

During the September 26, 2023 City Council meeting, one of the Council members asked how this project, approximately 35 acres in size, could have operational air quality impacts that were less than significant under CEQA. As analyzed in the Draft EIR, the California Emissions Estimator Model (CalEEMod) computer program was used to quantify Project-related emissions. CalEEMod is a statewide model that was developed in conjunction with the SCAQMD and other air districts to estimate emissions from land use development in California and is the model recommended by both the SCAQMD and the City. CalEEMod utilizes widely accepted methodologies for estimating emissions combined with default data that can be used when site-specific information is not available. Sources of these methodologies and default data include the United States Environmental Protection Agency (USEPA), California Air Resources Board’s (CARB), and studies commissioned by California agencies such as the California Energy Commission (CEC) and California Department of Resources Recycling and Recovery (CalRecycle). In addition, some local air districts provided customized values to support defaults and calculations for projects located in their jurisdictions.

Project-specific information is input into the model, such as land use type and size and traffic data from a traffic study, and then the model calculates the emissions associated with it. Generally, the level of emissions from a land use development is dependent upon the land use type and size and the intensity of the emissions sources. For example, 35 acres of a City park is going to have a different emissions inventory and mix of emissions in the various emission categories than a similarly sized development operating residential or industrial land uses.

For the proposed Project, a non-refrigerated warehouse building of 769,668 square feet was modeled, which is slightly larger than the current building size of 764,753 square feet proposed after site design changes from planning staff and Planning Commission input. The traffic data was obtained from the *Patterson-Nance Warehouse Project Traffic Impact Analysis (DPR 21-00005)*. As recommended by City staff for all industrial land use development proposals in the City, an average truck trip length of approximately 40 miles that was derived by SCAQMD was used.

As presented in **Table 5.2 H – Estimated Daily Project Operation Emissions (Summer)** and **Table 5.2 I – Estimated Daily Project Operation Emissions (Winter)** of the Draft EIR, the Project’s operational emissions of criteria pollutants are below the SCAQMD thresholds.

Table 5.2-H – Estimated Daily Project Operation Emissions (Summer)

Activity	Peak Daily Emissions (lb/day)					
	VOC	NO _x	CO	SO ₂	PM-10	PM-2.5
SCAQMD Daily Thresholds	55	55	550	150	150	55
Area	17.62	0.00	0.18	0.00	0.00	0.00
Energy	0.05	0.42	0.35	0.00	0.03	0.03
Mobile	5.14	17.78	65.40	0.20	17.33	4.81
Total	22.81	18.20	65.93	0.20	17.36	4.84
Exceeds Threshold?	No	No	No	No	No	No

Source: AQ Study, Table 3

Note: Emissions reported as zero are rounded and not necessarily equal to zero.

Table 5.2-I – Estimated Daily Project Operation Emissions (Winter)

Activity	Peak Daily Emissions (lb/day)					
	VOC	NO _x	CO	SO ₂	PM-10	PM-2.5
SCAQMD Daily Thresholds	55	55	550	150	150	55
Area	17.62	0.00	0.18	0.00	0.00	0.00
Energy	0.05	0.42	0.35	0.00	0.03	0.03
Mobile	4.64	18.86	57.06	0.19	17.33	4.81
Total	22.31	19.28	57.59	0.19	17.36	4.84
Exceeds Threshold?	No	No	No	No	No	No

Source: AQ Study, Table 4

Note: Emissions reported as zero are rounded and not necessarily equal to zero.

The primary sources of operation emissions were from mobile sources (i.e., the cars and trucks accessing the Project site). Due to implementation of statewide vehicle exhaust emission standards and fuel efficiency and the advancements in technology, the mobile source category of emissions has seen great reduction in emissions over the years and are projected to continue to decrease in the future. This means that a project developed now will have fewer emissions than the same project that first opened 10 years ago and likewise a project that opens 10 years from now will generate fewer emissions than those operating today.