



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-1000

This Worksheet was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

## Air Quality (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/air-quality>

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

Yes → Continue to Question 2.

No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Provide any documents used to make your determination.

2. Is your project’s air quality management district or county in non-attainment or maintenance status for any criteria pollutants?

Follow the link below to determine compliance status of project county or air quality management district:

<http://www.epa.gov/oaqps001/greenbk/>

No, project’s county or air quality management district is in attainment status for all criteria pollutants

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.

Yes, project’s management district or county is in non-attainment or maintenance status for one or more criteria pollutants. → Continue to Question 3.

3. Determine the estimated emissions levels of your project for each of those criteria pollutants that are in non-attainment or maintenance status on your project area. Will your project exceed any of the *de minimis* or *threshold* emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

No, the project will not exceed *de minimis* or threshold emissions levels or screening levels

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Explain how you determined that the project would not exceed *de minimis* or *threshold* emissions.

Yes, the project exceeds *de minimis* emissions levels or screening levels.

→ Continue to Question 4. Explain how you determined that the project would not exceed *de minimis* or threshold emissions in the Worksheet Summary.

**4. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

[Click here to enter text.](#)

### **Worksheet Summary**

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

### **Include all documentation supporting your findings in your submission to HUD.**

Carbon monoxide (CO) is a colorless, odorless gas that typically results from incomplete combustion. Blood hemoglobin has a high affinity for CO, typically over 200 times higher than oxygen. Thus, even low concentrations of ambient CO can build up in the blood. Initial symptoms of CO poisoning may be headache, dizziness and shortness of breath. Continued exposure can lead to people passing out and death. Fortunately, if a person is moved to an area of clean air they can be revived, usually with no lingering symptoms.

Washoe County ambient air exceeded federal CO standards from 1992 to 2003, and the county was designated “non-attainment”. Most standard violations occurred in winter when atmospheric mixing is diminished. The primary source of this CO was motor vehicles, although other sources such as wood burning stoves and natural gas combustion contributed to the unhealthy air. Various measures such as improved inspection and maintenance (smog check), winter gasoline blends, and phase out of old vehicles led to air quality improvements. EPA also instituted standards for wood stoves that substantially reduced winter emissions. Washoe County has met the federal CO standard since 2004 and is now designated a federal “maintenance area”. According to the *de minimis* tables in 40 CFR 93.153.(b)(1), CO emissions of up-to 100 tons per year are acceptable in maintenance areas. Emissions over 100 tons per year would require various levels of modeling, review, and possibly permitting by the local health authority.

Tables below show the federal 1-hour and 8-hour standards, as well as standards for other pollutants of concern. Washoe County is designated “attainment” for all other pollutants. Subsequent documents below also show Washoe County’s CO designation, and the *de minimis* emission levels allowed under federal law.

To determine if annual construction emissions would exceed 100 tons/year, they have been estimated using the air quality model CalEEMod v2022. This model was developed by the California Air Pollution Control Officers Association and is recognized as an appropriate tool for calculating CO (and other)

emissions from construction projects. Since the model requires a California location, Truckee, CA was used as a geographic surrogate for the Reno site. Both locations use similar construction equipment and fuel types, so CO emission rates would be similar. As noted in the project description, part of the Washoe Cares project has already been constructed. Future housing and support facilities will be built over the coming year(s). CO modeling looks at the cumulative effects of all five phases of the project and is reported for each year.

Modeled results of construction CO emissions show the following: 6 tons/year in 2021, 11 tons/year in 2022 and 3 tons/year in 2023. Total cumulative construction CO emissions over the three years is 20 tons. Each year's emissions are well below the 100 tons/year de minimis threshold in federal law for CO maintenance areas.

Operation CO emissions result from staff commuting in private autos, electricity generation, natural gas combustion, and water consumption (pumping and treatment), trash removal and land fill emissions, and other small sources. Operations are estimated at 7 ton/year for 2023 and subsequent years. Model output is presented below.

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# Ambient Air Quality Standards

## Monitoring Program - Pollutants of Concern

The principal ambient air pollutants, based on public health concerns, have been identified by the U.S. Environmental Protection Agency (EPA) as "criteria" pollutants. The EPA established National Ambient Air Quality Standards (NAAQS) for these criteria pollutants. The standards of quality for ambient air in Nevada differ from EPA's and shall not be exceeded. Detailed information on each criteria pollutant may be found on [EPA's criteria pollutant website](#).

### Notes

A: The Director shall use the Nevada standards in considering whether to issue a permit for a stationary source and shall ensure that the stationary source will not cause the Nevada standards to be exceeded in areas where the general public has access.

B: The National standards are used in determinations of attainment or nonattainment. The form of a National standard is the criteria which must be satisfied for each respective concentration level of a standard for the purposes of attainment. The form for each National standard is set forth in 40 C.F.R. Part 50 and may be viewed at <http://www.epa.gov/air/criteria.html>.

C: Where applicable, concentration is expressed first in units in which it was adopted. All measurements of air quality that are expressed as mass per unit volume, such as micrograms per cubic meter, must be corrected to a reference temperature of 25 degrees Centigrade and a reference pressure of 760 mm of Hg (1,013.2 millibars); "ppm" in this table refers to parts per million by volume, or micromoles of regulated air pollutant per mole of gas; "µg/m<sup>3</sup>" refers to micrograms per cubic meter.

D: Any reference method specified in accordance with 40 C.F.R. Part 50 or any reference method or equivalent method designated in accordance with 40 C.F.R. Part 53 may be substituted.

E: National primary standards are the levels of air quality necessary, with an adequate margin of safety, to protect the public health.

F: National secondary standards are the levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a regulated air pollutant.

G: The EPA revoked the National 1-hour ozone standard as it applies to all areas. However, anti-backsliding provisions in Federal law require certain areas to have continuing obligations under the National 1-hour ozone standard.

H: The 1971 National sulfur dioxide standards remain in effect for an area until 1 year after the area is designated for the 2010 National sulfur dioxide standard, except that in an area designated nonattainment for the 1971 National sulfur dioxide standards, the 1971 standards remain in effect until an implementation plan to attain or maintain the 2010 National sulfur dioxide standards is approved.

I: The ambient air quality standard for hydrogen sulfide does not include naturally occurring background concentrations.

Table of the National Ambient Air Quality Standards

Pollutant		Primary/Secondary	Averaging Time	Level	Form
Carbon Monoxide (CO)		Primary	8-hours	9 ppm	Not to be exceeded more than once per year
			1-hour	35 ppm	
Lead (Pb)		Primary and secondary	Rolling 3-month average	0.15 µg/m <sup>3</sup>	Not to be exceeded
Nitrogen Dioxide (NO <sub>2</sub> )		Primary	1-hour	100 ppb	98th percentile of 1-hour daily maximum concentrations, averaged over 3 years
		Primary and secondary	1-year	53 ppb	Annual mean
Ozone (O <sub>3</sub> )		Primary and secondary	8-hours	0.070 ppm	Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years
Particle Pollution (PM)	PM <sub>2.5</sub>	Primary	1-year	12.0 µg/m <sup>3</sup>	Annual mean, averaged over 3 years
		Secondary	1-year	15.0 µg/m <sup>3</sup>	Annual mean, averaged over 3 years
		Primary and secondary	24-hours	35 µg/m <sup>3</sup>	98th percentile, averaged over 3 years
	PM <sub>10</sub>	Primary and secondary	24-hours	150 µg/m <sup>3</sup>	Not to be exceeded more than once per year on average over 3 years
Sulfur Dioxide (SO <sub>2</sub> )		Primary	1-hour	75 ppb	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years
		Secondary	3-hours	0.5 ppm	Not to be exceeded more than once per year



You are here: EPA Home > Green Book > >National Area and County-Level Multi-Pollutant Information > Nevada Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants

## Nevada Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants

Data is current as of September 30, 2022

Listed by County, NAAQS, Area. The 8-hour Ozone (1997) standard was revoked on April 6, 2015 and the 1-hour Ozone (1979) standard was revoked on June 15, 2005.

\* The 1997 Primary Annual PM-2.5 NAAQS (level of 15 µg/m<sup>3</sup>) is revoked in attainment and maintenance areas for that NAAQS. For additional information see the PM-2.5 NAAQS SIP Requirements Final Rule, effective October 24, 2016. (81 FR 58009)

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Important Notes

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County	NAAQS	Area Name	Nonattainment in Year	Redesignation to Maintenance	C
<b>NEVADA</b>					
Carson City	Carbon Monoxide (1971)	Lake Tahoe, NV	929394959697989900010203	02/13/2004	N
Clark County	8-Hour Ozone (1997)-NAAQS revoked	Las Vegas, NV	040506070809101112	02/07/2013	
Clark County	8-Hour Ozone (2015)	Las Vegas, NV	1819202122	//	
Clark County	Carbon Monoxide (1971)	Las Vegas, NV	929394959697989900010203040506070809	09/27/2010	
Clark County	PM-10 (1987)	Clark County; Las Vegas planning area, NV	92939495969798990001020304050607080910111213	11/05/2014	
Douglas County	Carbon Monoxide (1971)	Lake Tahoe, NV	929394959697989900010203	02/13/2004	N
Washoe County	1-Hour Ozone (1979)-NAAQS revoked	Reno, NV	92939495969798990001020304	//	
Washoe County	Carbon Monoxide (1971)	Lake Tahoe, NV	929394959697989900010203	02/13/2004	N
Washoe County	Carbon Monoxide (1971)	Reno, NV	92939495969798990001020304050607	08/04/2008	N
Washoe County	PM-10 (1987)	Washoe County; Reno planning area, NV	010203040506070809101112131415	01/07/2016	
White Pine County	Sulfur Dioxide (1971)	Central Steptoe Valley, NV	92939495969798990001	06/11/2002	

Important Notes

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# De Minimis Tables

40 CFR 93.153(b)(1) - For purposes of paragraph (b) of this section the following rates apply in nonattainment areas (NAA's):	
	<b>Tons/year</b>
Ozone (VOC's or NOx):	
Serious NAA's	50
Severe NAA's	25
Extreme NAAs	10
Other ozone NAA's outside an ozone transport region:	100
Other ozone NAA's inside an ozone transport region:	
VOC	50
NOx	100
Carbon Monoxide: All maintenance areas	100
SO <sub>2</sub> or NO <sub>2</sub> : All NAA's	100
PM <sub>10</sub> :	
Moderate NAA's	100
Serious NAA's	70
PM <sub>2.5</sub> (direct emissions, SO <sub>2</sub> , NOx, VOC, and Ammonia):	
Moderate NAA's	100
Serious NAA's	70
Pb: All NAA's	25

40 CFR 93.153(b)(2) - For purposes of paragraph (b) of this section the following rates apply in maintenance areas:	
	<b>Tons/year</b>
Ozone (NO <sub>x</sub> ), SO <sub>2</sub> or NO <sub>2</sub> :	
All maintenance areas	100
Ozone (VOC's)	
Maintenance areas inside an ozone transport region	50
Maintenance areas outside an ozone transport region	100
Carbon monoxide: All maintenance areas	100
PM <sub>10</sub> : All maintenance areas	100
PM <sub>2.5</sub> (direct emissions, SO <sub>2</sub> , NO <sub>x</sub> , VOC, and Ammonia)	100
All maintenance areas	100
Pb: All maintenance areas	25

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LAST UPDATED ON JULY 20, 2022

# Washoe Cares Custom Report

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# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	Washoe Cares
Lead Agency	Washoe County
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.00
Precipitation (days)	55.0
Location	39.32484755237783, -120.18345639352322
County	Nevada
City	—
Air District	Northern Sierra AQMD
Air Basin	Mountain Counties
TAZ	262
EDFZ	0-H
Electric Utility	Truckee Donner Public Utilities District
Gas Utility	Southwest Gas Corp.

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Congregate Care (Assisted Living)	1.00	Dwelling Unit	0.00	45,900	2,000	—	500	Sprung building
User Defined Industrial	2.00	User Defined Unit	0.00	3,374	500	—	113	Restrooms

User Defined Educational	1.00	User Defined Unit	0.00	15,143	1,000	—	—	Intake Bldg
Day-Care Center	1.00	1000sqft	0.02	7,520	500	—	—	Day Center and Admin
Condo/Townhouse	50.0	Dwelling Unit	3.13	40,000	3,000	—	200	Low Income housing

## 2. Emissions Summary

### 2.2. Construction Emissions by Year, Unmitigated

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

Year	ROG	NOx	CO	PM10T	PM2.5T	CO2e
Daily - Summer (Max)	—	—	—	—	—	—
2021	10.0	97.1	89.1	33.9	18.3	14,889
2022	9.32	89.2	86.4	33.3	17.8	14,862
2023	49.5	48.8	52.5	3.55	2.28	9,028
Daily - Winter (Max)	—	—	—	—	—	—
2021	10.0	97.5	88.5	33.9	18.3	14,817
2022	9.30	89.5	86.0	33.3	17.8	14,793
2023	45.6	20.1	26.0	1.77	1.03	4,833
Average Daily	—	—	—	—	—	—
2021	3.87	37.7	34.1	13.3	7.21	5,683
2022	6.34	60.9	58.7	22.4	12.0	10,119
2023	10.6	13.5	16.1	1.07	0.66	2,909
Annual	—	—	—	—	—	—
2021	0.71	6.87	6.23	2.43	1.32	941
2022	1.16	11.1	10.7	4.09	2.19	1,675
2023	1.94	2.46	2.93	0.20	0.12	482

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

### 4.2. Energy

#### 4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	5.63
User Defined Industrial	—	—	—	—	—	0.00
User Defined Educational	—	—	—	—	—	0.00
Day-Care Center	—	—	—	—	—	43.0
Condo/Townhouse	—	—	—	—	—	322
Total	—	—	—	—	—	370
Daily, Winter (Max)	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	5.63
User Defined Industrial	—	—	—	—	—	0.00
User Defined Educational	—	—	—	—	—	0.00
Day-Care Center	—	—	—	—	—	43.0
Condo/Townhouse	—	—	—	—	—	322
Total	—	—	—	—	—	370
Annual	—	—	—	—	—	—

Congregate Care (Assisted Living)	—	—	—	—	—	0.93
User Defined Industrial	—	—	—	—	—	0.00
User Defined Educational	—	—	—	—	—	0.00
Day-Care Center	—	—	—	—	—	7.12
Condo/Townhouse	—	—	—	—	—	53.3
Total	—	—	—	—	—	61.3

### 4.3. Area Emissions by Source

#### 4.3.2. Unmitigated

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

Source	ROG	NOx	CO	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—
Hearths	78.0	1.52	96.3	13.3	13.2	2,070
Consumer Products	2.40	—	—	—	—	—
Architectural Coatings	0.90	—	—	—	—	—
Landscape Equipment	0.46	0.04	4.01	< 0.005	< 0.005	12.4
Total	81.8	1.56	100	13.3	13.2	2,082
Daily, Winter (Max)	—	—	—	—	—	—
Hearths	78.0	1.52	96.3	13.3	13.2	2,070
Consumer Products	2.40	—	—	—	—	—
Architectural Coatings	0.90	—	—	—	—	—
Landscape Equipment	0.46	0.04	4.02	< 0.005	< 0.005	12.5
Total	81.8	1.56	100	13.3	13.2	2,082
Annual	—	—	—	—	—	—
Hearths	3.20	0.06	3.95	0.54	0.54	77.0
Consumer Products	0.44	—	—	—	—	—

Architectural Coatings	0.16	—	—	—	—	—
Landscape Equipment	0.05	< 0.005	0.40	< 0.005	< 0.005	1.13
Total	3.85	0.07	4.35	0.54	0.54	78.1

## 4.5. Waste Emissions by Land Use

### 4.5.2. Unmitigated

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

Land Use	ROG	NOx	CO	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	861
User Defined Industrial	—	—	—	—	—	0.00
User Defined Educational	—	—	—	—	—	0.00
Day-Care Center	—	—	—	—	—	2.45
Condo/Townhouse	—	—	—	—	—	123
Total	—	—	—	—	—	986
Daily, Winter (Max)	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	861
User Defined Industrial	—	—	—	—	—	0.00
User Defined Educational	—	—	—	—	—	0.00
Day-Care Center	—	—	—	—	—	2.45
Condo/Townhouse	—	—	—	—	—	123
Total	—	—	—	—	—	986
Annual	—	—	—	—	—	—
Congregate Care (Assisted Living)	—	—	—	—	—	143
User Defined Industrial	—	—	—	—	—	0.00

User Defined Educational	—	—	—	—	—	0.00
Day-Care Center	—	—	—	—	—	0.41
Condo/Townhouse	—	—	—	—	—	20.3
Total	—	—	—	—	—	163

## 4.7. Offroad Emissions By Equipment Type

### 4.7.1. Unmitigated

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

Equipment Type	ROG	NOx	CO	PM10T	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—
Total	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—
Total	—	—	—	—	—	—
Annual	—	—	—	—	—	—
Total	—	—	—	—	—	—

## 5. Activity Data

### 5.2. Off-Road Equipment

#### 5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40

Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	1.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	6.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	6.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48
Paving	Cement and Mortar Mixers	Diesel	Average	2.00	6.00	10.0	0.56
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37

## 5.3. Construction Vehicles

### 5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	10.5	LDA,LDT1,LDT2
Demolition	Vendor	—	7.02	HHDT,MHDT
Demolition	Hauling	4.91	20.0	HHDT

Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	10.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	7.02	HHDT,MHDT
Site Preparation	Hauling	5.75	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	10.5	LDA,LDT1,LDT2
Grading	Vendor	—	7.02	HHDT,MHDT
Grading	Hauling	12.7	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	47.7	10.5	LDA,LDT1,LDT2
Building Construction	Vendor	9.72	7.02	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	20.0	10.5	LDA,LDT1,LDT2
Paving	Vendor	—	7.02	HHDT,MHDT
Paving	Hauling	4.06	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	9.53	10.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	7.02	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT