extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

However, Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence. The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis. It is noted that the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact less than significant.

California Energy Commission. Tracking Progress, Greenhouse Gas Emission Reductions. www.energy.ca.gov/renewables/tracking\_progress/documents/Greenhouse\_Gas\_Emissions\_Reductions.pdf. Last updated December 2018.

<sup>8</sup> CARB, California Greenhouse Gas Emissions for 2000 to 2017. 2019.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions." Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory schemes to reduce GHG emissions.

In the absence of any applicable adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Project is consistent with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020-2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements adopted by the AB 32 2008 Scoping Plan and its subsequent updates, as well as the City's Sustainable pLAn/Green New Deal.

#### 4.1.1 Construction

The Project's construction emissions were calculated using CalEEMod Version 2020.4.0. Details of the modeling assumptions and emissions factors are provided in the appendix to this report. GHG emissions from construction activities were modeled using a reasonable estimate of the Project's construction schedule and phasing. CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips.

In accordance with SCAQMD guidance, GHG emissions from construction were amortized over the lifetime of the Project. Because emissions from construction activities occur over a relatively short-term period of time, they typically contribute a relatively small portion of the overall lifetime GHG emissions for a project. Additionally, GHG emissions reduction measures for construction equipment are relatively limited. Thus, SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime so that GHG emissions reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. As a result, the Project's total construction GHG emissions were divided by 30 to determine an approximate annual construction emissions estimate comparable to operational emissions.

#### 4.1.2 Operations

Similar to construction, the SCAQMD-recommended CalEEMod is used to calculate potential GHG emissions generated by new land uses on the Project site. The Project would result in direct and indirect GHG emissions generated by related vehicle trips and operations associated with the proposed building.

<sup>9</sup> SCAQMD Governing Board Agenda Item 31. December 5, 2008.

## 4.2 Thresholds of significance

#### 4.2.1 State CEQA Guidelines: Appendix G

In accordance with Appendix G of the CEQA Guidelines, the Project would have a significant impact if the Project would:

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

For the Project, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although state, regional, and local plans and policies have been adopted to help address climate change, no current law or regulation would regulate all aspects of the Project's GHG emissions. In the absence of any adopted numeric threshold, the significance of the Project's GHG emission is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. As discussed earlier, for this Project, the most directly applicable adopted plans and policies to reduce GHG emissions are the AB 32 Scoping Plan and subsequent updates, SCAG's 2020-2045 RTP/SCS, and the City's Sustainability pLAn/Green New Deal. Thus, the Project would not have a significant effect on the environment if it is found to be consistent with these applicable plans and policies to reduce GHG emissions.

# 5. Analysis of Project Impacts

# 5.1 Threshold a):

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

#### Threshold b):

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

#### 5.1.1 Consistency with applicable plans and policies

As described above, compliance with applicable GHG emissions reduction plans would result in a less than significant Project-level and cumulative impact. The following section describes the extent to which the Project complies with the performance-based standards included in the regulations outlined in the Scoping Plan and its subsequent updates, the 2020-2045 RTP/SCS, and the Sustainable pLAn/Green New Deal. As shown therein, the Project would be consistent with the applicable GHG reduction plans and policies.

#### 5.1.1.1 Climate Change Scoping Plan

The Climate Change Scoping Plan sets forth a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a Cap-and-Trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce Project-related GHG emissions. **Table 1** 

contains an evaluation of applicable reduction actions/strategies by emissions source category outlined in the Climate Change Scoping Plan that, through implementation, would serve to indirectly reduce Project GHG emissions. Further evaluation of project design features and specific applicable policies and measures in the Climate Change Scoping Plan is provided in **Table 2**. As shown therein, the Project would not conflict with the policies included in the Climate Change Scoping Plan. Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets.

# Table 1 Mandatory Regulatory Compliance Measures within the Climate Change Scoping Plan

#### **Mandatory Regulatory Compliance Measures**

#### Energy

**RPS Program and SB 2X:** The California RPS program (Updated under Senate Bill 2X) required both public and investor-owned utilities in California to receive at least 33 percent of their electricity from renewable sources by the year 2020. SB 350 further required 50 percent renewables by 2030. ALADWP reports that, as of 2018, it has achieved 32% renewables. The CalEEMod default carbon intensity for electricity generated by LADWP is based on utility-provided data from 2021, so it presumably takes into account the 33 percent renewables requirement for 2020. C

However, with the recent passage of SB 100, LADWP is required to increase its renewable energy portfolio to 50 percent by 2026, 60 percent by 2030, and 100 percent by 2045. Additionally, the City's latest Green New Deal (an update of the Sustainable City pLAn) sets a target for LADWP to supply 55 percent renewable energy by 2025 and 80 percent by 2036. For 2045, the Green New Deal and SB 100 share the same 100 percent renewables requirement. The Project would comply with these percentage renewables requirements as the Project is served by LADWP, which is tasked with achieving these GHG reduction mandates.

The Project's electricity GHG emissions in this analysis do not account for these rapidly changing, and escalating, renewables requirements. By the Project's estimated buildout year of 2024, it is reasonable to assume that LADWP may supply at least 45 percent renewable energy, in line with the Green New Deal's 55% target for 2025. As such, GHG emissions from the Project's electricity use would likely be considerably lower than what is identified in this analysis.

**SB 350:** As required under SB 350, a doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, the California Energy Code (CEC), and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation.

**Cap-and-Trade Program:** As required by AB 32 and the Climate Change Scoping Plan, the Cap-and-Trade Program regulates GHG emissions associated with electricity demand, though the program applies to electricity service providers and not directly to development projects. The Project would benefit from Cap-and-Trade program impacts as its electricity consumption would benefit from GHG reductions associated with this Statewide program. The Cap-and-Trade program also covers GHG emissions from the combustion of transportation fuels.

#### Mobile

**Advanced Clean Cars Program:** CARB's Advanced Clean Cars Program regulates GHG emissions for model years 2017 through 2025 and increases the share of zero emission vehicles manufactured in model years 2018 through 2025. Mobile source GHG emissions in this analysis do not include the additional 34 percent reduction in mobile

source emissions attributable to this program as the CalEEMod model does not account for it. However, the USEPA withdrew the waiver it had previously provided to California for the State's GHG and ZEV programs, which became effective on November 26, 2019. California filed a lawsuit challenging the withdrawal of the EPA waiver. During the period the federal action is in effect, CARB will administer the affected portions of its program on a voluntary basis, including issuing certifications for GHG and ZEV programs. In any case, as noted, mobile source GHG emissions in this analysis do not include reductions in mobile source emissions attributable to this program to begin with. The Project would support this regulation as it would include electric vehicle charging facilities.

Other mobile source strategies are related to CARB's development of the Innovative Clean Transit and Advanced Clean Trucks programs. The Innovative Clean Transit regulation, adopted in December 2018, requires all public agencies to gradually transition to 100-percent zero-emission bus fleets, in part by mandating that all new bus purchases are zero-emission starting in 2029. Adopted in March 2021, the Advanced Clean Trucks regulation sets increased sales requirements for zero-emission trucks from 2024 to 2035 and contains company and fleet reporting requirements for large employers and fleet owners. The Project, which proposes warehouse uses that would demand truck deliveries, would indirectly benefit from both of these measures.

**Low Carbon Fuel Standard (LCFS):** The LCFS reduced the carbon intensity of California's transportation fuels by at least 7.5 percent by 2020. The CalEEMod model assumes that the LCFS reduces mobile source emissions accordingly. The 2018 updates to the LCFS target a 20 percent reduction in carbon intensity by 2030. The Project's GHG emissions would benefit from this regulatory program over time.

#### **Solid Waste**

California Integrated Waste Management Act of 1989: This regulation required jurisdictions to reduce solid waste by 50 percent by 2000. In 2011, AB 341 amended this regulation to provide a goal of reducing solid waste generation by 75 percent by 2020, and annually thereafter. The Project complies with these diversion requirements as it would be served by the City of Los Angeles, which currently achieves a 76 percent diversion rate. The CalEEMod model conservatively assumes a zero percent diversion rate; as a result, GHG emissions from the Project's solid- waste generation are conservative and would be lower. The Project would contract for waste disposal services from a provider that must meet AB 341 mandates for diversion. Additionally, it is worth noting that the City in its Green New Deal has committed to achieving 100 percent diversion of waste by 2050.

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<sup>c</sup> CalEEMod Version 2020.4.0 Appendix D. May 2021.

Table 2
Consistency Analysis – Climate Change Scoping Plan

	, ,	
Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Senate Bill 350 (SB 350):	CPUC, CEC, CARB	No Conflict. As LADWP would provide
Requires that the amount of		electricity service to the Project Site, and as
electricity generated and sold to retail		LADWP is tasked with achieving the latest
customers per year from eligible		SB 100 and Green New Deal renewables
		mandates that exceed the prior SB 350

<sup>&</sup>lt;sup>A</sup> SB 350 (2015-2016 Regular Session) Stats 2015, Ch. 547.

<sup>&</sup>lt;sup>B</sup> LADWP. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-renewableenergypolicy?\_adf.ctrl-

renewable energy resources be increased to 50 percent by 2030.  Increase RPS to 50 percent of retail sales by 2030.  Establish annual targets for statewide energy efficiency savings and demand reductions that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		mandates, the Project would use electricity that goes beyond the renewables requirements of SB 350.  The Project would also comply with the latest CalGreen and Title 24 energy efficiency standards
Senate Bill 100 (SB 100):  The California Renewables Portfolio Standard Program (2018) requires a Statewide renewables energy portfolio that requires retail sellers to procure renewable energy that is at least 50 percent by December 31, 2026, and 60 percent by December 31, 2030. It would also require that local publicly owned electric utilities procure a minimum quantity of electricity from renewable energy resources and achieve 44 percent of retail sales by December 31, 2024, and 60 percent by December 31, 2030.	LADWP, CPUC	No Conflict. As discussed, LADWP is required to generate electricity that would achieve these renewables mandates. As LADWP would provide electricity service to the Project, the Project would use electricity that is consistent with the requirements of SB 100.
<ul> <li>Implement Mobile Source Strategy (Cleaner Technology and Fuels)</li> <li>At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025.</li> <li>At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030.</li> <li>Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations.</li> <li>Medium and heavy-duty GHG Phase 2</li> <li>Innovative Clean Transit</li> <li>Last Mile Delivery</li> <li>Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy</li> </ul>	CARB, CalSTA, SGC, CalTrans CEC, OPR, Local agencies	No Conflict. GHG emissions generated by Project-related vehicular travel would benefit from the proposed regulations, and mobile source emissions generated by the Project would be reduced with the implementation of standards under the Advanced Clean Cars Program, consistent with the reduction of GHG emissions under AB 32. However, mobile source GHG emissions estimates do not include the additional 34-percent reduction in mobile source emissions attributable to this program. The Project would support this regulation as it would include electric vehicle charging facilities.  The Project would indirectly benefit from CARB's Innovative Clean Transit and Advanced Clean Trucks programs, which were adopted in December 2018 and March 2021, respectively.

but included in the document "Potential VMT Reduction Strategies for Discussion."  Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets)	CARB	Regarding SB 375, the Project's consistency with SCAG's latest 2020-2045 RTP/SCS is discussed later in this report. Implementation of the 2020-2045 RTP/SCS, which the Project would aid in, is projected to reduce per capita transportation emissions 19 percent by 2035 (as compared to 2005 levels), thus enabling the SCAG region to fulfil its portion of SB 375 compliance.  No Conflict. The Project's consistency with SCAG's latest 2020-2045 RTP/SCS is discussed later in this report. Implementation of the 2020-2045 RTP/SCS, which the Project would aid in, is projected to reduce per capita transportation emissions 19 percent by 2035 (as compared to 2005 levels), thus enabling the SCAG region to fulfil its portion of SB 375 compliance.
By 2019, adjust performance measures used to select and design transportation facilities.  Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g. via guideline	CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans	Not Applicable. The Project would not involve the construction of any transportation facilities.
documents, funding programs, project selection).  By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	OPR/SGC, CARB	policy as it would include 131 EV parking spaces and 44 EV charging stalls.
Implement California Sustainable Freight Action Plan:  Improve freight system efficiency.  Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	CalSTA, CalEPA, CNRA, CARB, CalTrans, CEC, GoBiz	Not Applicable. This action/strategy calls upon State agencies and regulators to implement recommendations of the California Sustainable Freight Action Plan. The Project's future warehouse may be subject to, or influenced by, future implementation of these recommendations.

Adopt a Low Carbon Fuel Standard with a	CARB	No Conflict. On September 27, 2018, CARB
CI reduction of 18 percent.	CAILD	amended the LCFS regulation to target a
cireduction of 18 percent.		
		20 percent reduction in CI from a 2010
		baseline by 2030. This regulatory program
		applies to fuel suppliers, not directly to
		land use development. GHG emissions
		related to vehicular travel associated with
		the Project would benefit from this
		regulation because fuel used by Project-
		related vehicles would be required to
		comply with the LCFS. CalEEMod, which
		was used to estimate the Project's GHG
		emissions, accounts for the LCFS when
		-
Luculaniant that Chart Final Climate	CADD CalDa a vala CDEA	calculating mobile source GHG emissions.
Implement the Short-Lived Climate	CARB, CalRecycle, CDFA,	No Conflict. The Project would comply
Pollutant Strategy by 2030:	SWRCB, Local air	with the CARB Short-Lived Climate
40 percent reduction in methane	districts	Pollutant (SLCP) Reduction Strategy, which
and hydrofluorocarbon emissions below		limits the use of hydrofluorocarbons for
2013 levels.		refrigeration uses.
• 50 percent reduction in black		
carbon emissions below 2013 levels.		
By 2019, develop regulations and	CARB, CalRecycle, CDFA,	Not Applicable. This strategy calls on
programs to support organic waste	SWRCB, Local air	regulators to reduce GHG emissions from
landfill reduction goals in the SLCP and SB	districts	landfills and is not applicable to the Project.
1383.		Under SB 1383, the California Department
		of Resources Recycling and Recovery
		(CalRecycle) is responsible for achieving a
		75-percent reduction in the level of
		statewide disposal of organic waste (from
		2014 levels) by 2025.
Implement the post-2020 Cap-and-Trade	CARB	Not Applicable. This applies to State
	CAND	1
Program with declining annual caps.		regulators and is not applicable to the
		Project. Assembly Bill 398 (AB 398) was
		enacted in 2017 to extend and clarify the
		role of the state's Cap-and-Trade Program
		from January 1, 2021, through December
		31, 2030. As part of AB 398, refinements
		were made to the Cap-and-Trade program
		to establish updated protocols and
		allocation of proceeds to reduce GHG
		emissions.
By 2018, develop Integrated Natural and	CNRA and departments	Not Applicable. This applies to State
Working Lands Implementation Plan to	within, CDFA, CalEPA,	regulators and is not applicable to the
secure California's land base as a net	CARB	Project. This regulatory program applies to
carbon sink:	CAND	Natural and Working Lands, and it is not
Cai boll sills.		
		directly related to development of the
		Project. However, the Project would not

<ul> <li>Protect land from conversion through conservation easements and other incentives.</li> <li>Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.</li> <li>Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.</li> <li>Establish scenario projections to serve as the foundation for the Implementation Plan.</li> </ul>		interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	Not Applicable. This applies to State regulators and is not applicable to the Project. This regulatory program applies to Natural and Working Lands, and it is not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.
Implement Forest Carbon Plan	CNRA, CAL FIRE, CalEPA and departments within	Not Applicable. This applies to State regulators and is not applicable to the Project. This regulatory program applies to state and federal forest land, and it is not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.  Source: CARB, California's 2017 Climate Change S	State Agencies and Local Agencies  Scoping Plan, November 2017.	Not Applicable. This applies to State regulators and is not applicable to the Project. Funding and financing mechanisms are the responsibility of the state and local agencies. The Project would not conflict with funding and financing mechanisms to support GHG reductions.

#### 5.1.1.2 SCAG 2020-2045 RTP/SCS consistency

As noted earlier, SCAG's latest 2020-2045 RTP/SCS (Connect SoCal) is expected to help the SCAG region, and in turn California, reach its latest GHG reduction goals. Implementation of the 2020-2045 RTP/SCS is projected to reduce per capita vehicle GHG emissions by 19 percent by 2035, thus enabling the region to fulfill its portion of SB 375 compliance. Implementation is also projected to reduce daily VMT per capita 5 percent by 2045.

Generally, projects are considered consistent with the provisions and policies of applicable City and regional land use plans and regulations if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The land use pattern emphasized by the 2020-2045 RTP/SCS involves concentrating new dense housing and job growth in infill locations and HQTAs in an effort to facilitate alternative transportation modes and reduce vehicle trips and VMT. Development of the Project would be consistent with smart growth policies to strategically concentrate employment density and growth in "Job Centers." According to the 2020-2045 RTP/SCS, "Job Centers" represent areas with significantly higher employment density than surrounding areas. The RTP/SCS seeks to prioritize employment growth in existing Job Centers to leverage existing density and infrastructure associated with these locations, or to leverage future transit infrastructure and related investments. The Project is located in or near the Sylmar Job Center, which the RTP/SCS identifies as being generally near the Foothill Freeway's connection to the Golden State Freeway, just north of the Project. Because the Project would intensify the site's usage by replacing the site's existing 182,230 square feet of warehouse uses with more than 600,000 square feet of warehouse and ancillary uses, the Project would presumably increase the share of employment associated with the site and contribute to both employment growth and employment density within the Sylmar Job Center. Therefore, development of the Project would be consistent with the RTP/SCS's strategies concerning employment growth and Job Centers. The Project is not located within a HQTA, but the local HQTA network currently extends to approximately the intersection of San Fernando Road and Polk Street – approximately 1.25 miles southeast of the Project. By boosting employment growth and employment density within the Sylmar Job Center – which is not yet a part of this HQTA network – the Project would help leverage future efforts to expand the local HQTA network to include the Sylmar Job Center. Given these considerations, the Project is appropriately located from a land-use perspective; it would support the RTP/SCS and its smart growth strategies to efficiently coordinate land usage and transportation in order to reduce regional VMT and related GHG emissions.

**Table 3** includes further discussion regarding the Project's consistency with the applicable GHG-related performance measures and objectives of the 2020-2045 RTP/SCS.

Table 3
Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis <sup>a</sup>		
Increase percentage of region's total household	Not Applicable. The Project does not propose the		
growth occurring within HQTAs.	construction of housing. Development of the Project would		
	not result in the removal or displacement of existing		
	housing units.		
Increase percentage of the region's total	No Conflict. Though the Project is not located within a		
employment growth occurring within HQTAs.	HQTA, as discussed earlier, the Project would contribute to		
	employment growth and employment density within the		
	Sylmar Job Center, which would help leverage future		
	efforts to expand the local HQTA network to include the		
	Sylmar Job Center.		
Decrease total acreage of greenfield or otherwise	No Conflict. The Project is an urban infill development that		
rural land uses converted to urban use.	would reduce the demand for sprawl development in		
	greenfield or rural areas on the fringes of Southern		
	California. This is a particularly important consideration		

Objectives	Consistency Analysis <sup>a</sup>
	because the Project's proposed land use – a large warehousing use – is the exact type of development that is commonly built in greenfield or rural areas on the fringes of Southern California and contributes to sprawl.
Decrease daily vehicle miles driven per person.	No Conflict. The Project site's previous existing uses were warehouse uses. Because the Project proposes similar warehouse uses, its VMT per employee is likely to be similar to these previous warehouse uses. From a regional perspective, the Project would be consistent with the RTP/SCS and therefore would not conflict with its goal to reduce daily VMT per capita by 5% by 2045.
Decrease average daily distance traveled for work and non-work trips (in miles)	No Conflict. Same as above.
Increase percentage of work and non-work trips which are less than 3 miles in length.	No Conflict. The Project is an urban infill development, and its proximity to communities with a high density of housing, jobs, and other destinations would increase the percentage of trips that are less than three miles in length.
Increase share of short trip lengths for commute purposes.	No Conflict. Same as above.
Decrease average minutes of delay experienced per capita due to traffic congestion.	No Conflict. The nature of the Project as an urban infill development and its proximity to communities with a high density of housing, jobs, and other destinations would help reduce the rate of traffic and congestion growth. Additionally, all development options are estimated to result in a net reduction of daily trips when compared to the site's previous and existing uses.
Decrease excess travel time resulting from the difference between a reference speed and actual speed.	<b>No Conflict.</b> For similar reasons as above, the Project would help reduce traffic congestion-related delays. Additionally, according to the Project's Transportation Assessment report, the Project is not forecast to result in operational deficiencies at nearby intersections, meaning that the Project would not contribute to substantially greater traffic congestion. <sup>10</sup>
Increase percentage of PM peak period trips completed within 45 minutes by travel mode.	No Conflict. Same as above.

Ganddini Group, Inc. Roxford Street Warehouses Project Transportation Assessment. January 6, 2022.

Objectives	Consistency Analysis <sup>a</sup>
Increase percentage of trips that use transit (work and all trips)	No Conflict. Though the Project is not located within a HQTA, as discussed earlier, the Project would contribute to employment growth and employment density within the Sylmar Job Center, which would help leverage future efforts to expand the local HQTA network to include the Sylmar Job Center. This would help increase transit mode share for the entire Sylmar Job Center. It is also worth noting that similar warehouse uses are frequently developed in greenfield or rural sprawl locations with limited—if any—transit options.
Decrease average travel time to work (all modes)	<b>No Conflict.</b> For the reasons discussed above, the Project would be consistent with this objective.
Increase percentage of trips using either walking or biking (by trip type)	<ul> <li>No Conflict. Short- and long-term bicycle parking spaces and lockers would be provided in accordance with State and local requirements. Additionally:         <ul> <li>The Project would conform to all design element requirements of the City's Complete Streets Design Guide so that Project features do not hinder sight distance, mobility, or accessibility.</li> <li>Nearby San Fernando Road is designated a "Moderate Transit Enhanced Street" by the City's Mobility Plan 2035.</li> <li>Nearby Telfair Avenue is designated a "Neighborhood Enhanced Network" by the City's Mobility Plan 2035.</li> </ul> </li> </ul>
Reduce per capita GHG emissions (from 2005 levels)	<b>No Conflict.</b> As discussed throughout this analysis, the Project would be consistent with AB 32, SB 32, SB 375, and other initiatives designed to reduce per capita GHG emissions from 2005 levels.
Increase percentage of trips using a travel mode other than single occupancy vehicle (SOV)	<b>No Conflict.</b> For the reasons discussed above, the Project would be consistent with this objective.
Source: Southern California Association of Governments; 20	20–2045 RTP/SCS; September 2020.

#### 5.1.1.3 Sustainable City pLAn/Green New Deal

As discussed earlier, the Sustainable City pLAn, a mayoral initiative, includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.

Though the Sustainable City pLAn and its update, the City's Green New Deal, are not plans that have been adopted solely to reduce GHG emissions, the Green New Deal includes climate mitigation as one of eight explicit benefits that help define its strategies and goals.

Generally, these plans provide information as to how the City will manage buildings and infrastructure in its control. They also provide specific targets related to housing and development, as well as mobility and transit. For example, targets include reducing VMT per capita by 5 percent by 2025 and increasing trips made by walking, biking, or transit by at least 35 percent by 2025. The latest Green New Deal document establishes targets such as achieving 100 percent renewable energy by 2045, diverting 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035. Although the Sustainable City pLAn and Green New Deal are not adopted plans that are directly applicable to private development projects, the Project would benefit from the City's commitment to the goals and aspirations outlined in these documents.

#### 5.1.2 Conclusion

In summary, the consistency analysis provided above demonstrates that the Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. As a result, the Project's GHG emissions would not result in a significant impact to the environment, and Project-specific impacts with regard to climate change would be **less than significant**.

#### 5.1.3 Project emissions

As discussed above, compliance with applicable GHG emissions reductions plans renders a Project less than significant. In support of the consistency analysis provided above, the following quantitative estimates of the Project's GHG emissions are provided. The Project would result in direct and indirect GHG emissions generated by the following emissions sources:

- <u>Construction:</u> emissions associated with construction-related equipment and vehicle use.
- Area Sources: emissions associated with the on-site use of powered equipment.
- <u>Energy Sources:</u> emissions associated with the Project's electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting.
- Mobile Sources: emissions associated with the Project's related vehicle travel.
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.

#### 5.1.3.1 Construction

Project construction is anticipated to last approximately 22 months. As shown in **Table 4**, construction of the Project is estimated to generate approximately 2,786 MTCO $_2$ e. As recommended by the SCAQMD, the total construction-related GHG emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's annual operational emissions) in order to determine the Project's annual GHG emissions inventory. <sup>11</sup> This results in an annual Project-related construction emissions of approximately 93 MTCO $_2$ e.

SCAQMD Governing Board Agenda Item 31. December 5, 2008.

Table 4
Construction-Related GHG Emissions

Year	Emissions (MTCO <sub>2</sub> e)
2023	1,416.2
2024	1,369.7
Total	2,785.9
Amortized over 30 years	92.9
Source: NTEC, 2022.	

#### 5.1.3.2 Operations

**Table 5** shows the Project's estimated GHG emissions from operations, including the Project's annualized construction-related GHG emissions. As shown, operation of the Project is estimated to result in approximately 4,164.7 MTCO $_2$ e per year.

Table 5
Operations-Related GHG Emissions

Source	Emissions (MTCO₂e)
Area	< 0.1
Energy	940.7
Mobile	2,063.7
Solid Waste	289.8
Water/Wastewater	777.5
Construction	92.9
Total Emissions	4,164.7
Source: NTEC, 2022.	

#### 5.1.4 Cumulative impacts

As explained earlier, the analysis of a project's GHG emissions is inherently a cumulative impact analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the analysis above took into account the potential for the Project to contribute to the cumulative impact of global climate change. Given the Project's consistency with statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project's incremental contribution to greenhouse gas emissions and its effect on global climate change would not be cumulatively considerable. For these reasons, the Project's cumulative contribution to global climate change would be **less than significant**.



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#### Roxford Warehouses Project - Los Angeles-South Coast County, Annual

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

## **Roxford Warehouses Project**

#### Los Angeles-South Coast County, Annual

## 1.0 Project Characteristics

## 1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	32.82	1000sqft	0.00	32,822.00	0
Unrefrigerated Warehouse-No Rail	580.66	1000sqft	14.08	580,663.00	0
Parking Lot	410.00	Space	13.85	603,306.00	0

Descipitation From (David)

#### 1.2 Other Project Characteristics

Urbanization	Urban	wina Speea (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	12			Operational Year	2024
Litility Company	Los Angolos Donartment	of Water & Bower			

**Utility Company** Los Angeles Department of Water & Power

 CO2 Intensity
 691.98
 CH4 Intensity
 0.033
 N2O Intensity
 0.004

 (lb/MWhr)
 (lb/MWhr)
 (lb/MWhr)
 (lb/MWhr)

Min al Connad (mala)

#### 1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Applicant info.

Construction Phase - Applicant info.

Off-road Equipment - Applicant info.

Trips and VMT - Applicant info.

## Roxford Warehouses Project - Los Angeles-South Coast County, Annual

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

Demolition - Applicant info.

Grading - Applicant info.

Architectural Coating - Per SCAQMD Rule 1113 VOC limits.

Vehicle Trips - Warehouse trip rate based on 285 daily truck trips and 767 passenger car trips.

Area Coating - Per SCAQMD Rule 1113.

Construction Off-road Equipment Mitigation - Assumes use of SCAQMD Rule 403 BACM to reduce trackout.

Area Mitigation - Per SCAQMD Rule 1113.

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	100.00	50.00
tblArchitecturalCoating	EF_Nonresidential_Interior	100.00	50.00
tblAreaCoating	Area_EF_Nonresidential_Exterior	100	50
tblAreaCoating	Area_EF_Nonresidential_Interior	100	50
tblConstDustMitigation	CleanPavedRoadPercentReduction	0	80
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	3.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	7.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	5.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00

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# Roxford Warehouses Project - Los Angeles-South Coast County, Annual EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	7.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
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tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstructionPhase	NumDays	35.00	66.00
tblConstructionPhase	NumDays	440.00	348.00
tblConstructionPhase	NumDays	30.00	42.00
tblConstructionPhase	NumDays	45.00	43.00
tblConstructionPhase	NumDays	35.00	23.00
tblGrading	AcresOfGrading	150.50	140.00
tblGrading	MaterialExported	0.00	100,000.00
tblLandUse	LandUseSquareFeet	32,820.00	32,822.00
tblLandUse	LandUseSquareFeet	580,660.00	580,663.00
tblLandUse	LandUseSquareFeet	164,000.00	603,306.00

## Roxford Warehouses Project - Los Angeles-South Coast County, Annual

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

tblLandUse	LotAcreage	0.75	0.00
tblLandUse	LotAcreage	13.33	14.08
tblLandUse	LotAcreage	3.69	13.85
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblTripsAndVMT	HaulingTripLength	20.00	5.00
tblTripsAndVMT	HaulingTripLength	20.00	5.00
tblTripsAndVMT	VendorTripNumber	0.00	10.00
tblTripsAndVMT	VendorTripNumber	0.00	10.00
tblVehicleTrips	DV_TP	19.00	0.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	PB_TP	4.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	77.00	100.00
tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	ST_TR	2.21	10.85
tblVehicleTrips	ST_TR	1.74	1.81
tblVehicleTrips	SU_TR	0.70	10.85
tblVehicleTrips	SU_TR	1.74	1.81
tblVehicleTrips	WD_TR	9.74	10.85
tblVehicleTrips	WD_TR	1.74	1.81

## 2.0 Emissions Summary

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## Roxford Warehouses Project - Los Angeles-South Coast County, Annual

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

# 2.1 Overall Construction <u>Unmitigated Construction</u>

	ROG	NOx	CO	SO2	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					ton	s/yr							МТ	/yr		
2023	0.5352	4.7322	5.6691	0.0153	0.7329	0.1623	0.8952	0.1746	0.1531	0.3277	0.0000	1,391.502 9	1,391.502 9	0.1882	0.0672	1,416.228 6
2024	2.0161	3.7639	5.6260	0.0149	0.7079	0.1237	0.8316	0.1908	0.1181	0.3089	0.0000	1,347.883 9	1,347.883 9	0.1379	0.0616	1,369.682 4
Maximum	2.0161	4.7322	5.6691	0.0153	0.7329	0.1623	0.8952	0.1908	0.1531	0.3277	0.0000	1,391.502 9	1,391.502 9	0.1882	0.0672	1,416.228 6

## **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					ton	s/yr							MT	/yr		
2023	0.2459	1.6936	6.2863	0.0153	0.2541	0.0187	0.2728	0.0688	0.0183	0.0871	0.0000	1,391.502 1	1,391.502 1	0.1882	0.0672	1,416.227 8
2024	1.7829	1.5844	6.0316	0.0149	0.2327	0.0167	0.2494	0.0742	0.0163	0.0905	0.0000	1,347.883 2	1,347.883 2	0.1379	0.0616	1,369.681 8
Maximum	1.7829	1.6936	6.2863	0.0153	0.2541	0.0187	0.2728	0.0742	0.0183	0.0905	0.0000	1,391.502 1	1,391.502 1	0.1882	0.0672	1,416.227 8

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

	ROG	NOx	СО	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	20.48	61.42	-9.05	0.00	66.21	87.63	69.76	60.88	87.26	72.12	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-1-2023	3-31-2023	1.2226	0.3201
2	4-1-2023	6-30-2023	1.2012	0.4050
3	7-1-2023	9-30-2023	1.3938	0.5843
4	10-1-2023	12-31-2023	1.4132	0.6037
5	1-1-2024	3-31-2024	1.3303	0.5893
6	4-1-2024	6-30-2024	1.3116	0.5706
7	7-1-2024	9-30-2024	2.3921	1.5888
		Highest	2.3921	1.5888

## Roxford Warehouses Project - Los Angeles-South Coast County, Annual

## 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					ton	s/yr							MT	/yr		
Area	2.4076	1.2000e- 004	0.0130	0.0000		5.0000e- 005	5.0000e- 005		5.0000e- 005	5.0000e- 005	0.0000	0.0254	0.0254	7.0000e- 005	0.0000	0.0271
Energy	4.5200e- 003	0.0411	0.0345	2.5000e- 004		3.1200e- 003	3.1200e- 003		3.1200e- 003	3.1200e- 003	0.0000	937.8025	937.8025	0.0435	5.9800e- 003	940.6714
Mobile	0.8708	1.0659	9.7046	0.0220	2.3413	0.0159	2.3571	0.6246	0.0147	0.6394	0.0000	2,035.183 0	2,035.183 0	0.1321	0.0847	2,063.734 4
Waste	 					0.0000	0.0000		0.0000	0.0000	116.9918	0.0000	116.9918	6.9140	0.0000	289.8423
Water	ri 					0.0000	0.0000		0.0000	0.0000	44.4507	585.0990	629.5497	4.5934	0.1112	777.5180
Total	3.2829	1.1071	9.7521	0.0223	2.3413	0.0191	2.3603	0.6246	0.0179	0.6425	161.4425	3,558.109 9	3,719.552 4	11.6831	0.2019	4,071.793 1

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## Roxford Warehouses Project - Los Angeles-South Coast County, Annual

## 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					ton	s/yr							MT	/yr		
Area	2.4076	1.2000e- 004	0.0130	0.0000		5.0000e- 005	5.0000e- 005		5.0000e- 005	5.0000e- 005	0.0000	0.0254	0.0254	7.0000e- 005	0.0000	0.0271
Energy	4.5200e- 003	0.0411	0.0345	2.5000e- 004		3.1200e- 003	3.1200e- 003		3.1200e- 003	3.1200e- 003	0.0000	937.8025	937.8025	0.0435	5.9800e- 003	940.6714
Mobile	0.8708	1.0659	9.7046	0.0220	2.3413	0.0159	2.3571	0.6246	0.0147	0.6394	0.0000	2,035.183 0	2,035.183 0	0.1321	0.0847	2,063.734 4
Waste	 					0.0000	0.0000		0.0000	0.0000	116.9918	0.0000	116.9918	6.9140	0.0000	289.8423
Water	ri 					0.0000	0.0000		0.0000	0.0000	44.4507	585.0990	629.5497	4.5934	0.1112	777.5180
Total	3.2829	1.1071	9.7521	0.0223	2.3413	0.0191	2.3603	0.6246	0.0179	0.6425	161.4425	3,558.109 9	3,719.552 4	11.6831	0.2019	4,071.793 1

	ROG	NOx	СО	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	Demolition	Demolition	1/1/2023	2/28/2023	5	42	
2	Grading	Grading	3/1/2023	4/28/2023	5	43	
3	Trenching	Trenching	5/1/2023	5/31/2023	5	23	

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4	Building Construction	Building Construction	6/1/2023	9/30/2024	5	348	
	Architectural Coating	Architectural Coating	8/1/2024	10/31/2024	5	66	
6	Paving	Paving	10/1/2024	10/31/2024	5	23	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 140

Acres of Paving: 13.85

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 920,228; Non-Residential Outdoor: 306,743; Striped Parking Area:

36,198 (Architectural Coating - sqft)

#### **OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Crawler Tractors	2	8.00	212	0.43
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	0	8.00	247	0.40
Demolition	Rubber Tired Loaders	2	8.00	203	0.36
Grading	Crawler Tractors	2	8.00	212	0.43
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rollers	2	8.00	80	0.38
Grading	Rubber Tired Dozers	0	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Trenching	Cranes	1	8.00	231	0.29
Trenching	Excavators	2	8.00	158	0.38
Trenching	Rough Terrain Forklifts	2	8.00	100	0.40
Trenching	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Aerial Lifts	2	8.00	63	0.31

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

Building Construction	Air Compressors	2	8.00	78	0.48
Building Construction	Cranes	2	8.00	231	0.29
Building Construction	Forklifts	0	8.00	89	0.20
Building Construction	Generator Sets	2	8.00	84	0.74
Building Construction	Rough Terrain Forklifts	3	8.00	100	0.40
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	2	8.00	46	0.45
Architectural Coating	Air Compressors	2	6.00	78	0.48
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Paving	Skid Steer Loaders	2	8.00	65	0.37

## **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
Demolition	8	20.00	10.00	829.00	14.70	6.90	5.00	LD_Mix	HDT_Mix	HHDT
Grading	11	28.00	10.00	12,500.00	14.70	6.90	5.00	LD_Mix	HDT_Mix	HHDT
Trenching	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	16	508.00	199.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	2	102.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

## **3.1 Mitigation Measures Construction**

Use Cleaner Engines for Construction Equipment

Water Exposed Area

Clean Paved Roads

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

# 3.2 Demolition - 2023

## **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					ton	s/yr							МТ	/yr		
Fugitive Dust	11 11 11				0.0897	0.0000	0.0897	0.0136	0.0000	0.0136	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0489	0.4786	0.4397	1.0500e- 003		0.0196	0.0196		0.0182	0.0182	0.0000	91.8376	91.8376	0.0266	0.0000	92.5028
Total	0.0489	0.4786	0.4397	1.0500e- 003	0.0897	0.0196	0.1092	0.0136	0.0182	0.0318	0.0000	91.8376	91.8376	0.0266	0.0000	92.5028

## **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							МТ	/yr		
Hauling	5.4000e- 004	0.0200	8.3300e- 003	7.0000e- 005	1.7900e- 003	9.0000e- 005	1.8800e- 003	4.9000e- 004	8.0000e- 005	5.8000e- 004	0.0000	6.8395	6.8395	3.5000e- 004	1.0900e- 003	7.1719
Vendor	2.4000e- 004	8.4600e- 003	3.1700e- 003	4.0000e- 005	1.3200e- 003	4.0000e- 005	1.3600e- 003	3.8000e- 004	4.0000e- 005	4.2000e- 004	0.0000	3.8183	3.8183	1.3000e- 004	5.5000e- 004	3.9852
Worker	1.3300e- 003	1.0600e- 003	0.0143	4.0000e- 005	4.6000e- 003	3.0000e- 005	4.6300e- 003	1.2200e- 003	3.0000e- 005	1.2500e- 003	0.0000	3.6634	3.6634	1.0000e- 004	1.0000e- 004	3.6943
Total	2.1100e- 003	0.0296	0.0258	1.5000e- 004	7.7100e- 003	1.6000e- 004	7.8700e- 003	2.0900e- 003	1.5000e- 004	2.2500e- 003	0.0000	14.3212	14.3212	5.8000e- 004	1.7400e- 003	14.8514

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

# 3.2 Demolition - 2023

## **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					ton	s/yr							MT	/yr		
Fugitive Dust					0.0350	0.0000	0.0350	5.3000e- 003	0.0000	5.3000e- 003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0126	0.0547	0.5955	1.0500e- 003		1.6800e- 003	1.6800e- 003		1.6800e- 003	1.6800e- 003	0.0000	91.8375	91.8375	0.0266	0.0000	92.5027
Total	0.0126	0.0547	0.5955	1.0500e- 003	0.0350	1.6800e- 003	0.0367	5.3000e- 003	1.6800e- 003	6.9800e- 003	0.0000	91.8375	91.8375	0.0266	0.0000	92.5027

## **Mitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	/yr		
Hauling	5.4000e- 004	0.0200	8.3300e- 003	7.0000e- 005	7.2000e- 004	9.0000e- 005	8.1000e- 004	2.3000e- 004	8.0000e- 005	3.1000e- 004	0.0000	6.8395	6.8395	3.5000e- 004	1.0900e- 003	7.1719
Vendor	2.4000e- 004	8.4600e- 003	3.1700e- 003	4.0000e- 005	5.7000e- 004	4.0000e- 005	6.2000e- 004	2.0000e- 004	4.0000e- 005	2.4000e- 004	0.0000	3.8183	3.8183	1.3000e- 004	5.5000e- 004	3.9852
Worker	1.3300e- 003	1.0600e- 003	0.0143	4.0000e- 005	1.4100e- 003	3.0000e- 005	1.4400e- 003	4.4000e- 004	3.0000e- 005	4.7000e- 004	0.0000	3.6634	3.6634	1.0000e- 004	1.0000e- 004	3.6943
Total	2.1100e- 003	0.0296	0.0258	1.5000e- 004	2.7000e- 003	1.6000e- 004	2.8700e- 003	8.7000e- 004	1.5000e- 004	1.0200e- 003	0.0000	14.3212	14.3212	5.8000e- 004	1.7400e- 003	14.8514

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## Roxford Warehouses Project - Los Angeles-South Coast County, Annual

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

3.3 Grading - 2023

## **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					ton	s/yr							MT	/yr		
Fugitive Dust					0.0799	0.0000	0.0799	8.8700e- 003	0.0000	8.8700e- 003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0824	0.8784	0.7124	1.6000e- 003		0.0361	0.0361	]   	0.0332	0.0332	0.0000	140.6123	140.6123	0.0455	0.0000	141.7493
Total	0.0824	0.8784	0.7124	1.6000e- 003	0.0799	0.0361	0.1160	8.8700e- 003	0.0332	0.0421	0.0000	140.6123	140.6123	0.0455	0.0000	141.7493

# **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							МТ	/yr		
Hauling	8.0800e- 003	0.3020	0.1256	1.0400e- 003	0.0270	1.3400e- 003	0.0283	7.4200e- 003	1.2800e- 003	8.7000e- 003	0.0000	103.1288	103.1288	5.3400e- 003	0.0164	108.1402
Vendor	2.4000e- 004	8.6600e- 003	3.2400e- 003	4.0000e- 005	1.3500e- 003	4.0000e- 005	1.4000e- 003	3.9000e- 004	4.0000e- 005	4.3000e- 004	0.0000	3.9092	3.9092	1.3000e- 004	5.6000e- 004	4.0801
Worker	1.9100e- 003	1.5200e- 003	0.0205	6.0000e- 005	6.6000e- 003	4.0000e- 005	6.6400e- 003	1.7500e- 003	4.0000e- 005	1.7900e- 003	0.0000	5.2509	5.2509	1.4000e- 004	1.4000e- 004	5.2951
Total	0.0102	0.3122	0.1493	1.1400e- 003	0.0349	1.4200e- 003	0.0364	9.5600e- 003	1.3600e- 003	0.0109	0.0000	112.2889	112.2889	5.6100e- 003	0.0171	117.5154

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

3.3 Grading - 2023

## **Mitigated Construction On-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	/yr		
Fugitive Dust					0.0312	0.0000	0.0312	3.4600e- 003	0.0000	3.4600e- 003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0197	0.0852	0.8645	1.6000e- 003		2.6200e- 003	2.6200e- 003		2.6200e- 003	2.6200e- 003	0.0000	140.6122	140.6122	0.0455	0.0000	141.7491
Total	0.0197	0.0852	0.8645	1.6000e- 003	0.0312	2.6200e- 003	0.0338	3.4600e- 003	2.6200e- 003	6.0800e- 003	0.0000	140.6122	140.6122	0.0455	0.0000	141.7491

## **Mitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							МТ	/уг		
,	8.0800e- 003	0.3020	0.1256	1.0400e- 003	0.0108	1.3400e- 003	0.0122	3.4600e- 003	1.2800e- 003	4.7400e- 003	0.0000	103.1288	103.1288	5.3400e- 003	0.0164	108.1402
V on don	2.4000e- 004	8.6600e- 003	3.2400e- 003	4.0000e- 005	5.9000e- 004	4.0000e- 005	6.3000e- 004	2.0000e- 004	4.0000e- 005	2.4000e- 004	0.0000	3.9092	3.9092	1.3000e- 004	5.6000e- 004	4.0801
1	1.9100e- 003	1.5200e- 003	0.0205	6.0000e- 005	2.0200e- 003	4.0000e- 005	2.0600e- 003	6.3000e- 004	4.0000e- 005	6.7000e- 004	0.0000	5.2509	5.2509	1.4000e- 004	1.4000e- 004	5.2951
Total	0.0102	0.3122	0.1493	1.1400e- 003	0.0134	1.4200e- 003	0.0149	4.2900e- 003	1.3600e- 003	5.6500e- 003	0.0000	112.2889	112.2889	5.6100e- 003	0.0171	117.5154

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

# 3.4 Trenching - 2023

## **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					ton	s/yr							MT	/yr		
	0.0143	0.1470	0.2000	3.4000e- 004		6.3500e- 003	6.3500e- 003		5.8500e- 003	5.8500e- 003	0.0000	29.5221	29.5221	9.5500e- 003	0.0000	29.7608
Total	0.0143	0.1470	0.2000	3.4000e- 004		6.3500e- 003	6.3500e- 003		5.8500e- 003	5.8500e- 003	0.0000	29.5221	29.5221	9.5500e- 003	0.0000	29.7608

## **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	6.6000e- 004	5.2000e- 004	7.0500e- 003	2.0000e- 005	2.2700e- 003	1.0000e- 005	2.2800e- 003	6.0000e- 004	1.0000e- 005	6.2000e- 004	0.0000	1.8055	1.8055	5.0000e- 005	5.0000e- 005	1.8208
Total	6.6000e- 004	5.2000e- 004	7.0500e- 003	2.0000e- 005	2.2700e- 003	1.0000e- 005	2.2800e- 003	6.0000e- 004	1.0000e- 005	6.2000e- 004	0.0000	1.8055	1.8055	5.0000e- 005	5.0000e- 005	1.8208

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

## 3.4 Trenching - 2023

#### **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					ton	s/yr							МТ	/yr		
	4.1200e- 003	0.0179	0.2339	3.4000e- 004		5.5000e- 004	5.5000e- 004		5.5000e- 004	5.5000e- 004	0.0000	29.5221	29.5221	9.5500e- 003	0.0000	29.7608
Total	4.1200e- 003	0.0179	0.2339	3.4000e- 004		5.5000e- 004	5.5000e- 004		5.5000e- 004	5.5000e- 004	0.0000	29.5221	29.5221	9.5500e- 003	0.0000	29.7608

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							МТ	/уг		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	6.6000e- 004	5.2000e- 004	7.0500e- 003	2.0000e- 005	7.0000e- 004	1.0000e- 005	7.1000e- 004	2.2000e- 004	1.0000e- 005	2.3000e- 004	0.0000	1.8055	1.8055	5.0000e- 005	5.0000e- 005	1.8208
Total	6.6000e- 004	5.2000e- 004	7.0500e- 003	2.0000e- 005	7.0000e- 004	1.0000e- 005	7.1000e- 004	2.2000e- 004	1.0000e- 005	2.3000e- 004	0.0000	1.8055	1.8055	5.0000e- 005	5.0000e- 005	1.8208

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

# 3.5 Building Construction - 2023 <u>Unmitigated Construction On-Site</u>

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	/yr		
Off-Road	0.2370	2.1792	2.5913	4.5300e- 003		0.0932	0.0932		0.0891	0.0891	0.0000	389.3714	389.3714	0.0822	0.0000	391.4252
Total	0.2370	2.1792	2.5913	4.5300e- 003		0.0932	0.0932		0.0891	0.0891	0.0000	389.3714	389.3714	0.0822	0.0000	391.4252

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/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	0.0171	0.6095	0.2281	2.8200e- 003	0.0953	2.9300e- 003	0.0982	0.0275	2.8000e- 003	0.0303	0.0000	274.9880	274.9880	9.1900e- 003	0.0396	287.0110
Worker	0.1225	0.0973	1.3154	3.6700e- 003	0.4231	2.6000e- 003	0.4257	0.1124	2.3900e- 003	0.1148	0.0000	336.7559	336.7559	8.9600e- 003	8.7700e- 003	339.5921
Total	0.1396	0.7068	1.5435	6.4900e- 003	0.5184	5.5300e- 003	0.5239	0.1399	5.1900e- 003	0.1451	0.0000	611.7438	611.7438	0.0182	0.0483	626.6030

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

# 3.5 Building Construction - 2023

#### **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					ton	s/yr							MT	/yr		
Off-Road	0.0570	0.4868	2.8667	4.5300e- 003		6.7300e- 003	6.7300e- 003		6.7300e- 003	6.7300e- 003	0.0000	389.3709	389.3709	0.0822	0.0000	391.4247
Total	0.0570	0.4868	2.8667	4.5300e- 003		6.7300e- 003	6.7300e- 003		6.7300e- 003	6.7300e- 003	0.0000	389.3709	389.3709	0.0822	0.0000	391.4247

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							МТ	/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	0.0171	0.6095	0.2281	2.8200e- 003	0.0414	2.9300e- 003	0.0443	0.0143	2.8000e- 003	0.0171	0.0000	274.9880	274.9880	9.1900e- 003	0.0396	287.0110
Worker	0.1225	0.0973	1.3154	3.6700e- 003	0.1297	2.6000e- 003	0.1323	0.0404	2.3900e- 003	0.0428	0.0000	336.7559	336.7559	8.9600e- 003	8.7700e- 003	339.5921
Total	0.1396	0.7068	1.5435	6.4900e- 003	0.1711	5.5300e- 003	0.1766	0.0546	5.1900e- 003	0.0598	0.0000	611.7438	611.7438	0.0182	0.0483	626.6030

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

# 3.5 Building Construction - 2024 <u>Unmitigated Construction On-Site</u>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	/yr		
	0.2883	2.6474	3.3274	5.8400e- 003		0.1065	0.1065		0.1017	0.1017	0.0000	502.1085	502.1085	0.1051	0.0000	504.7349
Total	0.2883	2.6474	3.3274	5.8400e- 003		0.1065	0.1065		0.1017	0.1017	0.0000	502.1085	502.1085	0.1051	0.0000	504.7349

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							МТ	/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	0.0213	0.7875	0.2880	3.5700e- 003	0.1229	3.8000e- 003	0.1267	0.0355	3.6300e- 003	0.0391	0.0000	349.2697	349.2697	0.0119	0.0503	364.5606
Worker	0.1474	0.1119	1.5772	4.6000e- 003	0.5455	3.2000e- 003	0.5487	0.1449	2.9500e- 003	0.1478	0.0000	421.9599	421.9599	0.0105	0.0105	425.3522
Total	0.1687	0.8994	1.8652	8.1700e- 003	0.6684	7.0000e- 003	0.6755	0.1804	6.5800e- 003	0.1870	0.0000	771.2295	771.2295	0.0224	0.0608	789.9128

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

# 3.5 Building Construction - 2024 Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	/yr		
Off-Road	0.0735	0.6278	3.6965	5.8400e- 003		8.6800e- 003	8.6800e- 003		8.6800e- 003	8.6800e- 003	0.0000	502.1079	502.1079	0.1051	0.0000	504.7343
Total	0.0735	0.6278	3.6965	5.8400e- 003		8.6800e- 003	8.6800e- 003		8.6800e- 003	8.6800e- 003	0.0000	502.1079	502.1079	0.1051	0.0000	504.7343

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							МТ	/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	0.0213	0.7875	0.2880	3.5700e- 003	0.0534	3.8000e- 003	0.0572	0.0184	3.6300e- 003	0.0220	0.0000	349.2697	349.2697	0.0119	0.0503	364.5606
Worker	0.1474	0.1119	1.5772	4.6000e- 003	0.1673	3.2000e- 003	0.1705	0.0520	2.9500e- 003	0.0550	0.0000	421.9599	421.9599	0.0105	0.0105	425.3522
Total	0.1687	0.8994	1.8652	8.1700e- 003	0.2206	7.0000e- 003	0.2276	0.0704	6.5800e- 003	0.0770	0.0000	771.2295	771.2295	0.0224	0.0608	789.9128

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

# 3.6 Architectural Coating - 2024 <u>Unmitigated Construction On-Site</u>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	/yr		
Archit. Coating	1.5056					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0119	0.0804	0.1195	2.0000e- 004		4.0200e- 003	4.0200e- 003		4.0200e- 003	4.0200e- 003	0.0000	16.8515	16.8515	9.5000e- 004	0.0000	16.8752
Total	1.5176	0.0804	0.1195	2.0000e- 004		4.0200e- 003	4.0200e- 003		4.0200e- 003	4.0200e- 003	0.0000	16.8515	16.8515	9.5000e- 004	0.0000	16.8752

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							МТ	/уг		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
VVOINCI	9.9600e- 003	7.5600e- 003	0.1066	3.1000e- 004	0.0369	2.2000e- 004	0.0371	9.8000e- 003	2.0000e- 004	0.0100	0.0000	28.5296	28.5296	7.1000e- 004	7.1000e- 004	28.7590
Total	9.9600e- 003	7.5600e- 003	0.1066	3.1000e- 004	0.0369	2.2000e- 004	0.0371	9.8000e- 003	2.0000e- 004	0.0100	0.0000	28.5296	28.5296	7.1000e- 004	7.1000e- 004	28.7590

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

# 3.6 Architectural Coating - 2024 Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							МТ	/yr		
Archit. Coating	1.5056					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
I on read	1.9600e- 003	8.5000e- 003	0.1209	2.0000e- 004		2.6000e- 004	2.6000e- 004		2.6000e- 004	2.6000e- 004	0.0000	16.8515	16.8515	9.5000e- 004	0.0000	16.8752
Total	1.5076	8.5000e- 003	0.1209	2.0000e- 004		2.6000e- 004	2.6000e- 004		2.6000e- 004	2.6000e- 004	0.0000	16.8515	16.8515	9.5000e- 004	0.0000	16.8752

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	/уг		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	9.9600e- 003	7.5600e- 003	0.1066	3.1000e- 004	0.0113	2.2000e- 004	0.0115	3.5200e- 003	2.0000e- 004	3.7200e- 003	0.0000	28.5296	28.5296	7.1000e- 004	7.1000e- 004	28.7590
Total	9.9600e- 003	7.5600e- 003	0.1066	3.1000e- 004	0.0113	2.2000e- 004	0.0115	3.5200e- 003	2.0000e- 004	3.7200e- 003	0.0000	28.5296	28.5296	7.1000e- 004	7.1000e- 004	28.7590

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

3.7 Paving - 2024
<u>Unmitigated Construction On-Site</u>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	√yr		
Off-Road	0.0128	0.1285	0.2000	3.1000e- 004		6.0000e- 003	6.0000e- 003	 	5.5200e- 003	5.5200e- 003	0.0000	27.2154	27.2154	8.8000e- 003	0.0000	27.4355
Paving	0.0181					0.0000	0.0000	       	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0309	0.1285	0.2000	3.1000e- 004		6.0000e- 003	6.0000e- 003		5.5200e- 003	5.5200e- 003	0.0000	27.2154	27.2154	8.8000e- 003	0.0000	27.4355

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							МТ	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.8000e- 004	5.2000e- 004	7.2900e- 003	2.0000e- 005	2.5200e- 003	1.0000e- 005	2.5400e- 003	6.7000e- 004	1.0000e- 005	6.8000e- 004	0.0000	1.9494	1.9494	5.0000e- 005	5.0000e- 005	1.9651
Total	6.8000e- 004	5.2000e- 004	7.2900e- 003	2.0000e- 005	2.5200e- 003	1.0000e- 005	2.5400e- 003	6.7000e- 004	1.0000e- 005	6.8000e- 004	0.0000	1.9494	1.9494	5.0000e- 005	5.0000e- 005	1.9651

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

3.7 Paving - 2024

<u>Mitigated Construction On-Site</u>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							МТ	⁻/yr		
	4.4000e- 003	0.0407	0.2350	3.1000e- 004		5.1000e- 004	5.1000e- 004		5.1000e- 004	5.1000e- 004	0.0000	27.2154	27.2154	8.8000e- 003	0.0000	27.4354
Paving	0.0181		 		 	0.0000	0.0000	i i	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0225	0.0407	0.2350	3.1000e- 004		5.1000e- 004	5.1000e- 004		5.1000e- 004	5.1000e- 004	0.0000	27.2154	27.2154	8.8000e- 003	0.0000	27.4354

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							МТ	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.8000e- 004	5.2000e- 004	7.2900e- 003	2.0000e- 005	7.7000e- 004	1.0000e- 005	7.9000e- 004	2.4000e- 004	1.0000e- 005	2.5000e- 004	0.0000	1.9494	1.9494	5.0000e- 005	5.0000e- 005	1.9651
Total	6.8000e- 004	5.2000e- 004	7.2900e- 003	2.0000e- 005	7.7000e- 004	1.0000e- 005	7.9000e- 004	2.4000e- 004	1.0000e- 005	2.5000e- 004	0.0000	1.9494	1.9494	5.0000e- 005	5.0000e- 005	1.9651

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# 4.0 Operational Detail - Mobile

## **4.1 Mitigation Measures Mobile**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	/yr		
Mitigated	0.8708	1.0659	9.7046	0.0220	2.3413	0.0159	2.3571	0.6246	0.0147	0.6394	0.0000	2,035.183 0	2,035.183 0	0.1321	0.0847	2,063.734 4
Unmitigated	0.8708	1.0659	9.7046	0.0220	2.3413	0.0159	2.3571	0.6246	0.0147	0.6394	0.0000	2,035.183 0	2,035.183 0	0.1321	0.0847	2,063.734 4

### **4.2 Trip Summary Information**

	Avei	age Daily Trip Ra	ite	Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Office Building	356.10	356.10	356.10	1,402,611	1,402,611
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	1,050.99	1,050.99	1050.99	4,829,081	4,829,081
Total	1,407.09	1,407.09	1,407.09	6,231,691	6,231,691

## **4.3 Trip Type Information**

		Miles			Trip %			Trip Purpos	e %
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
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	100	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	100	0	0

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#### 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
General Office Building	0.542464	0.063735	0.188241	0.126899	0.023249	0.006239	0.010717	0.008079	0.000923	0.000604	0.024795	0.000702	0.003352
Parking Lot	0.542464	0.063735	0.188241	0.126899	0.023249	0.006239	0.010717	0.008079	0.000923	0.000604	0.024795	0.000702	0.003352
Unrefrigerated Warehouse-No Rail	0.542464	0.063735	0.188241	0.126899	0.023249	0.006239	0.010717	0.008079	0.000923	0.000604	0.024795	0.000702	0.003352

## 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					ton	s/yr							MT	-/yr		
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	893.0962	893.0962	0.0426	5.1600e- 003	895.6994
Electricity Unmitigated						0.0000	0.0000	       	0.0000	0.0000	0.0000	893.0962	893.0962	0.0426	5.1600e- 003	895.6994
NaturalGas Mitigated	4.5200e- 003	0.0411	0.0345	2.5000e- 004		3.1200e- 003	3.1200e- 003	       	3.1200e- 003	3.1200e- 003	0.0000	44.7063	44.7063	8.6000e- 004	8.2000e- 004	44.9720
NaturalGas Unmitigated	4.5200e- 003	0.0411	0.0345	2.5000e- 004		3.1200e- 003	3.1200e- 003		3.1200e- 003	3.1200e- 003	0.0000	44.7063	44.7063	8.6000e- 004	8.2000e- 004	44.9720

#### 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 <u>Unmitigated</u>

	NaturalGa s Use	ROG	NOx	СО	SO2	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					ton	s/yr							MT	/yr		
General Office Building	338395	1.8200e- 003	0.0166	0.0139	1.0000e- 004		1.2600e- 003	1.2600e- 003		1.2600e- 003	1.2600e- 003	0.0000	18.0580	18.0580	3.5000e- 004	3.3000e- 004	18.1654
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	499370	2.6900e- 003	0.0245	0.0206	1.5000e- 004		1.8600e- 003	1.8600e- 003		1.8600e- 003	1.8600e- 003	0.0000	26.6483	26.6483	5.1000e- 004	4.9000e- 004	26.8067
Total		4.5100e- 003	0.0411	0.0345	2.5000e- 004		3.1200e- 003	3.1200e- 003		3.1200e- 003	3.1200e- 003	0.0000	44.7063	44.7063	8.6000e- 004	8.2000e- 004	44.9720

### 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**

	NaturalGa s Use	ROG	NOx	СО	SO2	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					
General Office Building	338395	1.8200e- 003	0.0166	0.0139	1.0000e- 004		1.2600e- 003	1.2600e- 003		1.2600e- 003	1.2600e- 003	0.0000	18.0580	18.0580	3.5000e- 004	3.3000e- 004	18.1654
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	499370	2.6900e- 003	0.0245	0.0206	1.5000e- 004		1.8600e- 003	1.8600e- 003		1.8600e- 003	1.8600e- 003	0.0000	26.6483	26.6483	5.1000e- 004	4.9000e- 004	26.8067
Total		4.5100e- 003	0.0411	0.0345	2.5000e- 004		3.1200e- 003	3.1200e- 003		3.1200e- 003	3.1200e- 003	0.0000	44.7063	44.7063	8.6000e- 004	8.2000e- 004	44.9720

### 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						
General Office Building	410275	128.7758	6.1400e- 003	7.4000e- 004	129.1512			
Parking Lot	211157	66.2773	3.1600e- 003	3.8000e- 004	66.4705			
Unrefrigerated Warehouse-No Rail	2.22394e +006	698.0431	0.0333	4.0400e- 003	700.0777			
Total		893.0962	0.0426	5.1600e- 003	895.6994			

#### 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					
General Office Building	410275	128.7758	6.1400e- 003	7.4000e- 004	129.1512		
Parking Lot	211157	66.2773	3.1600e- 003	3.8000e- 004	66.4705		
Unrefrigerated Warehouse-No Rail	2.22394e +006	698.0431	0.0333	4.0400e- 003	700.0777		
Total		893.0962	0.0426	5.1600e- 003	895.6994		

### 6.0 Area Detail

**6.1 Mitigation Measures Area** 

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					ton	s/yr							MT	/yr		
Mitigated	2.4076	1.2000e- 004	0.0130	0.0000		5.0000e- 005	5.0000e- 005		5.0000e- 005	5.0000e- 005	0.0000	0.0254	0.0254	7.0000e- 005	0.0000	0.0271
Unmitigated	2.4076	1.2000e- 004	0.0130	0.0000	 	5.0000e- 005	5.0000e- 005	 	5.0000e- 005	5.0000e- 005	0.0000	0.0254	0.0254	7.0000e- 005	0.0000	0.0271

# 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	0.1506					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	2.2558				       	0.0000	0.0000	       	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.2000e- 003	1.2000e- 004	0.0130	0.0000	       	5.0000e- 005	5.0000e- 005	       	5.0000e- 005	5.0000e- 005	0.0000	0.0254	0.0254	7.0000e- 005	0.0000	0.0271
Total	2.4076	1.2000e- 004	0.0130	0.0000		5.0000e- 005	5.0000e- 005		5.0000e- 005	5.0000e- 005	0.0000	0.0254	0.0254	7.0000e- 005	0.0000	0.0271

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#### 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															
Coating	0.1506					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	2.2558					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landocaping	1.2000e- 003	1.2000e- 004	0.0130	0.0000		5.0000e- 005	5.0000e- 005		5.0000e- 005	5.0000e- 005	0.0000	0.0254	0.0254	7.0000e- 005	0.0000	0.0271
Total	2.4076	1.2000e- 004	0.0130	0.0000		5.0000e- 005	5.0000e- 005		5.0000e- 005	5.0000e- 005	0.0000	0.0254	0.0254	7.0000e- 005	0.0000	0.0271

## 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							
Willigatoa	629.5497	4.5934	0.1112	777.5180					
- Ciminigatou	629.5497	4.5934	0.1112	777.5180					

# 7.2 Water by Land Use <u>Unmitigated</u>

	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e		
Land Use	Mgal	MT/yr					
General Office Building	5.83322 / 3.5752	38.1583	0.1918	4.7000e- 003	44.3534		
Parking Lot	0/0	0.0000	0.0000	0.0000	0.0000		
Unrefrigerated Warehouse-No Rail	134.278 / 0	591.3915	4.4016	0.1065	733.1645		
Total		629.5497	4.5934	0.1112	777.5179		

#### 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/Out door Use	Total CO2	CH4	N2O	CO2e			
Land Use	Mgal	MT/yr						
General Office Building	5.83322 / 3.5752	38.1583	0.1918	4.7000e- 003	44.3534			
Parking Lot	0/0	0.0000	0.0000	0.0000	0.0000			
Unrefrigerated Warehouse-No Rail	134.278 / 0	591.3915	4.4016	0.1065	733.1645			
Total		629.5497	4.5934	0.1112	777.5179			

### 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							
Willigatou		6.9140	0.0000	289.8423				
Unmitigated		6.9140	0.0000	289.8423				

# 8.2 Waste by Land Use <u>Unmitigated</u>

	Waste Disposed	Total CO2	CH4	N2O	CO2e			
Land Use	tons	MT/yr						
General Office Building	30.52	6.1953	0.3661	0.0000	15.3486			
Parking Lot	0	0.0000	0.0000	0.0000	0.0000			
Unrefrigerated Warehouse-No Rail	545.82	110.7965	6.5479	0.0000	274.4937			
Total		116.9918	6.9140	0.0000	289.8423			

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

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## 8.2 Waste by Land Use

#### **Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e			
Land Use	tons	MT/yr						
General Office Building	30.52	6.1953	0.3661	0.0000	15.3486			
Parking Lot	0	0.0000	0.0000	0.0000	0.0000			
Unrefrigerated Warehouse-No Rail	545.82	110.7965	6.5479	0.0000	274.4937			
Total		116.9918	6.9140	0.0000	289.8423			

## 9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
1-1 31			7			31

## **10.0 Stationary Equipment**

## **Fire Pumps and Emergency Generators**

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

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

## **User Defined Equipment**

Equipment Type	Number

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11.0 Vegetation