

# ***ICON-ECHO MIXED-USE TOWERS AIR QUALITY ASSESSMENT***

***San José, California***

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## **Introduction**

The purpose of this report is to address air quality and community health risk impacts associated with the proposed Icon-Echo Mixed-Use Towers project in downtown San José, California. The air quality impacts from this project would be associated with construction of the new buildings and infrastructure and operation of the project. Air pollutants associated with construction and operation of the project were predicted using appropriate computer models. In addition, the potential project health risk impacts (construction and operation) and the impacts of existing toxic air contaminant (TAC) sources affecting the nearby and proposed sensitive receptors were evaluated. The analysis was conducted following guidance provided by the Bay Area Air Quality Management District (BAAQMD).<sup>1</sup>

## **Project Description**

The approximately 2.1-acre site is located along the westside of N. 4<sup>th</sup> Street between E. St. John Street and E. Santa Clara Street in downtown San José. The site is currently developed with an 8-pump gas station, 13,500 square feet (sf) of commercial/retail use, and a 6,860-sf church. The project proposes to demolish the existing uses and construct a 27-story mixed-use building consisting of 8,500-sf of ground-floor retail use, 525,000-sf of office use in the southern tower, and 415 residential units in the northern tower. One level of below-grade parking and four floors of above-grade parking for the residential and office uses, totaling 1,146 parking spaces, would be included in the proposed project.<sup>2</sup> The project would also include two 1,000-kilowatt (kW) generators powered by 1,340-horsepower (HP) diesel engines which are proposed on the ground floor of each residential and office towers. The project is within the San José Downtown Strategy 2040 Plan area.

## **Setting**

The project is located in Santa Clara County, which is in the San Francisco Bay Area Air Basin. Ambient air quality standards have been established at both the State and federal level. The Bay Area meets all ambient air quality standards with the exception of ground-level ozone, respirable particulate matter (PM<sub>10</sub>), and fine particulate matter (PM<sub>2.5</sub>).

## Air Pollutants of Concern

High ozone levels are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NO<sub>x</sub>). These precursor pollutants react under certain meteorological conditions to form high ozone levels. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce ozone levels. The highest ozone levels in the Bay Area occur in the eastern and southern inland valleys that are downwind of air pollutant sources. High ozone

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<sup>1</sup> Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, May 2017.

<sup>2</sup> The project land uses have been updated since this analysis was conducted. Ten (10) commercial condominium units have been added to the retail use and the number of total parking spaces has increased from 1,146 spaces to 1,255 spaces. These project modifications would result barely measurable increases to the criteria pollutant emissions and health risk impacts, and would not change the project's impacts, as discussed further in the report.

levels aggravate respiratory and cardiovascular diseases, reduced lung function, and increase coughing and chest discomfort.

Particulate matter is another problematic air pollutant of the Bay Area. Particulate matter is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM<sub>10</sub>) and fine particulate matter where particles have a diameter of 2.5 micrometers or less (PM<sub>2.5</sub>). Elevated concentrations of PM<sub>10</sub> and PM<sub>2.5</sub> are the result of both region-wide (or cumulative) emissions and localized emissions. High particulate matter levels aggravate respiratory and cardiovascular diseases, reduce lung function, increase mortality (e.g., lung cancer), and result in reduced lung function growth in children.

### Toxic Air Contaminants

Toxic air contaminants (TAC) are a broad class of compounds known to cause morbidity or mortality (usually because they cause cancer) and include, but are not limited to, the criteria air pollutants. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, State, and federal level.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs (based on the Bay Area average). According to the California Air Resources Board (CARB), diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB, and are listed as carcinogens either under the State's Proposition 65 or under the Federal Hazardous Air Pollutants programs. The most recent Office of Environmental Health Hazard Assessment (OEHHA) risk assessment guidelines were published in February of 2015.<sup>3</sup> See *Attachment 1* for a detailed description of the community risk modeling methodology used in this assessment.

### Sensitive Receptors

There are groups of people more affected by air pollution than others. CARB has identified the following persons who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, elementary schools, and parks. For cancer risk assessments, children are the most sensitive receptors, since they are more susceptible to cancer causing TACs. Residential locations are assumed to include infants and small children. The closest sensitive receptors to the project site are the adjacent senior living residences to the west of the project site and the multi-family residences to the east of the site across N. 4<sup>th</sup> Street. There are additional sensitive receptors at

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<sup>3</sup> OEHHA, 2015. *Air Toxics Hot Spots Program Risk Assessment Guidelines, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. Office of Environmental Health Hazard Assessment. February.

farther distances to the north and south of the site. There are also children at the Little Einstein's Montessori Preschool (ages 2 - 5) and at the Horace Mann Preschool and Elementary School (ages 2 - 10) east of the project site. The project would introduce new sensitive receptors (i.e., new residents) to the area.

## **Regulatory Setting**

### Federal Regulations

The United States Environmental Protection Agency (EPA) sets nationwide emission standards for mobile sources, which include on-road (highway) motor vehicles such trucks, buses, and automobiles, and non-road (off-road) vehicles and equipment used in construction, agricultural, industrial, and mining activities (such as bulldozers and loaders). The EPA also sets nationwide fuel standards. California also has the ability to set motor vehicle emission standards and standards for fuel used in California, as long as they are the same or more stringent than the federal standards.

In the past decade the EPA has established a number of emission standards for on- and non-road heavy-duty diesel engines used in trucks and other equipment. This was done in part because diesel engines are a significant source of NO<sub>x</sub> and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) and because the EPA has identified DPM as a probable carcinogen. Implementation of the heavy-duty diesel on-road vehicle standards and the non-road diesel engine standards are estimated to reduce particulate matter and NO<sub>x</sub> emissions from diesel engines up to 95 percent in 2030 when the heavy-duty vehicle fleet is completely replaced with newer heavy-duty vehicles that comply with these emission standards.<sup>4</sup>

In concert with the diesel engine emission standards, the EPA has also substantially reduced the amount of sulfur allowed in diesel fuels. The sulfur contained in diesel fuel is a significant contributor to the formation of particulate matter in diesel-fueled engine exhaust. The new standards reduced the amount of sulfur allowed by 97 percent for highway diesel fuel (from 500 parts per million by weight [ppmw] to 15 ppmw), and by 99 percent for off-highway diesel fuel (from about 3,000 ppmw to 15 ppmw). The low sulfur highway fuel (15 ppmw sulfur), also called ultra-low sulfur diesel (ULSD), is currently required for use by all vehicles in the U.S.

All of the above federal diesel engine and diesel fuel requirements have been adopted by California, in some cases with modifications making the requirements more stringent or the implementation dates sooner.

### State Regulations

To address the issue of diesel emissions in the state, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles.<sup>5</sup> In addition to requiring more stringent emission standards for new on-road and off-road mobile sources and

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<sup>4</sup> USEPA, 2000. *Regulatory Announcement, Heavy-Duty Engine and Vehicle Standards and Highway Diesel Fuel Sulfur Control Requirements*. EPA420-F-00-057. December.

<sup>5</sup> California Air Resources Board, 2000. *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles*. October.

stationary diesel-fueled engines to reduce particulate matter emissions by 90 percent, a significant component of the plan involves application of emission control strategies to existing diesel vehicles and equipment. Many of the measures of the Diesel Risk Reduction Plan have been approved and adopted, including the federal on-road and non-road diesel engine emission standards for new engines, as well as adoption of regulations for low sulfur fuel in California.

CARB has adopted and implemented a number of regulations for stationary and mobile sources to reduce emissions of DPM. Several of these regulatory programs affect medium and heavy-duty diesel trucks that represent the bulk of DPM emissions from California highways. CARB regulations require on-road diesel trucks to be retrofitted with particulate matter controls or replaced to meet 2010 or later engine standards that have much lower DPM and PM<sub>2.5</sub> emissions. This regulation will substantially reduce these emissions between 2013 and 2023. While new trucks and buses will meet strict federal standards, this measure is intended to accelerate the rate at which the fleet either turns over so there are more cleaner vehicles on the road or is retrofitted to meet similar standards. With this regulation, older, more polluting trucks would be removed from the roads sooner.

CARB has also adopted and implemented regulations to reduce DPM and NO<sub>x</sub> emissions from in-use (existing) and new off-road heavy-duty diesel vehicles (e.g., loaders, tractors, bulldozers, backhoes, off-highway trucks, etc.). The regulations apply to diesel-powered off-road vehicles with engines 25 horsepower (hp) or greater. The regulations are intended to reduce particulate matter and NO<sub>x</sub> exhaust emissions by requiring owners to turn over their fleet (replace older equipment with newer equipment) or retrofit existing equipment in order to achieve specified fleet-averaged emission rates. Implementation of this regulation, in conjunction with stringent federal off-road equipment engine emission limits for new vehicles, will significantly reduce emissions of DPM and NO<sub>x</sub>.

#### Bay Area Air Quality Management District (BAAQMD)

BAAQMD has jurisdiction over an approximately 5,600-square mile area, commonly referred to as the San Francisco Bay Area (Bay Area). The District's boundary encompasses the nine San Francisco Bay Area counties, including Alameda County, Contra Costa County, Marin County, San Francisco County, San Mateo County, Santa Clara County, Napa County, southwestern Solano County, and southern Sonoma County.

BAAQMD is the lead agency in developing plans to address attainment and maintenance of the National Ambient Air Quality Standards and California Ambient Air Quality Standards. The District also has permit authority over most types of stationary equipment utilized for the proposed project. The BAAQMD is responsible for permitting and inspection of stationary sources; enforcement of regulations, including setting fees, levying fines, and enforcement actions; and ensuring that public nuisances are minimized.

BAAQMD's Community Air Risk Evaluation (CARE) program was initiated in 2004 to evaluate and reduce health risks associated with exposures to outdoor TACs in the Bay Area.<sup>6</sup> The program

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<sup>6</sup> See BAAQMD: <https://www.baaqmd.gov/community-health/community-health-protection-program/community-air-risk-evaluation-care-program>, accessed 2/18/2021.

examines TAC emissions from point sources, area sources, and on-road and off-road mobile sources with an emphasis on diesel exhaust, which is a major contributor to airborne health risk in California. The CARE program is an on-going program that encourages community involvement and input. The technical analysis portion of the CARE program is being implemented in three phases that includes an assessment of the sources of TAC emissions, modeling and measurement programs to estimate concentrations of TAC, and an assessment of exposures and health risks. Throughout the program, information derived from the technical analyses will be used to focus emission reduction measures in areas with high TAC exposures and high density of sensitive populations. Risk reduction activities associated with the CARE program are focused on the most at-risk communities in the Bay Area. The BAAQMD has identified six communities as impacted: Concord, Richmond/San Pablo, Western Alameda County, San José, Redwood City/East Palo Alto, and Eastern San Francisco. The project site is in the center of the San José area.

The BAAQMD California Environmental Quality Act (*CEQA*) *Air Quality Guidelines*<sup>7</sup> were prepared to assist in the evaluation of air quality impacts of projects and plans proposed within the Bay Area. The guidelines provide recommended procedures for evaluating potential air impacts during the environmental review process consistent with CEQA requirements including thresholds of significance, mitigation measures, and background air quality information. They also include assessment methodologies for air toxics, odors, and greenhouse gas emissions. *Attachment 1* includes detailed community risk modeling methodology.

### BAAQMD Rules and Regulations

Combustion equipment associated with the proposed project that includes new diesel engines to power generators and possibly new natural gas-fired boilers would establish new sources of particulate matter and gaseous emissions. Emissions would primarily result from the testing of the emergency backup generators, operation of the boilers for space and water heating and some minor emissions from cooling towers. Certain emission sources would be subject to BAAQMD Regulations and Rules. The District's rules and regulations that may apply to the project include:

- Regulation 2 – Permits
  - Rule 2-1: General Requirements
  - Rule 2-2: New Source Review
- Regulation 6 – Particulate Matter and Visible Emissions
  - Rule 6-3: Wood-Burning Devices
- Regulation 9 – Inorganic Gaseous Pollutants
  - Rule 9-1: Sulfur Dioxide
  - Rule 9-7: Nitrogen Oxides and Carbon Monoxide from Industrial, Institutional, and Commercial Boilers, Steam Generators, And Process Heaters
  - Rule 9-8: Nitrogen Oxides and Carbon Monoxide from Stationary Internal Combustion Engines

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<sup>7</sup> Bay Area Air Quality Management District, 2017. *CEQA Air Quality Guidelines*. May.

### *Permits*

Rule 2-1-301 requires that any person installing, modifying, or replacing any equipment, the use of which may reduce or control the emission of air contaminants, shall first obtain an Authority to Construct (ATC).

Rule 2-1-302 requires that written authorization from the BAAQMD in the form of a Permit to Operate (PTO) be secured before any such equipment is used or operated.

Rule 2-1 lists sources that are exempt from permitting. At the proposed facility, the diesel fuel storage tanks are expected to be exempt from permitting.

### *New Source Review*

Rule 2-2, New Source Review (NSR), applies to all new and modified sources or facilities that are subject to the requirements of Rule 2-1-301. The purpose of the rule is to provide for review of such sources and to provide mechanisms by which no net increase in emissions will result.

Rule 2-2-301 requires that an applicant for an ATC or PTO apply Best Available Control Technology (BACT) to any new or modified source that results in an increase in emissions and has emissions of precursor organic compounds, non-precursor organic compounds, NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, or CO of 10.0 pounds or more per highest day. Based on the estimated emissions from the proposed project, BACT will be required for NO<sub>x</sub> emissions from the diesel-fueled generator engines.

### *Stationary Diesel Airborne Toxic Control Measure*

The BAAQMD administers the CARB's Airborne Toxic Control Measure (ACTM) for Stationary Diesel engines (section 93115, title 17 CA Code of Regulations). The project's stationary sources will be new stationary emergency standby diesel engines larger than 50 hp. These limits vary based on maximum engine power. All engines are limited to PM emission rates of 0.15 g/hp-hour, regardless of size. This ACTM limits engine operation 50 hours per year for routine testing and maintenance.

### *Offsets*

Rule 2-2-302 require that offsets be provided for a new or modified source that emits more than 10 tons per year of NO<sub>x</sub> or precursor organic compounds. It is not expected that emissions of any pollutant will exceed the offset thresholds. Thus, is not expected that offsets for the proposed project would be required.

### *Prohibitory Rules*

Regulation 6 pertains to particulate matter and visible emissions. Although the engines will be fueled with diesel, they will be modern, low emission engines. Thus, the engines are expected to comply with Regulation 6.

Rule 6-3 applies to emissions from wood-burning devices. Effective November 1, 2016, no person or builder shall install a wood-burning device in a new building construction. Project plans do not depict fireplaces.

Rule 9-1 applies to sulfur dioxide. The engines will use ultra-low sulfur diesel fuel (less than 15 ppm sulfur) and will not be a significant source of sulfur dioxide emissions and are expected to comply with the requirements of Rule 9-1.

Rule 9-7 limits the emissions of NO<sub>x</sub> CO from industrial, institutional and commercial boilers, steam generators and process heaters. This regulation typically applies to boilers with a heat rating of 2 million British Thermal Units (BTU) per hour

Rule 9-8 prescribes NO<sub>x</sub> and CO emission limits for stationary internal combustion engines. Since the proposed engines will be used with emergency standby generators, Regulation 9-8-110 exempts the engines from the requirements of this Rule, except for the recordkeeping requirements (9-8-530) and limitations on hours of operation for reliability-related operation (maintenance and testing). The engines will not operate more than 50 hours per year, which will satisfy the requirements of 9-8-111.

#### *BACT for Diesel Generator Engines*

Since the generators will be used exclusively for emergency use during involuntary loss of power, the BACT levels listed for IC compression engines in the BAAQMD BACT Guidelines would apply. These are provided for two separate size ranges of diesel engines:

I.C. Engine – Compression Ignition >50hp and <1.000hp: BAAQMD applies BACT 2 emission limits based on the ATCM for stationary emergency standby diesel engines larger than 50 brake-horsepower (BHP). NO<sub>x</sub> emission factor limit is subject to the CARB ACTM that ranges from 3.0 to 3.5 grams per horsepower hour (g/hp-hr). The PM (PM<sub>10</sub> or PM<sub>2.5</sub>) limit is 0.15 g/hp-hr per CARB's ACTM.

I.C. Engine – Compression Ignition <999hp: BAAQMD applies specific BACT emission limits for stationary emergency standby diesel engines equal or larger than 1,000 brake-horsepower (BHP). NO<sub>x</sub> emission factor limit is subject to the CARB ACTM that ranges from 0.5 g/hp-hr. The PM (PM<sub>10</sub> or PM<sub>2.5</sub>) limit is 0.02 g/hp-hr. POC (i.e., ROG) limits are 0.14 g/hp-hr.

#### San José Envision 2040 General Plan

The San José Envision 2040 General Plan includes goals, policies, and actions to reduce exposure of the City's sensitive population to exposure of air pollution and toxic air contaminants or TACs. The following goals, policies, and actions are applicable to the proposed project and this assessment:

#### *Applicable Goals – Air Pollutant Emission Reduction*

Goal MS-10 Minimize emissions from new development.



*Applicable Policies – Air Pollutant Emission Reduction*

- MS-10.1 Assess projected air emissions from new development in conformance with the Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines and relative to state and federal standards. Identify and implement feasible air emission reduction measures.
- MS-10.2 Consider the cumulative air quality impacts from proposed developments for proposed land use designation changes and new development, consistent with the region’s Clean Air Plan and State law.
- MS-10.3 Promote the expansion and improvement of public transportation services and facilities, where appropriate, to both encourage energy conservation and reduce air pollution.

*Applicable Goals – Toxic Air Contaminants*

- Goal MS-11 Minimize exposure of people to air pollution and toxic air contaminants such as ozone, carbon monoxide, lead, and particulate matter.

*Applicable Policies – Toxic Air Contaminants*

- MS-11.2 For projects that emit toxic air contaminants, require project proponents to prepare health risk assessments in accordance with BAAQMD-recommended procedures as part of environmental review and employ effective mitigation to reduce possible health risks to a less than significant level. Alternatively, require new projects (such as, but not limited to, industrial, manufacturing, and processing facilities) that are sources of TACs to be located an adequate distance from residential areas and other sensitive receptors.
- MS-11.4 Encourage the installation of appropriate air filtration at existing schools, residences, and other sensitive receptor uses adversely affected by pollution sources.
- MS-11.5 Encourage the use of pollution absorbing trees and vegetation in buffer areas between substantial sources of TACs and sensitive land uses.

*Actions – Toxic Air Contaminants*

- MS-11.7 Consult with BAAQMD to identify stationary and mobile TAC sources and determine the need for and requirements of a health risk assessment for proposed developments.
- MS-11.8 For new projects that generate truck traffic, require signage which reminds drivers that the State truck idling law limits truck idling to five minutes.

*Applicable Goals – Construction Air Emissions*

- Goal MS-13 Minimize air pollutant emissions during demolition and construction activities

*Applicable Policies – Construction Air Emissions*

MS-13.1 Include dust, particulate matter, and construction equipment exhaust control measures as conditions of approval for subdivision maps, site development and planned development permits, grading permits, and demolition permits. At minimum, conditions shall conform to construction mitigation measures recommended in the current BAAQMD CEQA Guidelines for the relevant project size and type.

*Applicable Actions – Construction Air Emissions*

MS-13.4 Adopt and periodically update dust, particulate, and exhaust control standard measures for demolition and grading activities to include on project plans as conditions of approval based upon construction mitigation measures in the BAAQMD CEQA Guidelines.

Downtown Strategy 2040 Plan

The San José Downtown Strategy (DTS) 2040 Plan<sup>8</sup> is an urban design plan that guides development activities planned within the Downtown area. This strategy would increase the amount of new commercial office by an additional three million sf (approximately 10,000 jobs with the new total being 14.2 million sf of commercial by the year 2040. The residential capacity would be increased up to 4,360 units. The amount of new retail development (1.4 million sf) and hotel room (3,600 rooms) capacities of the DTS 2000 would be maintained. The integrated Final Environmental Impact Report was published December 2018.

The DTS identified less-than-significant construction period emissions if development projects are in conformance with 2017 BAAQMD CEQA Guidelines, GP Policy MS-13.1, and current City requirements that include various levels of construction emissions control measures. All projects are required to implement the following control measures:

City requirements, all projects will be required to implement the following control measures:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.
- Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

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<sup>8</sup> City of San José, *Downtown Strategy 2040 FILE NO. PP15-102*, Web: <https://www.sanjoseca.gov/your-government/departments/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs/downtown-strategy-2040#:~:text=The%20proposed%20Downtown%20Strategy%202040,Plan%204%2DYear%20Review%20recommendations.>

- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
- Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Future projects developed under the DTS that incorporate these measures and are below the screening levels would not result in a significant impact related to construction emissions of regional criteria pollutants. Projects that exceed the screening levels would be required to complete additional project level analysis of construction-related emissions of criteria pollutants and may require additional measures to ensure that construction emissions would not exceed the threshold for average daily emissions.

Operational emissions of regional criteria air pollutants with measures included to reduce emissions under the DTS were identified as significant and unavoidable. To reduce operational emissions associated with vehicle travel, future development will be required to implement a transportation demand management (TDM) program, consistent with the Downtown Transportation Plan. The TDM programs may incorporate, but would not be limited to, the following Transportation Control Measures (TCMs):

- Rideshare Measures: Implement carpool/vanpool program (e.g., carpool ride matching for employees, assistance with vanpool formation, provision of vanpool vehicles, etc.)
- Transit Measures:
  - Construct transit facilities such as bus turnouts/bus bulbs, benches, shelters, etc.
  - Design and locate buildings to facilitate transit access (e.g., locate building entrances near transit stops, eliminate building setbacks, etc.)
- Services Measures:
  - Provide on-site shops and services for employees, such as cafeteria, bank/ATM, dry cleaners, convenience market, etc.;
  - Provide on-site childcare or contribute to off-site childcare within walking distance.
- Shuttle Measures:
  - Establish mid-day shuttle service from work site to food service establishments/commercial areas;
  - Provide shuttle service to transit stations/multimodal centers
- Parking Measures:
  - Provide preferential parking (e.g., near building entrance, sheltered area, etc.) for carpool and vanpool vehicles;
  - Implement parking fees for single occupancy vehicle commuters;

- Implement parking cash-out program for employees (i.e., non-driving employees receive transportation allowance equivalent to value of subsidized parking);
- Bicycle and Pedestrian Measures:
  - Provide secure, weather-protected bicycle parking for employees;
  - Provide safe, direct access for bicyclists to adjacent bicycle routes;
  - Provide showers and lockers for employees bicycling or walking to work;
  - Provide secure short-term bicycle parking for retail customers or non-commute trips;
  - Provide direct, safe, attractive pedestrian access from Planning Area to transit stops and adjacent development;
- Other Measures:
  - Implement compressed work week schedule (e.g., 4 days/40 hours, 9 days/80 hours);
  - Implement home-based telecommuting program.

During project-level supplemental review of future individual development projects, the measures will be evaluated for consistency with the DTS 2040 and General Plan policies. All feasible and applicable measures will be required as part of project design or as conditions of approval.

### Significance Thresholds

In June 2010, BAAQMD adopted thresholds of significance to assist in the review of projects under CEQA and these significance thresholds were contained in the District's 2011 CEQA Air Quality Guidelines. These thresholds were designed to establish the level at which BAAQMD believed air pollution emissions would cause significant environmental impacts under CEQA. The thresholds were challenged through a series of court challenges and were mostly upheld. BAAQMD updated the CEQA Air Quality Guidelines in 2017 to include the latest significance thresholds, which were used in this analysis and are summarized in Table 1. Impacts above these thresholds are considered potentially significant. Note that the DTS Plan Draft Environmental Impact Report (DEIR) evaluated traffic-related emissions of criteria air pollutants (and their precursors) from planned development that includes the Proposed Project. Stationary source operational emissions, if any are proposed as part of the project, would still be required to be analyzed. Operational emissions from the Proposed Project are predicted in this assessment for informational purposes only.

**Table 1. BAAQMD CEQA Significance Thresholds**

Criteria Air Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Annual Average Emissions (tons/year)
ROG	54	<i>Evaluated in DTS Strategy DEIR</i>	
NO <sub>x</sub>	54		
PM <sub>10</sub>	82 (Exhaust)		
PM <sub>2.5</sub>	54 (Exhaust)		
CO	Not Applicable		
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	
<b>Health Risks and Hazards</b>	<b>Single Sources Within 1,000-foot Zone of Influence</b>	<b>Combined Sources (Cumulative from all sources within 1,000-foot zone of influence)</b>	
Excess Cancer Risk	10 per one million	100 per one million	
Hazard Index	1.0	10.0	
Incremental annual PM <sub>2.5</sub>	0.3 µg/m <sup>3</sup>	0.8 µg/m <sup>3</sup>	
Note: ROG = reactive organic gases, NO <sub>x</sub> = nitrogen oxides, PM <sub>10</sub> = course particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, PM <sub>2.5</sub> = fine particulate matter or particulates with an aerodynamic diameter of 2.5 µm or less.			

## AIR QUALITY IMPACTS AND MITIGATION MEASURES

### Impact AIR-1: Conflict with or obstruct implementation of the applicable air quality plan?

BAAQMD is the regional agency responsible for overseeing compliance with State and Federal laws, regulations, and programs within the San Francisco Bay Area Air Basin (SFBAAB). BAAQMD, with assistance from the Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC), prepares and implements specific plans to meet the applicable laws, regulations, and programs. The most recent and comprehensive of which is the *Bay Area 2017 Clean Air Plan*.<sup>9</sup> The primary goals of the Clean Air Plan are to attain air quality standards, reduce population exposure and protect public health, and reduce GHG emissions and protect the climate. The BAAQMD has also developed CEQA guidelines to assist lead agencies in evaluating the significance of air quality and GHG impacts. In formulating compliance strategies, BAAQMD relies on planned land uses established by local general plans. Land use planning affects vehicle travel, which, in turn, affects region-wide emissions of air pollutants and GHGs.

The 2017 Clean Air Plan, adopted by BAAQMD in April 2017, includes control measures that are intended to reduce air pollutant emissions in the Bay Area either directly or indirectly. Plans must show consistency with the control measures listed within the Clean Air Plan. At the project-level, there are no consistency measures or thresholds. The proposed project would not conflict with the latest Clean Air planning efforts since 1) the project is included in the adopted San José Downtown

<sup>9</sup> Bay Area Air Quality Management District (BAAQMD), 2017. *Final 2017 Clean Air Plan*.

Strategy (DTS) 2040 Plan, 2) project would have construction and operational emissions below the BAAQMD thresholds (see Impact 2 below), 3) the project would be considered urban infill, 4) the project would be located near employment centers, 5) the project would be located near transit with regional connections.

**Impact AIR-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?**

The Bay Area is considered a non-attainment area for ground-level ozone and PM<sub>2.5</sub> under both the Federal Clean Air Act and the California Clean Air Act. The area is also considered non-attainment for PM<sub>10</sub> under the California Clean Air Act, but not the federal act. The area has attained both State and federal ambient air quality standards for carbon monoxide. As part of an effort to attain and maintain ambient air quality standards for ozone and PM<sub>10</sub>, the BAAQMD has established thresholds of significance for these air pollutants and their precursors. These thresholds are for ozone precursor pollutants (ROG and NO<sub>x</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub> and apply to both construction period and operational period impacts.

**Construction Period Emissions**

The California Emissions Estimator Model (CalEEMod) Version 2020.4.0 was used to estimate emissions from on-site construction activity, construction vehicle trips, and evaporative emissions. The project land use types and size, and anticipated construction schedule were input to CalEEMod. The CARB Emission FACTors 2021 (EMFAC2021) model was used to predict emissions from construction traffic, which includes worker travel, vendor trucks, and haul trucks.<sup>10</sup> The CalEEMod model output along with construction inputs are included in *Attachment 2* and EMFAC2021 vehicle emissions modeling outputs are included in *Attachment 3*.

CalEEMod Inputs

*Land Use Inputs*

The proposed project land uses were entered into CalEEMod as described in Table 2.

**Table 2. Summary of Project Construction Land Use Inputs<sup>11</sup>**

Project Land Uses	Size	Units	Square Feet	Acreage
Apartments High Rise	415	Dwelling Units	400,101	2.1
General Office Building	525.00	1,000 Square Feet	525,000	
Strip Mall	8.50	1,000 Square Feet	8,500	
Enclosed Parking with Elevator	1,146	Parking Spaces	470,000	

<sup>10</sup> See CARB’s EMFAC2021 Emissions Inventory at <https://arb.ca.gov/emfac/emissions-inventory>

<sup>11</sup> The project land uses have been updated since this analysis was conducted. Ten (10) commercial condominium units have been added to the retail use, but the overall retail square footage has not changed. Also, the number of total parking spaces has increased from 1,146 spaces to 1,255 spaces. However, the overall total building square footage would remain the same and construction activities (i.e., schedule, equipment quantities, hours used) would not change with the updated project land uses. While emissions would increase slightly from these change, the project’s criteria pollutant emissions and the community risk impacts (with mitigation) are far below the thresholds that any minor increase due to the land use changes would not cause the emissions and impacts to exceed the thresholds.

### *Construction Inputs*

CalEEMod computes annual emissions for construction that are based on the project type, size, and acreage. The model provides emission estimates for both on-site and off-site construction activities. On-site activities are primarily made up of construction equipment emissions, while off-site activity includes worker, hauling, and vendor traffic.

The CalEEMod model generates a default set of construction assumptions for “typical construction site scenarios”; however, these are not appropriate for a project like this that involves demolition, excavation, and extensive vertical construction on a relatively small site.<sup>12</sup> For this project, the construction build-out scenario, including equipment list and schedule, were based on data provided by the project applicant. The project construction equipment worksheet provided by the applicant included the schedule for each phase. Within each phase, the quantity of equipment to be used along with the average hours per day and total number of workdays was provided. Since different equipment would have different estimates of the working days per phase, the hours per day for each phase was computed by dividing the total number of hours that the equipment would be used by the total number of days in that phase. The construction schedule assumed that the earliest possible start date would be January 2023 and the project would be built out 6 days a week over a period of approximately 36 months or 939 construction workdays. The earliest year of operation was assumed to be 2026.

### *Construction Traffic Emissions*

Construction would produce traffic in the form of worker trips and truck traffic. The traffic-related emissions are based on worker and vendor trip estimates produced by CalEEMod and haul trips that were computed based on the estimate of demolition material to be exported, soil material imported and/or exported to the site, and the estimate of cement and asphalt truck trips. CalEEMod provides daily estimates of worker and vendor trips for each applicable phase. The total trips for those were computed by multiplying the daily trip rate by the number of days in that phase. Haul trips for demolition and grading were estimated from the provided demolition and grading volumes by assuming each truck could carry 10 tons per load. The number of concrete and asphalt total round haul trips were provided for the project and converted to total one-way trips, assuming two trips per delivery.

The latest version of the CalEEMod model is based on the older version of the CARB EMFAC2014 motor vehicle emission factor model. This model has been superseded by the EMFAC2021 model; however, CalEEMod has not been updated to include EMFAC2021. The construction traffic information was combined with EMFAC2021 motor vehicle emissions factors. EMFAC2021 provides aggregate emission rates in grams per mile for each vehicle type. The vehicle mix for this study was based on CalEEMod defaults, where worker trips are assumed to be comprised of light-duty autos (EMFAC category LDA) and light duty trucks (EMFAC category LDT1 and LDT2). Vendor trips are comprised of delivery and large trucks (EMFAC category MHDT and HHDT) and haul trips, including cement trucks, are comprised of large trucks

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<sup>12</sup> SCAQMD. 2005. *Sample Construction Scenarios for Projects Less than Five Acres in Size*. February. Note that this is the supporting report used to develop CalEEMod default construction inputs (see Appendix E – Technical Source Documentation of the CalEEMod User’s Guide).

(EMFAC category HHDT). Travel distances are based on CalEEMod default lengths, which are 10.8 miles for worker travel, 7.3 miles for vendor trips and 20 miles for hauling (demolition material export and soil import/export). Since CalEEMod does not address cement or asphalt trucks, these were treated as vendor travel distances. Each trip was assumed to include an idle time of 5 minutes. Emissions associated with vehicle starts were also included. On-road emission rates from the years 2023-2025 for Santa Clara County were used. Table 3 provides the traffic inputs that were combined with the EMFAC2021 emission database to compute vehicle emissions.

**Table 3. Construction Traffic Data Used for EMFAC2021 Model Runs**

CalEEMod Run/Land Uses and Construction Phase	Trips by Trip Type			Notes
	Total Worker <sup>1</sup>	Total Vendor <sup>1</sup>	Total Haul <sup>2</sup>	
Vehicle mix <sup>1</sup>	68% LDA 5% LDT1 28% LDT2	33% MHDT 67% HHDT	100% HDDT	
Trip Length (miles)	10.8	7.3	20.0 (Demo/Soil) 7.3 (Cement/Asphalt)	CalEEMod default distance with 5-min truck idle time.
Demolition	1,012	-	1,291	8,000 tons of demolition hauling and 2,500 tons of pavement demolition. Default worker trips.
Site Preparation	286	-	-	CalEEMod default worker trips.
Grading	1,518	-	2,688	3,500-cy of import and 18,000-cy of export soil volumes. CalEEMod default worker trips.
Trenching	330	-	-	CalEEMod default worker trips.
Structure	176,088	55,176	-	CalEEMod default worker and vendor trips.
Building Construction	102,718	32,186	6,000	3,000 cement truck round trips. CalEEMod default worker and vendor trips.
Architectural Coating	19,019	-	-	CalEEMod default worker trips.
Sitework	645	-	30	15 asphalt truck round trips. CalEEMod default worker trips.
Notes: <sup>1</sup> Based on 2023-2025 EMFAC2021 light-duty vehicle fleet mix for Santa Clara County.				
<sup>2</sup> Includes demolition and grading trips estimated by CalEEMod based on amount of material to be removed. Cement and asphalt trips estimated based on data provided by the applicant.				

Summary of Computed Construction Period Emissions

Average daily emissions were annualized for each year of construction by dividing the annual construction emissions by the number of active workdays during that year. Table 4 shows the unmitigated annualized average daily construction emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub> exhaust, and PM<sub>2.5</sub> exhaust during construction of the project. As indicated in Table 4, predicted unmitigated annualized project construction emissions would not exceed the BAAQMD significance thresholds during any year of construction.



**Table 4. Construction Period Emissions - Unmitigated**

Year	ROG	NOx	PM <sub>10</sub> Exhaust	PM <sub>2.5</sub> Exhaust
<i>Construction Emissions Per Year (Tons)</i>				
2023	0.25	1.52	0.09	0.05
2024	0.37	2.62	0.14	0.10
2025	6.13	3.05	0.15	0.12
<i>Average Daily Construction Emissions Per Year (pounds/day)</i>				
2023 (311 construction workdays)	1.61	9.75	0.57	0.35
2024 (314 construction workdays)	2.34	16.70	0.89	0.65
2025 (313 construction workdays)	39.17	19.45	0.97	0.75
<i>BAAQMD Thresholds (pounds per day)</i>	54 lbs./day	54 lbs./day	82 lbs./day	54 lbs./day
<b>Exceed Threshold?</b>	No	No	No	No

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM<sub>10</sub> and PM<sub>2.5</sub>. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD CEQA Air Quality Guidelines consider these impacts to be less than significant if best management practices are implemented to reduce these emissions. The DTS requires control measures to implement the standard BAAQMD CEQA Air Quality Guidelines best management practices to control dust and exhaust during construction. However, enhanced measures to control dust are required for this project’s community health risk impact. *Mitigation Measure AQ-1 would implement BAAQMD’s standard and enhanced best management practices.*

**Mitigation Measure AQ-1: Implement BAAQMD-Recommended Standard and Enhanced Measures to Control Particulate Matter Emissions during Construction.**

Measures to reduce fugitive dust (i.e., PM<sub>2.5</sub>) emissions from construction are recommended to and ensure that health impacts to nearby sensitive receptors are minimized. During any construction period ground disturbance, the applicant shall ensure that the project contractor implements both basic and additional measures to control dust and exhaust. Implementation of the dust control measures recommended by BAAQMD and listed below would reduce the air quality impacts associated with grading and new construction to a less-than-significant level. The contractor shall implement the following enhanced best management practices:

1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 mph.

5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
7. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.
8. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
9. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.
10. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
11. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.
12. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
13. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12 inch compacted layer of wood chips, mulch, or gravel.
14. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.
15. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to two minutes. Clear signage shall be provided for construction workers at all access points.

#### *Effectiveness of Mitigation Measure AQ-1*

*Mitigation Measure AQ-1* represents standard and enhanced mitigation measures that would achieve greater than an 80 percent reduction in on-site fugitive PM<sub>2.5</sub> emissions. These measures are consistent with recommendations in the BAAMQD CEQA Guidance for providing "best management practices" to control construction emissions.

#### **Operational Period Emissions**

The impact of operational emissions was addressed in the DTS DEIR and found to be significant and unavoidable for the entire plan. Emissions from the project were computed for informational purposes. Operational air emissions from the project would be generated primarily from the project generator and autos driven by future residents, employees, and customers. Evaporative emissions from architectural coatings and maintenance products (classified as consumer products) are typical

emissions from these types of uses. CalEEMod was used to estimate emissions from operation of the proposed project assuming full build-out.

### CalEEMod Inputs

#### *Land Uses*

The project land uses were entered into CalEEMod as described above for the construction period modeling.

#### *Model Year*

Emissions associated with vehicle travel depend on the year of analysis because emission control technology requirements are phased-in over time. Therefore, the earlier the year analyzed in the model, the higher the emission rates utilized by CalEEMod. The earliest full year of operation would be 2026 if construction begins in 2023. Emissions associated with build-out later than 2026 would be lower.

#### *Traffic Information*

CalEEMod allows the user to enter specific vehicle trip generation rates. Therefore, the project-specific daily trip generation rate provided by the traffic consultant was entered into the model.<sup>13</sup> The project would produce approximately 3,489 net daily trips when considering the *Residential & Office Mixed-Use Reduction, Residential & Retail Mixed-Use Reduction, Office & Retail Mixed-Use Reduction, Location Based Reduction, and VMT Reduction* adjustments applied in the traffic analysis. The daily trip generation was calculated using the size of the project and the adjusted total automobile trips. The Saturday and Sunday trip rates were adjusted by multiplying the ratio of the CalEEMod default rates for Saturday and Sunday trips to the default weekday rate with the project-specific daily weekday trip rate. The default trip lengths and trip types specified by CalEEMod were used.

#### *EMFAC2021 Adjustment*

The vehicle emission factors and fleet mix used in CalEEMod are based on EMFAC2014, which is an older CARB emission inventory for on road and off road mobile sources. Since the release of CalEEMod Version 2020.4.0, new emission factors have been produced by CARB. EMFAC2021 became available for use in January 2021. It includes the latest data on California's car and truck fleets and travel activity. Additionally, CARB has recently released EMFAC off-model adjustment factors to account for the Safer Affordable Efficient (SAFE) Vehicle Rule Part one.<sup>14,15</sup> The CalEEMod vehicle emission factors and fleet mix were updated with the emission

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<sup>13</sup> Email correspondence with Fiona Phung, Project Manager, David J. Powers & Associates, Inc., May 6, 2021, Attachment: *ICON ECHO Volumes 5-5-21.xlsx*.

<sup>14</sup> California Air Resource Board, 2019. *EMFAC Off-Model Adjustment Factors to Account for the SAFE Vehicle Rule Part One*. November. Web: [https://ww3.arb.ca.gov/msei/emfac\\_off\\_model\\_adjustment\\_factors\\_final\\_draft.pdf](https://ww3.arb.ca.gov/msei/emfac_off_model_adjustment_factors_final_draft.pdf)

<sup>15</sup> California Air Resource Board, 2020. *EMFAC Off-Model Adjustment Factors for Carbon Dioxide (CO<sub>2</sub>) Emissions to Accounts for the SAFE Vehicles Rule Part One and the Final SAFE Rule*. June. Web:

rates and fleet mix from EMFAC2021, which were adjusted with the CARB EMFAC off-model adjustment factors. On road emission rates from 2023-2025 Santa Clara County were used (See *Attachment 3*). More details about the updates in emissions calculation methodologies and data are available in the EMFAC2021 Technical Support Document.<sup>16</sup>

### *Energy*

CalEEMod defaults for energy use were used, which include the 2019 Title 24 Building Standards. GHG emissions modeling includes those indirect emissions from electricity consumption. The electricity produced emission rate was modified in CalEEMod. An emission factor of 178 pounds of CO<sub>2</sub> per megawatt of electricity produced was entered into CalEEMod, which is based on San Jose Clean Energy's 2020 emissions rate.<sup>17</sup>

The City of San José passed an ordinance in December 2020 that prohibits the use of natural gas infrastructure in new residential, office, and most retail-type buildings.<sup>18</sup> This ordinance applies to any new construction starting August 1, 2021. Natural gas use for the residential and office land uses were set to zero and assigned to electricity use. Natural gas use was assumed for the retail use as a commercial kitchen (which is allowed to use natural gas) could occupy the retail space.

### *Project Generator*

The project proposes to include two stand-by emergency diesel generators on the ground floor of each residential and office towers. Each generator would be 1,000-kilowatts (kW) powered by a 1,340 horsepower (HP) diesel engine. The generators would be tested periodically and power the buildings in the event of a power failure. For modeling purposes, it was assumed that the generators would be operated primarily for testing and maintenance purposes. CARB and BAAQMD requirements limit these engine operations to 50 hours each per year of non-emergency operation. During testing periods, the engines would typically be run for less than one hour. The engines would be required to meet CARB and EPA emission standards and consume commercially available California low-sulfur diesel fuel. Additionally, the generators would have to meet BAAQMD BACT requirements for IC Engine-Compression Ignition: Stationary Emergency, non-Agricultural, non-direct drive fire pump sources. Based on the size of the proposed generators, these include emission limits similar to U.S. EPA Tier 4 engines. The generators' emissions, including BACT engine requirements, were modeled using CalEEMod.

### *Wood-Burning Devices*

CalEEMod default inputs assume new residential construction would include woodburning fireplaces and stoves. The project would not include wood-burning devices, as these devices are

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[https://ww3.arb.ca.gov/msei/emfac\\_off\\_model\\_co2\\_adjustment\\_factors\\_06262020-final.pdf?utm\\_medium=email&utm\\_source=govdelivery](https://ww3.arb.ca.gov/msei/emfac_off_model_co2_adjustment_factors_06262020-final.pdf?utm_medium=email&utm_source=govdelivery)

<sup>16</sup> See CARB 2021: <https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/road-documentation/msei-modeling-tools-emfac>

<sup>17</sup> San Jose Clean Energy Website, Standard Greensource service. Web: <https://sanjosecleanenergy.org/commercial-rates/>

<sup>18</sup> City of San Jose, 2020. "Expand Natural Gas Ban", December. Web: <https://www.sanjoseca.gov/Home/Components/News/News/2210/4699>

prohibited by BAAQMD Regulation 6, Rule 3.<sup>19</sup> Therefore, the number of woodstoves and woodburning fireplaces in CalEEMod were set to zero and assigned as natural gas.

*Other Inputs*

Default model assumptions for emissions associated with solid waste generation and water/wastewater use were applied to the project. Water/wastewater use was changed to 100% aerobic conditions to represent wastewater treatment plant conditions. The project site would not send wastewater to septic tanks or facultative lagoons.

*Existing Uses*

The existing site consist of a gas station, commercial/retail use, and a church. A CalEEMod model run was developed to compute emissions from use of the existing land uses as if it were operating in 2026. Inputs for the existing modeling scenario included 8 pumps entered as “Convenience Market with Gas Pumps”, 13,500-sf entered as “Strip Mall”, and 6,860-sf entered as “Place of Worship”. The existing trip generation rates and other inputs were applied to the existing modeling in the same manner described for the proposed project. Historical energy usage was applied.

Summary of Computed Operational Emissions

Annual emissions were predicted using CalEEMod and daily emissions were estimating assuming 365 days of operation. Table 5 shows net average daily operational emissions of ROG, NO<sub>x</sub>, total PM<sub>10</sub>, and total PM<sub>2.5</sub> during operation of the project. The operational period emissions would not exceed the BAAQMD significance thresholds.

**Table 5. Operational Period Emissions**

Scenario	ROG	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2026 Annual Project Operational Emissions (tons/year)	6.46	1.92	3.16	0.82
2026 Existing Use Emissions (tons/year)	0.74	0.64	1.14	0.29
Net Annual Emissions (tons/year)	5.72	1.28	2.02	0.53
BAAQMD Thresholds (tons/year)	10 tons	10 tons	15 tons	10 tons
<b>Exceed Threshold?</b>	No	No	No	No
2026 Daily Project Operational Emissions (pounds/day) <sup>1</sup>	31.34	7.03	11.06	2.90
BAAQMD Thresholds (pounds/day)	54 lbs.	54 lbs.	82 lbs.	54 lbs.
<b>Exceed Threshold?</b>	No	No	No	No

Notes: <sup>1</sup>Assumes 365-day operation.

**Impact AIR-3: Expose sensitive receptors to substantial pollutant concentrations?**

Project impacts related to increased community risk can occur either by introducing a new source of TACs with the potential to adversely affect existing sensitive receptors in the project vicinity or by significantly exacerbating existing cumulative TAC impacts. This project would introduce new sources of TACs during construction (i.e., on-site construction and truck hauling emissions) and operation (i.e., stationary and mobile sources).

<sup>19</sup> Bay Area Air Quality Management District, [https://www.baaqmd.gov/~/\\_media/dotgov/files/rules/regulation-6-rule-3/documents/20191120\\_r0603\\_final-pdf.pdf?la=en](https://www.baaqmd.gov/~/_media/dotgov/files/rules/regulation-6-rule-3/documents/20191120_r0603_final-pdf.pdf?la=en)

Project construction activity would generate dust and equipment exhaust that would affect nearby sensitive receptors. The project would also include the installation of stand-by generators powered by diesel engines and would generate some traffic consisting of mostly light-duty vehicles, which would produce TAC and air pollutant emissions.

Project impacts to existing sensitive receptors were addressed for temporary construction activities and long-term operational conditions. There are also several sources of existing TACs and localized air pollutants in the vicinity of the project. The impact of the existing sources of TAC was also assessed in terms of the cumulative risk which includes the project contribution, as well as the risk on the new sensitive receptors introduced by the project.

### **Community Risk Methodology for Construction and Operation**

Community risk impacts were addressed by predicting increased cancer risk, the increase in annual PM<sub>2.5</sub> concentrations and computing the Hazard Index (HI) for non-cancer health risks. The risk impacts from the project are the combination of risks from construction and operation sources. These sources include on-site construction activity, construction truck hauling, project generators, and increased traffic from the project. To evaluate the increased cancer risks from the project, a 30-year exposure period was used, per BAAQMD guidance,<sup>20</sup> with the sensitive receptors being exposed to both project construction and operation emissions during this timeframe.

The project increased cancer risk is computed by summing the project construction cancer risk and operation cancer risk contributions. Unlike, the increased maximum cancer risk, the annual PM<sub>2.5</sub> concentration and HI values are not additive but based on the annual maximum risk for the entirety of the project. The project maximally exposed individual (MEI) is identified as the sensitive receptor that is most impacted by the project's construction and operation.

The methodology for computing community risks impacts is contained in *Attachment 1*. This involved the calculation of TAC and PM<sub>2.5</sub> emissions, dispersion modeling of these emissions, and computations of cancer risk and non-cancer health effects.

### **Modeled Sensitive Receptors**

Receptors for this assessment included locations where sensitive populations would be present for extended periods of time (i.e., chronic exposures). This includes all existing residences to the east, west, and north the project site, as shown in Figure 1. Residential receptors are assumed to include all receptor groups (i.e., third trimester, infants, children, and adults) with almost continuous exposure to project emissions. Community risks were also computed for children at the Little Einstein's Montessori Preschool (ages 2 - 5) and at the Horace Mann Preschool and Elementary School (ages 2 - 10).

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<sup>20</sup> BAAQMD, 2016. *BAAQMD Air Toxics NSR Program Health Risk Assessment (HRA) Guidelines*. December 2016.

## Community Risks from Project Construction

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC. These exhaust air pollutant emissions would not be considered to contribute substantially to existing or projected air quality violations. Construction exhaust emissions may still pose health risks for sensitive receptors such as surrounding residents. The primary community risk impact issue associated with construction emissions are cancer risk and exposure to PM<sub>2.5</sub>. Diesel exhaust poses both a potential health and nuisance impact to nearby receptors. A health risk assessment of the project construction activities was conducted that evaluated potential health effects to nearby sensitive receptors from construction emissions of DPM and PM<sub>2.5</sub>.<sup>21</sup> This assessment included dispersion modeling to predict the offsite and onsite concentrations resulting from project construction, so that increased cancer risks and non-cancer health effects could be evaluated.

### Construction Emissions

The CalEEMod and EMFAC2021 models provided total annual PM<sub>10</sub> exhaust emissions (assumed to be DPM) for the off-road construction equipment and for exhaust emissions from on-road vehicles, with total emissions from all construction stages of 0.23 tons (452 pounds). The on-road emissions are a result of haul truck travel during demolition and grading activities, worker travel, and vendor deliveries during construction. A trip length of half a mile was used to represent vehicle travel while at or near the construction site. Fugitive PM<sub>2.5</sub> dust emissions were calculated by CalEEMod as 0.08 tons (164 pounds) for the overall construction period.

### Dispersion Modeling

The U.S. EPA AERMOD dispersion model was used to predict DPM and PM<sub>2.5</sub> concentrations at sensitive receptors (residences, high school, daycare) in the vicinity of the project construction area. The AERMOD dispersion model is a BAAQMD-recommended model for use in modeling analysis of these types of emission activities for CEQA projects.<sup>22</sup> Emission sources for the construction site were grouped into two categories: exhaust emissions of DPM and fugitive PM<sub>2.5</sub> dust emissions.

### *Construction Sources*

Combustion equipment DPM exhaust emissions were modeled as a series of point sources with a nine-foot release height (construction equipment exhaust stack height) placed at 23 feet (7 meter) intervals throughout the construction site. This resulted in 149 individual point sources being used to represent mobile equipment DPM exhaust emissions in the construction area, with DPM emissions occurring throughout the project construction site. In addition, the following stack parameters were used: a vertical release, a stack diameter of 2.5 inches, an exhaust temperature of 918°F, and an exit velocity of 309 feet per second. Since these are point sources, plume rise is calculated by the AERMOD dispersion model. Emissions from vehicle travel on- and off-site were

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<sup>21</sup> DPM is identified by California as a toxic air contaminant due to the potential to cause cancer.

<sup>22</sup> Bay Area Air Quality Management District (BAAQMD), 2012, *Recommended Methods for Screening and Modeling Local Risks and Hazards, Version 3.0*. May.

also distributed among the point sources throughout the site. The locations of the point sources used for the modeling are identified in Figure 1.

For modeling fugitive PM<sub>2.5</sub> emissions, a near-ground level release height of 7 feet (2 meters) was used for the area source. Fugitive dust emissions at construction sites come from a variety of sources, including truck and equipment travel, grading activities, truck loading (with loaders) and unloading (rear or bottom dumping), loaders and excavators moving and transferring soil and other materials, etc. All of these activities result in fugitive dust emissions at various heights at the point(s) of generation. Once generated, the dust plume will tend to rise as it moves downwind across the site and exit the site at a higher elevation than when it was generated. For all these reasons, a 7-foot release height was used as the average release height across the construction site. Emissions from the construction equipment and on-road vehicle travel were distributed throughout the modeled area sources.

#### *AERMOD Inputs and Meteorological Data*

Since there are a number of tall buildings adjacent to or in close proximity to the project construction site, the effects of building downwash on the construction equipment exhaust plumes were included in the modeling analysis. The locations of the point sources used for the modeling and the buildings that were evaluated for potential downwash effects are identified in Figure 1.

The modeling used a five-year meteorological data set (2013-2017) from the San José Airport prepared for use with the AERMOD model by the BAAQMD. Construction emissions were modeled as occurring between 7:00 a.m. to 7:00 p.m. Monday through Saturday per the project applicant's construction schedule. Annual DPM and PM<sub>2.5</sub> concentrations from construction activities during the 2023-2025 period were computed by the model. DPM and PM<sub>2.5</sub> concentrations were computed at nearby sensitive receptor locations. Receptor heights of 5 feet (1.5 meters), 20 feet (6.1 meters), and 30 feet (9.1 meters) were used to represent the breathing heights of residents in nearby residential units on the first through third floors, respectively.<sup>23</sup> A receptor height of 3 feet (1 meter) was used to represent the breathing height of children at the preschools and elementary school.

#### Summary of Construction Community Risk Impacts

The increased cancer risk calculations were based on applying the BAAQMD recommended age sensitivity factors to the TAC concentrations, as described in *Attachment 1*. Age-sensitivity factors reflect the greater sensitivity of infants and small children to cancer causing TACs. Third trimester, infant, child, and adult exposures were assumed to occur at all residences during the entire construction period. Students at the preschools and elementary school were assumed to be 2 years and older. The child (ages 2 through 16 years old) cancer risk parameters were used to calculate the increased cancer risk for the preschools and elementary school students.

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<sup>23</sup> Bay Area Air Quality Management District, 2012, Recommended Methods for Screening and Modeling Local Risks and Hazards, Version 3.0. May. Web: <https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/risk-modeling-approach-may-2012.pdf?la=en>

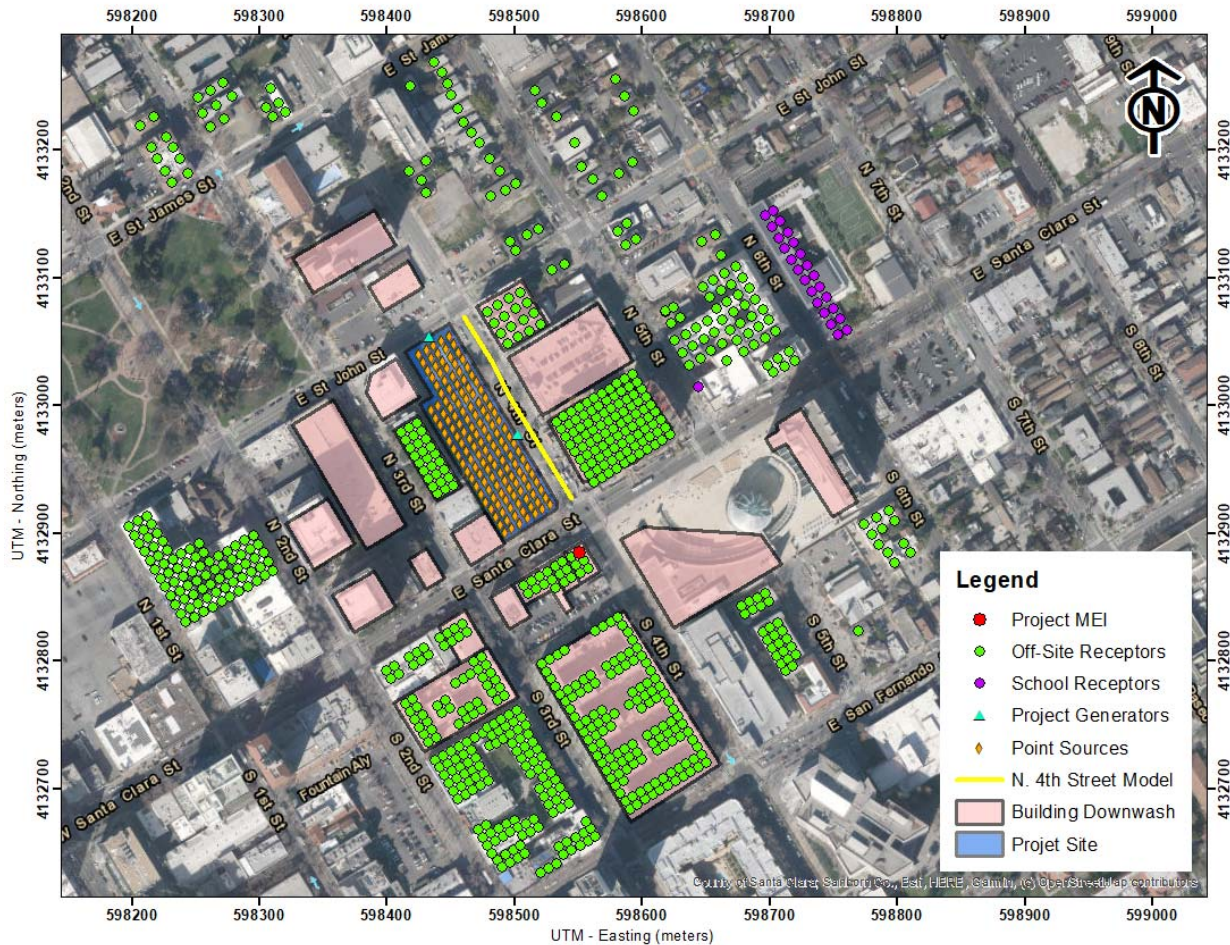


The maximum modeled annual PM<sub>2.5</sub> concentration was calculated based on combined exhaust and fugitive concentrations. The maximum computed HI values was based on the ratio of the maximum DPM concentration modeled and the chronic inhalation reference exposure level of 5 µg/m<sup>3</sup>.

The maximum modeled annual DPM and PM<sub>2.5</sub> concentrations, which includes both the DPM and fugitive PM<sub>2.5</sub> concentrations, were identified at nearby sensitive receptors to find the MEI. Results of this assessment indicated that the construction MEI was located on the second floor (20 feet above ground) of the residence to the south of the project site opposite E. Santa Clara Street. The location of the MEI and nearby sensitive receptors are shown in Figure 1. Table 6 lists the community risks from construction at the location of the residential construction MEI. *Attachment 4* to this report includes the emission calculations used for the construction modeling and the cancer risk calculations.

Additionally, modeling was conducted to predict the cancer risks, non-cancer health hazards, and maximum PM<sub>2.5</sub> concentrations associated with construction activities at the nearby preschools and elementary school. The maximum increased cancer risks were adjusted using child exposure parameters. The uncontrolled cancer risk, PM<sub>2.5</sub> concentration, and HI at the nearby preschools and elementary school do not exceed their respective BAAQMD single-source significance thresholds. Project construction health risks at the maximum impacted school receptor are shown in Table 6.

**Figure 1. Locations of Project Construction Site, Modeled DPM Point Sources, Project Traffic, Project Generator, Buildings Evaluated for Downwash Effects, and Maximum TAC Location (MEI)**



### Community Risks from Project Operation – Traffic and Generators

Operation of the project would have long-term emissions from mobile sources (i.e., traffic) and stationary sources (i.e., generators). While these emissions would not be as intensive at or near the site as construction activity, they would contribute to long-term effects to sensitive receptors.

#### Project Operational Traffic

An analysis was conducted of the impacts of TACs and PM<sub>2.5</sub> from local roadways increase in traffic due to the project. The project would generate 3,489 net daily trips.<sup>24</sup> A majority of these trips would be from light-duty, gasoline vehicles (i.e., passenger cars). To address the added community risks, the impact from this traffic was assessed using the CT-EMFAC 2017 emissions model, AERMOD dispersion model and cancer risk calculations following BAAQMD methodology described in *Attachment 1*. Figure 1 shows the modeled roadway segment.

<sup>24</sup> Email correspondence with Fiona Phung, Project Manager, David J. Powers & Associates, Inc., May 6, 2021, Attachment: *ICON ECHO Volumes 5-5-21.xlsx*.

## *Traffic Emissions*

This analysis involved the development of DPM, organic TACs, and PM<sub>2.5</sub> roadway emissions in the project area using the Caltrans version of the EMFAC2017 emission model, known as CT-EMFAC2017.<sup>25</sup> CT-EMFAC2017 provides emission factors for mobile source criteria pollutants and TACs, including DPM. Emission processes modeled include running exhaust for DPM, PM<sub>2.5</sub> and total organic compounds (e.g., TOG), running evaporative losses for TOG, and tire and brake wear and fugitive road dust for PM<sub>2.5</sub>. All PM<sub>2.5</sub> emissions from all vehicles were used, rather than just the PM<sub>2.5</sub> fraction from diesel powered vehicles, because all vehicle types (i.e., gasoline and diesel powered) produce PM<sub>2.5</sub>. Additionally, PM<sub>2.5</sub> emissions from vehicle tire and brake wear and from re-entrained roadway dust were included in these emissions. DPM emissions are projected to decrease in the future and are reflected in the CT-EMFAC2017 emissions data. Inputs to the model include region (Santa Clara County), type of road (major/collector), truck percentage for non-state highways in Santa Clara County (3.51 percent),<sup>26</sup> traffic mix assigned by CT-EMFAC2017 for the county, year of analysis (2026 – project operational year), and season (annual).

Project operation was assumed to begin in 2026 or thereafter. To calculate the increased cancer risk from increased traffic volumes due to the project traffic, the community risks were adjusted for exposure duration to account for the MEI being exposed to construction for the first 3 years of the 30-year period. The exposure duration from roadway traffic was adjusted for 27 years of exposure (2026-2052). In order to estimate TAC and PM<sub>2.5</sub> emissions over the exposure period for calculating increased cancer risks to exiting residents from project traffic, the CT-EMFAC2017 model was used to develop vehicle emission factors for the year 2026. Year 2026 emissions were conservatively assumed as being representative of future conditions over the time period that cancer risks are evaluated (27 years) from the roadway traffic, since, as discussed above, overall vehicle emissions, and in particular diesel truck emissions will decrease in the future.

## *Traffic Dispersion Modeling Inputs*

A conservative analysis was conducted based on project driveway locations where all project traffic emissions from on- and near-site travel were assumed to occur along N. 4<sup>th</sup> Street. This roadway is closest to the nearby sensitive receptors. The project's trip generation provided by the traffic consultant of 3,489 net daily trips was used to assess project traffic impacts.<sup>27</sup> The average hourly traffic distributions for Santa Clara County roadways were developed using the EMFAC model,<sup>28</sup> which were then applied to the trip volumes to obtain estimated hourly traffic volumes and emissions for the roadway. For all hours of the day, the average speed of 20 mph on N. 4<sup>th</sup> Street was assumed for all vehicles based on posted speed limit signs on the roadway and assuming 5 mph below to account for downtown traffic.

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<sup>25</sup> Note that Caltrans has not yet updated their version of EMFAC to incorporate EMFAC2021 emission rates for traffic modeling studies.

<sup>26</sup> Bay Area Air Quality Management District, 2012, *Recommended Methods for Screening and Modeling Local Risks and Hazards, Version 3.0*. May. Web: <https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/risk-modeling-approach-may-2012.pdf?la=en>

<sup>27</sup> Email correspondence with Fiona Phung, Project Manager, David J. Powers & Associates, Inc., May 6, 2021, Attachment: *ICON ECHO Volumes 5-5-21.xlsx*.

<sup>28</sup> The Burden output from EMFAC2007, a previous version of CARB's EMFAC model, was used for this since the current web-based version of EMFAC2021 does not include Burden type output with hour by hour traffic volume information.

## *Dispersion Modeling*

Operational traffic roadway travel emissions were modeled with the AERMOD model using a series of adjacent volume sources along a line (line volume sources) to represent traffic emissions on the roadway segment where all of the project traffic would occur. Five years (2013-2017) of hourly meteorological data from the San José Airport prepared for use with the AERMOD model by the BAAQMD, were used for the modeling. TAC and PM<sub>2.5</sub> concentrations for 2026 were calculated by the model at the same sensitive receptor locations with the same receptor heights of 20 feet (6.1 meters) and 20 feet (9.1 meters) used for the construction health risk modeling at the MEI location and 3 feet (1 meter) at the school receptors.

Figure 1 shows the project roadway segment modeled and residential MEI receptor location used in the modeling. Table 6 lists the project roadway risks and hazards at the location of the MEI and maximum school receptor. The emission rates and roadway calculations used in the project impact analysis are shown in *Attachment 4*.

### Project Operational Stand-By Diesel Generators

The project proposes to include two stand-by emergency diesel generators on the ground floor of each residential and office towers. Site plans show the generator rooms extend to the top of the second floor. Therefore, it was assumed that the generators emissions would be release near the top of the second floor along the boundaries of the building's generator rooms (see Figure 1). Each generator would be 1,000-kW powered by a 1,340-HP diesel engine.

Operation of a diesel generator would be a source of TAC emissions. The generators would be operated for testing and maintenance purposes, with a maximum of 50 hours per year of non-emergency operation under normal conditions. During testing periods, the engine would typically be run for less than one hour under light engine loads. The generator engines would be required to meet EPA emission standards and consume commercially available low sulfur diesel fuel. The emissions from the operation of the generators were calculated using the CalEEMod model.

This diesel engines would be subject to CARB's Stationary Diesel Airborne Toxics Control Measure (ATCM) and require permits from the BAAQMD, since it will be equipped with an engine larger than 50-HP. BACT requirements would apply to these generators that would limit DPM emissions. As part of the BAAQMD permit requirements for toxics screening analysis, the engine emissions will have to meet Best Available Control Technology for Toxics (BACT) and pass the toxic risk screening level of less than ten in a million. The risk assessment would be prepared by BAAQMD. Depending on results, BAAQMD would set limits for DPM emissions (e.g., more restricted engine operation periods). Sources of air pollutant emissions complying with all applicable BAAQMD regulations generally will not be considered to have a significant air quality community risk impact.

To obtain an estimate of potential cancer risks and PM<sub>2.5</sub> impacts from operation of the emergency generator the U.S. EPA AERMOD dispersion model was used to calculate the maximum annual DPM concentration at off-site sensitive receptor locations (nearby residences and schools). The same receptors, breathing heights, and BAAQMD San José International Airport meteorological

data used in the construction dispersion modeling were used for the generator models. Stack parameters (stack height, exhaust flow rate, and exhaust gas temperature) for modeling the generators was based on BAAQMD default parameters for emergency generators.<sup>29</sup> Annual average DPM and PM<sub>2.5</sub> concentrations were modeled assuming that generator testing could occur at any time of the day (24 hours per day, 365 days per year).

To calculate the increased cancer risk from the generators at the MEI, the cancer risks were also adjusted for exposure duration to account for the MEI being exposed to construction for the first 3 years of the 30-year period. The exposure duration was adjusted for 27 years of exposure. Table 6 lists the community risks from stand-by diesel generators at the location of residential MEI and maximum school receptor. The emissions and health risk calculations for the proposed generators are included in *Attachment 4*.

#### Cumulative Community Risks of all TAC Sources at Project MEI

The cumulative risk impacts from a project are the combination of construction and operation sources. These sources include on-site construction activity, project generators, and increased traffic from the project. The project impact is computed by adding the construction cancer risk for an infant/child to the increased cancer risk for the project operational conditions for the roadway and generators at the MEI over a 30-year period. The project MEI is identified as the sensitive receptor that is most impacted by the project's construction and operation.

For this project, the sensitive receptor identified in Figure 1 as the construction MEI is also the project MEI. At this location, the MEI would be exposed to 3 years of construction cancer risks and 27 years of operational (includes traffic and stand-by generators) cancer risks. The cancer risks from construction and operation of the project were summed together. Unlike, the increased maximum cancer risk, the annual PM<sub>2.5</sub> concentration and HI risks are not additive but based on an annual maximum risk for the entirety of the project.

Project risk impacts are shown in Table 6. The unmitigated maximum cancer risks and from construction activities at the residential project MEI locations would exceed the single-source significance threshold. However, with the incorporation of the *Mitigation Measure AQ-1 and AQ-2*, the mitigated risk and hazard values would no longer exceed the BAAQMD single-source significance thresholds. The unmitigated annual PM<sub>2.5</sub> concentration and non-cancer hazards at the MEI, and health risk impacts at the maximum school receptor, from project construction and operation activities would be below the single-source significance thresholds.

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<sup>29</sup> The San Francisco Community Risk Reduction Plan: Technical Support Document, BAAQMD, San Francisco Dept. of Public Health, and San Francisco Planning Dept., December 2012

**Table 6. Construction and Operation Risk Impacts at the Off-Site Project MEI**

Source		Cancer Risk (per million)	Annual PM <sub>2.5</sub> (µg/m <sup>3</sup> )	Hazard Index
Project Construction (Years 0-3)	Unmitigated	<b>42.39 (infant)</b>	0.26	0.04
	Mitigated*	3.58 – 7.31 (infant)	0.05	<0.01
Project Traffic on N. 4 <sup>th</sup> Street (Years 4-30)		0.04	0.01	<0.01
Project Generator, Two 1,000-kW, 1,340-HP (Years 4-30)		0.11	<0.01	<0.01
Total/Maximum Project Impact (Years 0-30)	Unmitigated	<b>42.54 (infant)</b>	0.26	0.04
	Mitigated*	3.73 – 7.46 (infant)	0.05	<0.01
<b>BAAQMD Single-Source Threshold</b>		<b>10</b>	<b>0.3</b>	<b>1.0</b>
<b>Exceed Threshold?</b>	Unmitigated	<b>Yes</b>	<b>No</b>	<b>No</b>
	Mitigated*	<b>No</b>	<b>No</b>	<b>No</b>
<b>Most Affected Nearby Child – Little Einstein's Montessori Preschool Child Receptor</b>				
Project Construction (Years 0-3)		1.86 (child)	0.03	0.01
Project Traffic (Years 0-4)		0.01	<0.01	<0.01
Project Generators (Years 0-4)		0.03	<0.01	<0.01
Unmitigated Total/Maximum Project (Years 0-4)		1.90 (child)	0.06	0.01
<b>BAAQMD Single-Source Threshold</b>		<b>&gt;10.0</b>	<b>&gt;0.3</b>	<b>&gt;1.0</b>
<b>Exceed Threshold?</b>		<b>No</b>	<b>No</b>	<b>No</b>

\* Construction equipment with Tier 4 Final or Tier 4 interim engines, electric cranes and generators, and enhanced BMPs as Mitigation.

### Cumulative Community Risks of all TAC Sources at the Offsite Project MEI

Community health risk assessments typically look at all substantial sources of TACs that can affect sensitive receptors that are located within 1,000 feet of a project site (i.e., influence area). These sources include rail lines, freeways or highways, busy surface streets, and stationary sources identified by BAAQMD.

A review of the project area and based on provided traffic information indicates that traffic on E. Santa Clara Street would exceed 10,000 vehicles per day. Other nearby streets are assumed to have less than 10,000 vehicles per day. A review of BAAQMD's stationary source map website identified three stationary sources with the potential to affect the project MEI. In addition, there are several development projects whose construction would contribute to the cumulative risk. The risk impacts from these developments are included within the analysis. Figure 2 shows the location of the sources affecting the MEI. Community risk impacts from these sources upon the MEI reported in Table 7. Details of the modeling and community risk calculations are included in *Attachment 5*.



**Figure 2. Project Site and Nearby TAC and PM<sub>2.5</sub> Sources**



Local Roadways – E. Santa Clara Street

A refined analysis of potential health impacts from vehicle traffic on the E. Santa Clara Street was conducted since the roadway was estimated to have average daily traffic (ADT) exceeding 10,000 vehicles. The refined analysis involved predicting emissions for the traffic volume and mix of vehicle types on the roadway near the project site and using an atmospheric dispersion model to predict exposure to TACs. The associated cancer risks are then computed based on the modeled exposures. *Attachment 1* includes a description of how community risk impacts, including cancer risk are computed.

*Traffic Emissions Modeling*

This analysis involved the development of DPM, organic TACs, and PM<sub>2.5</sub> emissions for traffic on E. Santa Clara Street using the Caltrans version of the CARB EMFAC2017 emissions model, known as CT-EMFAC2017. CT-EMFAC2017 provides emission factors for mobile source criteria pollutants and TACs, including DPM. Emission processes modeled include running exhaust for DPM, PM<sub>2.5</sub> and total organic compounds (TOG), running evaporative losses for TOG, and tire and brake wear and fugitive road dust for PM<sub>2.5</sub>. All PM<sub>2.5</sub> emissions from all vehicles were used,

rather than just the PM<sub>2.5</sub> fraction from diesel powered vehicles, because all vehicle types (i.e., gasoline and diesel powered) produce PM<sub>2.5</sub>. Additionally, PM<sub>2.5</sub> emissions from vehicle tire and brake wear and from re-entrained roadway dust were included in these emissions. DPM emissions are projected to decrease in the future and are reflected in the CT-EMFAC2017 emissions data. Inputs to the model include region (Santa Clara County), type of road (major/collector), truck percentage for non-state highways in Santa Clara County (3.51 percent),<sup>30</sup> traffic mix assigned by CT-EMFAC2017 for the county, year of analysis (2023 – construction start year), and season (annual).

To estimate TAC and PM<sub>2.5</sub> emissions over the 30-year exposure period used for calculating the increased cancer risks for sensitive receptors at the MEI and project site, the CT-EMFAC2017 model was used to develop vehicle emission factors for the year 2023 (project construction year). Emissions associated with vehicle travel depend on the year of analysis because emission control technology requirements are phased-in over time. Therefore, the earlier the year analyzed in the model, the higher the emission rates utilized by CT-EMFAC2017. Year 2023 emissions were conservatively assumed as being representative of future conditions over the time period that cancer risks are evaluated since, as discussed above, overall vehicle emissions, and in particular diesel truck emissions, will decrease in the future.

The ADT on Santa Clara Street was based on AM and PM peak-hour background traffic volumes for the nearby roadway provided by the project's traffic consultant.<sup>31</sup> Assuming a 1 percent per year increase, the predicted ADT on E. Santa Clara Street would be 16,978 vehicles. Average hourly traffic distributions for Santa Clara County roadways were developed using the EMFAC model,<sup>32</sup> which were then applied to the ADT volumes to obtain estimated hourly traffic volumes and emissions for the roadway. For all hours of the day, an average speed of 20 mph on E. Santa Clara Street was assumed for all vehicles based on posted speed limit signs on the roadway and assuming 5 mph below to account for downtown traffic

### *Dispersion Modeling*

Dispersion modeling of TAC and PM<sub>2.5</sub> emissions was conducted using the U.S. EPA AERMOD dispersion model, which is recommended by the BAAQMD for this type of analysis.<sup>33</sup> TAC and PM<sub>2.5</sub> emissions from traffic on E. Santa Clara Street within about 1,000 feet of the project site was evaluated with the model. Emissions from vehicle traffic were modeled in AERMOD using a series of volume sources along a line (line volume sources), with line segments used to represent the eastbound and westbound travel lanes on E. Santa Clara Street. The same meteorological data and off-site sensitive receptors used in the previous construction dispersion modeling were used in the roadway modeling. Other inputs to the model included road geometry, hourly traffic emissions, and receptor locations and heights. Annual TAC and PM<sub>2.5</sub> concentrations for 2023

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<sup>30</sup> Bay Area Air Quality Management District, 2012, *Recommended Methods for Screening and Modeling Local Risks and Hazards, Version 3.0*. May. Web: [https://www.baaqmd.gov/~/\\_/media/files/planning-and-research/ceqa/risk-modeling-approach-may-2012.pdf?la=en](https://www.baaqmd.gov/~/_/media/files/planning-and-research/ceqa/risk-modeling-approach-may-2012.pdf?la=en)

<sup>31</sup> Email correspondence with Fiona Phung, Project Manager, David J. Powers & Associates, Inc., May 6, 2021, Attachment: *ICON ECHO Volumes 5-5-21.xlsx*.

<sup>32</sup> The Burden output from EMFAC2007, a previous version of CARB's EMFAC model, was used for this since the current web-based version of EMFAC2014 does not include Burden type output with hour by hour traffic volume information.

<sup>33</sup> BAAQMD. *Recommended Methods for Screening and Modeling Local Risks and Hazards*. May 2012



from traffic on E. Santa Clara Street were calculated using the model. Concentrations were calculated at the project MEI with receptor heights of 20 feet (6.1 meters) to represent the breathing heights on the second floor of the nearby residence.

### *Computed Cancer and Non-Cancer Health Impacts*

The cancer risk, PM<sub>2.5</sub> concentration, and HI impacts from E. Santa Clara Street on the project MEI are shown in Table 7. Figure 2 shows the roadway links used for the modeling and receptor locations where concentrations were calculated. Details of the emission calculations, dispersion modeling and cancer risk calculations for the receptors with the maximum cancer risk from Santa Clara Street traffic are provided in *Attachment 5*.

### BAAQMD Permitted Stationary Sources

Permitted stationary sources of air pollution near the project site were identified using BAAQMD's *Permitted Stationary Sources 2018* GIS website,<sup>34</sup> which identifies the location of nearby stationary sources and their estimated risk and hazard impacts, including emissions and adjustments to account for new OEHHA guidance. Three sources were identified using this tool with two sources being diesel generators and one being a gas dispensing facility. The BAAQMD GIS website provided screening risks and hazards for this source, so a stationary source information request was not required to be submitted to BAAQMD. After further review, source #104124 would be removed as part of the project and would, therefore, no longer present any risk or hazard impacts.

The screening level risks and hazards provided by BAAQMD for the remaining stationary sources were adjusted for distance using BAAQMD's *Distance Adjustment Multiplier Tool for Diesel Internal Combustion Engines*. Community risk impacts from the stationary sources upon the MEI are reported in Table 7.

### Construction Risk Impacts from Nearby Developments

From the City's website,<sup>35</sup> the following planned or approved projects are located within 1,000 feet of the proposed project:

- **Miro (SJSC Towers)** – this project is located at 39 North 5<sup>th</sup> Street, which is located just east of the project site, in the northeastern corner of the North 4<sup>th</sup> Street/East Santa Clara Street intersection. This project is currently under construction and near completion. Construction of this project should be completed prior to construction of the project. This would not result in a cumulative construction impact.
- **4<sup>th</sup> Street Housing** – this project is in the northeast corner of the N. 4<sup>th</sup> Street/E. St. John Street intersection, within 100 feet of the project site. This project has been approved and would consist of a 23-story mixed-use building with approximately 10,733 square feet of

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<sup>34</sup> BAAQMD, <https://baaqmd.maps.arcgis.com/apps/webappviewer/index.html?id=2387ae674013413f987b1071715daa65>

<sup>35</sup> City of San Jose, Private / Key Economic Development Projects Map, Web: <https://gis.sanjoseca.gov/maps/devprojects/>

commercial uses and up to 316 residential units. While the construction schedule is unknown at this time, construction could occur simultaneously.

- **BDG Mixed-Use** – this project site is located at 148 to 150 E. Santa Clara Street, 17 S. 4<sup>th</sup> Street, and 130 to 134 E. Santa Clara Street. This project is about 100 feet south of the project site. This project is in the planning review phase and would consist of a would consist of a six-story mixed-use building with ground-level retail/restaurant uses and office space on the upper floors. While the construction schedule is unknown at this time, construction could occur simultaneously.
- **Hotel Clariana** – this project is located at 27 S. 4<sup>th</sup> Street, which is about 190 feet south of the project site. This project is currently under review and would consist of a five-story hotel and seven-story condominium building. Construction dates for this project have not been confirmed but would be expected to last for more than one year, and construction could occur simultaneously.
- **Fountain Alley Mixed-Use** – this project is located at 35 South 2<sup>nd</sup> Street and would include a 21-story mixed-use building with 194 residential units and 405,000 square feet of office space and 31,959 square feet of ground-level retail. This project is currently in the planning review phase and not expected to start before March 2023. Therefore, construction could occur simultaneously with the proposed project.
- **Fountain Alley Office** – this project is located at 26 S. 1<sup>st</sup> Street and is approximately 725 feet from the project site. This project is approved but not yet constructed. This project includes a six-story building with 91,992-sf of commercial office and retail space. While the construction schedule is unknown at this time, construction could occur simultaneously or concurrently.
- **19 N. 2<sup>nd</sup> Street** – this project is located approximately 535 feet west of the project site. This mixed-use project would include 210 residential units and 37,240-sf of commercial space. This project is currently in the planning review phase. While the construction schedule is unknown at this time, construction could occur simultaneously.
- **Park View Towers** – this project is located in the northeast corner of the intersection at N. 1<sup>st</sup> Street and E. St. James Street, approximately 875 feet northwest of the project site. This mixed-use project would include construction of two towers with 220 residential units and up to 18,000 square feet of commercial space. This project has been approved but not constructed. While the construction schedule is unknown at this time, construction could occur simultaneously.
- **6<sup>th</sup> Street Project** – this project is located at 73 North 6<sup>th</sup> Street, approximately 630 feet east of the project site. This 10-story mixed-use building would include up to 197 residential units and approximately 8,000 square feet of ground floor retail. This project has been approved but not constructed. While the construction schedule is unknown at this time, construction could occur simultaneously.

- **27 West** – this project is located at 27 S. 1<sup>st</sup> Street, which is about 925 feet southwest of the project site. This project has been approved and consists of a 22-story mixed-use building with 374 residential units and 35,712-sf of retail space. Construction has begun and some phases could occur simultaneously with the proposed project.
- **Eterna Tower** – this project is located at 17 E. Santa Clara Street, which is about 630 feet west of the project site. This project is currently under review and consists of a mixed-use building with approximately 2,500-sf of commercial space and 200 residential units. While the construction schedule is unknown at this time, construction could occur simultaneously.

The mitigated construction risks and hazard impact values for certain developments were available from their air quality technical reports either conducted by *Illingworth & Rodin, Inc.* or on the City of San José Environmental Review website for Active EIRs,<sup>36</sup> Completed EIRs,<sup>37</sup> or Negative Declaration / Initial Studies.<sup>38</sup> For developments that did not have available construction impact results at the time of this study, it was assumed the construction risks would be less than the BAAQMD single-source thresholds for community risks and hazards. If the nearby developments were more than 500 feet from the project site, the construction risks were assumed to be half of the BAAQMD single-source thresholds due to the distance and dispersion between the source and receptors. For the purpose of this analysis, it was conservatively assumed the entire construction period from the proposed project would overlap with the nearby developments' construction schedule. This approach likely provides an overestimate of the community risk and hazard levels because it assumes that maximum impacts from the nearby development occurs concurrently with the proposed project at the proposed project's MEIs. The mitigated construction risks reported in that air quality assessment were included in the cumulative risks Table 7.

#### Summary of Cumulative Risks at the Project MEI

Table 7 reports both the project and cumulative community risk impacts at the sensitive receptors most affected by project construction and operation (i.e., the project MEI). The project would have an exceedance with respect to community risk caused by project construction and operation activities, since the maximum unmitigated cancer risk exceeds the BAAQMD single-source threshold. The combined unmitigated annual PM<sub>2.5</sub> concentration would also exceed the BAAQMD cumulative-source threshold. With the implementation of *Mitigation Measure AQ-1 and AQ-2*, the project's cancer risk would be lowered to a level below the single-source thresholds. However, the combined annual PM<sub>2.5</sub> concentration, which includes unmitigated and mitigated impacts, could exceed its cumulative thresholds due to the concentration from the simultaneous construction of nearby developments. The cumulative threshold would be exceeded in the case where all construction activity occurs simultaneously. The cancer risk and HI, unmitigated and mitigated, does not exceed the cumulative thresholds.

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<sup>36</sup> City of San José, *Active EIRs*, <https://www.sanjoseca.gov/your-government/departments/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs>

<sup>37</sup> City of San José, *Completed EIRs*, <https://www.sanjoseca.gov/your-government/departments/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/completed-eirs>

<sup>38</sup> City of San José, *Negative Declaration / Initial Studies*, <https://www.sanjoseca.gov/your-government/departments/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/negative-declaration-initial-studies>

**Table 7. Cumulative Community Risk Impacts at the Location of the Project MEI**

Source		Maximum Cancer Risk (per million)	PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )	Hazard Index
<b>Project Impacts</b>				
Total/Maximum Project Impact	Unmitigated	<b>42.54 (infant)</b>	0.26	0.04
	Mitigated	3.73 -7.46 (infant)	0.05	<0.01
<b>BAAQMD Single-Source Threshold</b>		<b>10</b>	<b>0.3</b>	<b>1.0</b>
<i>Exceed Threshold?</i>	Unmitigated	<i>Yes</i>	<i>No</i>	<i>No</i>
	Mitigated	<i>No</i>	<i>No</i>	<i>No</i>
<b>Cumulative Operational Sources</b>				
E. Santa Clara Street, ADT 16,978		1.45	0.10	<0.01
San Jose New City Hall (Facility ID #15267, Generator), MEI at 400 feet		0.92	0.03	<0.01
V Towers Investments LLC, C/O Harvest Properties (Facility ID #23479, Generator), MEI at 500 feet		0.33	-	-
<b>Cumulative Temporary Construction Sources</b>				
4 <sup>th</sup> Street Housing Mitigated Construction Emissions – 750 feet north		<4.30	<0.06	<0.01
BDG Mixed-Use Mitigated Construction Emissions – same location		<5.00	<0.15	<0.50
Hotel Clariana Mitigated Construction Emissions – 100 feet south		<8.80	<0.07	<0.01
Fountain Alley Mixed-use Mitigated Construction Emissions – 700 feet west		<5.11	<0.10	<0.01
Fountain Alley Office Mitigated Construction Emissions – 840 feet west		<4.50	<0.03	<0.01
19 N. 2 <sup>nd</sup> Street Mitigated Construction Emissions – 720 feet west		<5.00	<0.15	<0.50
Park View Towers Mitigated Construction Emissions – +1,000 feet northwest		<5.00	<0.15	<0.50
6 <sup>th</sup> Street Mitigated Construction Emissions – 800 feet northeast		<5.00	<0.15	<0.50
27 West Mitigated Construction Emissions – 1,000 feet west		<2.40	<0.05	<0.01
Eterna Tower Mitigated Construction Emissions – 800 feet west		<5.00	<0.15	<0.50
<i>Combined Sources</i>	Unmitigated	<95.35	<b>&lt;1.45</b>	<2.61
	Mitigated	<56.54 – <60.27	<b>&lt;1.24</b>	<2.58
<b>BAAQMD Cumulative Source Threshold</b>		<b>100</b>	<b>0.8</b>	<b>10.0</b>
<i>Exceed Threshold?</i>	Unmitigated	<i>No</i>	<b><i>Yes</i></b>	<i>No</i>
	Mitigated	<i>No</i>	<b><i>Yes</i></b>	<i>No</i>

**Mitigation Measure AQ-2: Use construction equipment that has low diesel particulate matter exhaust emissions.**

A feasible plan to reduce emissions such that increased cancer risk and annual PM<sub>2.5</sub> concentrations from construction would be reduced below significance levels is as follows:

1. All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 final or interim emission standards for particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), if feasible, otherwise,
  - a. If use of Tier 4 equipment is not available, alternatively use equipment that meets U.S. EPA emission standards for Tier 3 engines and include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices that altogether achieve a minimum of 77 percent reduction in particulate matter exhaust in comparison to uncontrolled equipment.
  - b. Use of alternatively fueled or electric equipment.
2. Stationary cranes and construction generator sets shall be powered by electricity.

Alternatively, the applicant could develop a separate feasible plan that reduces on- and near-site construction diesel particulate matter emissions by a minimum of 77 percent or greater. Such a plan would have to be reviewed and approved by the City.

*Effectiveness of Mitigation Measure AQ-1 and AQ-2*

CalEEMod was used to compute emissions associated with this mitigation measure assuming that all equipment met U.S. EPA Tier 4 Final engines standards, electric stationary cranes and non-diesel-powered generator sets were used along with enhanced BAAQMD best management practices for construction were included. With these implemented, the project's construction cancer risk levels (assuming infant exposure) would be reduced by 91 percent to 3.73 chances per million using Tier 4 final engines or by 82 percent to 7.46 chances per million using Tier 4 interim engines. The project's annual PM<sub>2.5</sub> concentrations would be reduced by 81 percent to 0.05 µg/m<sup>3</sup>. The project's risk impacts would no longer exceed the BAAQMD single-source significance thresholds. This would reduce the cumulative cancer risk and to less than 56.54 or 60.27 chances per million and the cumulative PM<sub>2.5</sub> concentration risk to less than 1.24 µg/m<sup>3</sup>. The PM<sub>2.5</sub> concentration would still exceed the cumulative threshold due to the overwhelming contribution of non-project sources.

*Mitigation Measure AQ-1 and AQ-2* represent the best available measures to reduce project construction period emissions. The PM<sub>2.5</sub> concentration from existing sources alone exceeds the cumulative threshold at 1.06 µg/m<sup>3</sup>. Cumulative risks exceed the PM<sub>2.5</sub> concentration threshold because of the overwhelming influence of the potentially simultaneous nearby developments at the MEIs. The project's mitigated PM<sub>2.5</sub> concentration only represents 4 percent of the total mitigated cumulative concentration. In addition, according to BAAQMD health risks would be

less-than-significant to the MEI if the risks from the project are reduced below the single-source thresholds.<sup>39</sup> Therefore, the project would not substantially contribute to the total cumulative PM<sub>2.5</sub> concentration. The project would not be cumulatively considerable and no additional mitigation would be required on the part of the project to mitigate the exceedance of the cumulative source threshold for annual PM<sub>2.5</sub> concentration. Note that the project would apply best practices in reducing construction emissions, including those of PM<sub>2.5</sub>.

### **Non-CEQA: On-Site Community Risk Assessment for TAC Sources - New Project Residences**

In addition to evaluating health impact from project construction, a health risk assessment was completed to assess the impact existing TAC sources would have on the new proposed sensitive receptors (residents) that that project would introduce. The same TAC sources identified above were used in this health risk assessment.<sup>40</sup>

#### Local Roadways – E. Santa Clara Street

The roadway analysis for the project residents was conducted in the same manner as described above for the off-site MEI. The project set of receptors were placed in the northern residential tower the project area and were spaced every 23 feet (7 meters). Project residences in the project site would be located on the third floor and higher of the proposed residential tower. Roadway impacts were modeled at receptor heights of 25 feet (7.6 meters) and 35 feet (10.6 meters) representing sensitive receptors on the third and fourth floors. Project sensitive receptors higher than the fourth floor would have roadway impacts less than those on the fourth floor. The portions of E. Santa Clara Street included in the modeling are shown in Figure 3 along with the project site and receptor locations where impacts were modeled.

Maximum increased cancer risks were calculated for the residents at the project site using the maximum modeled TAC concentrations. A 30-year exposure period was used in calculating cancer risks assuming the residents would include third trimester pregnancy and infants/children and were assumed to be in the new building area for 24 hours per day for 350 days per year. The highest impacts from E. Santa Clara Street occurred at third-floor receptors of the unit in the southeast corner of the project's northern residential tower closest to the roadway. Cancer risks associated with E. Santa Clara Street are greatest closest to the roadway and decrease with distance from the road. The roadway's community risk impacts at the project site are shown in Table 8. Details of the emission calculations, dispersion modeling, and cancer risk calculations are contained in *Attachment 5*.

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<sup>39</sup> Correspondence with Areana Flores, MSc, Environmental Planner, BAAQMD, February 23, 2021.

<sup>40</sup> We note that to the extent this analysis considers *existing* air quality issues in relation to the impact on *future residents* of the Project, it does so for informational purposes only pursuant to the judicial decisions in *CBIA v. BAAQMD* (2015) 62 Cal.4th 369, 386 and *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473, which confirm that the impacts of the existing environment on a project are excluded from CEQA.



## Stationary Sources

The stationary source screening analysis for the new project sensitive receptors was conducted in the same manner as described above for the project MEI. Table 8 shows the health risk assessment results from the stationary sources.

## Construction Risk Impacts from Nearby Developments

The same mitigated construction risks from the nearby developments were included in the cumulative table for the on-site project sensitive receptors. However, the on-site project sensitive receptors would only be exposed to a portion of the construction from the nearby developments, as opposed to the project MEI which could be exposed to the entire portion of the nearby developments' construction. Therefore, the construction risks from the nearby developments would be lower at the proposed on-site project sensitive receptors.

**Figure 3. Project Site, On-Site Residential Receptors, Roadway Segments Evaluated, and Locations of Maximum Roadway TAC Impacts**



## Cumulative Community Health Risk at Project Site

Community risk impacts from the combined sources upon the project site are reported in Table 8. The TAC sources are compared against the BAAQMD single-source threshold and then combined and compared against the BAAQMD cumulative-source threshold. As shown, the maximum cancer risk, and annual PM<sub>2.5</sub> concentrations, and HI from the nearby fixed sources (roadways and stationary sources) do not exceed the single-source thresholds and the combined fixed group alone would not exceed the cumulative thresholds. The maximum cancer risk, annual PM<sub>2.5</sub> concentrations, and HI from nearby temporary sources (nearby developments construction) would not exceed the single-source thresholds, but the combined temporary group alone would exceed the PM<sub>2.5</sub> concentration threshold. Given that the construction of nearby developments is temporary, the construction schedule for many of these developments are unknown and may not overlap with this project, and the nearby developments impact results at the project site would be less than what is shown in the table, no additional project design features (i.e., air filtration) would be recommended since the project would comply with City policies over the lifetime of the project.

**Table 8. Impacts from Combined Sources to Project Site Receptors**

Source	Cancer Risk (per million)	Annual PM <sub>2.5</sub> (µg/m <sup>3</sup> )	Hazard Index
<b>Fixed Operational Sources</b>			
Santa Clara Street, ADT 16,978	0.59	0.04	<0.01
San Jose New City Hall (Facility ID #15267, Generator), Project Site at 450 feet	0.80	0.03	<0.01
V Towers Investments LLC, C/O Harvest Properties (Facility ID #23479, Generator), Project Site at 315 feet	0.60	-	-
<b>Temporary Construction Sources</b>			
4 <sup>th</sup> Street Housing Mitigated Construction Emissions – 100 feet northeast	<4.30	<0.06	<0.01
BDG Mixed-Use Mitigated Construction Emissions – 100 feet south	<5.00	<0.15	<0.50
Hotel Clariana Mitigated Construction Emissions – 190 feet south	<8.80	<0.07	<0.01
Fountain Alley Mixed-use Mitigated Construction Emissions – 575 feet southwest	<5.11	<0.10	<0.01
Fountain Alley Office Mitigated Construction Emissions – 725 feet southwest	<4.50	<0.03	<0.01
19 N. 2 <sup>nd</sup> Street Mitigated Construction Emissions – 535 feet west	<5.00	<0.15	<0.50
Park View Towers Mitigated Construction Emissions – 875 feet northwest	<5.00	<0.15	<0.50
6 <sup>th</sup> Street Mitigated Construction Emissions – 630 feet east	<5.00	<0.15	<0.50
27 West Mitigated Construction Emissions – 925 feet southwest	<2.40	<0.05	<0.01
Eterna Tower Mitigated Construction Emissions – 630 feet west	<5.00	<0.15	<0.50
<b>BAAQMD Single-Source Threshold</b>	<b>10</b>	<b>0.3</b>	<b>1.0</b>
<i>Exceed Threshold?</i>	<b>Yes</b>	<b>Yes</b>	<b>No</b>
Cumulative Total	<52.10	<1.13	<2.57
<b>BAAQMD Cumulative Source Threshold</b>	<b>100</b>	<b>0.8</b>	<b>10.0</b>
<i>Exceed Threshold?</i>	<b>No</b>	<b>Yes</b>	<b>No</b>



## **Supporting Documentation**

*Attachment 1* is the methodology used to compute community risk impacts, including the methods to compute increased cancer risk from exposure to project emissions.

*Attachment 2* includes the CalEEMod output for project construction and operational criteria air pollutant. Also included are any modeling assumptions.

*Attachment 3* includes the EMFAC2021 emissions modeling. The input files for these calculations are voluminous and are available upon request in digital format.

*Attachment 4* is the health risk assessment. This includes the summary of the dispersion modeling and the cancer risk calculations for construction and operation. The AERMOD dispersion modeling files for this assessment, which are quite voluminous, are available upon request and would be provided in digital format.

*Attachment 5* includes the cumulative community risk calculations, modeling results, and health risk calculations from sources affecting the construction MEI and project sensitive receptors.

## Attachment 1: Health Risk Calculation Methodology

### Health Risk Calculation Methodology

A health risk assessment (HRA) for exposure to Toxic Air Contaminates (TACs) requires the application of a risk characterization model to the results from the air dispersion model to estimate potential health risk at each sensitive receptor location. The State of California Office of Environmental Health Hazard Assessment (OEHHA) and California Air Resources Board (CARB) develop recommended methods for conducting health risk assessments. The most recent OEHHA risk assessment guidelines were published in February of 2015.<sup>41</sup> These guidelines incorporate substantial changes designed to provide for enhanced protection of children, as required by State law, compared to previous published risk assessment guidelines. CARB has provided additional guidance on implementing OEHHA's recommended methods.<sup>42</sup> This HRA used the 2015 OEHHA risk assessment guidelines and CARB guidance. The BAAQMD has adopted recommended procedures for applying the newest OEHHA guidelines as part of Regulation 2, Rule 5: New Source Review of Toxic Air Contaminants.<sup>43</sup> Exposure parameters from the OEHHA guidelines and the recent BAAQMD HRA Guidelines were used in this evaluation.

### Cancer Risk

Potential increased cancer risk from inhalation of TACs is calculated based on the TAC concentration over the period of exposure, inhalation dose, the TAC cancer potency factor, and an age sensitivity factor to reflect the greater sensitivity of infants and children to cancer causing TACs. The inhalation dose depends on a person's breathing rate, exposure time and frequency and duration of exposure. These parameters vary depending on the age, or age range, of the persons being exposed and whether the exposure is considered to occur at a residential location or other sensitive receptor location.

The current OEHHA guidance recommends that cancer risk be calculated by age groups to account for different breathing rates and sensitivity to TACs. Specifically, they recommend evaluating risks for the third trimester of pregnancy to age zero, ages zero to less than two (infant exposure), ages two to less than 16 (child exposure), and ages 16 to 70 (adult exposure). Age sensitivity factors (ASFs) associated with the different types of exposure are an ASF of 10 for the third trimester and infant exposures, an ASF of 3 for a child exposure, and an ASF of 1 for an adult exposure. Also associated with each exposure type are different breathing rates, expressed as liters per kilogram of body weight per day (L/kg-day) or liters per kilogram of body weight per 8-hour period for the case of worker or school child exposures. As recommended by the BAAQMD for residential exposures, 95<sup>th</sup> percentile breathing rates are used for the third trimester and infant exposures, and 80<sup>th</sup> percentile breathing rates for child and adult exposures. For children at schools and daycare facilities, BAAQMD recommends using the 95<sup>th</sup> percentile 8-hour breathing rates.

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<sup>41</sup> OEHHA, 2015. *Air Toxics Hot Spots Program Risk Assessment Guidelines, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. Office of Environmental Health Hazard Assessment. February.

<sup>42</sup> CARB, 2015. *Risk Management Guidance for Stationary Sources of Air Toxics*. July 23.

<sup>43</sup> BAAQMD, 2016. *BAAQMD Air Toxics NSR Program Health Risk Assessment (HRA) Guidelines*. December 2016.

Additionally, CARB and the BAAQMD recommend the use of a residential exposure duration of 30 years for sources with long-term emissions (e.g., roadways). For workers, assumed to be adults, a 25-year exposure period is recommended by the BAAQMD. For school children a 9-year exposure period is recommended by the BAAQMD.

Under previous OEHHA and BAAQMD HRA guidance, residential receptors are assumed to be at their home 24 hours a day, or 100 percent of the time. In the 2015 Risk Assessment Guidance, OEHHA includes adjustments to exposure duration to account for the fraction of time at home (FAH), which can be less than 100 percent of the time, based on updated population and activity statistics. The FAH factors are age-specific and are: 0.85 for third trimester of pregnancy to less than 2 years old, 0.72 for ages 2 to less than 16 years, and 0.73 for ages 16 to 70 years. Use of the FAH factors is allowed by the BAAQMD if there are no schools in the project vicinity have a cancer risk of one in a million or greater assuming 100 percent exposure (FAH = 1.0).

Functionally, cancer risk is calculated using the following parameters and formulas:

$$\text{Cancer Risk (per million)} = CPF \times \text{Inhalation Dose} \times ASF \times ED/AT \times FAH \times 10^6$$

Where:

CPF = Cancer potency factor (mg/kg-day)<sup>-1</sup>

ASF = Age sensitivity factor for specified age group

ED = Exposure duration (years)

AT = Averaging time for lifetime cancer risk (years)

FAH = Fraction of time spent at home (unitless)

$$\text{Inhalation Dose} = C_{\text{air}} \times DBR^* \times A \times (EF/365) \times 10^{-6}$$

Where:

C<sub>air</sub> = concentration in air (µg/m<sup>3</sup>)

DBR = daily breathing rate (L/kg body weight-day)

8HrBR = 8-hour breathing rate (L/kg body weight-8 hours)

A = Inhalation absorption factor

EF = Exposure frequency (days/year)

10<sup>-6</sup> = Conversion factor

\* An 8-hour breathing rate (8HrBR) is used for worker and school child exposures.

The health risk parameters used in this evaluation are summarized as follows:

Parameter	Exposure Type →	Infant		Child	Adult
	Age Range →	3 <sup>rd</sup> Trimester	0<2	2 < 16	16 - 30
DPM Cancer Potency Factor (mg/kg-day) <sup>-1</sup>		1.10E+00	1.10E+00	1.10E+00	1.10E+00
Daily Breathing Rate (L/kg-day) 80 <sup>th</sup> Percentile Rate		273	758	572	261
Daily Breathing Rate (L/kg-day) 95 <sup>th</sup> Percentile Rate		361	1,090	745	335
8-hour Breathing Rate (L/kg-8 hours) 95 <sup>th</sup> Percentile Rate		-	1,200	520	240
Inhalation Absorption Factor		1	1	1	1
Averaging Time (years)		70	70	70	70
Exposure Duration (years)		0.25	2	14	14*
Exposure Frequency (days/year)		350	350	350	350*
Age Sensitivity Factor		10	10	3	1
Fraction of Time at Home (FAH)		0.85-1.0	0.85-1.0	0.72-1.0	0.73*

\* For worker exposures (adult) the exposure duration and frequency are 25 years 250 days/year and FAH is not applicable.

### Non-Cancer Hazards

Non-cancer health risk is usually determined by comparing the predicted level of exposure to a chemical to the level of exposure that is not expected to cause any adverse effects (reference exposure level), even to the most susceptible people. Potential non-cancer health hazards from TAC exposure are expressed in terms of a hazard index (HI), which is the ratio of the TAC concentration to a reference exposure level (REL). OEHHA has defined acceptable concentration levels for contaminants that pose non-cancer health hazards. TAC concentrations below the REL are not expected to cause adverse health impacts, even for sensitive individuals. The total HI is calculated as the sum of the HIs for each TAC evaluated and the total HI is compared to the BAAQMD significance thresholds to determine whether a significant non-cancer health impact from a project would occur.

Typically, for residential projects located near roadways with substantial TAC emissions, the primary TAC of concern with non-cancer health effects is diesel particulate matter (DPM). For DPM, the chronic inhalation REL is 5 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ).

### Annual PM<sub>2.5</sub> Concentrations

While not a TAC, fine particulate matter (PM<sub>2.5</sub>) has been identified by the BAAQMD as a pollutant with potential non-cancer health effects that should be included when evaluating potential community health impacts under the California Environmental Quality Act (CEQA). The thresholds of significance for PM<sub>2.5</sub> (project level and cumulative) are in terms of an increase in the annual average concentration. When considering PM<sub>2.5</sub> impacts, the contribution from all sources of PM<sub>2.5</sub> emissions should be included. For projects with potential impacts from nearby local roadways, the PM<sub>2.5</sub> impacts should include those from vehicle exhaust emissions, PM<sub>2.5</sub> generated from vehicle tire and brake wear, and fugitive emissions from re-suspended dust on the roads.

**Attachment 2: CalEEMod Input Assumptions and Outputs**

## Air Quality/Noise Construction Information Data Request

<b>Project Name:</b> Icon/ Echo		<b>Complete ALL Portions in Yellow</b>
See Equipment Type TAB for type, horsepower and load factor		
Project Size	415 Dwelling Units	2.10 total project acres disturbed
	400,101 s.f. residential	Pile Driving? Y/N? No
	8,500 s.f. retail	Project include OPERATIONAL GENERATOR OR FIRE PUMP on-site? Y/N? <u>Y</u>
	525,000 s.f. office/commercial	IF YES (if BOTH separate values) -->
	0 s.f. other, specify:	Kilowatts/Horsepower: <u>1,000 KW</u>
	470,000 s.f. parking garage	Fuel Type: <u>Diesel</u>
	1146 spaces	Location in project (Plans Desired if Available):
	0 s.f. parking lot	0 spaces
Construction Hours- Request for Saturday work days	7 am to	7 pm

DO NOT MULTIPLY EQUIPMENT HOURS/DAY BY THE QUANTITY OF EQUIPMENT

Quantity	Description	HP	Load Factor	Hours/day	Total Work Days	Avg. Hours per day	Annual Hours	Comments
<b>Demolition</b>		Start Date:	1/3/2023	Total phase:	44	Overall Import/Export Volumes		
		End Date:	3/4/2023				Demolition Volume	
5	Concrete/Industrial Saws	81	0.73	10	11	2.5	550	Square footage of buildings to be demolished
2	Excavators	158	0.38	10	11	2.5	220	(or total tons to be hauled)
1	Rubber-Tired Dozers	247	0.4	10	11	2.5	110	10,000 square feet or
1	Tractors/Loaders/Backhoes	97	0.37	10	11	2.5	110	8,000 Hauling volume (tons)
								Any pavement demolished and hauled? <u>2,500 tons</u>
<b>Site Preparation</b>		Start Date:	3/4/2023	Total phase:	22	Soil Hauling Volume		
		End Date:	4/3/2023				Export volume = <u>18,000</u> cubic yards?	
1	Graders	187	0.41	10	7	3.3	73.3	Import volume = <u>3,500</u> cubic yards?
2	Rubber-Tired Dozers	247	0.4	10	7	3.3	146.7	
2	Tractors/Loaders/Backhoes	97	0.37	10	7	3.3	146.7	
<b>Grading / Excavation</b>		Start Date:	4/3/2023	Total phase:	66			
		End Date:	7/2/2023					
2	Excavators	158	0.38	10	13	2.0	264	
1	Graders	187	0.41	10	13	2.0	132	
1	Rubber-Tired Dozers	247	0.4	10	13	2.0	132	
4	Concrete/Industrial Saws	81	0.73	10	13	2.0	528	
1	Tractors/Loaders/Backhoes	97	0.37	10	13	2.0	132	
<b>Trenching/Foundation</b>		Start Date:	7/2/2023	Total phase:	66			
		End Date:	9/30/2023					
1	Tractor/Loader/Backhoe	97	0.37	10	33	5	330	
1	Excavators	158	0.38	10	33	5	330	
<b>Structure</b>		Start Date:	9/30/2023	Total phase:	264			
		End Date:	9/24/2024					
1	Crane	97	0.37	12	264	12	3168	
<b>Building - Exterior</b>		Start Date:	9/24/2024	Total phase:	154	Cement Trucks? <u>3,000</u> Total Round-Trips		
		End Date:	4/22/2025				Electric? (Y/N) <u>Y</u> Otherwise assumed diesel	
1	Cranes	231	0.29	12	139	10.8	1663.2	Liquid Propane (LPG)? (Y/N) <u>N</u> Otherwise Assumed diesel
10	Forklifts	89	0.2	12	123	9.6	14784	Or temporary line power? (Y/N) <u>Y</u>
4	Generator Sets	84	0.74	12	154	12	7392	
3	Tractors/Loaders/Backhoes	97	0.37	12	77	6	2772	
8	Welders	46	0.45	12	39	3	3696	
<b>Building - Interior/Architectural Coating</b>		Start Date:	4/22/2025	Total phase:	143			
		End Date:	11/3/2025					
10	Air Compressors	78	0.48	10	72	5	7150	
12	Aerial Lift	62	0.31	10	36	2.5	4290	
<b>Paving</b>		Start Date:	11/3/2025	Total phase:	44	Asphalt? <u>350</u> cubic yards or <u>15</u> round trips?		
		Start Date:	1/2/2026					
2	Cement and Mortar Mixers	9	0.56	10	9	2	176	
1	Pavers	130	0.42	10	9	2	88	
1	Paving Equipment	132	0.36	10	9	2	88	
1	Rollers	80	0.38	10	9	2	88	
1	Tractors/Loaders/Backhoes	97	0.37	10	9	2	88	

Equipment types listed in "Equipment Types" worksheet tab.

Equipment listed in this sheet is to provide an example of inputs  
 It is assumed that water trucks would be used during grading  
**Add or subtract phases and equipment, as appropriate**  
**Modify horsepower or load factor, as appropriate**

Complete one sheet for each project component

Land Use	Traffic Consultant Trip Gen					CalEEMod Default		
	Units	Size	Daily Trips	New Trips	Weekday Trip Gen	Weekday	Sat	Sun
Apartment High Rise	DU	415	1847	1280	3.08	4.45	4.53	3.59
Residential & Office Mixed-Use Reduction	3%		-55			Rev	3.14	2.49
Residential & Retail Mixed-Use Reduction	15%		-48					
Location-Based Reduction <sup>5</sup> A4	22%		-384					
VMT Reduction	5.87%		-80					
General Office Building	KSF	525	5114	3380	6.44	9.74	2.21	0.7
Residential & Office Mixed-Use Reduction	15%		-55			Rev	1.46	0.46
Office & Retail Mixed-Use Reduction	3%		-161					
Location-Based Reduction <sup>5</sup> A4	31%		-1518					
Retail	KSF	8.5	321	93	10.94	44.32	42.04	20.43
Residential & Retail Mixed-Use Reduction	15%		-48			Rev	10.38	5.04
Office & Retail Mixed-Use Reduction	3%		-161					
Location-Based Reduction <sup>5</sup> A4	17%		-19					
<b>Existing Land Uses</b>								
Gas Station & Store	≠ Positions	8	1643	723	90.38	322.5	322.5	322.5
Passby Reduction	56%		-920			Rev	90.38	90.38
Church	KSF	6.86	48	48	6.95	6.95	5.99	27.63
						Rev	5.99	27.63
Retail	KSF	13.5	510	493	36.52	44.32	42.04	20.43
Passby Reduction	56%		-17			Rev	34.64	16.83

### ICON ECHO Mixed-Use Development VMT Trip Generation Estimates

Land Use	% of Vehicle Mode Share	% Reduction	Size	Daily		AM Peak Hour						PM Peak Hour						
				Rate	Trip	Pk-Hr Rate	Split		Trip		Pk-Hr Rate	Split		Trip				
							In	Out	In	Out	Total		In	Out	In	Out	Total	
<b>Proposed Land Uses</b>																		
ITE LU # 222 - Multifamily Housing (High-Rise) <sup>1</sup>			415 Dwelling Units	4.45	1,847	0.31	24%	78%	31	98	129	0.36	61%	39%	91	58	149	
- Residential & Office Mixed-Use Reduction <sup>2</sup>		3%			-55				-1	-3	-4				-3	-2	-5	
- Residential & Retail Mixed-Use Reduction <sup>3</sup>		15%			-48				0	-1	-1				-3	-2	-5	
- Location-Based Reduction <sup>5</sup>	78%	22%			-384				-7	-21	-28				-19	-12	-31	
- VMT Reduction <sup>6</sup>		5.87%			-80				-1	-4	-5				-4	-2	-6	
<b>Residential Sub-Total</b>					<b>1,280</b>				<b>22</b>	<b>69</b>	<b>91</b>				<b>62</b>	<b>40</b>	<b>102</b>	
ITE LU # 710 - General Office Building <sup>1</sup>			525,000 Square Feet	9.74	5,114	1.16	86%	14%	524	85	609	1.15	16%	84%	97	507	604	
- Residential & Office Mixed-Use Reduction <sup>2</sup>		15%			-55				-3	-1	-4				-2	-3	-5	
- Office & Retail Mixed-Use Reduction <sup>4</sup>		3%			-161				-2	-3	-5				-9	-8	-17	
- Location-Based Reduction <sup>5</sup>	69%	31%			-1,518				-161	-25	-186				-27	-154	-181	
<b>Office Sub-Total</b>					<b>3,380</b>				<b>358</b>	<b>56</b>	<b>414</b>				<b>59</b>	<b>342</b>	<b>401</b>	
ITE LU # 820 - Shopping Center <sup>1</sup>			8,500 Square Feet	37.75	321	0.94	62%	38%	5	3	8	3.81	48%	52%	15	17	32	
- Residential & Retail Mixed-Use Reduction <sup>3</sup>		15%			-48				-1	0	-1				-2	-3	-5	
- Office & Retail Mixed-Use Reduction <sup>4</sup>		3%			-161				-3	-2	-5				-8	-9	-17	
- Location-Based Reduction <sup>5</sup>	83%	17%			-19				0	0	0				-1	-1	-2	
<b>Retail Sub-Total</b>					<b>93</b>				<b>1</b>	<b>1</b>	<b>2</b>				<b>4</b>	<b>4</b>	<b>8</b>	
<b>Baseline Project Trips (Before Reductions)</b>					<b>7,282</b>				<b>560</b>	<b>186</b>	<b>746</b>				<b>203</b>	<b>582</b>	<b>785</b>	
<b>Proposed Project Trips (After Reductions)</b>					<b>4,763</b>				<b>381</b>	<b>126</b>	<b>507</b>				<b>125</b>	<b>386</b>	<b>511</b>	
<b>Existing Land Uses</b>																		
ITE LU # 945 - Gas Station with Convenience Market <sup>1</sup>			8 Vehicle Fueling Post	205.36	1,643	12.47	51%	49%	51	49	100	13.99	51%	49%	57	55	112	
Passby Reduction <sup>7</sup>				56%	-920		62%		-32	-30	-62		56%		-32	-31	-63	
ITE LU # 560 - Church <sup>1</sup>			6,860 Square Feet	6.95	48	0.33	60%	40%	1	1	2	0.49	45%	55%	1	2	3	
ITE LU # 820 - Shopping Center <sup>1</sup>			13,500 Square Feet	37.75	510	0.94	62%	38%	8	5	13	3.81	48%	52%	24	27	51	
Passby Reduction <sup>7</sup>					-17								34%		-8	-9	-17	
<b>Total Existing Trips</b>					<b>1,264</b>				<b>28</b>	<b>25</b>	<b>53</b>				<b>42</b>	<b>44</b>	<b>86</b>	
<b>Net Project Trips (Proposed - Existing)</b>					<b>3,489</b>				<b>353</b>	<b>101</b>	<b>454</b>				<b>83</b>	<b>342</b>	<b>425</b>	

**Notes:**

<sup>1</sup> Source: ITE Trip Generation Manual, 10th Edition 2017, average trip generation rates.

<sup>2</sup> As prescribed by the Transportation Impact Analysis Guidelines from VTA (October 2014), the maximum trip reduction for a mixed-use development project with residential and office is equal to 3% off the smaller trip generator.

<sup>3</sup> As prescribed by the Transportation Impact Analysis Guidelines from VTA (October 2014), the maximum trip reduction for a mixed-use development project with residential and retail is equal to 15% off the smaller trip generator.

<sup>4</sup> As prescribed by the Transportation Impact Analysis Guidelines from VTA (October 2014), the maximum trip reduction for a mixed-use development project with employment and employee-serving retail uses is equal to 3% off the office component. However, a 3% reduction of office trips would exceed the total number of trips generated by the retail use during the AM peak hour. Therefore, a conservative 50% reduction off the retail trips was applied.

<sup>5</sup> The project site is located within an urban high-transit area based on the City of San Jose VMT Evaluation Tool (February 29, 2019). The location-based vehicle mode shares are obtained from Table 6 of the City of San Jose Transportation Analysis Handbook (April 2018). The trip reductions are based on the percent of mode share for all of the other modes of travel besides vehicle.

<sup>6</sup> VMT per capita for residential use. Existing and project VMTs were estimated using the City of San Jose VMT Evaluation Tool. The existing VMT per capita is 7.66, and the project VMT per capita is 7.21.

<sup>7</sup> It is assumed that every percent reduction in VMT per-capita is equivalent to one percent reduction in peak-hour vehicle trips.

<sup>8</sup> AM and PM peak-hour passerby reduction rates obtained from the ITE Trip Generation Handbook, Third Edition.

Construction Criteria Air Pollutants						
Unmitigated	ROG	NOX	PM10 Exhaust	PM2.5 Exhaust	CO2e	
Year	Tons				MT	
Construction Equipment						
2023	0.08	0.74	0.03	0.03	122.61	
2024	0.20	1.87	0.08	0.08	321.09	
2025	5.98	2.33	0.10	0.09	485.82	
EMFAC						
2023	0.17	0.78	0.05	0.02	747.82	
2024	0.16	0.75	0.06	0.02	742.77	
2025	0.16	0.72	0.05	0.02	728.87	
Total Construction Emissions by Year						
2023	0.25	1.52	0.09	0.05	870.44	
2024	0.37	2.62	0.14	0.10	1063.86	
2025	6.13	3.05	0.15	0.12	1214.68	
Total Construction Emissions						
Tons	6.75	7.19	0.38	0.27	3148.97	
Average Daily Emissions						
Pounds/Workdays					Workdays	
2023	1.61	9.75	0.57	0.35		311
2024	2.34	16.70	0.89	0.65		314
2025	39.17	19.45	0.97	0.75		313
Threshold - lbs/day	54.0	54.0	82.0	54.0		
Total Construction Emissions						
Pounds	43.12	45.90	2.43	1.74	0.00	
Average	14.38	15.31	0.81	0.58	0.00	939
Threshold - lbs/day	54.0	54.0	82.0	54.0		

Operational Criteria Air Pollutants					
Unmitigated	ROG	NOX	Total PM10	Total PM2.5	
Year	Tons				
Total	6.46	1.92	3.16	0.82	
Existing Use Emissions					
Total	0.74	0.64	1.14	0.29	
Net Annual Operational Emissions					
Tons/year	5.72	1.28	2.02	0.53	
Threshold - Tons/year	10.0	10.0	15.0	10.0	
Average Daily Emissions					
Pounds Per Day	31.34	7.03	11.06	2.90	
Threshold - lbs/day	54.0	54.0	82.0	54.0	

Category	CO2e			
	Project	Existing	Project 2030	Existing
Area	21.86			
Energy	1084.21			
Mobile	3370.68			
Waste	346.04			
Water	149.00			
TOTAL	4971.79	0.00	0.00	0.00
Net GHG Emissions		4971.79		0.00
Service Population	0.00			
Per Capita Emissions		#DIV/0!		#DIV/0!
CA DOF 2019 =	0 units 0 pphh			





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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Off-road Equipment - Provided construction equip & hours

Off-road Equipment - Provided construction equip & hours

Trips and VMT - EMFAC2021 0 trips, pavement demo = 2,500 tons, building const = 3,000 round cement truck trips, paving = 15 round asphalt trips

Demolition - existing demo hauling = 8,000 tons

Grading - grading = 3,500-cy import, 18,000-cy export

Vehicle Trips - Traffic provided trip gen w/ reductions

Woodstoves - No wood burning fire places, natural gas

Energy Use - San Jose Natural Gas Ban effective dec 2021, convert natural gas to electricity

Water And Wastewater - WWTP 100% aerobic no septic tanks or lagoons in downtown San Jose

Construction Off-road Equipment Mitigation - enhanced BMPs, Tier 4 final engines, electric cranes and generators mitigation

Energy Mitigation - SJCE 100% renewable no carbon electricity

Fleet Mix - EMFAC2021 Fleet Mix Santa Clara County 2026

Stationary Sources - Emergency Generators and Fire Pumps - two, 1,000-kw generators with 1,340-hp diesel engines, 50 hrs/yr

Stationary Sources - Emergency Generators and Fire Pumps EF - >1,000-hp generator requires BACT mitigation, NOx = 0.5, PM = 0.02

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Parking	0.00	28,200.00
tblAreaCoating	Area_Parking	0	28200
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	12
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblConstEquipMitigation	FuelType	Diesel	Electrical
tblConstEquipMitigation	FuelType	Diesel	Electrical
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	12.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	10.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	9.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	5.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	10.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	9.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	8.00
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
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
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstructionPhase	NumDays	10.00	143.00
tblConstructionPhase	NumDays	220.00	264.00
tblConstructionPhase	NumDays	220.00	154.00
tblConstructionPhase	NumDays	20.00	44.00
tblConstructionPhase	NumDays	6.00	66.00
tblConstructionPhase	NumDays	10.00	43.00
tblConstructionPhase	NumDays	3.00	22.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblEnergyUse	NT24E	3,054.10	3,055.00
tblEnergyUse	NT24NG	3,155.00	0.00
tblEnergyUse	NT24NG	0.06	0.00
tblEnergyUse	T24E	70.89	72.42
tblEnergyUse	T24NG	5,226.68	0.00
tblEnergyUse	T24NG	16.14	0.00
tblEnergyUse	T24NG	2.34	0.00
tblFireplaces	FireplaceWoodMass	228.80	0.00
tblFireplaces	NumberGas	62.25	132.80
tblFireplaces	NumberWood	70.55	0.00
tblFleetMix	HHD	0.00	0.02
tblFleetMix	HHD	0.00	0.02
tblFleetMix	HHD	0.00	0.02
tblFleetMix	HHD	0.00	0.02
tblFleetMix	LDA	0.00	0.54
tblFleetMix	LDA	0.00	0.54
tblFleetMix	LDA	0.00	0.54
tblFleetMix	LDA	0.00	0.54
tblFleetMix	LDT1	0.00	0.03
tblFleetMix	LDT1	0.00	0.03
tblFleetMix	LDT1	0.00	0.03
tblFleetMix	LDT1	0.00	0.03
tblFleetMix	LDT2	0.00	0.23
tblFleetMix	LDT2	0.00	0.23
tblFleetMix	LDT2	0.00	0.23
tblFleetMix	LDT2	0.00	0.23
tblFleetMix	LHD1	0.00	0.02
tblFleetMix	LHD1	0.00	0.02
tblFleetMix	LHD1	0.00	0.02

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblFleetMix	LHD1	0.00	0.02
tblFleetMix	LHD2	0.00	6.1120e-003
tblFleetMix	LHD2	0.00	6.1120e-003
tblFleetMix	LHD2	0.00	6.1120e-003
tblFleetMix	LHD2	0.00	6.1120e-003
tblFleetMix	MCY	0.00	3.5210e-003
tblFleetMix	MCY	0.00	3.5210e-003
tblFleetMix	MCY	0.00	3.5210e-003
tblFleetMix	MCY	0.00	3.5210e-003
tblFleetMix	MDV	0.00	0.12
tblFleetMix	MDV	0.00	0.12
tblFleetMix	MDV	0.00	0.12
tblFleetMix	MDV	0.00	0.12
tblFleetMix	MH	0.00	6.4900e-004
tblFleetMix	MH	0.00	6.4900e-004
tblFleetMix	MH	0.00	6.4900e-004
tblFleetMix	MH	0.00	6.4900e-004
tblFleetMix	MHD	0.00	0.01
tblFleetMix	MHD	0.00	0.01
tblFleetMix	MHD	0.00	0.01
tblFleetMix	MHD	0.00	0.01
tblFleetMix	OBUS	0.00	1.7230e-003
tblFleetMix	OBUS	0.00	1.7230e-003
tblFleetMix	OBUS	0.00	1.7230e-003
tblFleetMix	OBUS	0.00	1.7230e-003
tblFleetMix	SBUS	0.00	5.3000e-004
tblFleetMix	SBUS	0.00	5.3000e-004
tblFleetMix	SBUS	0.00	5.3000e-004
tblFleetMix	SBUS	0.00	5.3000e-004

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblFleetMix	UBUS	0.00	1.2470e-003
tblFleetMix	UBUS	0.00	1.2470e-003
tblFleetMix	UBUS	0.00	1.2470e-003
tblFleetMix	UBUS	0.00	1.2470e-003
tblGrading	MaterialExported	0.00	18,000.00
tblGrading	MaterialImported	0.00	3,500.00
tblStationaryGeneratorsPumpsEF	NOX_EF	4.56	0.50
tblStationaryGeneratorsPumpsEF	PM10_EF	0.15	0.02
tblStationaryGeneratorsPumpsEF	PM2_5_EF	0.15	0.02
tblStationaryGeneratorsPumpsUse	HorsePowerValue	0.00	1,340.00
tblStationaryGeneratorsPumpsUse	HoursPerYear	0.00	50.00
tblStationaryGeneratorsPumpsUse	NumberOfEquipment	0.00	2.00
tblTripsAndVMT	HaulingTripNumber	791.00	0.00
tblTripsAndVMT	HaulingTripNumber	2,688.00	0.00
tblTripsAndVMT	WorkerTripNumber	133.00	0.00
tblTripsAndVMT	WorkerTripNumber	667.00	0.00
tblTripsAndVMT	WorkerTripNumber	667.00	0.00
tblTripsAndVMT	WorkerTripNumber	23.00	0.00
tblTripsAndVMT	WorkerTripNumber	23.00	0.00
tblTripsAndVMT	WorkerTripNumber	15.00	0.00
tblTripsAndVMT	WorkerTripNumber	13.00	0.00
tblTripsAndVMT	WorkerTripNumber	5.00	0.00
tblVehicleTrips	ST_TR	4.53	3.14
tblVehicleTrips	ST_TR	2.21	1.46
tblVehicleTrips	ST_TR	42.04	10.38
tblVehicleTrips	SU_TR	3.59	2.49
tblVehicleTrips	SU_TR	0.70	0.46
tblVehicleTrips	SU_TR	20.43	5.04
tblVehicleTrips	WD_TR	4.45	3.08

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tbiVehicleTrips	WD_TR	9.74	6.44
tbiVehicleTrips	WD_TR	44.32	10.94
tbiWater	AerobicPercent	87.46	100.00
tbiWater	AerobicPercent	87.46	100.00
tbiWater	AerobicPercent	87.46	100.00
tbiWater	AerobicPercent	87.46	100.00
tbiWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tbiWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tbiWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tbiWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tbiWater	SepticTankPercent	10.33	0.00
tbiWater	SepticTankPercent	10.33	0.00
tbiWater	SepticTankPercent	10.33	0.00
tbiWater	SepticTankPercent	10.33	0.00
tbiWoodstoves	WoodstoveWoodMass	582.40	0.00

**2.0 Emissions Summary**

**2.1 Overall Construction**

**Unmitigated Construction**

Year	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
2023	0.0775	0.7397	0.6984	1.4000e-003	0.2071	0.0334	0.2405	0.0722	0.0314	0.1036	0.0000	121.8736	121.8736	0.0295	0.0000	122.6108
2024	0.2029	1.8721	1.9714	3.7100e-003	0.0000	0.0844	0.0844	0.0000	0.08	0.0800	0.0000	319.4654	319.4654	0.0648	0.0000	321.0859
2025	5.9779	2.3296	3.4119	5.6400e-003	0.0000	0.0979	0.0979	0.0000	0.0949	0.0949	0.0000	484.0687	484.0687	0.0699	0.0000	485.8157

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Maximum	5.9779	2.3296	3.4119	5.6400e-003	0.2071	0.0979	0.2405	0.0722	0.0949	0.1036	0.0000	484.0687	484.0687	0.0699	0.0000	485.8157
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**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.0127	0.0551	0.6951	1.1200e-003	0.0808	1.70E-03	0.0825	0.0141	1.7000e-003	0.0158	0.0000	97.1596	97.1596	0.0215	0.0000	97.6969
2024	0.0157	0.1548	0.8413	1.1700e-003	0.0000	1.79E-03	1.7900e-003	0.0000	1.7900e-003	1.7900e-003	0.0000	99.1199	99.1199	0.0276	0.0000	99.8104
2025	5.7445	0.5149	2.4761	3.6800e-003	0.0000	5.31E-03	5.3100e-003	0.0000	5.3100e-003	5.3100e-003	0.0000	314.9294	314.9294	0.0555	0.0000	316.3166
Maximum	5.7445	0.5149	2.4761	3.6800e-003	0.0808	5.3100e-003	0.0825	0.0141	5.3100e-003	0.0158	0.0000	314.9294	314.9294	0.0555	0.0000	316.3166

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	7.76	85.33	34.02	44.47	61.00	95.92	78.82	80.50	95.73	91.78	0.00	44.76	44.76	36.29	0.00	44.72

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-3-2023	4-2-2023	0.2908	0.0294
2	4-3-2023	7-2-2023	0.2490	0.0267
3	7-3-2023	10-2-2023	0.0797	0.0114
4	10-3-2023	1-2-2024	0.2050	0.0000
5	1-3-2024	4-2-2024	0.1870	0.0000
6	4-3-2024	7-2-2024	0.1870	0.0000



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

7	7-3-2024	10-2-2024	0.3251	0.0154
8	10-3-2024	1-2-2025	1.3906	0.1579
9	1-3-2025	4-2-2025	1.2704	0.1544
10	4-3-2025	7-2-2025	2.7088	2.2171
11	7-3-2025	9-30-2025	2.9802	2.7220
		Highest	2.9802	2.7220

**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	1/3/2023	3/3/2023	5	44	
2	Site Preparation	Site Preparation	3/4/2023	4/4/2023	5	22	
3	Grading	Grading	4/3/2023	7/3/2023	5	66	
4	Trenching	Trenching	7/2/2023	10/2/2023	5	66	
5	Structure	Building Construction	9/30/2023	10/3/2024	5	264	
6	Building Construction	Building Construction	9/24/2024	4/25/2025	5	154	
7	Architectural Coating	Architectural Coating	4/22/2025	11/6/2025	5	143	
8	Paving	Paving	11/3/2025	12/31/2025	5	43	

**Acres of Grading (Site Preparation Phase): 13.61**

**Acres of Grading (Grading Phase): 16.5**

**Acres of Paving: 0**

**Residential Indoor: 810,205; Residential Outdoor: 270,068; Non-Residential Indoor: 800,250; Non-Residential Outdoor: 266,750; Striped Parking Area:**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Demolition	Concrete/Industrial Saws	5	2.50	81	0.73
Demolition	Excavators	2	2.50	158	0.38
Demolition	Rubber Tired Dozers	1	2.50	247	0.40
Demolition	Tractors/Loaders/Backhoes	1	2.50	97	0.37
Site Preparation	Graders	1	3.30	187	0.41
Site Preparation	Rubber Tired Dozers	2	3.30	247	0.40
Site Preparation	Scrapers	0	0.00	367	0.48
Site Preparation	Tractors/Loaders/Backhoes	2	3.30	97	0.37
Grading	Concrete/Industrial Saws	4	2.00	81	0.73
Grading	Excavators	2	2.00	158	0.38
Grading	Graders	1	2.00	187	0.41
Grading	Rubber Tired Dozers	1	2.00	247	0.40
Grading	Tractors/Loaders/Backhoes	1	2.00	97	0.37
Trenching	Excavators	1	5.00	158	0.38
Trenching	Tractors/Loaders/Backhoes	1	5.00	97	0.37
Structure	Cranes	1	12.00	231	0.29
Structure	Forklifts	0	0.00	89	0.20
Structure	Generator Sets	0	0.00	84	0.74
Structure	Tractors/Loaders/Backhoes	0	0.00	97	0.37
Structure	Welders	0	0.00	46	0.45
Building Construction	Cranes	1	10.80	231	0.29
Building Construction	Forklifts	10	9.60	89	0.20
Building Construction	Generator Sets	4	12.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	6.00	97	0.37
Building Construction	Welders	8	3.00	46	0.45
Architectural Coating	Aerial Lifts	12	2.50	63	0.31
Architectural Coating	Air Compressors	10	5.00	78	0.48
Paving	Cement and Mortar Mixers	2	2.00	9	0.56
Paving	Pavers	1	2.00	130	0.42

Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Paving	Paving Equipment	1	2.00	132	0.36
Paving	Rollers	1	2.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	2.00	97	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	9	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	5	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	9	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Trenching	2	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Structure	1	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	26	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	22	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**

- Use Alternative Fuel for Construction Equipment
- Use Cleaner Engines for Construction Equipment
- Use Soil Stabilizer
- Replace Ground Cover
- Water Exposed Area
- Water Unpaved Roads
- Reduce Vehicle Speed on Unpaved Roads

**3.2 Demolition - 2023**

**Unmitigated Construction On-Site**

Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0856	0.0000	0.0856	0.0130	0.0000	0.0130	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0198	0.1697	0.2072	3.7000e-004		8.1800e-003	8.1800e-003		7.8800e-003	7.8800e-003	0.0000	31.7590	31.7590	5.2000e-003	0.0000	31.8891
<b>Total</b>	<b>0.0198</b>	<b>0.1697</b>	<b>0.2072</b>	<b>3.7000e-004</b>	<b>0.0856</b>	<b>8.1800e-003</b>	<b>0.0938</b>	<b>0.0130</b>	<b>7.8800e-003</b>	<b>0.0208</b>	<b>0.0000</b>	<b>31.7590</b>	<b>31.7590</b>	<b>5.2000e-003</b>	<b>0.0000</b>	<b>31.8891</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction On-Site**

Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0334	0.0000	0.0334	2.5300e-003	0.0000	2.5300e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.0000e-003	0.0174	0.2290	3.7000e-004		5.3000e-004	5.3000e-004		5.3000e-004	5.3000e-004	0.0000	31.7590	31.7590	5.2000e-003	0.0000	31.8891
<b>Total</b>	<b>4.0000e-003</b>	<b>0.0174</b>	<b>0.2290</b>	<b>3.7000e-004</b>	<b>0.0334</b>	<b>5.3000e-004</b>	<b>0.0339</b>	<b>2.5300e-003</b>	<b>5.3000e-004</b>	<b>3.0600e-003</b>	<b>0.0000</b>	<b>31.7590</b>	<b>31.7590</b>	<b>5.2000e-003</b>	<b>0.0000</b>	<b>31.8891</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**3.3 Site Preparation - 2023**

**Unmitigated Construction On-Site**

Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0619	0.0000	0.0619	0.0308	0.0000	0.0308	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.3300e-003	0.0997	0.0561	1.4000e-004		4.2800e-003	4.2800e-003		3.9400e-003	3.9400e-003	0.0000	11.9292	11.9292	3.8600e-003	0.0000	12.0257
<b>Total</b>	<b>9.3300e-003</b>	<b>0.0997</b>	<b>0.0561</b>	<b>1.4000e-004</b>	<b>0.0619</b>	<b>4.2800e-003</b>	<b>0.0662</b>	<b>0.0308</b>	<b>3.9400e-003</b>	<b>0.0348</b>	<b>0.0000</b>	<b>11.9292</b>	<b>11.9292</b>	<b>3.8600e-003</b>	<b>0.0000</b>	<b>12.0257</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction On-Site**

Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0241	0.0000	0.0241	6.0100e-003	0.0000	6.0100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.6600e-003	7.2000e-003	0.0695	1.4000e-004		2.2000e-004	2.2000e-004		2.2000e-004	2.2000e-004	0.0000	11.9292	11.9292	3.8600e-003	0.0000	12.0257
<b>Total</b>	<b>1.6600e-003</b>	<b>7.2000e-003</b>	<b>0.0695</b>	<b>1.4000e-004</b>	<b>0.0241</b>	<b>2.2000e-004</b>	<b>0.0244</b>	<b>6.0100e-003</b>	<b>2.2000e-004</b>	<b>6.2300e-003</b>	<b>0.0000</b>	<b>11.9292</b>	<b>11.9292</b>	<b>3.8600e-003</b>	<b>0.0000</b>	<b>12.0257</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**3.4 Grading - 2023**

**Unmitigated Construction On-Site**

Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0597	0.0000	0.0597	0.0284	0.0000	0.0284	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0242	0.2207	0.2325	4.4000e-004		0.0100	0.0100		9.5400e-003	9.5400e-003	0.0000	38.4715	38.4715	7.5800e-003	0.0000	38.6609
<b>Total</b>	<b>0.0242</b>	<b>0.2207</b>	<b>0.2325</b>	<b>4.4000e-004</b>	<b>0.0597</b>	<b>0.0100</b>	<b>0.0697</b>	<b>0.0284</b>	<b>9.5400e-003</b>	<b>0.0380</b>	<b>0.0000</b>	<b>38.4715</b>	<b>38.4715</b>	<b>7.5800e-003</b>	<b>0.0000</b>	<b>38.6609</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction On-Site**



Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0233	0.0000	0.0233	5.5500e-003	0.0000	5.5500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.9600e-003	0.0215	0.2675	4.4000e-004		6.6000e-004	6.6000e-004		6.6000e-004	6.6000e-004	0.0000	38.4714	38.4714	7.5800e-003	0.0000	38.6609
<b>Total</b>	<b>4.9600e-003</b>	<b>0.0215</b>	<b>0.2675</b>	<b>4.4000e-004</b>	<b>0.0233</b>	<b>6.6000e-004</b>	<b>0.0239</b>	<b>5.5500e-003</b>	<b>6.6000e-004</b>	<b>6.2100e-003</b>	<b>0.0000</b>	<b>38.4714</b>	<b>38.4714</b>	<b>7.5800e-003</b>	<b>0.0000</b>	<b>38.6609</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**3.5 Trenching - 2023**

**Unmitigated Construction On-Site**

Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	7.0100e-003	0.0636	0.1132	1.7000e-004		3.1300e-003	3.1300e-003		2.8800e-003	2.8800e-003	0.0000	15.0000	15.0000	4.8500e-003	0.0000	15.1213
<b>Total</b>	<b>7.0100e-003</b>	<b>0.0636</b>	<b>0.1132</b>	<b>1.7000e-004</b>		<b>3.1300e-003</b>	<b>3.1300e-003</b>		<b>2.8800e-003</b>	<b>2.8800e-003</b>	<b>0.0000</b>	<b>15.0000</b>	<b>15.0000</b>	<b>4.8500e-003</b>	<b>0.0000</b>	<b>15.1213</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**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
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Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Category	tons/yr								MT/yr							
	Off-Road	2.0900e-003	9.0700e-003	0.1291	1.7000e-004		2.8000e-004	2.8000e-004		2.8000e-004	2.8000e-004	0.0000	15.0000	15.0000	4.8500e-003	0.0000
<b>Total</b>	<b>2.0900e-003</b>	<b>9.0700e-003</b>	<b>0.1291</b>	<b>1.7000e-004</b>		<b>2.8000e-004</b>	<b>2.8000e-004</b>		<b>2.8000e-004</b>	<b>2.8000e-004</b>	<b>0.0000</b>	<b>15.0000</b>	<b>15.0000</b>	<b>4.8500e-003</b>	<b>0.0000</b>	<b>15.1213</b>

**Mitigated Construction Off-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**3.6 Structure - 2023**

**Unmitigated Construction On-Site**

Category	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
	tons/yr										MT/yr					



Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Total	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
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**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**3.6 Structure - 2024**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0495	0.5230	0.2649	8.6000e-004		0.0218	0.0218		0.0200	0.0200	0.0000	75.6610	75.6610	0.0245	0.0000	76.2728
<b>Total</b>	<b>0.0495</b>	<b>0.5230</b>	<b>0.2649</b>	<b>8.6000e-004</b>		<b>0.0218</b>	<b>0.0218</b>		<b>0.0200</b>	<b>0.0200</b>	<b>0.0000</b>	<b>75.6610</b>	<b>75.6610</b>	<b>0.0245</b>	<b>0.0000</b>	<b>76.2728</b>



Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**3.7 Building Construction - 2024**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1534	1.3490	1.7066	2.8500e-003		0.0627	0.0627		0.0600	0.0600	0.0000	243.8044	243.8044	0.0404	0.0000	244.8131
<b>Total</b>	<b>0.1534</b>	<b>1.3490</b>	<b>1.7066</b>	<b>2.8500e-003</b>		<b>0.0627</b>	<b>0.0627</b>		<b>0.0600</b>	<b>0.0600</b>	<b>0.0000</b>	<b>243.8044</b>	<b>243.8044</b>	<b>0.0404</b>	<b>0.0000</b>	<b>244.8131</b>

**Unmitigated Construction Off-Site**



Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
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	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0157	0.1548	0.8413	1.1700e-003		1.7900e-003	1.7900e-003		1.7900e-003	1.7900e-003	0.0000	99.1199	99.1199	0.0276	0.0000	99.8104
<b>Total</b>	<b>0.0157</b>	<b>0.1548</b>	<b>0.8413</b>	<b>1.1700e-003</b>		<b>1.7900e-003</b>	<b>1.7900e-003</b>		<b>1.7900e-003</b>	<b>1.7900e-003</b>	<b>0.0000</b>	<b>99.1199</b>	<b>99.1199</b>	<b>0.0276</b>	<b>0.0000</b>	<b>99.8104</b>

**Mitigated Construction Off-Site**

Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
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	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**3.7 Building Construction - 2025**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1668	1.4733	1.9869	3.3300e-003		0.0633	0.0633		0.0605	0.0605	0.0000	285.0362	285.0362	0.0465	0.0000	286.1992
<b>Total</b>	<b>0.1668</b>	<b>1.4733</b>	<b>1.9869</b>	<b>3.3300e-003</b>		<b>0.0633</b>	<b>0.0633</b>		<b>0.0605</b>	<b>0.0605</b>	<b>0.0000</b>	<b>285.0362</b>	<b>285.0362</b>	<b>0.0465</b>	<b>0.0000</b>	<b>286.1992</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

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
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	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0184	0.1810	0.9835	1.3700e-003		2.0900e-003	2.0900e-003		2.0900e-003	2.0900e-003	0.0000	115.8971	115.8971	0.0321	0.0000	116.7004
<b>Total</b>	<b>0.0184</b>	<b>0.1810</b>	<b>0.9835</b>	<b>1.3700e-003</b>		<b>2.0900e-003</b>	<b>2.0900e-003</b>		<b>2.0900e-003</b>	<b>2.0900e-003</b>	<b>0.0000</b>	<b>115.8971</b>	<b>115.8971</b>	<b>0.0321</b>	<b>0.0000</b>	<b>116.7004</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

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	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**3.8 Architectural Coating - 2025**  
Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	5.6964					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1109	0.8221	1.3705	2.2200e-003		0.0331	0.0331		0.0329	0.0329	0.0000	191.6868	191.6868	0.0211	0.0000	192.2141
<b>Total</b>	<b>5.8073</b>	<b>0.8221</b>	<b>1.3705</b>	<b>2.2200e-003</b>		<b>0.0331</b>	<b>0.0331</b>		<b>0.0329</b>	<b>0.0329</b>	<b>0.0000</b>	<b>191.6868</b>	<b>191.6868</b>	<b>0.0211</b>	<b>0.0000</b>	<b>192.2141</b>

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

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	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	5.6964					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0288	0.3298	1.4335	2.2200e-003		3.1000e-003	3.1000e-003		3.1000e-003	3.1000e-003	0.0000	191.6866	191.6866	0.0211	0.0000	192.2139
<b>Total</b>	<b>5.7252</b>	<b>0.3298</b>	<b>1.4335</b>	<b>2.2200e-003</b>		<b>3.1000e-003</b>	<b>3.1000e-003</b>		<b>3.1000e-003</b>	<b>3.1000e-003</b>	<b>0.0000</b>	<b>191.6866</b>	<b>191.6866</b>	<b>0.0211</b>	<b>0.0000</b>	<b>192.2139</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

Icon-Echo MU Towers, San Jose - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

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	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**3.9 Paving - 2025**

**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	3.8000e-003	0.0342	0.0545	9.0000e-005		1.5700e-003	1.5700e-003		1.4600e-003	1.4600e-003	0.0000	7.3457	7.3457	2.2700e-003	0.0000	7.4024
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>3.8000e-003</b>	<b>0.0342</b>	<b>0.0545</b>	<b>9.0000e-005</b>		<b>1.5700e-003</b>	<b>1.5700e-003</b>		<b>1.4600e-003</b>	<b>1.4600e-003</b>	<b>0.0000</b>	<b>7.3457</b>	<b>7.3457</b>	<b>2.2700e-003</b>	<b>0.0000</b>	<b>7.4024</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					









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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Off-road Equipment - Provided construction equip & hours

Off-road Equipment - Provided construction equip & hours

Trips and VMT - EMFAC2021 0 trips, pavement demo = 2,500 tons, building const = 3,000 round cement truck trips, paving = 15 round asphalt trips

Demolition - existing demo hauling = 8,000 tons

Grading - grading = 3,500-cy import, 18,000-cy export

Vehicle Trips - Traffic provided trip gen w/ reductions

Vehicle Emission Factors - EMFAC2021 Vehicle Emissions Factors Santa Clara County 2026

Woodstoves - No wood burning fire places, natural gas

Energy Use - San Jose Natural Gas Ban effective dec 2021, convert natural gas to electricity, retail still use natural gas

Water And Wastewater - WWTP 100% aerobic no septic tanks or lagoons in downtown San Jose

Construction Off-road Equipment Mitigation - enhanced BMPs, Tier 4 final engines, electric cranes and generators mitigation

Energy Mitigation -

Fleet Mix - EMFAC2021 Fleet Mix Santa Clara County 2026

Stationary Sources - Emergency Generators and Fire Pumps - two, 1,000-kw generators with 1,340-hp diesel engines, 50 hrs/yr

Stationary Sources - Emergency Generators and Fire Pumps EF - >1,000-hp generator requires BACT mitigation, NOx = 0.5, PM = 0.02

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	12
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblConstEquipMitigation	FuelType	Diesel	Electrical
tblConstEquipMitigation	FuelType	Diesel	Electrical
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	12.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	10.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	9.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	5.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	10.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	4.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	9.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	8.00
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
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
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstructionPhase	NumDays	20.00	44.00
tblConstructionPhase	NumDays	3.00	22.00
tblConstructionPhase	NumDays	6.00	66.00
tblConstructionPhase	NumDays	220.00	264.00
tblConstructionPhase	NumDays	220.00	154.00
tblConstructionPhase	NumDays	10.00	143.00
tblConstructionPhase	NumDays	10.00	43.00
tblEnergyUse	NT24E	3,054.10	3,055.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblEnergyUse	NT24NG	3,155.00	0.00
tblEnergyUse	NT24NG	0.06	0.00
tblEnergyUse	T24E	70.89	72.42
tblEnergyUse	T24NG	5,226.68	0.00
tblEnergyUse	T24NG	16.14	0.00
tblFireplaces	FireplaceWoodMass	228.80	0.00
tblFireplaces	NumberGas	62.25	132.80
tblFireplaces	NumberWood	70.55	0.00
tblFleetMix	HHD	6.3120e-003	0.02
tblFleetMix	HHD	6.3120e-003	0.02
tblFleetMix	HHD	6.3120e-003	0.02
tblFleetMix	HHD	6.3120e-003	0.02
tblFleetMix	LDA	0.57	0.54
tblFleetMix	LDA	0.57	0.54
tblFleetMix	LDA	0.57	0.54
tblFleetMix	LDA	0.57	0.54
tblFleetMix	LDT1	0.06	0.03
tblFleetMix	LDT1	0.06	0.03
tblFleetMix	LDT1	0.06	0.03
tblFleetMix	LDT1	0.06	0.03
tblFleetMix	LDT2	0.19	0.23
tblFleetMix	LDT2	0.19	0.23
tblFleetMix	LDT2	0.19	0.23
tblFleetMix	LDT2	0.19	0.23
tblFleetMix	LHD1	0.02	0.02
tblFleetMix	LHD1	0.02	0.02
tblFleetMix	LHD1	0.02	0.02
tblFleetMix	LHD1	0.02	0.02
tblFleetMix	LHD2	5.2090e-003	6.1120e-003

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblFleetMix	LHD2	5.2090e-003	6.1120e-003
tblFleetMix	LHD2	5.2090e-003	6.1120e-003
tblFleetMix	LHD2	5.2090e-003	6.1120e-003
tblFleetMix	MCY	0.02	3.5210e-003
tblFleetMix	MCY	0.02	3.5210e-003
tblFleetMix	MCY	0.02	3.5210e-003
tblFleetMix	MCY	0.02	3.5210e-003
tblFleetMix	MDV	0.12	0.12
tblFleetMix	MDV	0.12	0.12
tblFleetMix	MDV	0.12	0.12
tblFleetMix	MDV	0.12	0.12
tblFleetMix	MH	2.6680e-003	6.4900e-004
tblFleetMix	MH	2.6680e-003	6.4900e-004
tblFleetMix	MH	2.6680e-003	6.4900e-004
tblFleetMix	MH	2.6680e-003	6.4900e-004
tblFleetMix	MHD	8.0910e-003	0.01
tblFleetMix	MHD	8.0910e-003	0.01
tblFleetMix	MHD	8.0910e-003	0.01
tblFleetMix	MHD	8.0910e-003	0.01
tblFleetMix	OBUS	8.8400e-004	1.7230e-003
tblFleetMix	OBUS	8.8400e-004	1.7230e-003
tblFleetMix	OBUS	8.8400e-004	1.7230e-003
tblFleetMix	OBUS	8.8400e-004	1.7230e-003
tblFleetMix	SBUS	8.8700e-004	5.3000e-004
tblFleetMix	SBUS	8.8700e-004	5.3000e-004
tblFleetMix	SBUS	8.8700e-004	5.3000e-004
tblFleetMix	SBUS	8.8700e-004	5.3000e-004
tblFleetMix	UBUS	3.6400e-004	1.2470e-003
tblFleetMix	UBUS	3.6400e-004	1.2470e-003

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblFleetMix	UBUS	3.6400e-004	1.2470e-003
tblFleetMix	UBUS	3.6400e-004	1.2470e-003
tblGrading	MaterialExported	0.00	18,000.00
tblGrading	MaterialImported	0.00	3,500.00
tblLandUse	LandUseSquareFeet	458,400.00	470,000.00
tblLandUse	LandUseSquareFeet	415,000.00	400,101.00
tblLandUse	LotAcreage	12.05	0.00
tblLandUse	LotAcreage	10.31	0.00
tblLandUse	LotAcreage	6.69	2.10
tblLandUse	LotAcreage	0.20	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	10.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	5.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	10.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	3.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	8.00
tblOffRoadEquipment	UsageHours	6.00	5.00
tblOffRoadEquipment	UsageHours	8.00	2.00
tblOffRoadEquipment	UsageHours	8.00	2.50

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblOffRoadEquipment	UsageHours	8.00	12.00
tblOffRoadEquipment	UsageHours	8.00	10.80
tblOffRoadEquipment	UsageHours	7.00	0.00
tblOffRoadEquipment	UsageHours	7.00	9.60
tblOffRoadEquipment	UsageHours	8.00	0.00
tblOffRoadEquipment	UsageHours	8.00	12.00
tblOffRoadEquipment	UsageHours	8.00	2.00
tblOffRoadEquipment	UsageHours	8.00	3.30
tblOffRoadEquipment	UsageHours	8.00	2.00
tblOffRoadEquipment	UsageHours	8.00	2.00
tblOffRoadEquipment	UsageHours	8.00	2.00
tblOffRoadEquipment	UsageHours	8.00	2.50
tblOffRoadEquipment	UsageHours	8.00	2.00
tblOffRoadEquipment	UsageHours	8.00	0.00
tblOffRoadEquipment	UsageHours	6.00	0.00
tblOffRoadEquipment	UsageHours	8.00	2.50
tblOffRoadEquipment	UsageHours	7.00	2.00
tblOffRoadEquipment	UsageHours	8.00	2.00
tblOffRoadEquipment	UsageHours	7.00	3.30
tblOffRoadEquipment	UsageHours	8.00	0.00
tblOffRoadEquipment	UsageHours	8.00	3.00
tblProjectCharacteristics	CO2IntensityFactor	807.98	178
tblStationaryGeneratorsPumpsEF	NOX_EF	4.56	0.50
tblStationaryGeneratorsPumpsEF	PM10_EF	0.15	0.02
tblStationaryGeneratorsPumpsEF	PM2_5_EF	0.15	0.02
tblStationaryGeneratorsPumpsUse	HorsePowerValue	0.00	1,340.00
tblStationaryGeneratorsPumpsUse	HoursPerYear	0.00	50.00
tblStationaryGeneratorsPumpsUse	NumberOfEquipment	0.00	2.00
tblTripsAndVMT	HaulingTripNumber	791.00	0.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblTripsAndVMT	HaulingTripNumber	2,688.00	0.00
tblTripsAndVMT	VendorTripNumber	209.00	0.00
tblTripsAndVMT	VendorTripNumber	209.00	0.00
tblTripsAndVMT	WorkerTripNumber	23.00	0.00
tblTripsAndVMT	WorkerTripNumber	13.00	0.00
tblTripsAndVMT	WorkerTripNumber	23.00	0.00
tblTripsAndVMT	WorkerTripNumber	5.00	0.00
tblTripsAndVMT	WorkerTripNumber	667.00	0.00
tblTripsAndVMT	WorkerTripNumber	667.00	0.00
tblTripsAndVMT	WorkerTripNumber	133.00	0.00
tblTripsAndVMT	WorkerTripNumber	15.00	0.00
tblVehicleEF	HHD	0.02	0.22
tblVehicleEF	HHD	0.05	0.11
tblVehicleEF	HHD	6.31	5.15
tblVehicleEF	HHD	0.41	0.73
tblVehicleEF	HHD	5.9100e-003	7.3800e-004
tblVehicleEF	HHD	1,010.86	795.67
tblVehicleEF	HHD	1,358.12	1,554.97
tblVehicleEF	HHD	0.05	0.01
tblVehicleEF	HHD	0.16	0.13
tblVehicleEF	HHD	0.22	0.25
tblVehicleEF	HHD	5.0000e-006	8.0000e-006
tblVehicleEF	HHD	5.31	4.01
tblVehicleEF	HHD	2.65	1.70
tblVehicleEF	HHD	2.32	2.76
tblVehicleEF	HHD	2.4220e-003	2.0130e-003
tblVehicleEF	HHD	0.06	0.08
tblVehicleEF	HHD	0.04	0.04
tblVehicleEF	HHD	0.02	0.02



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblVehicleEF	HHD	1.0000e-006	0.00
tblVehicleEF	HHD	2.3170e-003	1.9190e-003
tblVehicleEF	HHD	0.03	0.03
tblVehicleEF	HHD	8.8910e-003	8.7830e-003
tblVehicleEF	HHD	0.02	0.02
tblVehicleEF	HHD	1.0000e-006	0.00
tblVehicleEF	HHD	2.0000e-006	1.0600e-004
tblVehicleEF	HHD	7.9000e-005	3.4000e-005
tblVehicleEF	HHD	0.43	0.32
tblVehicleEF	HHD	1.0000e-006	1.0600e-004
tblVehicleEF	HHD	0.03	0.02
tblVehicleEF	HHD	3.5000e-005	3.0300e-004
tblVehicleEF	HHD	2.0000e-006	0.00
tblVehicleEF	HHD	9.4050e-003	6.9240e-003
tblVehicleEF	HHD	0.01	0.01
tblVehicleEF	HHD	2.0000e-006	1.0600e-004
tblVehicleEF	HHD	7.9000e-005	3.4000e-005
tblVehicleEF	HHD	0.49	0.58
tblVehicleEF	HHD	1.0000e-006	1.0600e-004
tblVehicleEF	HHD	0.08	0.13
tblVehicleEF	HHD	3.5000e-005	3.0300e-004
tblVehicleEF	HHD	3.0000e-006	0.00
tblVehicleEF	LDA	1.3660e-003	1.6750e-003
tblVehicleEF	LDA	0.04	0.06
tblVehicleEF	LDA	0.47	0.58
tblVehicleEF	LDA	1.94	2.58
tblVehicleEF	LDA	228.80	244.37
tblVehicleEF	LDA	48.59	63.17
tblVehicleEF	LDA	3.5660e-003	3.6780e-003

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblVehicleEF	LDA	0.02	0.03
tblVehicleEF	LDA	0.02	0.03
tblVehicleEF	LDA	0.15	0.21
tblVehicleEF	LDA	0.04	7.1220e-003
tblVehicleEF	LDA	1.1900e-003	1.0810e-003
tblVehicleEF	LDA	1.5810e-003	1.7910e-003
tblVehicleEF	LDA	0.02	2.4930e-003
tblVehicleEF	LDA	1.0960e-003	9.9500e-004
tblVehicleEF	LDA	1.4540e-003	1.6470e-003
tblVehicleEF	LDA	0.03	0.26
tblVehicleEF	LDA	0.08	0.07
tblVehicleEF	LDA	0.03	0.26
tblVehicleEF	LDA	4.9190e-003	6.2200e-003
tblVehicleEF	LDA	0.03	0.19
tblVehicleEF	LDA	0.16	0.25
tblVehicleEF	LDA	2.1780e-003	2.3240e-003
tblVehicleEF	LDA	4.6300e-004	6.0100e-004
tblVehicleEF	LDA	0.03	0.26
tblVehicleEF	LDA	0.08	0.07
tblVehicleEF	LDA	0.03	0.26
tblVehicleEF	LDA	7.1490e-003	9.0640e-003
tblVehicleEF	LDA	0.03	0.19
tblVehicleEF	LDA	0.18	0.28
tblVehicleEF	LDT1	2.7310e-003	5.0100e-003
tblVehicleEF	LDT1	0.05	0.09
tblVehicleEF	LDT1	0.71	1.22
tblVehicleEF	LDT1	2.09	4.55
tblVehicleEF	LDT1	275.31	328.89
tblVehicleEF	LDT1	59.08	85.96

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblVehicleEF	LDT1	4.8810e-003	7.9710e-003
tblVehicleEF	LDT1	0.02	0.04
tblVehicleEF	LDT1	0.05	0.10
tblVehicleEF	LDT1	0.19	0.34
tblVehicleEF	LDT1	0.04	9.2110e-003
tblVehicleEF	LDT1	1.4440e-003	1.7220e-003
tblVehicleEF	LDT1	1.8990e-003	2.6150e-003
tblVehicleEF	LDT1	0.02	3.2240e-003
tblVehicleEF	LDT1	1.3280e-003	1.5850e-003
tblVehicleEF	LDT1	1.7460e-003	2.4040e-003
tblVehicleEF	LDT1	0.06	0.53
tblVehicleEF	LDT1	0.12	0.15
tblVehicleEF	LDT1	0.05	0.53
tblVehicleEF	LDT1	0.01	0.02
tblVehicleEF	LDT1	0.07	0.41
tblVehicleEF	LDT1	0.22	0.46
tblVehicleEF	LDT1	2.6210e-003	3.1280e-003
tblVehicleEF	LDT1	5.6300e-004	8.1800e-004
tblVehicleEF	LDT1	0.06	0.53
tblVehicleEF	LDT1	0.12	0.15
tblVehicleEF	LDT1	0.05	0.53
tblVehicleEF	LDT1	0.02	0.03
tblVehicleEF	LDT1	0.07	0.41
tblVehicleEF	LDT1	0.24	0.50
tblVehicleEF	LDT2	2.4210e-003	2.4020e-003
tblVehicleEF	LDT2	0.05	0.07
tblVehicleEF	LDT2	0.66	0.75
tblVehicleEF	LDT2	2.54	3.27
tblVehicleEF	LDT2	291.90	339.66

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblVehicleEF	LDT2	63.24	86.57
tblVehicleEF	LDT2	4.9510e-003	5.3470e-003
tblVehicleEF	LDT2	0.03	0.03
tblVehicleEF	LDT2	0.05	0.06
tblVehicleEF	LDT2	0.21	0.29
tblVehicleEF	LDT2	0.04	8.8560e-003
tblVehicleEF	LDT2	1.2670e-003	1.2550e-003
tblVehicleEF	LDT2	1.6290e-003	2.0020e-003
tblVehicleEF	LDT2	0.02	3.1000e-003
tblVehicleEF	LDT2	1.1670e-003	1.1540e-003
tblVehicleEF	LDT2	1.4980e-003	1.8410e-003
tblVehicleEF	LDT2	0.06	0.28
tblVehicleEF	LDT2	0.11	0.08
tblVehicleEF	LDT2	0.05	0.28
tblVehicleEF	LDT2	9.5470e-003	9.2510e-003
tblVehicleEF	LDT2	0.06	0.21
tblVehicleEF	LDT2	0.24	0.33
tblVehicleEF	LDT2	2.7790e-003	3.2300e-003
tblVehicleEF	LDT2	6.0200e-004	8.2300e-004
tblVehicleEF	LDT2	0.06	0.28
tblVehicleEF	LDT2	0.11	0.08
tblVehicleEF	LDT2	0.05	0.28
tblVehicleEF	LDT2	0.01	0.01
tblVehicleEF	LDT2	0.06	0.21
tblVehicleEF	LDT2	0.27	0.36
tblVehicleEF	LHD1	4.6670e-003	5.0240e-003
tblVehicleEF	LHD1	6.7660e-003	6.5110e-003
tblVehicleEF	LHD1	0.01	0.02
tblVehicleEF	LHD1	0.18	0.19

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblVehicleEF	LHD1	0.61	0.77
tblVehicleEF	LHD1	0.99	2.16
tblVehicleEF	LHD1	8.66	8.48
tblVehicleEF	LHD1	749.59	747.67
tblVehicleEF	LHD1	11.02	17.34
tblVehicleEF	LHD1	7.4200e-004	6.3000e-004
tblVehicleEF	LHD1	0.04	0.04
tblVehicleEF	LHD1	0.02	0.03
tblVehicleEF	LHD1	0.05	0.04
tblVehicleEF	LHD1	0.50	0.52
tblVehicleEF	LHD1	0.27	0.40
tblVehicleEF	LHD1	8.7200e-004	6.8700e-004
tblVehicleEF	LHD1	0.08	0.08
tblVehicleEF	LHD1	9.8310e-003	9.4180e-003
tblVehicleEF	LHD1	8.5970e-003	0.01
tblVehicleEF	LHD1	2.3200e-004	1.9000e-004
tblVehicleEF	LHD1	8.3400e-004	6.5700e-004
tblVehicleEF	LHD1	0.03	0.03
tblVehicleEF	LHD1	2.4580e-003	2.3550e-003
tblVehicleEF	LHD1	8.1790e-003	0.01
tblVehicleEF	LHD1	2.1300e-004	1.7400e-004
tblVehicleEF	LHD1	1.7170e-003	0.12
tblVehicleEF	LHD1	0.06	0.03
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	9.0400e-004	0.12
tblVehicleEF	LHD1	0.08	0.07
tblVehicleEF	LHD1	0.19	0.17
tblVehicleEF	LHD1	0.06	0.10
tblVehicleEF	LHD1	8.4000e-005	8.3000e-005

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tblVehicleEF	LHD1	7.3150e-003	7.3000e-003
tblVehicleEF	LHD1	1.0900e-004	1.7100e-004
tblVehicleEF	LHD1	1.7170e-003	0.12
tblVehicleEF	LHD1	0.06	0.03
tblVehicleEF	LHD1	0.03	0.03
tblVehicleEF	LHD1	9.0400e-004	0.12
tblVehicleEF	LHD1	0.10	0.09
tblVehicleEF	LHD1	0.19	0.17
tblVehicleEF	LHD1	0.07	0.11
tblVehicleEF	LHD2	2.8270e-003	2.9010e-003
tblVehicleEF	LHD2	6.0420e-003	5.9100e-003
tblVehicleEF	LHD2	6.5340e-003	0.01
tblVehicleEF	LHD2	0.14	0.14
tblVehicleEF	LHD2	0.54	0.49
tblVehicleEF	LHD2	0.55	1.18
tblVehicleEF	LHD2	13.60	13.61
tblVehicleEF	LHD2	727.00	794.48
tblVehicleEF	LHD2	7.15	9.38
tblVehicleEF	LHD2	1.7170e-003	1.6800e-003
tblVehicleEF	LHD2	0.07	0.08
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	0.09	0.09
tblVehicleEF	LHD2	0.60	0.73
tblVehicleEF	LHD2	0.15	0.22
tblVehicleEF	LHD2	1.4660e-003	1.4060e-003
tblVehicleEF	LHD2	0.09	0.09
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	1.1700e-004	8.1000e-005

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tblVehicleEF	LHD2	1.4020e-003	1.3460e-003
tblVehicleEF	LHD2	0.04	0.03
tblVehicleEF	LHD2	2.7000e-003	2.6660e-003
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	1.0800e-004	7.5000e-005
tblVehicleEF	LHD2	8.4300e-004	0.06
tblVehicleEF	LHD2	0.03	0.01
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	4.5700e-004	0.06
tblVehicleEF	LHD2	0.10	0.10
tblVehicleEF	LHD2	0.08	0.08
tblVehicleEF	LHD2	0.03	0.05
tblVehicleEF	LHD2	7.0160e-003	7.6510e-003
tblVehicleEF	LHD2	7.1000e-005	9.3000e-005
tblVehicleEF	LHD2	8.4300e-004	0.06
tblVehicleEF	LHD2	0.03	0.01
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	4.5700e-004	0.06
tblVehicleEF	LHD2	0.12	0.12
tblVehicleEF	LHD2	0.08	0.08
tblVehicleEF	LHD2	0.04	0.06
tblVehicleEF	MCY	0.32	0.15
tblVehicleEF	MCY	0.25	0.17
tblVehicleEF	MCY	18.17	11.99
tblVehicleEF	MCY	9.11	7.93
tblVehicleEF	MCY	209.94	186.84
tblVehicleEF	MCY	60.17	46.31
tblVehicleEF	MCY	0.07	0.04
tblVehicleEF	MCY	0.02	7.3810e-003

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tblVehicleEF	MCY	1.14	0.55
tblVehicleEF	MCY	0.27	0.12
tblVehicleEF	MCY	0.01	0.01
tblVehicleEF	MCY	2.0610e-003	1.9450e-003
tblVehicleEF	MCY	2.9290e-003	3.4700e-003
tblVehicleEF	MCY	5.0400e-003	4.2000e-003
tblVehicleEF	MCY	1.9240e-003	1.8180e-003
tblVehicleEF	MCY	2.7480e-003	3.2560e-003
tblVehicleEF	MCY	0.90	3.85
tblVehicleEF	MCY	0.66	3.56
tblVehicleEF	MCY	0.48	3.85
tblVehicleEF	MCY	2.16	0.99
tblVehicleEF	MCY	0.51	3.77
tblVehicleEF	MCY	1.91	1.27
tblVehicleEF	MCY	2.0780e-003	1.8470e-003
tblVehicleEF	MCY	5.9500e-004	4.5800e-004
tblVehicleEF	MCY	0.90	0.09
tblVehicleEF	MCY	0.66	3.56
tblVehicleEF	MCY	0.48	0.09
tblVehicleEF	MCY	2.70	1.20
tblVehicleEF	MCY	0.51	3.77
tblVehicleEF	MCY	2.08	1.38
tblVehicleEF	MDV	2.6580e-003	2.9620e-003
tblVehicleEF	MDV	0.06	0.08
tblVehicleEF	MDV	0.68	0.81
tblVehicleEF	MDV	2.69	3.42
tblVehicleEF	MDV	352.05	408.07
tblVehicleEF	MDV	75.02	103.20
tblVehicleEF	MDV	6.5120e-003	6.9830e-003



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tblVehicleEF	MDV	0.03	0.04
tblVehicleEF	MDV	0.05	0.07
tblVehicleEF	MDV	0.24	0.35
tblVehicleEF	MDV	0.04	8.9510e-003
tblVehicleEF	MDV	1.3160e-003	1.2580e-003
tblVehicleEF	MDV	1.6770e-003	1.9840e-003
tblVehicleEF	MDV	0.02	3.1330e-003
tblVehicleEF	MDV	1.2140e-003	1.1600e-003
tblVehicleEF	MDV	1.5420e-003	1.8240e-003
tblVehicleEF	MDV	0.06	0.32
tblVehicleEF	MDV	0.12	0.08
tblVehicleEF	MDV	0.06	0.32
tblVehicleEF	MDV	0.01	0.01
tblVehicleEF	MDV	0.06	0.25
tblVehicleEF	MDV	0.28	0.41
tblVehicleEF	MDV	3.3510e-003	3.8790e-003
tblVehicleEF	MDV	7.1400e-004	9.8200e-004
tblVehicleEF	MDV	0.06	0.32
tblVehicleEF	MDV	0.12	0.08
tblVehicleEF	MDV	0.06	0.32
tblVehicleEF	MDV	0.02	0.02
tblVehicleEF	MDV	0.06	0.25
tblVehicleEF	MDV	0.31	0.45
tblVehicleEF	MH	7.6660e-003	9.9190e-003
tblVehicleEF	MH	0.02	0.03
tblVehicleEF	MH	0.68	0.93
tblVehicleEF	MH	1.87	2.26
tblVehicleEF	MH	1,445.75	1,674.32
tblVehicleEF	MH	17.15	21.62

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tblVehicleEF	MH	0.06	0.07
tblVehicleEF	MH	0.03	0.03
tblVehicleEF	MH	1.21	1.44
tblVehicleEF	MH	0.24	0.30
tblVehicleEF	MH	0.13	0.04
tblVehicleEF	MH	0.01	0.01
tblVehicleEF	MH	0.02	0.03
tblVehicleEF	MH	2.4000e-004	2.8100e-004
tblVehicleEF	MH	0.06	0.02
tblVehicleEF	MH	3.2870e-003	3.3150e-003
tblVehicleEF	MH	0.02	0.03
tblVehicleEF	MH	2.2100e-004	2.5800e-004
tblVehicleEF	MH	0.52	28.55
tblVehicleEF	MH	0.04	7.36
tblVehicleEF	MH	0.19	28.55
tblVehicleEF	MH	0.05	0.07
tblVehicleEF	MH	0.01	0.18
tblVehicleEF	MH	0.08	0.10
tblVehicleEF	MH	0.01	0.02
tblVehicleEF	MH	1.7000e-004	2.1400e-004
tblVehicleEF	MH	0.52	28.55
tblVehicleEF	MH	0.04	7.36
tblVehicleEF	MH	0.19	28.55
tblVehicleEF	MH	0.07	0.09
tblVehicleEF	MH	0.01	0.18
tblVehicleEF	MH	0.09	0.11
tblVehicleEF	MHD	3.6600e-003	0.01
tblVehicleEF	MHD	1.3680e-003	9.5250e-003
tblVehicleEF	MHD	8.6830e-003	7.9190e-003

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tblVehicleEF	MHD	0.40	0.66
tblVehicleEF	MHD	0.19	0.26
tblVehicleEF	MHD	0.97	0.93
tblVehicleEF	MHD	69.63	156.70
tblVehicleEF	MHD	1,051.19	1,196.53
tblVehicleEF	MHD	8.85	7.91
tblVehicleEF	MHD	0.01	0.02
tblVehicleEF	MHD	0.13	0.15
tblVehicleEF	MHD	7.3550e-003	5.6890e-003
tblVehicleEF	MHD	0.38	0.84
tblVehicleEF	MHD	1.45	0.91
tblVehicleEF	MHD	1.70	1.39
tblVehicleEF	MHD	2.7700e-004	1.4450e-003
tblVehicleEF	MHD	0.13	0.05
tblVehicleEF	MHD	7.0640e-003	9.6350e-003
tblVehicleEF	MHD	1.1200e-004	9.6000e-005
tblVehicleEF	MHD	2.6500e-004	1.3820e-003
tblVehicleEF	MHD	0.06	0.02
tblVehicleEF	MHD	6.7520e-003	9.2100e-003
tblVehicleEF	MHD	1.0300e-004	8.9000e-005
tblVehicleEF	MHD	3.3400e-004	0.02
tblVehicleEF	MHD	0.02	5.1060e-003
tblVehicleEF	MHD	0.02	0.02
tblVehicleEF	MHD	1.8000e-004	0.02
tblVehicleEF	MHD	0.01	0.03
tblVehicleEF	MHD	0.02	0.04
tblVehicleEF	MHD	0.04	0.04
tblVehicleEF	MHD	6.6100e-004	1.4520e-003
tblVehicleEF	MHD	0.01	0.01

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblVehicleEF	MHD	8.8000e-005	7.8000e-005
tblVehicleEF	MHD	3.3400e-004	0.02
tblVehicleEF	MHD	0.02	5.1060e-003
tblVehicleEF	MHD	0.02	0.04
tblVehicleEF	MHD	1.8000e-004	0.02
tblVehicleEF	MHD	0.02	0.04
tblVehicleEF	MHD	0.02	0.04
tblVehicleEF	MHD	0.05	0.05
tblVehicleEF	OBUS	7.0720e-003	7.5520e-003
tblVehicleEF	OBUS	2.9940e-003	9.8650e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.61	0.53
tblVehicleEF	OBUS	0.35	0.40
tblVehicleEF	OBUS	1.73	1.78
tblVehicleEF	OBUS	95.34	88.16
tblVehicleEF	OBUS	1,283.24	1,344.05
tblVehicleEF	OBUS	14.49	14.24
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	0.13	0.16
tblVehicleEF	OBUS	0.02	0.01
tblVehicleEF	OBUS	0.40	0.36
tblVehicleEF	OBUS	1.45	0.93
tblVehicleEF	OBUS	1.11	0.99
tblVehicleEF	OBUS	1.3100e-004	3.9000e-004
tblVehicleEF	OBUS	0.13	0.05
tblVehicleEF	OBUS	7.5500e-003	0.01
tblVehicleEF	OBUS	1.4900e-004	1.2900e-004
tblVehicleEF	OBUS	1.2600e-004	3.7300e-004
tblVehicleEF	OBUS	0.06	0.02

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tblVehicleEF	OBUS	7.2100e-003	0.01
tblVehicleEF	OBUS	1.3700e-004	1.1800e-004
tblVehicleEF	OBUS	1.0720e-003	0.07
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.05	0.04
tblVehicleEF	OBUS	4.8300e-004	0.07
tblVehicleEF	OBUS	0.02	0.04
tblVehicleEF	OBUS	0.04	0.08
tblVehicleEF	OBUS	0.08	0.09
tblVehicleEF	OBUS	9.0500e-004	8.3300e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	1.4300e-004	1.4100e-004
tblVehicleEF	OBUS	1.0720e-003	0.07
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.06	0.05
tblVehicleEF	OBUS	4.8300e-004	0.07
tblVehicleEF	OBUS	0.03	0.06
tblVehicleEF	OBUS	0.04	0.08
tblVehicleEF	OBUS	0.09	0.09
tblVehicleEF	SBUS	0.06	0.08
tblVehicleEF	SBUS	5.4710e-003	0.09
tblVehicleEF	SBUS	5.3640e-003	4.9930e-003
tblVehicleEF	SBUS	2.48	1.73
tblVehicleEF	SBUS	0.45	0.84
tblVehicleEF	SBUS	0.76	0.68
tblVehicleEF	SBUS	344.98	188.59
tblVehicleEF	SBUS	1,025.26	1,007.35
tblVehicleEF	SBUS	4.41	3.84
tblVehicleEF	SBUS	0.05	0.02

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tblVehicleEF	SBUS	0.13	0.12
tblVehicleEF	SBUS	5.3260e-003	4.5020e-003
tblVehicleEF	SBUS	3.24	1.31
tblVehicleEF	SBUS	4.17	2.24
tblVehicleEF	SBUS	0.95	0.50
tblVehicleEF	SBUS	3.0570e-003	1.1130e-003
tblVehicleEF	SBUS	0.74	0.04
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	0.03	0.01
tblVehicleEF	SBUS	5.4000e-005	4.2000e-005
tblVehicleEF	SBUS	2.9250e-003	1.0640e-003
tblVehicleEF	SBUS	0.32	0.02
tblVehicleEF	SBUS	2.7030e-003	2.6360e-003
tblVehicleEF	SBUS	0.03	0.01
tblVehicleEF	SBUS	5.0000e-005	3.9000e-005
tblVehicleEF	SBUS	6.4100e-004	0.03
tblVehicleEF	SBUS	6.2050e-003	8.3130e-003
tblVehicleEF	SBUS	0.27	0.19
tblVehicleEF	SBUS	2.9200e-004	0.03
tblVehicleEF	SBUS	0.08	0.05
tblVehicleEF	SBUS	0.01	0.02
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	3.2860e-003	1.7120e-003
tblVehicleEF	SBUS	9.7970e-003	9.3590e-003
tblVehicleEF	SBUS	4.4000e-005	3.8000e-005
tblVehicleEF	SBUS	6.4100e-004	0.03
tblVehicleEF	SBUS	6.2050e-003	8.3130e-003
tblVehicleEF	SBUS	0.39	0.31
tblVehicleEF	SBUS	2.9200e-004	0.03

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblVehicleEF	SBUS	0.09	0.15
tblVehicleEF	SBUS	0.01	0.02
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	UBUS	1.74	0.53
tblVehicleEF	UBUS	1.7570e-003	3.7120e-003
tblVehicleEF	UBUS	13.20	6.31
tblVehicleEF	UBUS	0.14	0.50
tblVehicleEF	UBUS	1,654.13	1,064.85
tblVehicleEF	UBUS	1.40	3.15
tblVehicleEF	UBUS	0.28	0.16
tblVehicleEF	UBUS	1.1340e-003	6.0350e-003
tblVehicleEF	UBUS	0.71	0.29
tblVehicleEF	UBUS	0.01	0.04
tblVehicleEF	UBUS	0.07	0.13
tblVehicleEF	UBUS	0.03	0.04
tblVehicleEF	UBUS	5.1700e-003	5.5470e-003
tblVehicleEF	UBUS	1.5000e-005	1.2000e-005
tblVehicleEF	UBUS	0.03	0.04
tblVehicleEF	UBUS	8.3320e-003	0.01
tblVehicleEF	UBUS	4.9450e-003	5.3030e-003
tblVehicleEF	UBUS	1.4000e-005	1.1000e-005
tblVehicleEF	UBUS	2.7000e-005	0.01
tblVehicleEF	UBUS	2.5800e-004	3.7810e-003
tblVehicleEF	UBUS	1.3000e-005	0.01
tblVehicleEF	UBUS	0.03	0.06
tblVehicleEF	UBUS	5.2000e-005	7.9860e-003
tblVehicleEF	UBUS	7.3620e-003	0.01
tblVehicleEF	UBUS	0.01	8.5860e-003
tblVehicleEF	UBUS	1.4000e-005	3.1000e-005

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblVehicleEF	UBUS	2.7000e-005	0.01
tblVehicleEF	UBUS	2.5800e-004	3.7810e-003
tblVehicleEF	UBUS	1.3000e-005	0.01
tblVehicleEF	UBUS	1.78	0.60
tblVehicleEF	UBUS	5.2000e-005	7.9860e-003
tblVehicleEF	UBUS	8.0600e-003	0.01
tblVehicleTrips	ST_TR	4.53	3.14
tblVehicleTrips	ST_TR	2.21	1.46
tblVehicleTrips	ST_TR	42.04	10.38
tblVehicleTrips	SU_TR	3.59	2.49
tblVehicleTrips	SU_TR	0.70	0.46
tblVehicleTrips	SU_TR	20.43	5.04
tblVehicleTrips	WD_TR	4.45	3.08
tblVehicleTrips	WD_TR	9.74	6.44
tblVehicleTrips	WD_TR	44.32	10.94
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tblWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tblWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tblWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWoodstoves	WoodstoveWoodMass	582.40	0.00



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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.0 Emissions Summary

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	4.3417	0.0499	3.1000	2.6000e-004		0.0183	0.0183		0.0183	0.0183	0.0000	21.6421	21.6421	5.2200e-003	3.0000e-004	21.8631
Energy	1.1000e-004	9.7000e-004	8.2000e-004	1.0000e-005		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005	0.0000	1,072.0654	1,072.0654	0.1986	0.0241	1,084.21
Mobile	2.0115	1.8186	11.8415	0.0346	3.1100	0.0255	3.1355	0.7769	0.0239	0.8007	0.0000	3,315.1815	3,315.1815	0.1520	0.1735	3,370.68
Stationary	0.1100	0.0539	0.2804	5.3000e-004		2.1600e-003	2.1600e-003		2.1600e-003	2.1600e-003	0.0000	51.0268	51.0268	7.1500e-003	0.0000	51.2057
Waste						0.0000	0.0000		0.0000	0.0000	139.6740	0.0000	139.6740	8.2545	0.0000	346.0365
Water						0.0000	0.0000		0.0000	0.0000	42.8025	73.9407	116.7432	0.1610	0.0947	149.0023
<b>Total</b>	<b>6.4632</b>	<b>1.9234</b>	<b>15.2226</b>	<b>0.0354</b>	<b>3.1100</b>	<b>0.0460</b>	<b>3.156</b>	<b>0.7769</b>	<b>0.0444</b>	<b>0.8213</b>	<b>182.4765</b>	<b>4,533.8565</b>	<b>4,716.3330</b>	<b>8.7784</b>	<b>0.2926</b>	<b>5,022.9988</b>

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Area	4.3417	0.0499	3.1000	2.6000e-004		0.0183	0.0183		0.0183	0.0183	0.0000	21.6421	21.6421	5.2200e-003	3.0000e-004	21.8631
Energy	1.1000e-004	9.7000e-004	8.2000e-004	1.0000e-005		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005	0.0000	1,072.0654	1,072.0654	0.1986	0.0241	1,084.2078
Mobile	2.0115	1.8186	11.8415	0.0346	3.1100	0.0255	3.1355	0.7769	0.0239	0.8007	0.0000	3,315.1815	3,315.1815	0.1520	0.1735	3,370.6834
Stationary	0.1100	0.0539	0.2804	5.3000e-004		2.1600e-003	2.1600e-003		2.1600e-003	2.1600e-003	0.0000	51.0268	51.0268	7.1500e-003	0.0000	51.2057
Waste						0.0000	0.0000		0.0000	0.0000	139.6740	0.0000	139.6740	8.2545	0.0000	346.0365
Water						0.0000	0.0000		0.0000	0.0000	42.8025	73.9407	116.7432	0.1610	0.0947	149.0023
<b>Total</b>	<b>6.4632</b>	<b>1.9234</b>	<b>15.2226</b>	<b>0.0354</b>	<b>3.1100</b>	<b>0.0460</b>	<b>3.1560</b>	<b>0.7769</b>	<b>0.0444</b>	<b>0.8213</b>	<b>182.4765</b>	<b>4,533.8565</b>	<b>4,716.3330</b>	<b>8.7784</b>	<b>0.2926</b>	<b>5,022.9988</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	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

**4.0 Operational Detail - Mobile**

**4.1 Mitigation Measures Mobile**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	2.0115	1.8186	11.8415	0.0346	3.1100	0.0255	3.1355	0.7769	0.0239	0.8007	0.0000	3,315.1815	3,315.1815	0.1520	0.1735	3,370.6834
Unmitigated	2.0115	1.8186	11.8415	0.0346	3.1100	0.0255	3.1355	0.7769	0.0239	0.8007	0.0000	3,315.1815	3,315.1815	0.1520	0.1735	3,370.6834

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments High Rise	1,278.20	1,303.10	1033.35	2,879,569	2,879,569
Enclosed Parking with Elevator	0.00	0.00	0.00		
General Office Building	3,381.00	766.50	241.50	6,115,377	6,115,377
Strip Mall	92.99	88.23	42.84	131,127	131,127
<b>Total</b>	<b>4,752.19</b>	<b>2,157.83</b>	<b>1,317.69</b>	<b>9,126,074</b>	<b>9,126,074</b>

**4.3 Trip Type Information**

Land Use	Miles			Trip %			Trip Purpose %		
	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
Apartments High Rise	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
Enclosed Parking with Elevator	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
General Office Building	9.50	7.30	7.30	33.00	48.00	19.00	77	19	4
Strip Mall	9.50	7.30	7.30	16.60	64.40	19.00	45	40	15

**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments High Rise	0.541057	0.034611	0.227949	0.124011	0.024753	0.006112	0.010991	0.022846	0.001723	0.001247	0.003521	0.000530	0.000649
Enclosed Parking with Elevator	0.541057	0.034611	0.227949	0.124011	0.024753	0.006112	0.010991	0.022846	0.001723	0.001247	0.003521	0.000530	0.000649
General Office Building	0.541057	0.034611	0.227949	0.124011	0.024753	0.006112	0.010991	0.022846	0.001723	0.001247	0.003521	0.000530	0.000649
Strip Mall	0.541057	0.034611	0.227949	0.124011	0.024753	0.006112	0.010991	0.022846	0.001723	0.001247	0.003521	0.000530	0.000649

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	1,071.0040	1,071.0040	0.1986	0.0241	1,083.1401
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	1,071.0040	1,071.0040	0.1986	0.0241	1,083.1401
NaturalGas Mitigated	1.1000e-004	9.7000e-004	8.2000e-004	1.0000e-005		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005	0.0000	1.0614	1.0614	2.0000e-005	2.0000e-005	1.0677
NaturalGas Unmitigated	1.1000e-004	9.7000e-004	8.2000e-004	1.0000e-005		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005	0.0000	1.0614	1.0614	2.0000e-005	2.0000e-005	1.0677

**5.2 Energy by Land Use - NaturalGas Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments High Rise	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
Enclosed Parking with Elevator	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
General Office Building	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
Strip Mall	19890	1.1000e-004	9.7000e-004	8.2000e-004	1.0000e-005		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005	0.0000	1.0614	1.0614	2.0000e-005	2.0000e-005	1.0677
<b>Total</b>		<b>1.1000e-004</b>	<b>9.7000e-004</b>	<b>8.2000e-004</b>	<b>1.0000e-005</b>		<b>7.0000e-005</b>	<b>7.0000e-005</b>		<b>7.0000e-005</b>	<b>7.0000e-005</b>	<b>0.0000</b>	<b>1.0614</b>	<b>1.0614</b>	<b>2.0000e-005</b>	<b>2.0000e-005</b>	<b>1.0677</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**Mitigated**

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Land Use	kBTU/yr	tons/yr										MT/yr						
Apartments High Rise	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	0.0000
Enclosed Parking with Elevator	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	0.0000
General Office Building	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	0.0000
Strip Mall	19890	1.1000e-004	9.7000e-004	8.2000e-004	1.0000e-005		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005	0.0000	1.0614	1.0614	2.0000e-005	2.0000e-005	1.0677	
<b>Total</b>		<b>1.1000e-004</b>	<b>9.7000e-004</b>	<b>8.2000e-004</b>	<b>1.0000e-005</b>		<b>7.0000e-005</b>	<b>7.0000e-005</b>		<b>7.0000e-005</b>	<b>7.0000e-005</b>	<b>0.0000</b>	<b>1.0614</b>	<b>1.0614</b>	<b>2.0000e-005</b>	<b>2.0000e-005</b>	<b>1.0677</b>	

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments High Rise	1.60558e+006	129.6334	0.0240	2.9100e-003	131.1023
Enclosed Parking with Elevator	2.5568e+006	206.4346	0.0383	4.6400e-003	208.7738

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

General Office Building	9.01425e+006	727.8055	0.1349	0.0164	736.0526
Strip Mall	88315	7.1305	1.3200e-003	1.6000e-004	7.2113
<b>Total</b>		<b>1,071.0040</b>	<b>0.1986</b>	<b>0.0241</b>	<b>1,083.1400</b>

**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments High Rise	1.60558e+006	129.6334	0.0240	2.9100e-003	131.1023
Enclosed Parking with Elevator	2.5568e+006	206.4346	0.0383	4.6400e-003	208.7738
General Office Building	9.01425e+006	727.8055	0.1349	0.0164	736.0526
Strip Mall	88315	7.1305	1.3200e-003	1.6000e-004	7.2113
<b>Total</b>		<b>1,071.0040</b>	<b>0.1986</b>	<b>0.0241</b>	<b>1,083.1400</b>

**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 Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	4.3417	0.0499	3.1000	2.6000e-004		0.0183	0.0183		0.0183	0.0183	0.0000	21.6421	21.6421	5.2200e-003	3.0000e-004	21.8631
Unmitigated	4.3417	0.0499	3.1000	2.6000e-004		0.0183	0.0183		0.0183	0.0183	0.0000	21.6421	21.6421	5.2200e-003	3.0000e-004	21.8631

**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	0.5696					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	3.6766					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	1.6800e-003	0.0143	6.0900e-003	9.0000e-005		1.1600e-003	1.1600e-003		1.1600e-003	1.1600e-003	0.0000	16.5787	16.5787	3.2000e-004	3.0000e-004	16.6772
Landscaping	0.0939	0.0356	3.0939	1.6000e-004		0.0171	0.0171		0.0171	0.0171	0.0000	5.0635	5.0635	4.9000e-003	0.0000	5.1859
<b>Total</b>	<b>4.3417</b>	<b>0.0499</b>	<b>3.1000</b>	<b>2.5000e-004</b>		<b>0.0183</b>	<b>0.0183</b>		<b>0.0183</b>	<b>0.0183</b>	<b>0.0000</b>	<b>21.6421</b>	<b>21.6421</b>	<b>5.2200e-003</b>	<b>3.0000e-004</b>	<b>21.8631</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.5696					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	3.6766					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	1.6800e-003	0.0143	6.0900e-003	9.0000e-005		1.1600e-003	1.1600e-003		1.1600e-003	1.1600e-003	0.0000	16.5787	16.5787	3.2000e-004	3.0000e-004	16.6772
Landscaping	0.0939	0.0356	3.0939	1.6000e-004		0.0171	0.0171		0.0171	0.0171	0.0000	5.0635	5.0635	4.9000e-003	0.0000	5.1859
<b>Total</b>	<b>4.3417</b>	<b>0.0499</b>	<b>3.1000</b>	<b>2.5000e-004</b>		<b>0.0183</b>	<b>0.0183</b>		<b>0.0183</b>	<b>0.0183</b>	<b>0.0000</b>	<b>21.6421</b>	<b>21.6421</b>	<b>5.2200e-003</b>	<b>3.0000e-004</b>	<b>21.8631</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	116.7432	0.1610	0.0947	149.0023
Unmitigated	116.7432	0.1610	0.0947	149.0023



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments High Rise	27.0389 / 17.0463	26.1963	0.0360	0.0212	33.4074
Enclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
General Office Building	93.3102 / 57.1901	89.9400	0.1242	0.0731	114.8202
Strip Mall	0.629616 / 0.385894	0.6069	8.4000e-004	4.9000e-004	0.7748
<b>Total</b>		<b>116.7432</b>	<b>0.1610</b>	<b>0.0947</b>	<b>149.0023</b>

**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments High Rise	27.0389 / 17.0463	26.1963	0.0360	0.0212	33.4074
Enclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

General Office Building	93.3102 / 57.1901	89.9400	0.1242	0.0731	114.8202
Strip Mall	0.629616 / 0.385894	0.6069	8.4000e-004	4.9000e-004	0.7748
<b>Total</b>		<b>116.7432</b>	<b>0.1610</b>	<b>0.0947</b>	<b>149.0023</b>

**8.0 Waste Detail**

**8.1 Mitigation Measures Waste**

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	139.6740	8.2545	0.0000	346.0365
Unmitigated	139.6740	8.2545	0.0000	346.0365

**8.2 Waste by Land Use**

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Apartments High Rise	190.9	38.7510	2.2901	0.0000	96.0039
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
General Office Building	488.25	99.1103	5.8573	0.0000	245.5417
Strip Mall	8.93	1.8127	0.1071	0.0000	4.4909
<b>Total</b>		<b>139.6740</b>	<b>8.2545</b>	<b>0.0000</b>	<b>346.0365</b>

**Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments High Rise	190.9	38.7510	2.2901	0.0000	96.0039
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
General Office Building	488.25	99.1103	5.8573	0.0000	245.5417
Strip Mall	8.93	1.8127	0.1071	0.0000	4.4909
<b>Total</b>		<b>139.6740</b>	<b>8.2545</b>	<b>0.0000</b>	<b>346.0365</b>

**9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
Emergency Generator	2	0	50	1340	0.73	Diesel

Boilers

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

Equipment Type	Number
----------------	--------

10.1 Stationary Sources

Unmitigated/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
Equipment Type	tons/yr										MT/yr					
Emergency Generator - Diesel	0.1100	0.0539	0.2804	5.3000e-004		2.1600e-003	2.1600e-003		2.1600e-003	2.1600e-003	0.0000	51.0268	51.0268	7.1500e-003	0.0000	51.2057
<b>Total</b>	<b>0.1100</b>	<b>0.0539</b>	<b>0.2804</b>	<b>5.3000e-004</b>		<b>2.1600e-003</b>	<b>2.1600e-003</b>		<b>2.1600e-003</b>	<b>2.1600e-003</b>	<b>0.0000</b>	<b>51.0268</b>	<b>51.0268</b>	<b>7.1500e-003</b>	<b>0.0000</b>	<b>51.2057</b>

11.0 Vegetation

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**Icon-Echo MU Towers, San Jose - Existing  
Santa Clara County, Annual**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Convenience Market with Gas Pumps	8.00	Pump	0.03	1,129.40	0
Place of Worship	6.86	1000sqft	0.16	6,860.00	0
Strip Mall	13.50	1000sqft	0.31	13,500.00	0

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	58
<b>Climate Zone</b>	4			<b>Operational Year</b>	2026
<b>Utility Company</b>	Pacific Gas and Electric Company				
<b>CO2 Intensity (lb/MW hr)</b>	203.98	<b>CH4 Intensity (lb/MW hr)</b>	0.033	<b>N2O Intensity (lb/MW hr)</b>	0.004

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

- Project Characteristics -
- Land Use - Provided existing land uses - traffic info
- Construction Phase - Existing - no construction
- Off-road Equipment - Existing - no construction
- Grading -
- Vehicle Trips - Traffic provided existing uses trip gen w/ reductions. 100% primary trips in CalEEMod to account for passby reduction in traffic
- Fleet Mix - EMFAC2021 Fleet Mix Santa Clara County 2026
- Energy Use - Historical energy usage
- Vehicle Emission Factors - EMFAC2021 Vehicle Emission Factors Santa Clara County 2026

## Icon-Echo MU Towers, San Jose - Existing - Santa Clara County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Table Name	Column Name	Default Value	New Value
tblEnergyUse	LightingElect	6.02	5.25
tblEnergyUse	LightingElect	3.80	3.08
tblEnergyUse	LightingElect	6.02	5.25
tblEnergyUse	T24E	3.55	2.46
tblEnergyUse	T24E	1.93	1.32
tblEnergyUse	T24E	3.55	2.46
tblEnergyUse	T24NG	2.92	2.34
tblEnergyUse	T24NG	22.58	19.51
tblEnergyUse	T24NG	2.92	2.34
tblFleetMix	HHD	0.00	0.02
tblFleetMix	HHD	0.00	0.02
tblFleetMix	HHD	0.00	0.02
tblFleetMix	LDA	0.00	0.54
tblFleetMix	LDA	0.00	0.54
tblFleetMix	LDA	0.00	0.54
tblFleetMix	LDT1	0.00	0.03
tblFleetMix	LDT1	0.00	0.03
tblFleetMix	LDT1	0.00	0.03
tblFleetMix	LDT2	0.00	0.23
tblFleetMix	LDT2	0.00	0.23
tblFleetMix	LDT2	0.00	0.23
tblFleetMix	LHD1	0.00	0.02
tblFleetMix	LHD1	0.00	0.02
tblFleetMix	LHD1	0.00	0.02
tblFleetMix	LHD2	0.00	6.1120e-003
tblFleetMix	LHD2	0.00	6.1120e-003
tblFleetMix	LHD2	0.00	6.1120e-003
tblFleetMix	MCY	0.00	3.5210e-003

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblFleetMix	MCY	0.00	3.5210e-003
tblFleetMix	MCY	0.00	3.5210e-003
tblFleetMix	MDV	0.00	0.12
tblFleetMix	MDV	0.00	0.12
tblFleetMix	MDV	0.00	0.12
tblFleetMix	MH	0.00	6.4900e-004
tblFleetMix	MH	0.00	6.4900e-004
tblFleetMix	MH	0.00	6.4900e-004
tblFleetMix	MHD	0.00	0.01
tblFleetMix	MHD	0.00	0.01
tblFleetMix	MHD	0.00	0.01
tblFleetMix	OBUS	0.00	1.7230e-003
tblFleetMix	OBUS	0.00	1.7230e-003
tblFleetMix	OBUS	0.00	1.7230e-003
tblFleetMix	SBUS	0.00	5.3000e-004
tblFleetMix	SBUS	0.00	5.3000e-004
tblFleetMix	SBUS	0.00	5.3000e-004
tblFleetMix	UBUS	0.00	1.2470e-003
tblFleetMix	UBUS	0.00	1.2470e-003
tblFleetMix	UBUS	0.00	1.2470e-003
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	UsageHours	8.00	0.00
tblOffRoadEquipment	UsageHours	8.00	0.00
tblVehicleTrips	DV_TP	21.00	0.00
tblVehicleTrips	DV_TP	40.00	0.00
tblVehicleTrips	PB_TP	65.00	0.00
tblVehicleTrips	PB_TP	15.00	0.00
tblVehicleTrips	PR_TP	14.00	100.00

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

tblVehicleTrips	PR_TP	45.00	100.00
tblVehicleTrips	ST_TR	322.50	90.38
tblVehicleTrips	ST_TR	42.04	34.64
tblVehicleTrips	SU_TR	322.50	90.38
tblVehicleTrips	SU_TR	20.43	16.83
tblVehicleTrips	WD_TR	322.50	90.38
tblVehicleTrips	WD_TR	44.32	36.52

**2.0 Emissions Summary**

**2.2 Overall Operational**

**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0952	0.0000	2.6000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	5.1000e-004	5.1000e-004	0.0000	0.0000	5.4000e-004
Energy	1.1500e-003	0.0105	8.8000e-003	6.0000e-005		8.0000e-004	8.0000e-004		8.0000e-004	8.0000e-004	0.0000	30.6154	30.6154	3.3300e-003	5.9000e-004	30.8731
Mobile	0.6482	0.6304	4.0943	0.0125	1.1283	9.1200e-003	1.1374	0.2818	8.5400e-003	0.2904	0.0000	1,197.0605	1,197.0605	0.0509	0.0609	1,216.4816
Waste						0.0000	0.0000		0.0000	0.0000	10.8154	0.0000	10.8154	0.6392	0.0000	26.7946
Water						0.0000	0.0000		0.0000	0.0000	0.4119	0.9738	1.3857	0.0425	1.0200e-003	2.7506
<b>Total</b>	<b>0.7445</b>	<b>0.6409</b>	<b>4.1034</b>	<b>0.0126</b>	<b>1.1283</b>	<b>9.9200e-003</b>	<b>1.1382</b>	<b>0.2818</b>	<b>9.3400e-003</b>	<b>0.2912</b>	<b>11.2272</b>	<b>1,228.6502</b>	<b>1,239.8774</b>	<b>0.7359</b>	<b>0.0625</b>	<b>1,276.9004</b>



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0952	0.0000	2.6000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	5.1000e-004	5.1000e-004	0.0000	0.0000	5.4000e-004
Energy	1.1500e-003	0.0105	8.8000e-003	6.0000e-005		8.0000e-004	8.0000e-004		8.0000e-004	8.0000e-004	0.0000	30.6154	30.6154	3.3300e-003	5.9000e-004	30.8731
Mobile	0.6482	0.6304	4.0943	0.0125	1.1283	9.1200e-003	1.1374	0.2818	8.5400e-003	0.2904	0.0000	1,197.0605	1,197.0605	0.0509	0.0609	1,216.4816
Waste						0.0000	0.0000		0.0000	0.0000	10.8154	0.0000	10.8154	0.6392	0.0000	26.7946
Water						0.0000	0.0000		0.0000	0.0000	0.4119	0.9738	1.3857	0.0425	1.0200e-003	2.7506
<b>Total</b>	<b>0.7445</b>	<b>0.6409</b>	<b>4.1034</b>	<b>0.0126</b>	<b>1.1283</b>	<b>9.9200e-003</b>	<b>1.1382</b>	<b>0.2818</b>	<b>9.3400e-003</b>	<b>0.2912</b>	<b>11.2272</b>	<b>1,228.6502</b>	<b>1,239.8774</b>	<b>0.7359</b>	<b>0.0625</b>	<b>1,276.9004</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	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

**4.0 Operational Detail - Mobile**

**4.1 Mitigation Measures Mobile**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Category	tons/yr											MT/yr				
	Mitigated	0.6482	0.6304	4.0943	0.0125	1.1283	9.1200e-003	1.1374	0.2818	8.5400e-003	0.2904	0.0000	1,197.0605	1,197.0605	0.0509	0.0609
Unmitigated	0.6482	0.6304	4.0943	0.0125	1.1283	9.1200e-003	1.1374	0.2818	8.5400e-003	0.2904	0.0000	1,197.0605	1,197.0605	0.0509	0.0609	1,216.4816

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated Annual VMT	Mitigated Annual VMT
	Weekday	Saturday	Sunday		
Convenience Market with Gas Pumps	723.04	723.04	723.04	1,925,894	1,925,894
Place of Worship	47.68	41.09	189.54	125,341	125,341
Strip Mall	493.02	467.64	227.21	1,259,524	1,259,524
<b>Total</b>	<b>1,263.74</b>	<b>1,231.77</b>	<b>1,139.79</b>	<b>3,310,759</b>	<b>3,310,759</b>

**4.3 Trip Type Information**

Land Use	Miles			Trip %			Trip Purpose %		
	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
Convenience Market with Gas	9.50	7.30	7.30	0.80	80.20	19.00	100	0	0
Place of Worship	9.50	7.30	7.30	0.00	95.00	5.00	64	25	11
Strip Mall	9.50	7.30	7.30	16.60	64.40	19.00	100	0	0

**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Convenience Market with Gas	0.541057	0.034611	0.227949	0.124011	0.024753	0.006112	0.010991	0.022846	0.001723	0.001247	0.003521	0.000530	0.000649
Place of Worship	0.541057	0.034611	0.227949	0.124011	0.024753	0.006112	0.010991	0.022846	0.001723	0.001247	0.003521	0.000530	0.000649
Strip Mall	0.541057	0.034611	0.227949	0.124011	0.024753	0.006112	0.010991	0.022846	0.001723	0.001247	0.003521	0.000530	0.000649

**5.0 Energy Detail**

Historical Energy Use: Y

**5.1 Mitigation Measures Energy**

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	19.2047	19.2047	3.1100e-003	3.8000e-004	19.3946
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	19.2047	19.2047	3.1100e-003	3.8000e-004	19.3946
NaturalGas Mitigated	1.1500e-003	0.0105	8.8000e-003	6.0000e-005		8.0000e-004	8.0000e-004		8.0000e-004	8.0000e-004	0.0000	11.4107	11.4107	2.2000e-004	2.1000e-004	11.4785
NaturalGas Unmitigated	1.1500e-003	0.0105	8.8000e-003	6.0000e-005		8.0000e-004	8.0000e-004		8.0000e-004	8.0000e-004	0.0000	11.4107	11.4107	2.2000e-004	2.1000e-004	11.4785

**5.2 Energy by Land Use - NaturalGas**  
**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Convenience Market with Gas	2642.8	1.0000e-005	1.3000e-004	1.1000e-004	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	0.1410	0.1410	0.0000	0.0000	0.1419
Place of Worship	179595	9.7000e-004	8.8000e-003	7.4000e-003	5.0000e-005		6.7000e-004	6.7000e-004		6.7000e-004	6.7000e-004	0.0000	9.5839	9.5839	1.8000e-004	1.8000e-004	9.6408
Strip Mall	31590	1.7000e-004	1.5500e-003	1.3000e-003	1.0000e-005		1.2000e-004	1.2000e-004		1.2000e-004	1.2000e-004	0.0000	1.6858	1.6858	3.0000e-005	3.0000e-005	1.6958
<b>Total</b>		<b>1.1500e-003</b>	<b>0.0105</b>	<b>8.8100e-003</b>	<b>6.0000e-005</b>		<b>8.0000e-004</b>	<b>8.0000e-004</b>		<b>8.0000e-004</b>	<b>8.0000e-004</b>	<b>0.0000</b>	<b>11.4107</b>	<b>11.4107</b>	<b>2.1000e-004</b>	<b>2.1000e-004</b>	<b>11.4785</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

**Mitigated**

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Convenience Market with Gas	2642.8	1.0000e-005	1.3000e-004	1.1000e-004	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	0.1410	0.1410	0.0000	0.0000	0.1419
Place of Worship	179595	9.7000e-004	8.8000e-003	7.4000e-003	5.0000e-005		6.7000e-004	6.7000e-004		6.7000e-004	6.7000e-004	0.0000	9.5839	9.5839	1.8000e-004	1.8000e-004	9.6408
Strip Mall	31590	1.7000e-004	1.5500e-003	1.3000e-003	1.0000e-005		1.2000e-004	1.2000e-004		1.2000e-004	1.2000e-004	0.0000	1.6858	1.6858	3.0000e-005	3.0000e-005	1.6958
<b>Total</b>		<b>1.1500e-003</b>	<b>0.0105</b>	<b>8.8100e-003</b>	<b>6.0000e-005</b>		<b>8.0000e-004</b>	<b>8.0000e-004</b>		<b>8.0000e-004</b>	<b>8.0000e-004</b>	<b>0.0000</b>	<b>11.4107</b>	<b>11.4107</b>	<b>2.1000e-004</b>	<b>2.1000e-004</b>	<b>11.4785</b>

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Convenience Market with Gas	11734.5	1.0857	1.8000e-004	2.0000e-005	1.0965
Place of Worship	55566	5.1412	8.3000e-004	1.0000e-004	5.1920
Strip Mall	140265	12.9779	2.1000e-003	2.5000e-004	13.1062

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

<b>Total</b>		<b>19.2048</b>	<b>3.1100e-003</b>	<b>3.7000e-004</b>	<b>19.3946</b>
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**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Convenience Market with Gas	11734.5	1.0857	1.8000e-004	2.0000e-005	1.0965
Place of Worship	55566	5.1412	8.3000e-004	1.0000e-004	5.1920
Strip Mall	140265	12.9779	2.1000e-003	2.5000e-004	13.1062
<b>Total</b>		<b>19.2048</b>	<b>3.1100e-003</b>	<b>3.7000e-004</b>	<b>19.3946</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive 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				



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Consumer Products	0.0839					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0000e-005	0.0000	2.6000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	5.1000e-004	5.1000e-004	0.0000	0.0000	5.4000e-004
<b>Total</b>	<b>0.0952</b>	<b>0.0000</b>	<b>2.6000e-004</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>5.1000e-004</b>	<b>5.1000e-004</b>	<b>0.0000</b>	<b>0.0000</b>	<b>5.4000e-004</b>

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	1.3857	0.0425	1.0200e-003	2.7506
Unmitigated	1.3857	0.0425	1.0200e-003	2.7506

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Convenience	0.0836574	0.0850	2.7400e-003	7.0000e-005	0.1729
Market with Gas	/				
Place of Worship	0.214642 / 0.335722	0.2843	7.0300e-003	1.7000e-004	0.5105
Strip Mall	0.999979 / 0.61289	1.0164	0.0327	7.8000e-004	2.0672
<b>Total</b>		<b>1.3857</b>	<b>0.0425</b>	<b>1.0200e-003</b>	<b>2.7506</b>

**Mitigated**

Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e	
Land Use	Mgal	MT/yr			
Convenience	0.0836574	0.0850	2.7400e-003	7.0000e-005	0.1729
Market with Gas	/				
Place of Worship	0.214642 / 0.335722	0.2843	7.0300e-003	1.7000e-004	0.5105
Strip Mall	0.999979 / 0.61289	1.0164	0.0327	7.8000e-004	2.0672
<b>Total</b>		<b>1.3857</b>	<b>0.0425</b>	<b>1.0200e-003</b>	<b>2.7506</b>

**8.0 Waste Detail**

**8.1 Mitigation Measures Waste**

**Category/Year**



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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	10.8154	0.6392	0.0000	26.7946
Unmitigated	10.8154	0.6392	0.0000	26.7946

**8.2 Waste by Land Use**

**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Place of Worship	39.1	7.9370	0.4691	0.0000	19.6635
Strip Mall	14.18	2.8784	0.1701	0.0000	7.1311
<b>Total</b>		<b>10.8154</b>	<b>0.6392</b>	<b>0.0000</b>	<b>26.7946</b>

**Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**

Land Use	tons	MT/yr			
Place of Worship	39.1	7.9370	0.4691	0.0000	19.6635
Strip Mall	14.18	2.8784	0.1701	0.0000	7.1311
<b>Total</b>		<b>10.8154</b>	<b>0.6392</b>	<b>0.0000</b>	<b>26.7946</b>

**9.0 Operational Offroad**

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

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**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
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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**Attachment 3: EMFAC2021 Emissions and CARB SAFE Off-Model Adjustment Factors**

**CalEEMod Construction Inputs**

Phase	CalEEMod	CalEEMod	Total	Total	CalEEMod	Worker Trip	Vendor Trip	Hauling Trip	Worker Vehicle	Vendor Vehicle	Hauling Vehicle	Worker	Vendor	Hauling
	WORKER	VENDOR	Worker	Vendor	HAULING									
	TRIPS	TRIPS	Trips	Trips	TRIPS									
Demolition	23	0	1012	0	1,291	10.8	7.3	20	LD_Mix	HDT_Mix	HHDT	10929.6	0	25820
Site Preparation	13	0	286	0	0	10.8	7.3	20	LD_Mix	HDT_Mix	HHDT	3088.8	0	0
Grading	23	0	1518	0	2,688	10.8	7.3	20	LD_Mix	HDT_Mix	HHDT	16394.4	0	53760
Trenching	5	0	330	0	0	10.8	7.3	20	LD_Mix	HDT_Mix	HHDT	3564	0	0
Structure	667	209	176088	55176	0	10.8	7.3	7.3	LD_Mix	HDT_Mix	HHDT	1901750	402784.8	0
Building Construction	667	209	102718	32186	6,000	10.8	7.3	7.3	LD_Mix	HDT_Mix	HHDT	1109354	234957.8	43800
Architectural Coating	133	0	19019	0	0	10.8	7.3	20	LD_Mix	HDT_Mix	HHDT	205405.2	0	0
Paving	15	0	645	0	30	10.8	7.3	7.3	LD_Mix	HDT_Mix	HHDT	6966	0	219

**Number of Days Per Year**

2023	1/3/23	12/31/23	363	311
2024	1/1/24	12/31/24	366	314
2025	1/1/25	12/31/25	365	313
			1094	<b>939 Total Workdays</b>

Phase	Start Date	End Date	Days/Week	Workdays
Demolition	1/3/2023	3/3/2023	6	44
Site Preparation	3/4/2023	4/4/2023	6	22
Grading	4/3/2023	7/3/2023	6	66
Trenching	7/2/2023	10/2/2023	6	66
Structure	9/30/2023	10/3/2024	6	264
Building Construction	9/24/2024	4/25/2025	6	154
Architectural Coating	4/22/2025	11/6/2025	6	143
Paving	11/3/2025	12/31/2025	6	43

**Summary of Construction Traffic Emissions (EMFAC2021)**

Pollutants YEAR	ROG	NOx	CO	SO2	Fugitive	Exhaust	PM10	Fugitive	Exhaust	PM2.5	NBio- CO2	CH4	N2O	CO2e
					PM10	PM10	Total	PM2.5	PM2.5	Total				
					<i>Tons</i>									
<b>Criteria Pollutants</b>														
2023	0.1728	0.7787	1.6652	0.0075	0.4395	0.0550	0.4945	0.0661	0.0224	0.0886	725.4747	0.0399	0.0717	747.8250
2024	0.1643	0.7508	1.5791	0.0074	0.4431	0.0551	0.4982	0.0667	0.0223	0.0890	720.7103	0.0387	0.0708	742.7702
2025	0.1560	0.7163	1.4888	0.0073	0.4419	0.0546	0.4965	0.0665	0.0219	0.0884	707.3696	0.0370	0.0690	728.8654
<b>Toxic Air Contaminants (0.5 Mile Trip Length)</b>														
2023	0.1535	0.2618	0.5845	0.0007	0.0218	0.0034	0.0252	0.0033	0.0016	0.0049	67.4277	0.0148	0.0108	71.0083
2024	0.1469	0.2597	0.5607	0.0007	0.0220	0.0034	0.0254	0.0033	0.0016	0.0049	66.8803	0.0144	0.0106	70.4003
2025	0.1404	0.2545	0.5336	0.0007	0.0219	0.0034	0.0253	0.0033	0.0015	0.0048	65.5507	0.0137	0.0103	68.9698

## CalEEMod EMFAC2021 Emission Factors Input

Year 2026

Season	EmissionType	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH	
A	CH4_IDLEX		0	0	0	0	0.005024	0.002901	0.014329	0.224308568	0.007552	0	0	0.077545	0
A	CH4_RUNEX	0.001675	0.00501	0.002402	0.002962	0.006511	0.00591	0.009525	0.111846137	0.009865	0.533854641	0.154451	0.090415	0.009919	
A	CH4_STREX	0.056959	0.091594	0.07317	0.0841	0.020518	0.010947	0.007919	7.49827E-08	0.016116	0.003711567	0.172746	0.004993	0.025168	
A	CO_IDLEX		0	0	0	0	0.193382	0.139764	0.664762	5.153655195	0.53297	0	0	1.729088	0
A	CO_RUNEX	0.577812	1.217819	0.748128	0.813785	0.767637	0.490256	0.257149	0.733099915	0.401188	6.307010922	11.99329	0.836984	0.927158	
A	CO_STREX	2.57526	4.55299	3.265545	3.42337	2.163001	1.175504	0.934813	0.000737725	1.778436	0.497532984	7.931677	0.675054	2.264736	
A	CO2_NBIO_IDLEX		0	0	0	0	8.476906	13.60976	156.6958	795.6699429	88.15791	0	0	188.587	0
A	CO2_NBIO_RUNEX	244.365	328.8861	339.6578	408.0688	747.6667	794.4808	1196.529	1554.973392	1344.054	1064.852599	186.8446	1007.354	1674.317	
A	CO2_NBIO_STREX	63.16695	85.95778	86.56713	103.199	17.33995	9.379616	7.914622	0.013527798	14.24203	3.148221534	46.30646	3.836494	21.6173	
A	NOX_IDLEX		0	0	0	0	0.04434	0.086409	0.837392	4.013652026	0.3605	0	0	1.308491	0
A	NOX_RUNEX	0.030445	0.103441	0.056133	0.074701	0.516639	0.725632	0.906229	1.701647234	0.930849	0.294278253	0.54585	2.244119	1.44219	
A	NOX_STREX	0.208428	0.338338	0.292916	0.34788	0.400976	0.21716	1.391692	2.760133946	0.991531	0.038127875	0.123182	0.502734	0.298756	
A	PM10_IDLEX		0	0	0	0	0.000687	0.001406	0.001445	0.002012959	0.00039	0	0	0.001113	0
A	PM10_PMBW	0.007122	0.009211	0.008856	0.008951	0.077204	0.090087	0.045088	0.081458247	0.049896	0.125580022	0.012	0.044699	0.044944	
A	PM10_PMTW	0.008	0.008	0.008	0.008	0.009418	0.010663	0.012	0.035131691	0.012	0.044105924	0.004	0.010543	0.013261	
A	PM10_RUNEX	0.001081	0.001722	0.001255	0.001258	0.012107	0.020463	0.009635	0.024769283	0.014798	0.005547054	0.001945	0.011633	0.027752	
A	PM10_STREX	0.001791	0.002615	0.002002	0.001984	0.00019	8.13E-05	9.63E-05	3.29375E-07	0.000129	1.21095E-05	0.00347	4.23E-05	0.000281	
A	PM25_IDLEX		0	0	0	0	0.000657	0.001346	0.001382	0.001919468	0.000373	0	0	0.001064	0
A	PM25_PMBW	0.002493	0.003224	0.0031	0.003133	0.027021	0.03153	0.015781	0.028510387	0.017464	0.043953008	0.0042	0.015645	0.01573	
A	PM25_PMTW	0.002	0.002	0.002	0.002	0.002355	0.002666	0.003	0.008782923	0.003	0.011026481	0.001	0.002636	0.003315	
A	PM25_RUNEX	0.000995	0.001585	0.001154	0.00116	0.011546	0.019561	0.00921	0.02369428	0.014149	0.005303299	0.001818	0.011114	0.026508	
A	PM25_STREX	0.001647	0.002404	0.001841	0.001824	0.000174	7.48E-05	8.86E-05	3.02848E-07	0.000118	1.11343E-05	0.003256	3.89E-05	0.000258	
A	ROG_DIURN	0.255064	0.530888	0.279706	0.323614	0.116726	0.060196	0.021313	0.000106002	0.073271	0.010212124	3.854231	0.032962	28.55295	
A	ROG_HTSK	0.073852	0.147903	0.075456	0.084729	0.028726	0.014862	0.005106	3.36143E-05	0.016123	0.003780717	3.558543	0.008313	7.360966	
A	ROG_IDLEX		0	0	0	0	0.020461	0.015058	0.024261	0.32445582	0.04037	0	0	0.189085	0
A	ROG_RESTL	0.255064	0.530888	0.279706	0.323614	0.116726	0.060196	0.021313	0.000106002	0.073271	0.010212124	3.854231	0.032962	28.55295	
A	ROG_RUNEX	0.00622	0.02192	0.009251	0.012187	0.073128	0.102722	0.027662	0.017018907	0.041494	0.059153068	0.991178	0.051281	0.070828	
A	ROG_RUNLS	0.191409	0.414819	0.208857	0.245046	0.165357	0.082688	0.042018	0.000302729	0.081242	0.00798618	3.769688	0.021611	0.176029	
A	ROG_STREX	0.254766	0.459227	0.333189	0.409144	0.100626	0.053154	0.043043	4.06848E-07	0.08541	0.013136414	1.267526	0.028372	0.103602	
A	SO2_IDLEX		0	0	0	0	8.25E-05	0.00013	0.001452	0.006923512	0.000833	0	0	0.001712	0
A	SO2_RUNEX	0.002324	0.003128	0.00323	0.003879	0.0073	0.007651	0.011344	0.014049606	0.012819	0.008586151	0.001847	0.009359	0.016412	
A	SO2_STREX	0.000601	0.000818	0.000823	0.000982	0.000171	9.27E-05	7.82E-05	1.33736E-07	0.000141	3.11234E-05	0.000458	3.79E-05	0.000214	
A	TOG_DIURN	0.255064	0.530888	0.279706	0.323614	0.116726	0.060196	0.021313	0.000106002	0.073271	0.010212124	0.085098	0.032962	28.55295	
A	TOG_HTSK	0.073852	0.147903	0.075456	0.084729	0.028726	0.014862	0.005106	3.36143E-05	0.016123	0.003780717	3.558543	0.008313	7.360966	
A	TOG_IDLEX		0	0	0	0	0.028987	0.020219	0.041853	0.579654551	0.053441	0	0	0.308305	0
A	TOG_RESTL	0.255064	0.530888	0.279706	0.323614	0.116726	0.060196	0.021313	0.000106002	0.073271	0.010212124	0.085098	0.032962	28.55295	
A	TOG_RUNEX	0.009064	0.031971	0.013484	0.017736	0.08958	0.119	0.040924	0.131035808	0.057178	0.601092032	1.200425	0.149659	0.091829	
A	TOG_RUNLS	0.191409	0.414819	0.208857	0.245046	0.165357	0.082688	0.042018	0.000302729	0.081242	0.00798618	3.769688	0.021611	0.176029	
A	TOG_STREX	0.278937	0.502796	0.3648	0.447961	0.110173	0.058197	0.047127	4.45447E-07	0.093513	0.01438272	1.378329	0.031064	0.113431	
A	N2O_IDLEX		0	0	0	0	0.00063	0.00168	0.024186	0.128345993	0.012682	0	0	0.024778	0
A	N2O_RUNEX	0.003678	0.007971	0.005347	0.006983	0.039725	0.080555	0.153578	0.248265947	0.156351	0.163683708	0.038475	0.124	0.068939	
A	N2O_STREX	0.027983	0.036165	0.034432	0.036101	0.033064	0.017628	0.005689	8.0417E-06	0.013951	0.006034849	0.007381	0.004502	0.032161	

**CalEEMod EMFAC2021 Fleet Mix Input**

**Year 2026**

FleetMixLandUseSubType	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments High Rise	0.541057	0.034611	0.227949	0.124011	0.024753	0.006112	0.010991	0.022846	0.001723	0.001247	0.003521	0.00053	0.000649
Enclosed Parking with Elev	0.541057	0.034611	0.227949	0.124011	0.024753	0.006112	0.010991	0.022846	0.001723	0.001247	0.003521	0.00053	0.000649
General Office Building	0.541057	0.034611	0.227949	0.124011	0.024753	0.006112	0.010991	0.022846	0.001723	0.001247	0.003521	0.00053	0.000649
Strip Mall	0.541057	0.034611	0.227949	0.124011	0.024753	0.006112	0.010991	0.022846	0.001723	0.001247	0.003521	0.00053	0.000649

**CalEEMod EMFAC2021 Fleet Mix Input**

**Year 2026**

FleetMixLandUseSubType	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Convenience Market with	0.541057	0.034611	0.227949	0.124011	0.024753	0.006112	0.010991	0.022846	0.001723	0.001247	0.003521	0.00053	0.000649
Place of Worship	0.541057	0.034611	0.227949	0.124011	0.024753	0.006112	0.010991	0.022846	0.001723	0.001247	0.003521	0.00053	0.000649
Strip Mall	0.541057	0.034611	0.227949	0.124011	0.024753	0.006112	0.010991	0.022846	0.001723	0.001247	0.003521	0.00053	0.000649





Source: EMFAC2021 (v1.0.1) Emission Rates

Region: Tule County  
 Calendar Year: 2024  
 Season: Annual

Vehicle Classification: EMFAC2007 Categories

Units: miles/cycle for CVMT and EVMT, Trips/day for Trips, kWh/day for Energy Consumption, g/mile for RUMEX, PMWB and PMTWT, g/strip for STREX, HOTSDAK and RUNIND5, g/vehicle/day for IDEXX and DURIN

Region	Calendar Year	Vehicle Class	Fuel	Population Totals	CVMT	EVMT	Energy Cons.	TRIPS	RUMEX	PMWB	PMTWT	STREX	HOTSDAK	RUNIND5	IDEXX	DURIN	SOX	NOx	PM	PM10	P2+10	P3+10	CO	CH4	N2O	HFC	PFC	SF6	Hexafluoroethane	SOI	NOI	PM10eq	SOIeq	NOIeq	PM10eq	SOIeq	NOIeq	PM10eq	SOIeq	NOIeq
Santa Clara	2024	HHOT	Aggregate	Gasoline	218870	115126	115126	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0





**Attachment 4: Project Construction and Operation Dispersion Modeling  
Inputs and Risk Calculations**

## Construction Health Risk Assessment and Calculations

### Icon-Echo MU, San Jose, CA

Year	Unmitigated	DPM	Unmitigated	Unmitigated	Fug PM2.5	Unmitigated
	DPM	EMFAC2021	Emissions	Fug PM2.5	EMFAC2021	Emissions
2023	0.0334	0.0034	0.0368	0.0722	0.0033	0.0755
2024	0.0844	0.0034	0.0878	0.0000	0.0033	0.0033
2025	0.0979	0.0034	0.1013	0.0000	0.0033	0.0033

Year	Mitigated	DPM	Mitigated	Mitigated	Fug PM2.5	Mitigated
	DPM	EMFAC2021	Emissions	Fug PM2.5	EMFAC2021	Emissions
2023	0.0017	0.0034	0.0051	0.0141	0.0033	0.0174
2024	0.0018	0.0034	0.0052	0.0000	0.0033	0.0033
2025	0.0053	0.0034	0.0087	0.0000	0.0033	0.0033

### Icon-Echo MU, San Jose, CA

#### DPM Construction Emissions and Modeling Emission Rates

Construction Year	Activity	DPM (ton/year)	Source Type	No. Sources	DPM Emissions			Emissions per Point Source
					(lb/yr)	(lb/hr)	(g/s)	(g/s)
2023	Construction	0.0368	Point	149	73.7	0.01967	2.48E-03	1.66E-05
2024	Construction	0.0878	Point	149	175.6	0.04691	5.91E-03	3.97E-05
2025	Construction	0.1013	Point	149	202.6	0.05410	6.82E-03	4.58E-05
<b>Total</b>		<b>0.2259</b>			<b>451.8</b>	<b>0.1207</b>	<b>0.0152</b>	

Emissions assumed to be evenly distributed over each construction areas

hr/day = 12 (7am - 7pm Mon-Sat)  
 days/yr = 312  
 hours/year = 3744

### Icon-Echo MU, San Jose, CA

#### PM2.5 Fugitive Dust Construction Emissions for Modeling

Construction Year	Activity	Area Source	DPM (ton/year)	PM2.5 Emissions			Modeled Area (m <sup>2</sup> )	DPM Emission Rate
				(lb/yr)	(lb/hr)	(g/s)		g/s/m <sup>2</sup>
2023	Construction	CON_FUG	0.0755	151.0	0.04032	5.08E-03	8369.3	6.07E-07
2024	Construction	CON_FUG	0.0033	6.6	0.00177	2.23E-04	8369.3	2.66E-08
2025	Construction	CON_FUG	0.0033	6.6	0.00176	2.22E-04	8369.3	2.65E-08
<b>Total</b>			<b>0.0821</b>	<b>164.2</b>	<b>0.0439</b>	<b>0.0055</b>		

Emissions assumed to be evenly distributed over each construction areas

hr/day = 12 (7am - 7pm Mon-Sat)  
 days/yr = 312  
 hours/year = 3744

### DPM Construction Emissions and Modeling Emission Rates - With Mitigation

Construction Year	Activity	DPM (ton/year)	Source Type	No. Sources	DPM Emissions			Emissions per Point Source
					(lb/yr)	(lb/hr)	(g/s)	(g/s)
2023	Construction	0.0051	Point	149	10.3	0.00274	3.45E-04	2.32E-06
2024	Construction	0.0052	Point	149	10.4	0.00278	3.51E-04	2.35E-06
2025	Construction	0.0087	Point	149	17.4	0.00464	5.85E-04	3.92E-06
<b>Total</b>		<b>0.0190</b>			<b>38.0</b>	<b>0.0102</b>	<b>0.0013</b>	

Emissions assumed to be evenly distributed over each construction areas

hr/day = 12 (7am - 7pm Mon-Sat)  
 days/yr = 312  
 hours/year = 3744

### PM2.5 Fugitive Dust Construction Emissions for Modeling - With Mitigation

Construction Year	Activity	Area Source	PM2.5 Emissions				Modeled Area (m <sup>2</sup> )	DPM Emission Rate
			(ton/year)	(lb/yr)	(lb/hr)	(g/s)		g/s/m <sup>2</sup>
2023	Construction	CON_FUG	0.0174	34.8	0.00929	1.17E-03	8369.3	1.40E-07
2024	Construction	CON_FUG	0.0033	6.6	0.00177	2.23E-04	8369.3	2.66E-08
2025	Construction	CON_FUG	0.0033	6.6	0.00176	2.22E-04	8369.3	2.65E-08
<b>Total</b>			<b>0.0240</b>	<b>48.0</b>	<b>0.0128</b>	<b>0.0016</b>		

Emissions assumed to be evenly distributed over each construction areas

hr/day = 12 (7am - 7pm Mon-Sat)  
 days/yr = 312  
 hours/year = 3744

### Icon-Echo MU, San Jose, CA - Construction Health Impact Modeling

#### Source Parameters for Point Sources Used in Construction Modeling

Source	Stack Height (ft)	Stack Diam (in)	Exhaust Temp (F)	Volume Flow (acfm)	Velocity (ft/min)	Velocity (ft/sec)
Construction Equipment	9.0	2.5	918	632	18540	309.0
Source	Stack Height (m)	Stack Diam (m)	Exhaust Temp (K)			Velocity (ft/sec)
Construction Equipment	2.74	0.064	765.37			94.2

Icon-Echo MU, San Jose, CA - Construction Health Impact Summary

Maximum Impacts at MEI Residential Location - Without Mitigation

Emissions Year	Maximum Concentrations		Cancer Risk* (per million)		Hazard Index (-)	Maximum Annual PM2.5 Concentration* (µg/m <sup>3</sup> )
	Exhaust PM10/DPM (µg/m <sup>3</sup> )	Fugitive PM2.5 (µg/m <sup>3</sup> )	Infant/Child	Adult		
	2023	0.0660			0.1920	11.74
2024	0.1579	0.0084	25.94	0.45	0.03	0.17
2025	0.1822	0.0084	4.71	0.52	0.04	0.19
<b>Total</b>	-	-	<b>42.39</b>	<b>1.2</b>	-	-
<b>Maximum</b>	0.1822	0.1920	-	-	<b>0.04</b>	<b>0.26</b>

Maximum Impacts at MEI Residential Location - With Mitigation

Emissions Year	Maximum Concentrations		Cancer Risk* (per million)		Hazard Index (-)	Maximum Annual PM2.5 Concentration* (µg/m <sup>3</sup> )
	Exhaust PM10/DPM (µg/m <sup>3</sup> )	Fugitive PM2.5 (µg/m <sup>3</sup> )	Infant/Child	Adult		
	2023	0.0092			0.0443	1.64
2024	0.0094	0.0084	1.54	0.03	0.002	0.02
2025	0.0156	0.0084	0.40	0.04	0.003	0.02
<b>Total</b>	-	-	<b>3.58</b>	<b>0.1</b>	-	-
<b>Maximum</b>	0.0156	0.0443	-	-	<b>0.003</b>	<b>0.05</b>

- Tier 4 Final Engine, Electric Cranes and Generators, and Enhanced BMPs Mitigation

Maximum Impacts at Little Einstein's Montessori Preschool

Construction Year	Unmitigated Emissions				
	Maximum Concentrations		Child Cancer Risk (per million)	Hazard Index (-)	Maximum Annual PM2.5 Concentration (µg/m <sup>3</sup> )
	Exhaust PM2.5/DPM (µg/m <sup>3</sup> )	Fugitive PM2.5 (µg/m <sup>3</sup> )			
2023	0.0062	0.0243	0.30	0.001	0.03
2024	0.0148	0.0011	0.73	0.003	0.02
2025	0.0171	0.0011	0.84	0.003	0.02
<b>Total</b>	-	-	<b>1.86</b>	-	-
<b>Maximum</b>	0.0171	0.0243	-	<b>0.003</b>	<b>0.03</b>



**Icon-Echo MU, San Jose, CA - Construction Impacts - Without Mitigation**  
**Maximum DPM Cancer Risk and PM2.5 Calculations From Construction**  
**Maximum Impacts at Off-Site 1st Floor MEI Location - 1.5 meter receptor height**

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)<sup>-1</sup>  
 ASF = Age sensitivity factor for specified age group  
 ED = Exposure duration (years)  
 AT = Averaging time for lifetime cancer risk (years)  
 FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C<sub>air</sub> x DBR x A x (EF/365) x 10<sup>-6</sup>

Where: C<sub>air</sub> = concentration in air (µg/m<sup>3</sup>)  
 DBR = daily breathing rate (L/kg body weight-day)  
 A = Inhalation absorption factor  
 EF = Exposure frequency (days/year)  
 10<sup>-6</sup> = Conversion factor

Values

Age -> Parameter	Infant/Child			Adult
	3rd Trimester	0 - 2	2 - 16	16 - 30
ASF =	10	10	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	572	261
A =	1	1	1	1
EF =	350	350	350	350
AT =	70	70	70	70
FAH =	1.00	1.00	1.00	0.73

\* 95th percentile breathing rates for infants and 80th percentile for children and adults

**Construction Cancer Risk by Year - Maximum Impact Receptor Location**

Exposure Year	Exposure Duration (years)	Age	Infant/Child - Exposure Information			Infant/Child Cancer Risk (per million)	Adult - Exposure Information			Adult Cancer Risk (per million)	Maximum				
			DPM Conc (ug/m3)		Age Sensitivity Factor		Modeled		Age Sensitivity Factor		DPM Conc (ug/m3)	Sensitivity Factor	DPM Conc (ug/m3)	Sensitivity Factor	DPM Conc (ug/m3)
			Year	Annual			Year	Annual							
0	0.25	-0.25 - 0*	2023	0.0104	10	0.14	2023	0.0104	-	-	-	-	-	-	
1	1	0 - 1	2023	0.0104	10	1.70	2023	0.0104	1	0.03	0.0021	0.0413	0.0516		
2	1	1 - 2	2024	0.0248	10	4.07	2024	0.0248	1	0.07	0.0050	0.0018	0.0266		
3	1	2 - 3	2025	0.0286	3	0.74	2025	0.0286	1	0.08	0.0057	0.0018	0.0304		
4	1	3 - 4		0.0000	3	0.00		0.0000	1	0.00					
5	1	4 - 5		0.0000	3	0.00		0.0000	1	0.00					
6	1	5 - 6		0.0000	3	0.00		0.0000	1	0.00					
7	1	6 - 7		0.0000	3	0.00		0.0000	1	0.00					
8	1	7 - 8		0.0000	3	0.00		0.0000	1	0.00					
9	1	8 - 9		0.0000	3	0.00		0.0000	1	0.00					
10	1	9 - 10		0.0000	3	0.00		0.0000	1	0.00					
11	1	10 - 11		0.0000	3	0.00		0.0000	1	0.00					
12	1	11 - 12		0.0000	3	0.00		0.0000	1	0.00					
13	1	12 - 13		0.0000	3	0.00		0.0000	1	0.00					
14	1	13 - 14		0.0000	3	0.00		0.0000	1	0.00					
15	1	14 - 15		0.0000	3	0.00		0.0000	1	0.00					
16	1	15 - 16		0.0000	3	0.00		0.0000	1	0.00					
17	1	16-17		0.0000	1	0.00		0.0000	1	0.00					
18	1	17-18		0.0000	1	0.00		0.0000	1	0.00					
19	1	18-19		0.0000	1	0.00		0.0000	1	0.00					
20	1	19-20		0.0000	1	0.00		0.0000	1	0.00					
21	1	20-21		0.0000	1	0.00		0.0000	1	0.00					
22	1	21-22		0.0000	1	0.00		0.0000	1	0.00					
23	1	22-23		0.0000	1	0.00		0.0000	1	0.00					
24	1	23-24		0.0000	1	0.00		0.0000	1	0.00					
25	1	24-25		0.0000	1	0.00		0.0000	1	0.00					
26	1	25-26		0.0000	1	0.00		0.0000	1	0.00					
27	1	26-27		0.0000	1	0.00		0.0000	1	0.00					
28	1	27-28		0.0000	1	0.00		0.0000	1	0.00					
29	1	28-29		0.0000	1	0.00		0.0000	1	0.00					
30	1	29-30		0.0000	1	0.00		0.0000	1	0.00					
<b>Total Increased Cancer Risk</b>						<b>6.65</b>				<b>0.18</b>					

\* Third trimester of pregnancy

**Icon-Echo MU, San Jose, CA - Construction Impacts - Without Mitigation  
Maximum DPM Cancer Risk and PM2.5 Calculations From Construction  
Impacts at Off-Site MEI Location - 6.1 meter receptor height (2nd Floor Level)**

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)<sup>-1</sup>

ASF = Age sensitivity factor for specified age group

ED = Exposure duration (years)

AT = Averaging time for lifetime cancer risk (years)

FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C<sub>air</sub> x DBR x A x (EF/365) x 10<sup>-6</sup>

Where: C<sub>air</sub> = concentration in air (µg/m<sup>3</sup>)

DBR = daily breathing rate (L/kg body weight-day)

A = Inhalation absorption factor

EF = Exposure frequency (days/year)

10<sup>-6</sup> = Conversion factor

Values

Age -> Parameter	Infant/Child			Adult
	3rd Trimester	0 - 2	2 - 16	16 - 30
ASF =	10	10	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	572	261
A =	1	1	1	1
EF =	350	350	350	350
AT =	70	70	70	70
FAH =	1.00	1.00	1.00	0.73

\* 95th percentile breathing rates for infants and 80th percentile for children and adults

**Construction Cancer Risk by Year - Maximum Impact Receptor Location**

Exposure Year	Exposure Duration (years)	Age	Infant/Child - Exposure Information		Age Sensitivity Factor	Infant/Child Cancer Risk (per million)	Adult - Exposure Information		Adult Cancer Risk (per million)	Maximum			
			DPM Conc (ug/m <sup>3</sup> )				Modeled	Age Sensitivity Factor		Hazard Index	Fugitive PM2.5	Total PM2.5	
			Year	Annual									Year
0	0.25	-0.25 - 0*	2023	0.0660	10	0.90	2023	0.0660	-	-	-	-	-
1	1	0 - 1	2023	0.0660	10	10.85	2023	0.0660	1	0.19	0.0132	0.1920	0.2581
2	1	1 - 2	2024	0.1579	10	25.94	2024	0.1579	1	0.45	0.0316	0.0084	0.1664
3	1	2 - 3	2025	0.1822	3	4.71	2025	0.1822	1	0.52	0.0364	0.0084	0.1906
4	1	3 - 4		0.0000	3	0.00		0.0000	1	0.00			
5	1	4 - 5		0.0000	3	0.00		0.0000	1	0.00			
6	1	5 - 6		0.0000	3	0.00		0.0000	1	0.00			
7	1	6 - 7		0.0000	3	0.00		0.0000	1	0.00			
8	1	7 - 8		0.0000	3	0.00		0.0000	1	0.00			
9	1	8 - 9		0.0000	3	0.00		0.0000	1	0.00			
10	1	9 - 10		0.0000	3	0.00		0.0000	1	0.00			
11	1	10 - 11		0.0000	3	0.00		0.0000	1	0.00			
12	1	11 - 12		0.0000	3	0.00		0.0000	1	0.00			
13	1	12 - 13		0.0000	3	0.00		0.0000	1	0.00			
14	1	13 - 14		0.0000	3	0.00		0.0000	1	0.00			
15	1	14 - 15		0.0000	3	0.00		0.0000	1	0.00			
16	1	15 - 16		0.0000	3	0.00		0.0000	1	0.00			
17	1	16-17		0.0000	1	0.00		0.0000	1	0.00			
18	1	17-18		0.0000	1	0.00		0.0000	1	0.00			
19	1	18-19		0.0000	1	0.00		0.0000	1	0.00			
20	1	19-20		0.0000	1	0.00		0.0000	1	0.00			
21	1	20-21		0.0000	1	0.00		0.0000	1	0.00			
22	1	21-22		0.0000	1	0.00		0.0000	1	0.00			
23	1	22-23		0.0000	1	0.00		0.0000	1	0.00			
24	1	23-24		0.0000	1	0.00		0.0000	1	0.00			
25	1	24-25		0.0000	1	0.00		0.0000	1	0.00			
26	1	25-26		0.0000	1	0.00		0.0000	1	0.00			
27	1	26-27		0.0000	1	0.00		0.0000	1	0.00			
28	1	27-28		0.0000	1	0.00		0.0000	1	0.00			
29	1	28-29		0.0000	1	0.00		0.0000	1	0.00			
30	1	29-30		0.0000	1	0.00		0.0000	1	0.00			
<b>Total Increased Cancer Risk</b>						<b>42.39</b>							

\* Third trimester of pregnancy

**Icon-Echo MU, San Jose, CA - Construction Impacts - Without Mitigation  
Maximum DPM Cancer Risk and PM2.5 Calculations From Construction  
Impacts at Off-Site MEI Location - 9.1 meter receptor height (3rd Floor Level)**

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)<sup>-1</sup>  
 ASF = Age sensitivity factor for specified age group  
 ED = Exposure duration (years)  
 AT = Averaging time for lifetime cancer risk (years)  
 FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C<sub>air</sub> x DBR x A x (EF/365) x 10<sup>-6</sup>

Where: C<sub>air</sub> = concentration in air (µg/m<sup>3</sup>)  
 DBR = daily breathing rate (L/kg body weight-day)  
 A = Inhalation absorption factor  
 EF = Exposure frequency (days/year)  
 10<sup>-6</sup> = Conversion factor

Values

Age -> Parameter	Infant/Child			Adult
	3rd Trimester	0 - 2	2 - 16	16 - 30
ASF =	10	10	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	572	261
A =	1	1	1	1
EF =	350	350	350	350
AT =	70	70	70	70
FAH =	1.00	1.00	1.00	0.73

\* 95th percentile breathing rates for infants and 80th percentile for children and adults

**Construction Cancer Risk by Year - Maximum Impact Receptor Location**

Exposure Year	Exposure Duration (years)	Age	Infant/Child - Exposure Information			Infant/Child Cancer Risk (per million)	Adult - Exposure Information			Adult Cancer Risk (per million)	Maximum		
			DPM Conc (ug/m3)		Age Sensitivity Factor		Modeled		Age Sensitivity Factor		Hazard Index	Fugitive PM2.5	Total PM2.5
			Year	Annual			Year	Annual					
0	0.25	-0.25 - 0*	2023	0.0641	10	0.87	2023	0.0641	-	-			
1	1	0 - 1	2023	0.0641	10	10.52	2023	0.0641	1	0.18	0.0128	0.1226	0.1867
2	1	1 - 2	2024	0.1532	10	25.17	2024	0.1532	1	0.44	0.0306	0.0053	0.1585
3	1	2 - 3	2025	0.1768	3	4.57	2025	0.1768	1	0.51	0.0354	0.0053	0.1821
4	1	3 - 4		0.0000	3	0.00		0.0000	1	0.00			
5	1	4 - 5		0.0000	3	0.00		0.0000	1	0.00			
6	1	5 - 6		0.0000	3	0.00		0.0000	1	0.00			
7	1	6 - 7		0.0000	3	0.00		0.0000	1	0.00			
8	1	7 - 8		0.0000	3	0.00		0.0000	1	0.00			
9	1	8 - 9		0.0000	3	0.00		0.0000	1	0.00			
10	1	9 - 10		0.0000	3	0.00		0.0000	1	0.00			
11	1	10 - 11		0.0000	3	0.00		0.0000	1	0.00			
12	1	11 - 12		0.0000	3	0.00		0.0000	1	0.00			
13	1	12 - 13		0.0000	3	0.00		0.0000	1	0.00			
14	1	13 - 14		0.0000	3	0.00		0.0000	1	0.00			
15	1	14 - 15		0.0000	3	0.00		0.0000	1	0.00			
16	1	15 - 16		0.0000	3	0.00		0.0000	1	0.00			
17	1	16-17		0.0000	1	0.00		0.0000	1	0.00			
18	1	17-18		0.0000	1	0.00		0.0000	1	0.00			
19	1	18-19		0.0000	1	0.00		0.0000	1	0.00			
20	1	19-20		0.0000	1	0.00		0.0000	1	0.00			
21	1	20-21		0.0000	1	0.00		0.0000	1	0.00			
22	1	21-22		0.0000	1	0.00		0.0000	1	0.00			
23	1	22-23		0.0000	1	0.00		0.0000	1	0.00			
24	1	23-24		0.0000	1	0.00		0.0000	1	0.00			
25	1	24-25		0.0000	1	0.00		0.0000	1	0.00			
26	1	25-26		0.0000	1	0.00		0.0000	1	0.00			
27	1	26-27		0.0000	1	0.00		0.0000	1	0.00			
28	1	27-28		0.0000	1	0.00		0.0000	1	0.00			
29	1	28-29		0.0000	1	0.00		0.0000	1	0.00			
30	1	29-30		0.0000	1	0.00		0.0000	1	0.00			
<b>Total Increased Cancer Risk</b>						<b>41.13</b>				<b>1.13</b>			

\* Third trimester of pregnancy

**Icon-Echo MU, San Jose, CA - Construction Impacts - With Mitigation  
Maximum DPM Cancer Risk and PM2.5 Calculations From Construction  
Impacts at Off-Site MEI Location - 6.1 meter receptor height (2nd Floor Level)**

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)<sup>-1</sup>

ASF = Age sensitivity factor for specified age group

ED = Exposure duration (years)

AT = Averaging time for lifetime cancer risk (years)

FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C<sub>air</sub> x DBR x A x (EF/365) x 10<sup>-6</sup>

Where: C<sub>air</sub> = concentration in air (µg/m<sup>3</sup>)

DBR = daily breathing rate (L/kg body weight-day)

A = Inhalation absorption factor

EF = Exposure frequency (days/year)

10<sup>-6</sup> = Conversion factor

Values

Age -> Parameter	Infant/Child			Adult
	3rd Trimester	0 - 2	2 - 16	16 - 30
ASF =	10	10	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	572	261
A =	1	1	1	1
EF =	350	350	350	350
AT =	70	70	70	70
FAH =	1.00	1.00	1.00	0.73

\* 95th percentile breathing rates for infants and 80th percentile for children and adults

**Construction Cancer Risk by Year - Maximum Impact Receptor Location**

Exposure Year	Exposure Duration (years)	Age	Infant/Child - Exposure Information			Infant/Child Cancer Risk (per million)	Adult - Exposure Information			Adult Cancer Risk (per million)	Maximum				
			DPM Conc (ug/m <sup>3</sup> )		Age Sensitivity Factor		Modeled		Age Sensitivity Factor		DPM Conc (ug/m <sup>3</sup> )	Sensitivity Factor	DPM Conc (ug/m <sup>3</sup> )	Fugitive PM2.5	Total PM2.5
			Year	Annual			Year	Annual							
0	0.25	-0.25 - 0*	2023	0.0092	10	0.13	2023	0.0092	-	-					
1	1	0 - 1	2023	0.0092	10	1.52	2023	0.0092	1	0.03	0.0018	0.0443	0.0535		
2	1	1 - 2	2024	0.0094	10	1.54	2024	0.0094	1	0.03	0.0019	0.0084	0.0178		
3	1	2 - 3	2025	0.0156	3	0.40	2025	0.0156	1	0.04	0.0031	0.0084	0.0240		
4	1	3 - 4		0.0000	3	0.00		0.0000	1	0.00					
5	1	4 - 5		0.0000	3	0.00		0.0000	1	0.00					
6	1	5 - 6		0.0000	3	0.00		0.0000	1	0.00					
7	1	6 - 7		0.0000	3	0.00		0.0000	1	0.00					
8	1	7 - 8		0.0000	3	0.00		0.0000	1	0.00					
9	1	8 - 9		0.0000	3	0.00		0.0000	1	0.00					
10	1	9 - 10		0.0000	3	0.00		0.0000	1	0.00					
11	1	10 - 11		0.0000	3	0.00		0.0000	1	0.00					
12	1	11 - 12		0.0000	3	0.00		0.0000	1	0.00					
13	1	12 - 13		0.0000	3	0.00		0.0000	1	0.00					
14	1	13 - 14		0.0000	3	0.00		0.0000	1	0.00					
15	1	14 - 15		0.0000	3	0.00		0.0000	1	0.00					
16	1	15 - 16		0.0000	3	0.00		0.0000	1	0.00					
17	1	16-17		0.0000	1	0.00		0.0000	1	0.00					
18	1	17-18		0.0000	1	0.00		0.0000	1	0.00					
19	1	18-19		0.0000	1	0.00		0.0000	1	0.00					
20	1	19-20		0.0000	1	0.00		0.0000	1	0.00					
21	1	20-21		0.0000	1	0.00		0.0000	1	0.00					
22	1	21-22		0.0000	1	0.00		0.0000	1	0.00					
23	1	22-23		0.0000	1	0.00		0.0000	1	0.00					
24	1	23-24		0.0000	1	0.00		0.0000	1	0.00					
25	1	24-25		0.0000	1	0.00		0.0000	1	0.00					
26	1	25-26		0.0000	1	0.00		0.0000	1	0.00					
27	1	26-27		0.0000	1	0.00		0.0000	1	0.00					
28	1	27-28		0.0000	1	0.00		0.0000	1	0.00					
29	1	28-29		0.0000	1	0.00		0.0000	1	0.00					
30	1	29-30		0.0000	1	0.00		0.0000	1	0.00					
<b>Total Increased Cancer Risk</b>						<b>3.6</b>									

\* Third trimester of pregnancy

**Icon-Echo MU, San Jose, CA - Construction Impacts - Without Mitigation  
 Maximum DPM Cancer Risk and PM2.5 Calculations From Construction  
 Impacts at Little Einstein's Montessori Preschool (+2 years old) - 1 meter - Child Exposure**

Student Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)<sup>-1</sup>  
 ASF = Age sensitivity factor for specified age group  
 ED = Exposure duration (years)  
 AT = Averaging time for lifetime cancer risk (years)

Inhalation Dose = C<sub>air</sub> x SAF x 8-Hr BR x A x (EF/365) x 10<sup>-6</sup>

Where: C<sub>air</sub> = concentration in air (µg/m<sup>3</sup>)  
 SAF = Student Adjustment Factor (unitless)  
 = (24 hrs/12 hrs) x (7 days/6 days) x (10/8) = 2.92  
 8-Hr BR = Eight-hour breathing rate (L/kg body weight-per 8 hrs)  
 A = Inhalation absorption factor  
 EF = Exposure frequency (days/year)  
 10<sup>-6</sup> = Conversion factor

**Values**

	Infant	School Child	Adult
Age -->	0 - <2	2 - <16	16 - 30
Parameter			
ASF =	10	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00
8-Hr BR* =	1200	520	240
A =	1	1	1
EF =	250	250	250
AT =	70	70	70
SAF =	1.00	2.92	1.00

\* 95th percentile 8-hr breathing rates for moderate intensity activities

**Construction Cancer Risk by Year - Maximum Preschool Impact Receptor Location**

Exposure Year	Exposure Duration (years)	Age	Child - Exposure Information		Age* Sensitivity Factor	Child Cancer Risk (per million)
			DPM Conc (ug/m3)			
			Year	Annual		
1	1	2 - 3	2023	0.0062	3	0.3
2	1	3 - 4	2024	0.0148	3	0.7
3	1	4 - 5	2025	0.0171	3	0.8
4	1			0.0000	3	0.0
5	1			0.0000	3	0.0
6	1			0.0000	3	0.0
7	1			0.0000	3	0.0
8	1			0.0000	3	0.0
9	1			0.0000	3	0.0
<b>Total Increased Cancer Risk</b>						<b>1.86</b>

\* Children assumed to be 2 years of age or older with 3 years of Construction Exposure

Maximum		
Hazard Index	Fugitive PM2.5	Total PM2.5
0.0012	0.0243	0.0304
0.0030	0.00106	0.0159
0.0034	0.00106	0.0181

**Icon-Echo MU, San Jose, CA - Construction Impacts - Without Mitigation  
 Maximum DPM Cancer Risk and PM2.5 Calculations From Construction  
 Impacts at Horace Mann Elementary School (+2 years old) - 1 meter - Child Exposure**

Student Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)<sup>-1</sup>  
 ASF = Age sensitivity factor for specified age group  
 ED = Exposure duration (years)  
 AT = Averaging time for lifetime cancer risk (years)

Inhalation Dose = C<sub>air</sub> x SAF x 8-Hr BR x A x (EF/365) x 10<sup>-6</sup>

Where: C<sub>air</sub> = concentration in air (µg/m<sup>3</sup>)  
 SAF = Student Adjustment Factor (unitless)  
 = (24 hrs/12 hrs) x (7 days/6 days) x (10/8) = 2.92  
 8-Hr BR = Eight-hour breathing rate (L/kg body weight-per 8 hrs)  
 A = Inhalation absorption factor  
 EF = Exposure frequency (days/year)  
 10<sup>-6</sup> = Conversion factor

**Values**

	Infant	School Child	Adult
Age -->	0 - <2	2 - <16	16 - 30
Parameter			
ASF =	10	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00
8-Hr BR* =	1200	520	240
A =	1	1	1
EF =	250	250	250
AT =	70	70	70
SAF =	1.00	2.92	1.00

\* 95th percentile 8-hr breathing rates for moderate intensity activities

**Construction Cancer Risk by Year - Maximum Elementary School Impact Receptor Location**

Exposure Year	Exposure Duration (years)	Age	Child - Exposure Information		Age* Sensitivity Factor	Child Cancer Risk (per million)
			DPM Conc (ug/m3)			
			Year	Annual		
1	1	2 - 3	2023	0.0021	3	0.1
2	1	3 - 4	2024	0.0050	3	0.2
3	1	4 - 5	2025	0.0058	3	0.3
4	1			0.0000	3	0.0
5	1			0.0000	3	0.0
6	1			0.0000	3	0.0
7	1			0.0000	3	0.0
8	1			0.0000	3	0.0
9	1			0.0000	3	0.0
<b>Total Increased Cancer Risk</b>						<b>0.63</b>

Maximum		
Hazard Index	Fugitive PM2.5	Total PM2.5
0.0004	0.0074	0.0095
0.0010	0.00032	0.0053
0.0012	0.00032	0.0061

\* Children assumed to be 2 years of age or older with 3 years of Construction Exposure

# Project Traffic Health Risk Assessment and Calculations

## CT-EMFAC2017 Emissions Factors for Project Traffic on N. 4<sup>th</sup> Street for 2026

File Name: 2026 Icon Echo MU - Santa Clara (SF) - 2026 - Annual.EF  
 CT-EMFAC2017 Version: 1.0.2.27401  
 Run Date: 6/8/2021 16:17  
 Area: Santa Clara (SF)  
 Analysis Year: 2026  
 Season: Annual

Vehicle Category	VMT	Diesel VMT	Gas VMT
	Fraction	Fraction	Fraction
	Across	Within	Within
	Category	Category	Category
Truck 1	0.015	0.508	0.492
Truck 2	0.02	0.935	0.049
Non-Truck	0.965	0.015	0.949

Road Type: Major/Collector  
 Silt Loading Factor: CARB 0.032 g/m2  
 Precipitation Correction: CARB P = 64 days N = 365 days

### Fleet Average Running Exhaust Emission Factors (grams/veh-mile)

Pollutant Name	<= 5 mph	10 mph	15 mph	20 mph	25 mph	30 mph	35 mph	40 mph
PM2.5	0.008121	0.005263	0.003569	0.002552	0.001935	0.001561	0.001341	0.001228
TOG	0.164195	0.107707	0.072399	0.051278	0.038871	0.031092	0.026106	0.02299
Diesel PM	0.000735	0.000612	0.000478	0.000385	0.000334	0.000314	0.000317	0.000341

### Fleet Average Running Loss Emission Factors (grams/veh-hour)

Pollutant Name	Emission Factor
TOG	1.210741

### Fleet Average Tire Wear Factors (grams/veh-mile)

Pollutant Name	Emission Factor
PM2.5	0.002109

### Fleet Average Brake Wear Factors (grams/veh-mile)

Pollutant Name	Emission Factor
PM2.5	0.016799

### Fleet Average Road Dust Factors (grams/veh-mile)

Pollutant Name	Emission Factor
PM2.5	0.014818

=====**END**=====

## N. 4<sup>th</sup> Street Emissions and Health Risk Calculations

Icon-Echo MU, San Jose - Offsite Residential Roadway Modeling

Project Operation - 4th Street

DPM Modeling - Roadway Links, Traffic Volumes, and DPM Emissions

Year = 2026

Road Link	Description	Direction	No. Lanes	Link Length (m)	Link Length (mi)	Link Width (m)	Link Width (ft)	Release Height (m)	Average Speed (mph)	Average Vehicles per Day
DPM 4th	4th Street	SB	2	191.5	0.12	13.3	43.7	3.4	20	3,489

### Emission Factors - DPM

Speed Category	1	2	3	4
Travel Speed (mph)	20			
Emissions per Vehicle (g/VMT)	0.00039			

Emission Factors from CT-EMFAC2017

### 2026 Hourly Traffic Volumes and DPM Emissions - DPM\_4th

Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s
1	3.98%	139	1.77E-06	9	6.44%	225	2.86E-06	17	5.53%	193	2.45E-06
2	2.67%	93	1.19E-06	10	7.40%	258	3.28E-06	18	3.14%	110	1.40E-06
3	2.84%	99	1.26E-06	11	6.32%	220	2.80E-06	19	2.35%	82	1.04E-06
4	3.30%	115	1.46E-06	12	6.88%	240	3.06E-06	20	0.86%	30	3.82E-07
5	2.16%	75	9.59E-07	13	6.27%	219	2.78E-06	21	3.08%	107	1.37E-06
6	3.30%	115	1.46E-06	14	6.21%	217	2.76E-06	22	4.21%	147	1.87E-06
7	6.03%	210	2.68E-06	15	5.13%	179	2.28E-06	23	2.62%	91	1.16E-06
8	4.56%	159	2.03E-06	16	3.88%	135	1.72E-06	24	0.85%	30	3.78E-07
Total										3,489	



Icon-Echo MU, San Jose - Offsite Residential Roadway Modeling  
 Project Operation - 4th Street  
 PM2.5 Modeling - Roadway Links, Traffic Volumes, and PM2.5 Emissions  
 Year = 2026

Road Link	Description	Direction	No. Lanes	Link Length (m)	Link Length (mi)	Link Width (m)	Link Width (ft)	Release Height (m)	Average Speed (mph)	Average Vehicles per Day
PM25_4th	4th Street	SB	2	191.5	0.12	13.3	44	1.3	20	3,489

Emission Factors - PM2.5

Speed Category	1	2	3	4
Travel Speed (mph)	20			
Emissions per Vehicle (g/VMT)	0.002552			

Emission Factors from CT-EMFAC2017

2026 Hourly Traffic Volumes and PM2.5 Emissions - PM25\_4th

Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s
1	1.15%	40	3.38E-06	9	7.11%	248	2.09E-05	17	7.38%	258	2.17E-05
2	0.42%	15	1.24E-06	10	4.39%	153	1.29E-05	18	8.18%	285	2.41E-05
3	0.41%	14	1.19E-06	11	4.66%	163	1.37E-05	19	5.70%	199	1.68E-05
4	0.26%	9	7.67E-07	12	5.89%	205	1.73E-05	20	4.27%	149	1.26E-05
5	0.50%	17	1.47E-06	13	6.15%	215	1.81E-05	21	3.26%	114	9.59E-06
6	0.90%	32	2.66E-06	14	6.04%	211	1.78E-05	22	3.30%	115	9.71E-06
7	3.79%	132	1.11E-05	15	7.01%	245	2.06E-05	23	2.46%	86	7.25E-06
8	7.76%	271	2.28E-05	16	7.14%	249	2.10E-05	24	1.87%	65	5.49E-06
Total										3,489	

Icon-Echo MU, San Jose - Offsite Residential Roadway Modeling  
 Project Operation - 4th Street  
 TOG Exhaust Modeling - Roadway Links, Traffic Volumes, and TOG Exhaust Emissions  
 Year = 2026

Road Link	Description	Direction	No. Lanes	Link Length (m)	Link Length (mi)	Link Width (m)	Link Width (ft)	Release Height (m)	Average Speed (mph)	Average Vehicles per Day
TEXH_4th	4th Street	SB	2	191.5	0.12	13.3	44	1.3	20	3,489

Emission Factors - TOG Exhaust

Speed Category	1	2	3	4
Travel Speed (mph)	20			
Emissions per Vehicle (g/VMT)	0.05128			

Emission Factors from CT-EMFAC2017

2026 Hourly Traffic Volumes and TOG Exhaust Emissions - TEXH\_4th

Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s
1	1.15%	40	6.80E-05	9	7.11%	248	4.21E-04	17	7.38%	258	4.37E-04
2	0.42%	15	2.49E-05	10	4.39%	153	2.59E-04	18	8.18%	285	4.84E-04
3	0.41%	14	2.40E-05	11	4.66%	163	2.76E-04	19	5.70%	199	3.37E-04
4	0.26%	9	1.54E-05	12	5.89%	205	3.48E-04	20	4.27%	149	2.53E-04
5	0.50%	17	2.95E-05	13	6.15%	215	3.64E-04	21	3.26%	114	1.93E-04
6	0.90%	32	5.35E-05	14	6.04%	211	3.57E-04	22	3.30%	115	1.95E-04
7	3.79%	132	2.24E-04	15	7.01%	245	4.15E-04	23	2.46%	86	1.46E-04
8	7.76%	271	4.59E-04	16	7.14%	249	4.22E-04	24	1.87%	65	1.10E-04
Total										3,489	

Icon-Echo MU, San Jose - Offsite Residential Roadway Modeling

Project Operation - 4th Street

TOG Evaporative Emissions Modeling - Roadway Links, Traffic Volumes, and TOG Evaporative Emissions

Year = 2026

Road Link	Description	Direction	No. Lanes	Link Length (m)	Link Length (mi)	Link Width (m)	Link Width (ft)	Release Height (m)	Average Speed (mph)	Average Vehicles per Day
TEVAP 4th	4th Street	SB	2	191.5	0.12	13.3	44	1.3	20	3,489

Emission Factors - PM2.5 - Evaporative TOG

Speed Category	1	2	3	4
Travel Speed (mph)	20			
Emissions per Vehicle per Hour (g/hour)	1.21074			
Emissions per Vehicle per Mile (g/VMT)	0.06054			

Emission Factors from CT-EMFAC2017

2026 Hourly Traffic Volumes and TOG Evaporative Emissions - TEVAP\_4th

Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s
1	1.15%	40	8.03E-05	9	7.11%	248	4.97E-04	17	7.38%	258	5.16E-04
2	0.42%	15	2.94E-05	10	4.39%	153	3.06E-04	18	8.18%	285	5.71E-04
3	0.41%	14	2.83E-05	11	4.66%	163	3.26E-04	19	5.70%	199	3.98E-04
4	0.26%	9	1.82E-05	12	5.89%	205	4.11E-04	20	4.27%	149	2.98E-04
5	0.50%	17	3.48E-05	13	6.15%	215	4.30E-04	21	3.26%	114	2.27E-04
6	0.90%	32	6.31E-05	14	6.04%	211	4.21E-04	22	3.30%	115	2.30E-04
7	3.79%	132	2.64E-04	15	7.01%	245	4.90E-04	23	2.46%	86	1.72E-04
8	7.76%	271	5.42E-04	16	7.14%	249	4.98E-04	24	1.87%	65	1.30E-04
Total										3,489	

Icon-Echo MU, San Jose - Offsite Residential Roadway Modeling  
 Project Operation - 4th Street  
 Fugitive Road PM2.5 Modeling - Roadway Links, Traffic Volumes, and Fugitive Road PM2.5 Emissions  
 Year = 2026

Road Link	Description	Direction	No. Lanes	Link Length (m)	Link Length (mi)	Link Width (m)	Link Width (ft)	Release Height (m)	Average Speed (mph)	Average Vehicles per Day
FUG 4th	4th Street	SB	2	191.5	0.12	13.3	44	1.3	20	3,489

Emission Factors - Fugitive PM2.5

Speed Category	1	2	3	4
Travel Speed (mph)	20			
Tire Wear - Emissions per Vehicle (g/VMT)	0.00211			
Brake Wear - Emissions per Vehicle (g/VMT)	0.01680			
Road Dust - Emissions per Vehicle (g/VMT)	0.01482			
<b>Total Fugitive PM2.5 - Emissions per Vehicle (g/VMT)</b>	<b>0.03373</b>			

Emission Factors from CT-EMFAC2017

2026 Hourly Traffic Volumes and Fugitive PM2.5 Emissions - FUG\_4th

Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s
1	1.15%	40	4.47E-05	9	7.11%	248	2.77E-04	17	7.38%	258	2.87E-04
2	0.42%	15	1.64E-05	10	4.39%	153	1.71E-04	18	8.18%	285	3.18E-04
3	0.41%	14	1.58E-05	11	4.66%	163	1.81E-04	19	5.70%	199	2.22E-04
4	0.26%	9	1.01E-05	12	5.89%	205	2.29E-04	20	4.27%	149	1.66E-04
5	0.50%	17	1.94E-05	13	6.15%	215	2.39E-04	21	3.26%	114	1.27E-04
6	0.90%	32	3.52E-05	14	6.04%	211	2.35E-04	22	3.30%	115	1.28E-04
7	3.79%	132	1.47E-04	15	7.01%	245	2.73E-04	23	2.46%	86	9.58E-05
8	7.76%	271	3.02E-04	16	7.14%	249	2.78E-04	24	1.87%	65	7.26E-05
<b>Total</b>										<b>3,489</b>	

**Icon-Echo MU, San Jose, CA - 4th Street Traffic - TACs & PM2.5  
 AERMOD Risk Modeling Parameters and Maximum Concentrations - Project Traffic  
 at Construction MEI Receptor (6.1 m receptor height)**

**Emission Year** 2026  
**Receptor Information** Construction MEI receptor  
 Number of Receptors 1  
 Receptor Height 6.1 meters  
 Receptor Distances At Construction MEI location

**Meteorological Conditions**  
 BAQMD San Jose Airport Met Data 2013-2017  
 Land Use Classification Urban  
 Wind Speed Variable  
 Wind Direction Variable

**Construction MEI Cancer Risk Maximum Concentrations**

Meteorological Data Years	Concentration (µg/m3)		
	DPM	Exhaust TOG	Evaporative TOG
2013-2017	0.00008	0.00848	0.01003

2nd Floor

**Construction MEI PM2.5 Maximum Concentrations**

Meteorological Data Years	PM2.5 Concentration (µg/m3)		
	Total PM2.5	Fugitive PM2.5	Vehicle PM2.5
2013-2017	0.0060	0.00558	0.00042

2nd Floor

**Icon-Echo MU, San Jose, CA - 4th Street Cancer Risk**  
**Impacts at Construction MEI - 6.1 meter receptor height (2nd floor)**  
**27 Year Residential Exposure - Project Traffic**

**Cancer Risk Calculation Method**

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)<sup>-1</sup>  
 ASF = Age sensitivity factor for specified age group  
 ED = Exposure duration (years)  
 AT = Averaging time for lifetime cancer risk (years)  
 FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C<sub>air</sub> x DBR x A x (EF/365) x 10<sup>6</sup>

Where: C<sub>air</sub> = concentration in air (µg/m<sup>3</sup>)  
 DBR = daily breathing rate (L/kg body weight-day)  
 A = Inhalation absorption factor  
 EF = Exposure frequency (days/year)  
 10<sup>6</sup> = Conversion factor

**Cancer Potency Factors (mg/kg-day)<sup>-1</sup>**

TAC	CPF
DPM	1.10E+00
Vehicle TOG Exhaust	6.28E-03
Vehicle TOG Evaporative	3.70E-04

**Values**

Age ->	Infant/Child			Adult
	3rd Trimester	0 - 2	2 - 16	16 - 30
Parameter				
ASF =	10	10	3	1
DBR* =	361	1090	572	261
A =	1	1	1	1
EF =	350	350	350	350
AT =	70	70	70	70
FAH =	0.85	0.85	0.72	0.73

\* 95th percentile breathing rates for infants and 80th percentile for children and adults

**Construction Cancer Risk by Year - Maximum Impact Receptor Location**

Exposure Year	Maximum - Exposure Information				Concentration (ug/m3)			Cancer Risk (per million)			TOTAL
	Exposure Duration (years)	Age	Year	Age Sensitivity Factor	DPM	Exhaust TOG	Evaporative TOG	DPM	Exhaust TOG	Evaporative TOG	
1	1	0 - 1	2023	10	0.00000	0.0000	0.0000	0.000	0.000	0.00000	0.00
2	1	1 - 2	2024	10	0.00000	0.0000	0.0000	0.000	0.000	0.00000	0.00
3	1	2 - 3	2025	3	0.00000	0.0000	0.0000	0.000	0.000	0.00000	0.00
4	1	3 - 4	2026	3	0.00008	0.0085	0.0100	0.001	0.001	0.0001	0.00
5	1	4 - 5	2027	3	0.00008	0.0085	0.0100	0.001	0.001	0.0001	0.00
6	1	5 - 6	2028	3	0.00008	0.0085	0.0100	0.001	0.001	0.0001	0.00
7	1	6 - 7	2029	3	0.00008	0.0085	0.0100	0.001	0.001	0.0001	0.00
8	1	7 - 8	2030	3	0.00008	0.0085	0.0100	0.001	0.001	0.0001	0.00
9	1	8 - 9	2031	3	0.00008	0.0085	0.0100	0.001	0.001	0.0001	0.00
10	1	9 - 10	2032	3	0.00008	0.0085	0.0100	0.001	0.001	0.0001	0.00
11	1	10 - 11	2033	3	0.00008	0.0085	0.0100	0.001	0.001	0.0001	0.00
12	1	11 - 12	2034	3	0.00008	0.0085	0.0100	0.001	0.001	0.0001	0.00
13	1	12 - 13	2035	3	0.00008	0.0085	0.0100	0.001	0.001	0.0001	0.00
14	1	13 - 14	2036	3	0.00008	0.0085	0.0100	0.001	0.001	0.0001	0.00
15	1	14 - 15	2037	3	0.00008	0.0085	0.0100	0.001	0.001	0.0001	0.00
16	1	15 - 16	2038	3	0.00008	0.0085	0.0100	0.001	0.001	0.0001	0.00
17	1	16 - 17	2039	1	0.00008	0.0085	0.0100	0.000	0.000	0.00000	0.00
18	1	17 - 18	2040	1	0.00008	0.0085	0.0100	0.000	0.000	0.00000	0.00
19	1	18 - 19	2041	1	0.00008	0.0085	0.0100	0.000	0.000	0.00000	0.00
20	1	19 - 20	2042	1	0.00008	0.0085	0.0100	0.000	0.000	0.00000	0.00
21	1	20 - 21	2043	1	0.00008	0.0085	0.0100	0.000	0.000	0.00000	0.00
22	1	21 - 22	2044	1	0.00008	0.0085	0.0100	0.000	0.000	0.00000	0.00
23	1	22 - 23	2045	1	0.00008	0.0085	0.0100	0.000	0.000	0.00000	0.00
24	1	23 - 24	2046	1	0.00008	0.0085	0.0100	0.000	0.000	0.00000	0.00
25	1	24 - 25	2047	1	0.00008	0.0085	0.0100	0.000	0.000	0.00000	0.00
26	1	25 - 26	2048	1	0.00008	0.0085	0.0100	0.000	0.000	0.00000	0.00
27	1	26 - 27	2049	1	0.00008	0.0085	0.0100	0.000	0.000	0.00000	0.00
28	1	27 - 28	2050	1	0.00008	0.0085	0.0100	0.000	0.000	0.00000	0.00
29	1	28 - 29	2051	1	0.00008	0.0085	0.0100	0.000	0.000	0.00000	0.00
30	1	29 - 30	2052	1	0.00008	0.0085	0.0100	0.000	0.000	0.00000	0.00
<b>Total Increased Cancer Risk</b>								0.02	0.014	0.001	<b>0.04</b>

\* Third trimester of pregnancy

Maximum  
 Hazard Index 0.00002  
 Fugitive PM2.5 0.006  
 Total PM2.5 0.006

**Icon-Echo MU, San Jose, CA - 4th Street Traffic - TACs & PM2.5  
 Maximum Cancer Risk and PM2.5 Concentration  
 AERMOD Risk Modeling Parameters and Maximum Concentrations  
 Impacts at Little Einstein's Montessori Preschool, 4-Year Child Exposure - 1 meter**

**Emissions Years** 2026  
**Receptor Information**  
 Number of Receptors 1  
 Receptor Height = 1.0 meters  
 Receptor distances = at preschool site

**Meteorological Conditions**

BAAQMD San Jose Airport Met Data 2013-2017  
 Land Use Classification urban  
 Wind speed = variable  
 Wind direction = variable

Emission Years	Concentration ( $\mu\text{g}/\text{m}^3$ )		
	DPM	Exhaust TOG	Evaporative TOG
2026	0.00005	0.00723	0.00855

Emission Years	PM2.5 Concentrations ( $\mu\text{g}/\text{m}^3$ )		
	Total PM2.5	Fugitive PM2.5	Vehicle PM2.5
2026	0.0051	0.00476	0.00036

<b>Maximum School Child PM2.5 Concentration (<math>\mu\text{g}/\text{m}^3</math>)* = 0.001</b>
--

\* Concentration adjusted for exposure duration at school

**Icon-Echo MU, San Jose, CA - 4th Street Cancer Risk**

**Maximum Child Cancer Risk**

**Child Exposures (1.0 meter receptor heights)**

**Impacts at Little Einstein's Montessori Preschool, 4-Year Child Exposure - 1 meter**

**Cancer Risk Calculation Method**

Student Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x 1.0E6

- Where: CPF = Cancer potency factor (mg/kg-day)<sup>-1</sup>
- ASF = Age sensitivity factor for specified age group
- ED = Exposure duration (years)
- AT = Averaging time for lifetime cancer risk (years)

Inhalation Dose = C<sub>air</sub> x SAF x 8hr BR x A x (EF/365) x 10<sup>-6</sup>

- Where: C<sub>air</sub> = concentration in air (µg/m<sup>3</sup>)
- SAF = School Adjustment Factor (unitless) for source operation and exposures different than 8 hours/day  
= (24/SHR) x (7days/SDay) x (ScHR/8 hrs)
- SHR = Hours of emission source operation
- SDay = Modeled number of days per week of source operation
- ScHR = School operation hours while emission source in operation
- 8-Hr BR = Eight-hour breathing rate (L/kg body weight-per 8 hrs)
- A = Inhalation absorption factor
- 10<sup>-6</sup> = Conversion factor

**Values**

**Cancer Potency Factors (mg/kg-day)<sup>-1</sup>**

TAC	CPF
DPM	1.10E+00
Vehicle TOG Exhaust	6.28E-03
Vehicle TOG Evaporative	3.70E-04

Age ->	Child
	2 - <16
Parameter	
ASF	3
8-Hr BR* =	520
ScHR** =	10.00
SHR =	24
SDay =	7
A =	1
EF =	250
AT =	70
SAF =	1.25

\* 95th percentile 8-hr breathing rates for moderate intensity activities

\*\* ScHR based on 10 hours school day

**Road Traffic Cancer Risk by Year - Maximum Impact Receptor Location**

Exposure	Year	Exposure Duration (years)	Age	Maximum - Exposure Information			Cancer Risk (per million)				Hazard Index	
				Age Sensitivity Factor	Annual TAC Conc (ug/m <sup>3</sup> )			DPM	TOG Exhaust	TOG Evaporative		Total
					DPM	TOG	TOG					
1	2026	1	2 - 3	3	0.0001	0.0072	0.0086	0.0010	0.0009	0.0001	0.0020	0.00001
2	2027	1	3 - 4	3	0.0001	0.0072	0.0086	0.0010	0.0009	0.0001	0.0020	
3	2028	1	4 - 5	3	0.0001	0.0072	0.0086	0.0010	0.0009	0.0001	0.0020	
4	2029	1	5 - 6	3	0.0001	0.0072	0.0086	0.0010	0.0009	0.0001	0.0020	
<b>Total Increased Cancer Risk</b>								0.0042	0.0078	0.0005	<b>0.013</b>	



**Icon-Echo MU, San Jose, CA - 4th Street Traffic - TACs & PM2.5  
 Maximum Cancer Risk and PM2.5 Concentration  
 AERMOD Risk Modeling Parameters and Maximum Concentrations  
 Impacts at Horace Mann Elementary School, 9-Year Child Exposure - 1 meter**

**Emissions Years** 2026  
**Receptor Information**  
 Number of Receptors 24  
 Receptor Height = 1.0 meters  
 Receptor distances = receptors within in school area

**Meteorological Conditions**  
 BAAQMD San Jose Airport Met Data 2013-2017  
 Land Use Classification urban  
 Wind speed = variable  
 Wind direction = variable

Emission Years	Concentration ( $\mu\text{g}/\text{m}^3$ )		
	DPM	Exhaust TOG	Evaporative TOG
2026	0.00002	0.00192	0.00227

Emission Years	PM2.5 Concentrations ( $\mu\text{g}/\text{m}^3$ )		
	Total PM2.5	Fugitive PM2.5	Vehicle PM2.5
2026	0.00136	0.00126	0.00010

<b>Maximum School Child PM2.5 Concentration (<math>\mu\text{g}/\text{m}^3</math>)* = 0.0004</b>
---

\* Concentration adjusted for exposure duration at school

**Icon-Echo MU, San Jose, CA - 4th Street Cancer Risk**  
**Maximum Child Cancer Risk - Horace Mann Elementary School**  
**Child Exposures (1.0 meter receptor heights)**  
**Impacts at Horace Mann Elementary School, 9-Year Child Exposure - 1 meter**

**Cancer Risk Calculation Method**

Student Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)<sup>-1</sup>  
 ASF = Age sensitivity factor for specified age group  
 ED = Exposure duration (years)  
 AT = Averaging time for lifetime cancer risk (years)

Inhalation Dose = C<sub>air</sub> x SAF x 8hr BR x A x (EF/365) x 10<sup>-6</sup>

Where: C<sub>air</sub> = concentration in air (µg/m<sup>3</sup>)  
 SAF = School Adjustment Factor (unitless) for source operation and exposures different than 8 hours/day  
 = (24/SHR) x (7days/SDay) x (ScHR/8 hrs)  
 SHR = Hours of emission source operation  
 SDay = Modeled number of days per week of source operation  
 ScHR = School operation hours while emission source in operation  
 8-Hr BR = Eight-hour breathing rate (L/kg body weight-per 8 hrs)  
 A = Inhalation absorption factor  
 10<sup>-6</sup> = Conversion factor

**Values**

**Cancer Potency Factors (mg/kg-day)<sup>-1</sup>**

TAC	CPF
DPM	1.10E+00
Vehicle TOG Exhaust	6.28E-03
Vehicle TOG Evaporative	3.70E-04

Child	
Age ->	2 - <16
Parameter	
ASF	3
8-Hr BR* =	520
ScHR** =	10
SDay =	7
SHR =	24
A =	1
EF =	250
AT =	70
SAF =	1.25

\* 95th percentile 8-hr breathing rates for moderate intensity activities

\*\* ScHR based on 10 hours at school

**Road Traffic Cancer Risk by Year - Maximum Impact Receptor Location**

Exposure	Year	Exposure Duration (years)	Age	Maximum - Exposure Information			Cancer Risk (per million)				Hazard Index	
				Age Sensitivity Factor	Annual TAC Conc (ug/m <sup>3</sup> )			DPM	TOG Exhaust	TOG Evaporative		Total
					DPM	TOG	TOG					
1	2026	1	2 - 3	3	0.00002	0.0019	0.0023	0.00042	0.00023	0.00002	0.00067	0.000004
2	2027	1	3 - 4	3	0.00002	0.0019	0.0023	0.00042	0.00023	0.00002	0.00067	
3	2028	1	4 - 5	3	0.00002	0.0019	0.0023	0.00042	0.00023	0.00002	0.00067	
4	2029	1	5 - 6	3	0.00002	0.0019	0.0023	0.00042	0.00023	0.00002	0.00067	
5	2025	1	6-7	3	0.00002	0.0019	0.0023	0.00042	0.00023	0.00002	0.00067	
6	2026	1	7-8	3	0.00002	0.0019	0.0023	0.00042	0.00023	0.00002	0.00067	
7	2027	1	8-9	3	0.00002	0.0019	0.0023	0.00042	0.00023	0.00002	0.00067	
8	2028	1	9 - 10	3	0.00002	0.0019	0.0023	0.00042	0.00023	0.00002	0.00067	
9	2029	1	10-11	3	0.00002	0.0019	0.0023	0.00042	0.00023	0.00002	0.00067	
<b>Total Increased Cancer Risk</b>								<b>0.0038</b>	<b>0.0021</b>	<b>0.0001</b>	<b>0.006</b>	

## Project Generator Health Risk Assessment and Calculations

### Icon-Echo MU, San Jose, CA

Standby Emergency Generator Impacts - w/ BAAQMD BACT Requirements for engines >1,000-hp  
Off-site Sensitive Receptors

MEI Location = 6.1 meter receptor height

DPM Emission Rates		
Source Type	DPM Emissions per Generator	
	Max Daily (lb/day)	Annual (lb/year)
Two, 1,000-kW, 1,340-hp Generator BACT Requirements	0.012	4.32
CalEEMod DPM Emissions	2.16E-03	tons/year

Modeling Information		
Model	AERMOD	
Source	Diesel Generator Engine	
Source Type	Point	
Meteorological Data	2013-2017 San Jose Airport Meteorological Data	
Point Source Stack Parameters		
Generator Engine Size (hp)	1340	
Stack Height (ft)	18.00	top of 2nd floor based exhaust release
Stack Diameter (ft)**	0.60	
Exhaust Gas Flowrate (CFM)*	2528	
Stack Exit Velocity (ft/sec)**	149	
Exhaust Temperature (°F)**	872	
Emissions Rate (lb/hr)	0.0005	0.00025 each generator

\* AERMOD default

\*\*BAAQMD default generator parameters

**Icon-Echo MU, San Jose - Cancer Risks from Project Operation  
Project Emergency Generators  
Impacts at Construction MEI Receptor- 6.1m Receptor Height  
Impact at Project MEI (27-year Exposure)**

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)<sup>-1</sup>  
ASF = Age sensitivity factor for specified age group  
ED = Exposure duration (years)  
AT = Averaging time for lifetime cancer risk (years)  
FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C<sub>air</sub> x DBR x A x (EF/365) x 10<sup>6</sup>

Where: C<sub>air</sub> = concentration in air (µg/m<sup>3</sup>)  
DBR = daily breathing rate (L/kg body weight-day)  
A = Inhalation absorption factor  
EF = Exposure frequency (days/year)  
10<sup>6</sup> = Conversion factor

Age -> Parameter	Infant/Child			Adult
	3rd Trimester	0 - 2	2 - 16	16 - 30
ASF =	10	10	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	572	261
A =	1	1	1	1
EF =	350	350	350	350
AT =	70	70	70	70
FAH =	0.85	0.85	0.72	0.73

\* 95th percentile breathing rates for infants and 80th percentile for children and adults

**Project Generators Operation Cancer Risk by Year - Maximum Impact Receptor Location**

Exposure Year	Exposure Duration (years)	Age	Infant/Child - Exposure Information		Age Sensitivity Factor	Cancer Risk (per million)	Hazard Index	Fugitive PM2.5	Total PM2.5	
			DPM Conc (ug/m3)							
			Year	Annual						
0	0.25	-0.25 - 0*	2023	0.00000	10	0.000				
1	1	0 - 1	2023	0.00000	10	0.000				
2	1	1 - 2	2024	0.00000	10	0.000				
3	1	2 - 3	2025	0.00000	3	0.000				
4	1	3 - 4	2026	0.00038	3	0.007	0.0001	0.0004	0.001	
5	1	4 - 5	2027	0.00038	3	0.007	0.0001	0.0004	0.001	
6	1	5 - 6	2028	0.00038	3	0.007	0.0001	0.0004	0.001	
7	1	6 - 7	2029	0.00038	3	0.007	0.0001	0.0004	0.001	
8	1	7 - 8	2030	0.00038	3	0.007	0.0001	0.0004	0.001	
9	1	8 - 9	2031	0.00038	3	0.007	0.0001	0.0004	0.001	
10	1	9 - 10	2032	0.00038	3	0.007	0.0001	0.0004	0.001	
11	1	10 - 11	2033	0.00038	3	0.007	0.0001	0.0004	0.001	
12	1	11 - 12	2034	0.00038	3	0.007	0.0001	0.0004	0.001	
13	1	12 - 13	2035	0.00038	3	0.007	0.0001	0.0004	0.001	
14	1	13 - 14	2036	0.00038	3	0.007	0.0001	0.0004	0.001	
15	1	14 - 15	2037	0.00038	3	0.007	0.0001	0.0004	0.001	
16	1	15 - 16	2038	0.00038	3	0.007	0.0001	0.0004	0.001	
17	1	16-17	2039	0.00038	1	0.001	0.0001	0.0004	0.001	
18	1	17-18	2040	0.00038	1	0.001	0.0001	0.0004	0.001	
19	1	18-19	2041	0.00038	1	0.001	0.0001	0.0004	0.001	
20	1	19-20	2042	0.00038	1	0.001	0.0001	0.0004	0.001	
21	1	20-21	2043	0.00038	1	0.001	0.0001	0.0004	0.001	
22	1	21-22	2044	0.00038	1	0.001	0.0001	0.0004	0.001	
23	1	22-23	2045	0.00038	1	0.001	0.0001	0.0004	0.001	
24	1	23-24	2046	0.00038	1	0.001	0.0001	0.0004	0.001	
25	1	24-25	2047	0.00038	1	0.001	0.0001	0.0004	0.001	
26	1	25-26	2048	0.00038	1	0.001	0.0001	0.0004	0.001	
27	1	26-27	2049	0.00038	1	0.001	0.0001	0.0004	0.001	
28	1	27-28	2050	0.00038	1	0.001	0.0001	0.0004	0.001	
29	1	28-29	2051	0.00038	1	0.001	0.0001	0.0004	0.001	
30	1	29-30	2052	0.00038	1	0.001	0.0001	0.0004	0.001	
<b>Total Increased Cancer Risk</b>						<b>0.11</b>	<b>Max</b>	<b>0.0001</b>	<b>0.0004</b>	<b>0.001</b>

\* Third trimester of pregnancy

**Icon-Echo MU, San Jose, CA - Project Generator Impacts  
 Maximum DPM Cancer Risk and PM2.5 Calculations  
 Impacts at Little Einstein's Montessori Preschool, 4-Year Child Exposure - 1 meter**

Student Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)<sup>-1</sup>  
 ASF = Age sensitivity factor for specified age group  
 ED = Exposure duration (years)  
 AT = Averaging time for lifetime cancer risk (years)

Inhalation Dose = C<sub>air</sub> x SAF x 8-Hr BR x A x (EF/365) x 10<sup>-6</sup>

Where: C<sub>air</sub> = concentration in air (µg/m<sup>3</sup>)  
 SAF = Student Adjustment Factor (unitless)  
 = (24 hrs/24 hrs) x (7 days/7 days) x (10/8) = 1.25  
 8-Hr BR = Eight-hour breathing rate (L/kg body weight-per 8 hrs)  
 A = Inhalation absorption factor  
 EF = Exposure frequency (days/year)  
 10<sup>-6</sup> = Conversion factor

**Values**

	Infant	School Child	Adult
Age -->	0 - <2	2 - <16	16 - 30
Parameter			
ASF =	10	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00
8-Hr BR* =	1200	520	240
A =	1	1	1
EF =	250	250	250
AT =	70	70	70
SAF =	1.00	1.25	1.00

\* 95th percentile 8-hr breathing rates for moderate intensity activities

**Project Generators Operation Cancer Risk by Year - Maximum Impact Receptor Location**

Exposure Year	Exposure Duration (years)	Age	Child - Exposure Information		Age* Sensitivity Factor	Child Cancer Risk (per million)
			DPM Conc (ug/m3)			
			Year	Annual		
1	1	2 - 3	2026	0.0004	3	0.01
2	1	3 - 4	2027	0.0004	3	0.01
3	1	4 - 5	2028	0.0004	3	0.01
4	1	5 - 6	2029	0.0004	3	0.01
5	1			0.0000	3	0.0
6	1			0.0000	3	0.0
7	1			0.0000	3	0.0
8	1			0.0000	3	0.0
9	1			0.0000	3	0.0
<b>Total Increased Cancer Risk</b>						<b>0.03</b>

\* Children assumed to be 2 years of age or older with 4 years of exposure

Maximum		
Hazard Index	Fugitive PM2.5	Total PM2.5
0.0001	0.0004	0.001
0.0001	0.0004	0.001
0.0001	0.0004	0.001



**Attachment 5: Cumulative Community Risk from Existing TAC Sources**

CT-EMFAC2017 Emissions Factors for E. Santa Clara Street 2023

File Name: 2023 Icon Echo MU - Santa Clara (SF) - 2023 - Annual.EF  
 CT-EMFAC2017 Version: 1.0.2.27401  
 Run Date: 6/8/2021 16:05  
 Area: Santa Clara (SF)  
 Analysis Year: 2023  
 Season: Annual

```
=====
```

Vehicle Category	VMT Fraction Across Category	Diesel VMT Fraction Within Category	Gas VMT Fraction Within Category
Truck 1	0.015	0.487	0.513
Truck 2	0.02	0.938	0.047
Non-Truck	0.965	0.014	0.958

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```

Road Type: Major/Collector  
 Silt Loading Factor: CARB 0.032 g/m2  
 Precipitation Correction: CARB P = 64 days N = 365 days

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```

Fleet Average Running Exhaust Emission Factors (grams/veh-mile)

Pollutant Name	<= 5 mph	10 mph	15 mph	20 mph	25 mph	30 mph	35 mph	40 mph
PM2.5	0.009229	0.005981	0.004054	0.002896	0.002194	0.001765	0.001511	0.001375
TOG	0.195764	0.127928	0.086105	0.061055	0.046181	0.036838	0.030861	0.027137
Diesel PM	0.000904	0.000732	0.000563	0.000446	0.000382	0.000353	0.00035	0.00037

Fleet Average Running Loss Emission Factors (grams/veh-hour)

Pollutant Name	Emission Factor
TOG	1.35761

Fleet Average Tire Wear Factors (grams/veh-mile)

Pollutant Name	Emission Factor
PM2.5	0.002108

Fleet Average Brake Wear Factors (grams/veh-mile)

Pollutant Name	Emission Factor
PM2.5	0.016808

Fleet Average Road Dust Factors (grams/veh-mile)

Pollutant Name	Emission Factor
PM2.5	0.014855

=====END=====



E. Santa Clara Street Emissions and Health Risk Calculations

**Analysis Year = 2023**

<b>Vehicle Type</b>	<b>2021 Caltrans Vehicles (veh/day)</b>	<b>2023 Vehicles (veh/day)</b>
Truck 1 (MDT)	460	470
Truck 2 (HDT)	124	126
Non-Truck	16,061	16,382
<b>Total</b>	<b>16,645</b>	<b>16,978</b>

Increase From 2021 1.02  
**Vehicles/Direction 8,489**  
 Avg Vehicles/Hour/Direction 354

**Traffic Data Year = 2021**

<b>Proejct Traffic Cumulative ADT</b>	<b>AADT Total</b>	<b>Total Truck</b>
E. Santa Clara Street	16,645	584

Percent of Total Vehicles 3.51%

Traffic Increase per Year (%) = 1.00%

Icon-Echo MU, San Jose - Offsite Residential Roadway Modeling  
 Cumulative Operation - E. Santa Clara Street  
 DPM Modeling - Roadway Links, Traffic Volumes, and DPM Emissions  
 Year = 2023

Road Link	Description	Direction	No. Lanes	Link Length (m)	Link Length (mi)	Link Width (m)	Link Width (ft)	Release Height (m)	Average Speed (mph)	Average Vehicles per Day
DPM_EBSC	E Santa Clara Street Eastbound	EB	2	662.3	0.41	13.3	43.7	3.4	20	8,489
DPM_WBSC	E Santa Clara Street Westbound	WB	2	662.3	0.41	13.3	43.7	3.4	20	8,489
									Total	16,978

Emission Factors - DPM

Speed Category Travel Speed (mph)	1	2	3	4
	20	0.00045		
Emissions per Vehicle (g/VTM)				

Emission Factors from CT-EMFAC2017

2023 Hourly Traffic Volumes and DPM Emissions - DPM\_EBSC

Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s
1	3.91%	332	1.69E-05	9	6.50%	552	2.81E-05	17	5.58%	474	2.41E-05
2	2.59%	220	1.12E-05	10	7.36%	625	3.19E-05	18	3.28%	278	1.42E-05
3	2.88%	244	1.24E-05	11	6.33%	537	2.74E-05	19	2.36%	200	1.02E-05
4	3.34%	283	1.44E-05	12	6.84%	581	2.96E-05	20	0.92%	78	3.98E-06
5	2.19%	185	9.46E-06	13	6.15%	522	2.66E-05	21	2.99%	254	1.29E-05
6	3.39%	288	1.47E-05	14	6.15%	522	2.66E-05	22	4.14%	351	1.79E-05
7	5.98%	508	2.59E-05	15	5.23%	444	2.26E-05	23	2.47%	210	1.07E-05
8	4.66%	395	2.02E-05	16	3.91%	332	1.69E-05	24	0.86%	73	3.73E-06
Total										8,489	

2023 Hourly Traffic Volumes Per Direction and DPM Emissions - DPM\_WBSC

Hour	% Per Hour	VPH	g/mile	Hour	% Per Hour	VPH	g/mile	Hour	% Per Hour	VPH	g/mile
1	3.91%	332	1.69E-05	9	6.50%	552	2.81E-05	17	5.58%	474	2.41E-05
2	2.59%	220	1.12E-05	10	7.36%	625	3.19E-05	18	3.28%	278	1.42E-05
3	2.88%	244	1.24E-05	11	6.33%	537	2.74E-05	19	2.36%	200	1.02E-05
4	3.34%	283	1.44E-05	12	6.84%	581	2.96E-05	20	0.92%	78	3.98E-06
5	2.19%	185	9.46E-06	13	6.15%	522	2.66E-05	21	2.99%	254	1.29E-05
6	3.39%	288	1.47E-05	14	6.15%	522	2.66E-05	22	4.14%	351	1.79E-05
7	5.98%	508	2.59E-05	15	5.23%	444	2.26E-05	23	2.47%	210	1.07E-05
8	4.66%	395	2.02E-05	16	3.91%	332	1.69E-05	24	0.86%	73	3.73E-06
Total										8,489	

Icon-Echo MU, San Jose - Offsite Residential Roadway Modeling  
 Cumulative Operation - E. Santa Clara Street  
 PM2.5 Modeling - Roadway Links, Traffic Volumes, and PM2.5 Emissions  
 Year = 2023

Road Link	Description	Direction	No. Lanes	Link Length (m)	Link Length (mi)	Link Width (m)	Link Width (ft)	Release Height (m)	Average Speed (mph)	Average Vehicles per Day
PM25_EBSC	E Santa Clara Street Eastbound	EB	2	662.3	0.41	13.3	44	1.3	20	8,489
PM25_WBSC	E Santa Clara Street Westbound	WB	2	662.3	0.41	13.3	44	1.3	20	8,489
									Total	16,978

Emission Factors - PM2.5

Speed Category	1	2	3	4
Travel Speed (mph)	20			
Emissions per Vehicle (g/VMT)	0.002896			

Emission Factors from CT-EMFAC2017

2023 Hourly Traffic Volumes and PM2.5 Emissions - PM25\_EBSC

Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s
1	1.15%	98	3.24E-05	9	7.11%	604	2.00E-04	17	7.38%	627	2.08E-04
2	0.42%	35	1.17E-05	10	4.39%	373	1.23E-04	18	8.17%	694	2.30E-04
3	0.41%	35	1.15E-05	11	4.66%	396	1.31E-04	19	5.70%	484	1.60E-04
4	0.26%	22	7.40E-06	12	5.89%	500	1.65E-04	20	4.27%	363	1.20E-04
5	0.50%	42	1.41E-05	13	6.15%	522	1.73E-04	21	3.26%	277	9.16E-05
6	0.90%	77	2.54E-05	14	6.04%	512	1.70E-04	22	3.30%	280	9.27E-05
7	3.79%	322	1.07E-04	15	7.01%	595	1.97E-04	23	2.46%	209	6.91E-05
8	7.76%	659	2.18E-04	16	7.14%	606	2.01E-04	24	1.86%	158	5.24E-05
Total										8,489	

2023 Hourly Traffic Volumes Per Direction and PM2.5 Emissions - PM25\_WBSC

Hour	% Per Hour	VPH	g/mile	Hour	% Per Hour	VPH	g/mile	Hour	% Per Hour	VPH	g/mile
1	1.15%	98	3.24E-05	9	7.11%	604	2.00E-04	17	7.38%	627	2.08E-04
2	0.42%	35	1.17E-05	10	4.39%	373	1.23E-04	18	8.17%	694	2.30E-04
3	0.41%	35	1.15E-05	11	4.66%	396	1.31E-04	19	5.70%	484	1.60E-04
4	0.26%	22	7.40E-06	12	5.89%	500	1.65E-04	20	4.27%	363	1.20E-04
5	0.50%	42	1.41E-05	13	6.15%	522	1.73E-04	21	3.26%	277	9.16E-05
6	0.90%	77	2.54E-05	14	6.04%	512	1.70E-04	22	3.30%	280	9.27E-05
7	3.79%	322	1.07E-04	15	7.01%	595	1.97E-04	23	2.46%	209	6.91E-05
8	7.76%	659	2.18E-04	16	7.14%	606	2.01E-04	24	1.86%	158	5.24E-05
Total										8,489	

Icon-Echo MU, San Jose - Offsite Residential Roadway Modeling  
 Cumulative Operation - E. Santa Clara Street  
 TOG Exhaust Modeling - Roadway Links, Traffic Volumes, and TOG Exhaust Emissions  
 Year = 2023

Road Link	Description	Direction	No. Lanes	Link Length (m)	Link Length (mi)	Link Width (m)	Link Width (ft)	Release Height (m)	Average Speed (mph)	Average Vehicles per Day
TEXH_EBSC	E Santa Clara Street Eastbound	EB	2	662.3	0.41	13.3	44	1.3	20	8,489
TEXH_WBSC	E Santa Clara Street Westbound	WB	2	662.3	0.41	13.3	44	1.3	20	8,489
									Total	16,978

Emission Factors - TOG Exhaust

Speed Category	1	2	3	4
Travel Speed (mph)	20			
Emissions per Vehicle (g/VMT)	0.06106			

Emission Factors from CT-EMFAC2017

2023 Hourly Traffic Volumes and TOG Exhaust Emissions - TEXH\_EBSC

Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s
1	1.15%	98	6.82E-04	9	7.11%	604	4.21E-03	17	7.38%	627	4.38E-03
2	0.42%	35	2.47E-04	10	4.39%	373	2.60E-03	18	8.17%	694	4.84E-03
3	0.41%	35	2.42E-04	11	4.66%	396	2.76E-03	19	5.70%	484	3.38E-03
4	0.26%	22	1.56E-04	12	5.89%	500	3.49E-03	20	4.27%	363	2.53E-03
5	0.50%	42	2.97E-04	13	6.15%	522	3.64E-03	21	3.26%	277	1.93E-03
6	0.90%	77	5.36E-04	14	6.04%	512	3.58E-03	22	3.30%	280	1.95E-03
7	3.79%	322	2.25E-03	15	7.01%	595	4.15E-03	23	2.46%	209	1.46E-03
8	7.76%	659	4.60E-03	16	7.14%	606	4.23E-03	24	1.86%	158	1.10E-03
Total										8,489	

2023 Hourly Traffic Volumes Per Direction and TOG Exhaust Emissions - TEXH\_WBSC

Hour	% Per Hour	VPH	g/mile	Hour	% Per Hour	VPH	g/mile	Hour	% Per Hour	VPH	g/mile
1	1.15%	98	6.82E-04	9	7.11%	604	4.21E-03	17	7.38%	627	4.38E-03
2	0.42%	35	2.47E-04	10	4.39%	373	2.60E-03	18	8.17%	694	4.84E-03
3	0.41%	35	2.42E-04	11	4.66%	396	2.76E-03	19	5.70%	484	3.38E-03
4	0.26%	22	1.56E-04	12	5.89%	500	3.49E-03	20	4.27%	363	2.53E-03
5	0.50%	42	2.97E-04	13	6.15%	522	3.64E-03	21	3.26%	277	1.93E-03
6	0.90%	77	5.36E-04	14	6.04%	512	3.58E-03	22	3.30%	280	1.95E-03
7	3.79%	322	2.25E-03	15	7.01%	595	4.15E-03	23	2.46%	209	1.46E-03
8	7.76%	659	4.60E-03	16	7.14%	606	4.23E-03	24	1.86%	158	1.10E-03
Total										8,489	

Icon-Echo MU, San Jose - Offsite Residential Roadway Modeling

Cumulative Operation - E. Santa Clara Street

TOG Evaporative Emissions Modeling - Roadway Links, Traffic Volumes, and TOG Evaporative Emissions

Year = 2023

Road Link	Description	Direction	No. Lanes	Link Length (m)	Link Length (mi)	Link Width (m)	Link Width (ft)	Release Height (m)	Average Speed (mph)	Average Vehicles per Day
TEVAP_EBSC	E Santa Clara Street Eastbound	EB	2	662.3	0.41	13.3	44	1.3	20	8,489
TEVAP_WBSC	E Santa Clara Street Westbound	WB	2	662.3	0.41	13.3	44	1.3	20	8,489
									Total	16,978

Emission Factors - PM2.5 - Evaporative TOG

Speed Category	1	2	3	4
Travel Speed (mph)	20			
Emissions per Vehicle per Hour (g/hour)	1.35761			
Emissions per Vehicle per Mile (g/VMT)	0.06788			

Emission Factors from CT-EMFAC2017

2023 Hourly Traffic Volumes and TOG Evaporative Emissions - TEVAP\_EBSC

Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s
1	1.15%	98	7.59E-04	9	7.11%	604	4.68E-03	17	7.38%	627	4.86E-03
2	0.42%	35	2.75E-04	10	4.39%	373	2.89E-03	18	8.17%	694	5.38E-03
3	0.41%	35	2.68E-04	11	4.66%	396	3.07E-03	19	5.70%	484	3.75E-03
4	0.26%	22	1.73E-04	12	5.89%	500	3.88E-03	20	4.27%	363	2.82E-03
5	0.50%	42	3.30E-04	13	6.15%	522	4.05E-03	21	3.26%	277	2.15E-03
6	0.90%	77	5.96E-04	14	6.04%	512	3.98E-03	22	3.30%	280	2.17E-03
7	3.79%	322	2.50E-03	15	7.01%	595	4.62E-03	23	2.46%	209	1.62E-03
8	7.76%	659	5.11E-03	16	7.14%	606	4.70E-03	24	1.86%	158	1.23E-03
									Total	8,489	

2023 Hourly Traffic Volumes Per Direction and TOG Evaporative Emissions - TEVAP\_WBSC

Hour	% Per Hour	VPH	g/mile	Hour	% Per Hour	VPH	g/mile	Hour	% Per Hour	VPH	g/mile
1	1.15%	98	7.59E-04	9	7.11%	604	4.68E-03	17	7.38%	627	4.86E-03
2	0.42%	35	2.75E-04	10	4.39%	373	2.89E-03	18	8.17%	694	5.38E-03
3	0.41%	35	2.68E-04	11	4.66%	396	3.07E-03	19	5.70%	484	3.75E-03
4	0.26%	22	1.73E-04	12	5.89%	500	3.88E-03	20	4.27%	363	2.82E-03
5	0.50%	42	3.30E-04	13	6.15%	522	4.05E-03	21	3.26%	277	2.15E-03
6	0.90%	77	5.96E-04	14	6.04%	512	3.98E-03	22	3.30%	280	2.17E-03
7	3.79%	322	2.50E-03	15	7.01%	595	4.62E-03	23	2.46%	209	1.62E-03
8	7.76%	659	5.11E-03	16	7.14%	606	4.70E-03	24	1.86%	158	1.23E-03
									Total	8,489	

Icon-Echo MU, San Jose - Offsite Residential Roadway Modeling  
 Cumulative Operation - E. Santa Clara Street  
 Fugitive Road PM2.5 Modeling - Roadway Links, Traffic Volumes, and Fugitive Road PM2.5 Emissions  
 Year = 2023

Road Link	Description	Direction	No. Lanes	Link Length (m)	Link Length (mi)	Link Width (m)	Link Width (ft)	Release Height (m)	Average Speed (mph)	Average Vehicles per Day
FUG_EBSC	E Santa Clara Street Eastbound	EB	2	662.3	0.41	13.3	44	1.3	20	8,489
FUG_WBSC	E Santa Clara Street Westbound	WB	2	662.3	0.41	13.3	44	1.3	20	8,489
									Total	16,978

Emission Factors - Fugitive PM2.5

Speed Category	1	2	3	4
Travel Speed (mph)	20			
Tire Wear - Emissions per Vehicle (g/VMT)	0.00211			
Brake Wear - Emissions per Vehicle (g/VMT)	0.01681			
Road Dust - Emissions per Vehicle (g/VMT)	0.01486			
Total Fugitive PM2.5 - Emissions per Vehicle (g/VMT)	0.03377			

Emission Factors from CT-EMFAC2017

2023 Hourly Traffic Volumes and Fugitive PM2.5 Emissions - FUG\_EBSC

Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s	Hour	% Per Hour	VPH	g/s
1	1.15%	98	3.77E-04	9	7.11%	604	2.33E-03	17	7.38%	627	2.42E-03
2	0.42%	35	1.37E-04	10	4.39%	373	1.44E-03	18	8.17%	694	2.68E-03
3	0.41%	35	1.34E-04	11	4.66%	396	1.53E-03	19	5.70%	484	1.87E-03
4	0.26%	22	8.62E-05	12	5.89%	500	1.93E-03	20	4.27%	363	1.40E-03
5	0.50%	42	1.64E-04	13	6.15%	522	2.02E-03	21	3.26%	277	1.07E-03
6	0.90%	77	2.96E-04	14	6.04%	512	1.98E-03	22	3.30%	280	1.08E-03
7	3.79%	322	1.24E-03	15	7.01%	595	2.30E-03	23	2.46%	209	8.06E-04
8	7.76%	659	2.54E-03	16	7.14%	606	2.34E-03	24	1.86%	158	6.11E-04
Total										8,489	

2023 Hourly Traffic Volumes Per Direction and Fugitive PM2.5 Emissions - FUG\_WBSC

Hour	% Per Hour	VPH	g/mile	Hour	% Per Hour	VPH	g/mile	Hour	% Per Hour	VPH	g/mile
1	1.15%	98	3.77E-04	9	7.11%	604	2.33E-03	17	7.38%	627	2.42E-03
2	0.42%	35	1.37E-04	10	4.39%	373	1.44E-03	18	8.17%	694	2.68E-03
3	0.41%	35	1.34E-04	11	4.66%	396	1.53E-03	19	5.70%	484	1.87E-03
4	0.26%	22	8.62E-05	12	5.89%	500	1.93E-03	20	4.27%	363	1.40E-03
5	0.50%	42	1.64E-04	13	6.15%	522	2.02E-03	21	3.26%	277	1.07E-03
6	0.90%	77	2.96E-04	14	6.04%	512	1.98E-03	22	3.30%	280	1.08E-03
7	3.79%	322	1.24E-03	15	7.01%	595	2.30E-03	23	2.46%	209	8.06E-04
8	7.76%	659	2.54E-03	16	7.14%	606	2.34E-03	24	1.86%	158	6.11E-04
Total										8,489	

**Icon-Echo MU, San Jose - E. Santa Clara Street Traffic - TACs & PM2.5  
 AERMOD Risk Modeling Parameters and Maximum Concentrations  
 at Construction PM2.5 MEI Receptor, 6.1m receptor height (2nd floor)**

**Emission Year** 2023-2025  
**Receptor Information** Construction Cancer Risk & PM2.5 MEI receptor  
 Number of Receptors 1  
 Receptor Height 2nd Floor, 6.1 meters  
 Receptor Distances At Construction MEI location

**Meteorological Conditions**  
 BAQMD San Jose Airport Met Data 2013-2017  
 Land Use Classification Urban  
 Wind Speed Variable  
 Wind Direction Variable

**Construction MEI Cancer Risk Maximum Concentrations**

Meteorological Data Years	Concentration (µg/m3)		
	DPM	Exhaust TOG	Evaporative TOG
2013-2017	0.0016	0.1437	0.1594

**Construction MEI PM2.5 Maximum Concentrations**

Meteorological Data Years	PM2.5 Concentration (µg/m3)		
	Total PM2.5	Fugitive PM2.5	Vehicle PM2.5
2013-2017	0.09651	0.0889	0.0076

**Icon-Echo MU, San Jose, CA - E. Santa Clara Street Cancer Risk & PM2.5**  
**Impacts at Construction Cancer Risk & PM2.5 MEI - 6.1 meter receptor height (2nd floor)**  
**30 Year Residential Exposure**

**Cancer Risk Calculation Method**

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)<sup>-1</sup>  
 ASF = Age sensitivity factor for specified age group  
 ED = Exposure duration (years)  
 AT = Averaging time for lifetime cancer risk (years)  
 FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C<sub>air</sub> x DBR x A x (EF/365) x 10<sup>-6</sup>

Where: C<sub>air</sub> = concentration in air (µg/m<sup>3</sup>)  
 DBR = daily breathing rate (L/kg body weight-day)  
 A = Inhalation absorption factor  
 EF = Exposure frequency (days/year)  
 10<sup>-6</sup> = Conversion factor

**Cancer Potency Factors (mg/kg-day)<sup>-1</sup>**

TAC	CPF
DPM	1.10E+00
Vehicle TOG Exhaust	6.28E-03
Vehicle TOG Evaporative	3.70E-04

**Values**

Age → Parameter	Infant/Child			Adult
	3rd Trimester	0 - 2	2 - 16	16 - 30
ASF =	10	10	3	1
DBR* =	361	1090	572	261
A =	1	1	1	1
EF =	350	350	350	350
AT =	70	70	70	70
FAH =	0.85	0.85	0.72	0.73

\* 95th percentile breathing rates for infants and 80th percentile for children and adults

**Construction Cancer Risk by Year - Maximum Impact Receptor Location**

Exposure Year	Maximum - Exposure Information				Concentration (ug/m3)			Cancer Risk (per million)			TOTAL
	Exposure Duration (years)	Age	Year	Age Sensitivity Factor	DPM	Exhaust TOG	Evaporative TOG	DPM	Exhaust TOG	Evaporative TOG	
1	1	0 - 1	2023	10	0.0016	0.1437	0.1594	0.219	0.115	0.0075	0.34
2	1	1 - 2	2024	10	0.0016	0.1437	0.1594	0.219	0.115	0.0075	0.34
3	1	2 - 3	2025	3	0.0016	0.1437	0.1594	0.029	0.015	0.0010	0.05
4	1	3 - 4	2026	3	0.0016	0.1437	0.1594	0.029	0.015	0.0010	0.05
5	1	4 - 5	2027	3	0.0016	0.1437	0.1594	0.029	0.015	0.0010	0.05
6	1	5 - 6	2028	3	0.0016	0.1437	0.1594	0.029	0.015	0.0010	0.05
7	1	6 - 7	2029	3	0.0016	0.1437	0.1594	0.029	0.015	0.0010	0.05
8	1	7 - 8	2030	3	0.0016	0.1437	0.1594	0.029	0.015	0.0010	0.05
9	1	8 - 9	2031	3	0.0016	0.1437	0.1594	0.029	0.015	0.0010	0.05
10	1	9 - 10	2032	3	0.0016	0.1437	0.1594	0.029	0.015	0.0010	0.05
11	1	10 - 11	2033	3	0.0016	0.1437	0.1594	0.029	0.015	0.0010	0.05
12	1	11 - 12	2034	3	0.0016	0.1437	0.1594	0.029	0.015	0.0010	0.05
13	1	12 - 13	2035	3	0.0016	0.1437	0.1594	0.029	0.015	0.0010	0.05
14	1	13 - 14	2036	3	0.0016	0.1437	0.1594	0.029	0.015	0.0010	0.05
15	1	14 - 15	2037	3	0.0016	0.1437	0.1594	0.029	0.015	0.0010	0.05
16	1	15 - 16	2038	3	0.0016	0.1437	0.1594	0.029	0.015	0.0010	0.05
17	1	16 - 17	2039	1	0.0016	0.1437	0.1594	0.005	0.002	0.0002	0.01
18	1	17 - 18	2040	1	0.0016	0.1437	0.1594	0.005	0.002	0.0002	0.01
19	1	18 - 19	2041	1	0.0016	0.1437	0.1594	0.005	0.002	0.0002	0.01
20	1	19 - 20	2042	1	0.0016	0.1437	0.1594	0.005	0.002	0.0002	0.01
21	1	20 - 21	2043	1	0.0016	0.1437	0.1594	0.005	0.002	0.0002	0.01
22	1	21 - 22	2044	1	0.0016	0.1437	0.1594	0.005	0.002	0.0002	0.01
23	1	22 - 23	2045	1	0.0016	0.1437	0.1594	0.005	0.002	0.0002	0.01
24	1	23 - 24	2046	1	0.0016	0.1437	0.1594	0.005	0.002	0.0002	0.01
25	1	24 - 25	2047	1	0.0016	0.1437	0.1594	0.005	0.002	0.0002	0.01
26	1	25 - 26	2048	1	0.0016	0.1437	0.1594	0.005	0.002	0.0002	0.01
27	1	26 - 27	2049	1	0.0016	0.1437	0.1594	0.005	0.002	0.0002	0.01
28	1	27 - 28	2050	1	0.0016	0.1437	0.1594	0.005	0.002	0.0002	0.01
29	1	28 - 29	2051	1	0.0016	0.1437	0.1594	0.005	0.002	0.0002	0.01
30	1	29 - 30	2052	1	0.0016	0.1437	0.1594	0.005	0.002	0.0002	0.01
<b>Total Increased Cancer Risk</b>								0.93	0.485	0.032	<b>1.45</b>

\* Third trimester of pregnancy

Maximum  
 Hazard Index 0.0003  
 Fugitive PM2.5 0.09  
 Total PM2.5 0.097



**Icon-Echo MU, San Jose - E. Santa Clara Street Traffic - TACs & PM2.5  
 AERMOD Risk Modeling Parameters and Maximum Concentrations  
 On-Site 3rd Floor Residential Receptors (7.6 meter receptor height)**

**Emission Year** 2023  
**Receptor Information** Maximum On-Site Receptor  
 Number of Receptors 65  
 Receptor Height 7.6  
 Receptor Distances 7 meter grid spacing in residential area

**Meteorological Conditions**  
 BAQMD San Jose Airport Met Data 2013-2017  
 Land Use Classification Urban  
 Wind Speed Variable  
 Wind Direction Variable

**3rd Floor Project Cancer Risk Maximum Concentrations**

Meteorological Data Years	Concentration (µg/m3)		
	DPM	Exhaust TOG	Evaporative TOG
2013-2017	0.0006	0.0619	0.0687

**34d Floor Project PM2.5 Maximum Concentrations**

Meteorological Data Years	PM2.5 Concentration (µg/m3)		
	Total PM2.5	Fugitive PM2.5	Vehicle PM2.5
2013-2017	0.0373	0.0344	0.0029

**Icon-Echo MU, San Jose, CA - E. Santa Clara Street Cancer Risk  
Impacts at On-Site 3rd Floor Residential Receptors - 7.6 meter receptor height  
30 Year Residential Exposure**

**Cancer Risk Calculation Method**

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)<sup>-1</sup>  
 ASF = Age sensitivity factor for specified age group  
 ED = Exposure duration (years)  
 AT = Averaging time for lifetime cancer risk (years)  
 FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C<sub>air</sub> x DBR x A x (EF/365) x 10<sup>-6</sup>

Where: C<sub>air</sub> = concentration in air (µg/m<sup>3</sup>)  
 DBR = daily breathing rate (L/kg body weight-day)  
 A = Inhalation absorption factor  
 EF = Exposure frequency (days/year)  
 10<sup>-6</sup> = Conversion factor

**Cancer Potency Factors (mg/kg-day)<sup>-1</sup>**

TAC	CPF
DPM	1.10E+00
Vehicle TOG Exhaust	6.28E-03
Vehicle TOG Evaporative	3.70E-04

**Values**

Age → Parameter	Infant/Child			Adult
	3rd Trimester	0 - 2	2 - 16	16 - 30
ASF =	10	10	3	1
DBR* =	361	1090	572	261
A =	1	1	1	1
EF =	350	350	350	350
AT =	70	70	70	70
FAH =	0.85	0.85	0.72	0.73

\* 95th percentile breathing rates for infants and 80th percentile for children and adults

**Construction Cancer Risk by Year - Maximum Impact Receptor Location**

Exposure Year	Maximum - Exposure Information				Concentration (ug/m3)			Cancer Risk (per million)			TOTAL
	Exposure Duration (years)	Age	Year	Age Sensitivity Factor	DPM	Exhaust TOG	Evaporative TOG	DPM	Exhaust TOG	Evaporative TOG	
1	1	0 - 1	2026	10	0.0006	0.0619	0.0687	0.087	0.049	0.0032	0.14
2	1	1 - 2	2027	10	0.0006	0.0619	0.0687	0.087	0.049	0.0032	0.14
3	1	2 - 3	2028	3	0.0006	0.0619	0.0687	0.012	0.007	0.0004	0.02
4	1	3 - 4	2029	3	0.0006	0.0619	0.0687	0.012	0.007	0.0004	0.02
5	1	4 - 5	2030	3	0.0006	0.0619	0.0687	0.012	0.007	0.0004	0.02
6	1	5 - 6	2031	3	0.0006	0.0619	0.0687	0.012	0.007	0.0004	0.02
7	1	6 - 7	2032	3	0.0006	0.0619	0.0687	0.012	0.007	0.0004	0.02
8	1	7 - 8	2033	3	0.0006	0.0619	0.0687	0.012	0.007	0.0004	0.02
9	1	8 - 9	2034	3	0.0006	0.0619	0.0687	0.012	0.007	0.0004	0.02
10	1	9 - 10	2035	3	0.0006	0.0619	0.0687	0.012	0.007	0.0004	0.02
11	1	10 - 11	2036	3	0.0006	0.0619	0.0687	0.012	0.007	0.0004	0.02
12	1	11 - 12	2037	3	0.0006	0.0619	0.0687	0.012	0.007	0.0004	0.02
13	1	12 - 13	2038	3	0.0006	0.0619	0.0687	0.012	0.007	0.0004	0.02
14	1	13 - 14	2039	3	0.0006	0.0619	0.0687	0.012	0.007	0.0004	0.02
15	1	14 - 15	2040	3	0.0006	0.0619	0.0687	0.012	0.007	0.0004	0.02
16	1	15 - 16	2041	3	0.0006	0.0619	0.0687	0.012	0.007	0.0004	0.02
17	1	16 - 17	2042	1	0.0006	0.0619	0.0687	0.002	0.001	0.0001	0.00
18	1	17 - 18	2043	1	0.0006	0.0619	0.0687	0.002	0.001	0.0001	0.00
19	1	18 - 19	2044	1	0.0006	0.0619	0.0687	0.002	0.001	0.0001	0.00
20	1	19 - 20	2045	1	0.0006	0.0619	0.0687	0.002	0.001	0.0001	0.00
21	1	20 - 21	2046	1	0.0006	0.0619	0.0687	0.002	0.001	0.0001	0.00
22	1	21 - 22	2047	1	0.0006	0.0619	0.0687	0.002	0.001	0.0001	0.00
23	1	22 - 23	2048	1	0.0006	0.0619	0.0687	0.002	0.001	0.0001	0.00
24	1	23 - 24	2049	1	0.0006	0.0619	0.0687	0.002	0.001	0.0001	0.00
25	1	24 - 25	2050	1	0.0006	0.0619	0.0687	0.002	0.001	0.0001	0.00
26	1	25 - 26	2051	1	0.0006	0.0619	0.0687	0.002	0.001	0.0001	0.00
27	1	26 - 27	2052	1	0.0006	0.0619	0.0687	0.002	0.001	0.0001	0.00
28	1	27 - 28	2053	1	0.0006	0.0619	0.0687	0.002	0.001	0.0001	0.00
29	1	28 - 29	2054	1	0.0006	0.0619	0.0687	0.002	0.001	0.0001	0.00
30	1	29 - 30	2055	1	0.0006	0.0619	0.0687	0.002	0.001	0.0001	0.00
<b>Total Increased Cancer Risk</b>								0.37	0.209	0.014	<b>0.59</b>

\* Third trimester of pregnancy

Maximum  
 Hazard Index 0.0001  
 Fugitive PM2.5 0.03  
 Total PM2.5 0.037

**Icon-Echo MU, San Jose - E. Santa Clara Street Traffic - TACs & PM2.5  
 AERMOD Risk Modeling Parameters and Maximum Concentrations  
 On-Site 4th Floor Residential Receptors (10.6 meter receptor height)**

**Emission Year** 2023  
**Receptor Information** Maximum On-Site Receptor  
 Number of Receptors 65  
 Receptor Height 10.6  
 Receptor Distances 7 meter grid spacing in residential area

**Meteorological Conditions**  
 BAQMD San Jose Airport Met Data 2013-2017  
 Land Use Classification Urban  
 Wind Speed Variable  
 Wind Direction Variable

**4th Floor Project Cancer Risk Maximum Concentrations**

Meteorological Data Years	Concentration (µg/m3)		
	DPM	Exhaust TOG	Evaporative TOG
2013-2017	0.0005	0.0442	0.0491

**4th Floor Project PM2.5 Maximum Concentrations**

Meteorological Data Years	PM2.5 Concentration (µg/m3)		
	Total PM2.5	Fugitive PM2.5	Vehicle PM2.5
2013-2017	0.02711	0.0250	0.0021

**Icon-Echo MU, San Jose, CA - E. Santa Clara Street Cancer Risk  
Impacts at On-Site 4th Floor Residential Receptors - 10.6 meter receptor height  
30 Year Residential Exposure**

**Cancer Risk Calculation Method**

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)<sup>-1</sup>  
ASF = Age sensitivity factor for specified age group  
ED = Exposure duration (years)  
AT = Averaging time for lifetime cancer risk (years)  
FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C<sub>air</sub> x DBR x A x (EF/365) x 10<sup>-6</sup>

Where: C<sub>air</sub> = concentration in air (µg/m<sup>3</sup>)  
DBR = daily breathing rate (L/kg body weight-day)  
A = Inhalation absorption factor  
EF = Exposure frequency (days/year)  
10<sup>-6</sup> = Conversion factor

**Cancer Potency Factors (mg/kg-day)<sup>-1</sup>**

TAC	CPF
DPM	1.10E+00
Vehicle TOG Exhaust	6.28E-03
Vehicle TOG Evaporative	3.70E-04

**Values**

Age → Parameter	Infant/Child			Adult
	3rd Trimester	0 - 2	2 - 16	16 - 30
ASF =	10	10	3	1
DBR* =	361	1090	572	261
A =	1	1	1	1
EF =	350	350	350	350
AT =	70	70	70	70
FAH =	0.85	0.85	0.72	0.73

\* 95th percentile breathing rates for infants and 80th percentile for children and adults

**Construction Cancer Risk by Year - Maximum Impact Receptor Location**

Exposure Year	Maximum - Exposure Information				Concentration (ug/m3)			Cancer Risk (per million)			TOTAL
	Exposure Duration (years)	Age	Year	Age Sensitivity Factor	DPM	Exhaust TOG	Evaporative TOG	DPM	Exhaust TOG	Evaporative TOG	
0	0.25	-0.25 - 0*	2026	10	0.0005	0.0442	0.0491	0.005	0.003	0.0002	0.01
1	1	0 - 1	2026	10	0.0005	0.0442	0.0491	0.064	0.035	0.0023	0.10
2	1	1 - 2	2027	10	0.0005	0.0442	0.0491	0.064	0.035	0.0023	0.10
3	1	2 - 3	2028	3	0.0005	0.0442	0.0491	0.009	0.005	0.0003	0.01
4	1	3 - 4	2029	3	0.0005	0.0442	0.0491	0.009	0.005	0.0003	0.01
5	1	4 - 5	2030	3	0.0005	0.0442	0.0491	0.009	0.005	0.0003	0.01
6	1	5 - 6	2031	3	0.0005	0.0442	0.0491	0.009	0.005	0.0003	0.01
7	1	6 - 7	2032	3	0.0005	0.0442	0.0491	0.009	0.005	0.0003	0.01
8	1	7 - 8	2033	3	0.0005	0.0442	0.0491	0.009	0.005	0.0003	0.01
9	1	8 - 9	2034	3	0.0005	0.0442	0.0491	0.009	0.005	0.0003	0.01
10	1	9 - 10	2035	3	0.0005	0.0442	0.0491	0.009	0.005	0.0003	0.01
11	1	10 - 11	2036	3	0.0005	0.0442	0.0491	0.009	0.005	0.0003	0.01
12	1	11 - 12	2037	3	0.0005	0.0442	0.0491	0.009	0.005	0.0003	0.01
13	1	12 - 13	2038	3	0.0005	0.0442	0.0491	0.009	0.005	0.0003	0.01
14	1	13 - 14	2039	3	0.0005	0.0442	0.0491	0.009	0.005	0.0003	0.01
15	1	14 - 15	2040	3	0.0005	0.0442	0.0491	0.009	0.005	0.0003	0.01
16	1	15 - 16	2041	3	0.0005	0.0442	0.0491	0.009	0.005	0.0003	0.01
17	1	16-17	2042	1	0.0005	0.0442	0.0491	0.001	0.001	0.0000	0.00
18	1	17-18	2043	1	0.0005	0.0442	0.0491	0.001	0.001	0.0000	0.00
19	1	18-19	2044	1	0.0005	0.0442	0.0491	0.001	0.001	0.0000	0.00
20	1	19-20	2045	1	0.0005	0.0442	0.0491	0.001	0.001	0.0000	0.00
21	1	20-21	2046	1	0.0005	0.0442	0.0491	0.001	0.001	0.0000	0.00
22	1	21-22	2047	1	0.0005	0.0442	0.0491	0.001	0.001	0.0000	0.00
23	1	22-23	2048	1	0.0005	0.0442	0.0491	0.001	0.001	0.0000	0.00
24	1	23-24	2049	1	0.0005	0.0442	0.0491	0.001	0.001	0.0000	0.00
25	1	24-25	2050	1	0.0005	0.0442	0.0491	0.001	0.001	0.0000	0.00
26	1	25-26	2051	1	0.0005	0.0442	0.0491	0.001	0.001	0.0000	0.00
27	1	26-27	2052	1	0.0005	0.0442	0.0491	0.001	0.001	0.0000	0.00
28	1	27-28	2053	1	0.0005	0.0442	0.0491	0.001	0.001	0.0000	0.00
29	1	28-29	2054	1	0.0005	0.0442	0.0491	0.001	0.001	0.0000	0.00
30	1	29-30	2055	1	0.0005	0.0442	0.0491	0.001	0.001	0.0000	0.00
<b>Total Increased Cancer Risk</b>								0.27	0.149	0.010	<b>0.43</b>

\* Third trimester of pregnancy

Maximum  
**Hazard Index** 0.0001  
**Fugitive PM2.5** 0.02  
**Total PM2.5** 0.027



# BAY AREA AIR QUALITY MANAGEMENT DISTRICT

## Risk & Hazard Stationary Source Inquiry Form

This form is required when users request stationary source data from BAAQMD

This form is to be used with the BAAQMD's Google Earth stationary source screening tables.

[Click here for guidance on conducting risk & hazard screening, including roadways & freeways, refer to the District's Risk & Hazard Analysis flow chart.](#)

[Click here for District's Recommended Methods for Screening and Modeling Local Risks and Hazards document.](#)

**Table A: Requester Contact Information**

Date of Request	5/7/2021
Contact Name	Casey Divine
Affiliation	Illingworth & Rodkin, Inc.
Phone	707-794-0400 x103
Email	<a href="mailto:cdivine@illingworthrodkin.com">cdivine@illingworthrodkin.com</a>
Project Name	Icon-Echo Mixed-Use Towers
Address	N 4th Street & E. Santa Clara St
City	San Jose
County	Santa Clara
Type (residential, commercial, mixed use, industrial, etc.)	Mixed-Use
Project Size (# of units or building square feet)	415du, 525ksf office, 8.5ksf retail
Comments:	

For Air District assistance, the following steps must be completed:

1. Complete all the contact and project information requested in **Table A**. Incomplete forms will not be processed. Please include a project site map.
2. Download and install the free program Google Earth, <http://www.google.com/earth/download/ge/>, and then download the county specific Google Earth stationary source application files from the District's website, <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Tools-and-Methodology.aspx>. The small points on the map represent stationary sources permitted by the District (Map A on right). These permitted sources include diesel back-up generators, gas stations, dry cleaners, boilers, printers, auto spray booths, etc. Click on a point to view the source's Information Table, including the name, location, and preliminary estimated cancer risk, hazard index, and PM2.5 concentration.
3. Find the project site in Google Earth by inputting the site's address in the Google Earth search box.
4. Identify stationary sources within at least a 1000ft radius of project site. Verify that the location of the source on the map matches with the source's address in the Information Table, by using the Google Earth address search box to confirm the source's address location. Please report any mapping errors to the District.
5. List the stationary source information in **Table B** blue section only.
6. Note that a small percentage of the stationary sources have Health Risk Screening Assessment (HRSA) data INSTEAD of screening level data. These sources will be noted by an asterisk next to the Plant Name (see Map A on right). If HRSA values are presented, these values have already been modeled and cannot be adjusted further.
7. Email this completed form to District staff. District staff will provide the most recent risk, hazard, and PM2.5 data that are available for the source(s). If this information or data are not available, source emissions data will be provided. Staff will respond to inquiries within three weeks.

Note that a public records request received for the same stationary source information will cancel the processing of your SSIF request.

Submit forms, maps, and questions to Areana Flores at 415-749-4616, or [aflores@baaqmd.gov](mailto:aflores@baaqmd.gov)

**Table B: Google Earth data**

Distance from Receptor (feet) or MEI <sup>1</sup>	Plant No.	Facility Name	Address	Cancer Risk <sup>2</sup>	Hazard Risk <sup>2</sup>	PM <sub>2.5</sub> <sup>2</sup>	Source No. <sup>3</sup>	Type of Source <sup>4</sup>	Fuel Code <sup>5</sup>	Status/Comments	Project MEI			
											Distance Adjustment Multiplier	Adjusted Cancer Risk Estimate	Adjusted Hazard Risk	Adjusted PM2.5
400	15267	San Jose New City Hall	200 E Santa Clara St	5.73	0.02	0.19		Generator, Boiler (2)		2018 Dataset	0.16	0.92	0.003	0.03
500	23479	SV Towers Investments LLC, C/O Harvest Properties	75 E Santa Clara St	2.73	--	--		Generators		2018 Dataset	0.12	0.33	#VALUE!	#VALUE!
To Be Removed	104124	Chevron #4259	147 E Santa Clara St	13.39	0.06	--		Gas Dispensing Facility		2018 Dataset	--	#VALUE!	#VALUE!	#VALUE!

**Footnotes:**

- Maximally exposed individual
- These Cancer Risk, Hazard Index, and PM2.5 columns represent the values in the Google Earth Plant Information Table.
- Each plant may have multiple permits and sources.
- Permitted sources include diesel back-up generators, gas stations, dry cleaners, boilers, printers, auto spray booths, etc.
- Fuel codes: 98 = diesel, 189 = Natural Gas.
- If a Health Risk Screening Assessment (HRSA) was completed for the source, the application number will be listed here.
- The date that the HRSA was completed.
- Engineer who completed the HRSA. For District purposes only.
- All HRSA completed before 1/5/2010 need to be multiplied by an age sensitivity factor of 1.7.
- The HRSA "Chronic Health" number represents the Hazard Index.
- Further information about common sources:
  - Sources that only include diesel internal combustion engines can be adjusted using the BAAQMD's Diesel Multiplier worksheet.
  - The risk from natural gas boilers used for space heating when <25 MM BTU/hr would have an estimated cancer risk of one in a million or less, and a chronic hazard index of 0.003
  - BAAQMD Reg 11 Rule 16 required that all co-residential (sharing a wall, floor, ceiling or is in the same building as a residential unit) dry cleaners cease use of perc on July 1, 2010. Therefore, there is no cancer risk, hazard or PM2.5 concentrations from co-residential dry cleaning businesses in the BAAQMD.
  - Non co-residential dry cleaners must phase out use of perc by Jan. 1, 2023. Therefore, the risk from these dry cleaners does not need to be factored in over a 70-year period, but instead should
  - Gas stations can be adjusted using BAAQMD's Gas Station Distance Multiplier worksheet.
  - Unless otherwise noted, exempt sources are considered insignificant. See BAAQMD Reg 2 Rule 1 for a list of exempt sources.
  - This spray booth is considered to be insignificant.

Date last updated:

03/13/2018

**Project Site**

Distance from Receptor (feet) or MEI <sup>1</sup>	FACID (Plant No.)	Distance Adjustment Multiplier	Adjusted Cancer Risk Estimate	Adjusted Hazard Risk	Adjusted PM2.5
450	15267	0.14	0.80	0.003	0.03
315	23479	0.22	0.60	#VALUE!	#VALUE!
To Be Removed	104124	--	#VALUE!	#VALUE!	#VALUE!

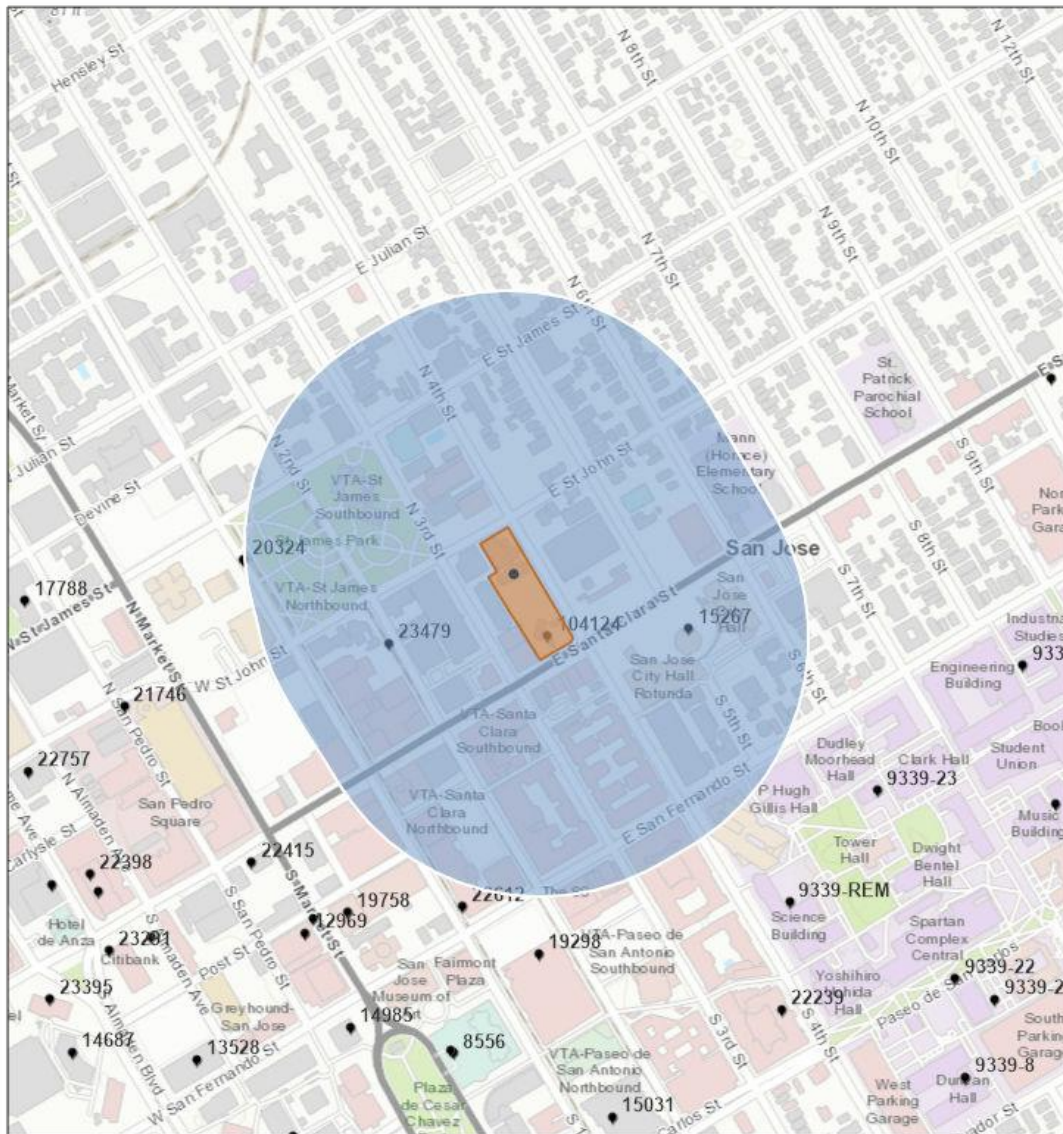


# Stationary Source Risk & Hazards Screening Report

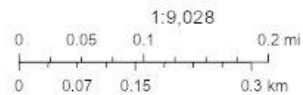
## Area of Interest (AOI) Information

Area : 4,636,449.72 ft<sup>2</sup>

May 7 2021 11:53:23 Pacific Daylight Time



● Permitted Facilities 2018



City of San Jose, County of Santa Clara, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, Intermap, USGS, METINASA, EPA, USDA

## Summary

Name	Count	Area(ft <sup>2</sup> )	Length(ft)
Permitted Facilities 2018	3	N/A	N/A

## Permitted Facilities 2018

#	FACID	Name	Address	City	St
1	15267	San Jose New City Hall	200 E Santa Clara St	San Jose	CA
2	23479	SV Towers Investments LLC, C/O Harvest Properties	75 E Santa Clara St	San Jose	CA
3	104124	Chevron #4259	147 E Santa Clara St	San Jose	CA

#	Zip	County	Cancer	Hazard	PM_25	Type	Count
1	95113	Santa Clara	5.730	0.020	0.190	Contact BAAQMD	1
2	95113	Santa Clara	2.730	0.000	0.000	Generators	1
3	95113	Santa Clara	13.390	0.060	0.000	Gas Dispensing Facility	1

Note: The estimated risk and hazard impacts from these sources would be expected to be substantially lower when site specific Health Risk Screening Assessments are conducted.

The screening level map is not recommended for evaluating sensitive land uses such as schools, senior centers, day cares, and health facilities.

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**M E M O**

Date: September 23, 2021

To: Shannon George  
Vice President & Principal Project Manager  
David J. Powers & Associates, Inc.  
1871 The Alameda, Suite 200  
San José, CA 95126

From: James A. Reyff  
Illingworth & Rodkin, Inc.  
429 East Cotati Avenue  
Cotati, CA 94931

SUBJECT: Icon-Echo Mixed-Use Towers Air Quality Cumulative Memo  
I&R Job# 20-009

The City of San José currently has and is planning for the construction of many development projects in the downtown area. Due to the high number of construction activities from development projects, the City requested that air quality assessments for these projects include the construction community risk impacts from these nearby developments in the cumulative analysis.

The inclusion of construction community risk impacts in the cumulative analysis is problematic because not all nearby developments have had CEQA studies conducted, nor have these projects been scheduled for construction in a timely manner that the cumulative analysis could properly include their effects. Construction projects can have elevated effects but usually only temporarily (e.g., for one year or so). Refined information is not usually available for these construction assessments so cumulative analyses have to assume projects meet the health risk single-source significance thresholds. With these assumptions, it only takes the inclusion of two to three projects to reveal exceedances of the annual PM<sub>2.5</sub> concentration cumulative threshold. There are often more than three approved projects in downtown San José that could be constructed around the same time as a proposed project. Therefore, downtown San José has become an environment where the existing health risk impacts could exceed the cumulative significance thresholds on their own without a proposed project.

The Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines state that, "A Lead Agency shall examine TAC and/or PM<sub>2.5</sub> sources that are located within 1,000 feet of a proposed project site. Sources of TACs include, but are not limited to, land uses such as freeways and high-volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating

facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities.” While the Guidelines do not exclude construction impacts from nearby developments as a cumulative source, *Illingworth & Rodkin, Inc.* (I&R) has typically not included this as a cumulative source due to its adjustable and temporary variables. The construction activities of a project can change from what was analyzed in a report and most substantial emissions from construction would only last a few years or less.

Alternatively, I&R reached out to BAAQMD<sup>1</sup> to get direction on how to address the cumulative impact threshold when a project’s maximally exposure individual (MEI) is at receptors that has existing exposure levels already exceeding cumulative thresholds. This would mean that no matter what mitigation was applied to the project, the resulting cumulative level would be above the threshold. I&R’s approach has been (1) apply mitigation to the project to minimize project impacts to below the single-source threshold and (2) explain that the cumulative sources alone exceed the cumulative threshold, and the project, using best available mitigation measures, would only contribute a small percentage to the total cumulative risk impact, and therefore the project’s impact is not cumulatively considerable. BAAQMD response concurred with this approach and that the impact would not be considered significant after mitigation is applied.

It should be noted that BAAQMD is considering new cancer risk thresholds for overburdened communities.<sup>2</sup> The District recently held a workshop to encourage public comment. These would include a lower cancer risk threshold of 6 chances per million at an MEI. Overburdened communities are proposed to be defined as an area located (1) within a census tract identified by the California Communities Environmental Health Screening Tool (CalEnviroScreen), Version 4.0 implemented by OEHHA, as having an overall CalEnviroScreen score at or above the 70<sup>th</sup> percentile, or (2) within 1,000 feet of any such census tract. The City, as a lead agency, could consider areas with cumulative cancer risk greater than 100 per million or annual PM<sub>2.5</sub> concentrations greater than 0.8 micrograms per cubic meter to also be overburdened. The District’s proposal is only that and is currently going through the public workshop process. The risk of 6 chances per million as at this stage and idea and not adopted. We are aware of one other community that has a similar approach, which is San Francisco. In overburdened areas of that City (considered Air Pollution Exposure Zones), they use a cancer risk threshold of 7 chances per million.

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<sup>1</sup> Correspondence with Areana Flores, MSc, Environmental Planner, BAAQMD, February 23, 2021.

<sup>2</sup> See BAAQMD Proposed Regulation 2: Permits - 2021 Amendments to Rules 2-1 and 2-5 (Under Development) [https://www.baaqmd.gov/rules-and-compliance/rules/reg-2-permits?rule\\_version=2021%20Amendments](https://www.baaqmd.gov/rules-and-compliance/rules/reg-2-permits?rule_version=2021%20Amendments)