# Dauchy Street

## GREENHOUSE GAS ANALYSIS

## CITY OF RIVERSIDE

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# LIST OF ABBREVIATED TERMS

| | |
|---|---|
| % | Percent |
| °F | Degrees Fahrenheit |
| (1) | Reference |
| AB | Assembly Bill |
| AB 32 | Global Warming Solutions Act of 2006 |
| AB 1493 | Pavley Fuel Efficiency Standards |
| AB 1181 | California Water Conservation Landscaping Act of 2006 |
| Annex I | Industrialized Nations |
| APA | Administrative Procedure Act |
| AQIA | Air Quality Impact Analysis |
| BAU | Business As Usual |
| $C_2F_6$ | Hexafluoroethane |
| $C_2H_6$ | Ethane |
| $C_2H_2F_4$ | Tetrafluroethane |
| $C_2H_4F_2$ | Ethylidene Fluoride |
| CAA | Federal Clean Air Act |
| CalEEMod | California Emissions Estimator Model |
| CalEPA | California Environmental Protection Agency |
| CALGAPS | California LBNL GHG Analysis of Policies Spreadsheet |
| CALGreen | California Green Building Standards Code |
| CALSTA | California State Transportation Agency |
| CALTRANS | California Department of Transportation |
| CAPCOA | California Air Pollution Control Officers Association |
| CARB | California Air Resource Board |
| CAP | Climate Action Plan |
| CEC | California Energy Commission |
| CCR | California Code of Regulations |
| CEQA | California Environmental Quality Act |
| CDFA | California Department of Food and Agriculture |
| $CF_4$ | Tetrafluoromethane |
| CFC | Chlorofluorocarbons |
| $CH_4$ | Methane |
| $CHF_3$ | Fluoroform |
| $CH_2FCF$ | 1,1,1,2-tetrafluoroethane |
| $CH_3CF_2$ | 1,1-difluoroethane |
| City | City of Riverside |

| | |
|---|---|
| CNRA | California Natural Resources Agency |
| CNRA 2009 | 2009 California Climate Adaptation Strategy |
| CO | Carbon Monoxide |
| $CO_2$ | Carbon Dioxide |
| $CO_2e$ | Carbon Dioxide Equivalent |
| Convention | United Nation's Framework Convention on Climate Change |
| COP | Conference of the Parties |
| CPUC | California Public Utilities Commission |
| CTC | California Transportation Commission |
| DOF | Department of Finance |
| EMFAC | Emission Factor Model |
| EPA | Environmental Protection Agency |
| FBMSM | Facility-Based Mobile Source Measures |
| FED | Functional Equivalent Document |
| GCC | Global Climate Change |
| Gg | Gigagram |
| GHGA | Greenhouse Gas Analysis |
| GOBIZ | Governor's Office of Business and Economic Development |
| GPD | Gallons Per Day |
| GPY | Gallons Per Year |
| GWP | Global Warming Potential |
| $H_2O$ | Water |
| HFC | Hydrofluorocarbons |
| HDT | Heavy-Duty Trucks |
| HHDT | Heavy-Heavy-Duty Trucks |
| hp | Horsepower |
| I-215 | Interstate 215 |
| IBANK | California Infrastructure and Economic Development Bank |
| IPCC | Intergovernmental Panel on Climate Change |
| ISO | Independent System Operator |
| ITE | Institute of Transportation Engineers |
| LBNL | Lawrence Berkeley National Laboratory |
| LCA | Life-Cycle Analysis |
| LCD | Liquid Crystal Display |
| LCFS | Low Carbon Fuel Standard |
| LDA | Light-Duty Auto |
| LDT1/LDT2 | Light-Duty Trucks |
| LEV III | Low-Emission Vehicle |

| | |
|---|---|
| LHDT | Light-Heavy-Duty Trucks |
| MDV | Medium-Duty Vehicles |
| MHT | Medium-Duty Trucks |
| MHDT | Medium-Heavy-Duty Tucks |
| MMR | Mandatory Reporting Rule |
| $MMTCO_2e$ | Million Metric Ton of Carbon Dioxide Equivalent |
| MPG | Miles Per Gallon |
| MPOs | Metropolitan Planning Organizations |
| MT/yr | Metric Tons Per Year |
| $MTCO_2e$ | Metric Ton of Carbon Dioxide Equivalent |
| MWELO | California Department of Water Resources' Model Water Efficient |
| MY | Model Year |
| $N_20$ | Nitrous Oxide |
| NDC | Nationally Determined Contributions |
| $NF_3$ | Nitrogen Trifluoride |
| NHTSA | National Highway Traffic Safety Administration |
| NIOSH | National Institute for Occupational Safety and Health |
| $NO_X$ | Oxides of Nitrogen |
| Non-Annex I | Developing Nations |
| OAL | Office of Administrative Law |
| OPR | Office of Planning and Research |
| PFC | Perfluorocarbons |
| $PM_{10}$ | Particulate Matter 10 microns in diameter or less |
| $PM_{2.5}$ | Particulate Matter 2.5 microns in diameter or less |
| ppb | Parts Per Billion |
| ppm | Parts Per Million |
| ppt | Parts Per Trillion |
| Project | Dauchy Street |
| RPS | Renewable Portfolio Standards |
| RTP | Regional Transportation Plan |
| RV | Recreational Vehicle |
| SAR | Second Assessment Report |
| SB | Senate Bill |
| SB 32 | California Global Warming Solutions Act of 2006 |
| SB 375 | Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies |
| SB 1078 | Renewable Portfolio Standards |

| | |
|---|---|
| SB 1368 | Statewide Retail Provider Emissions Performance Standards |
| SCAG | Southern California Association of Governments |
| SCAQMD | South Coast Air Quality Management District |
| SCAX | Metrolink |
| Scoping Plan | California Air Resources Board Climate Change Scoping Plan |
| Sf | Square Feet |
| $SF_6$ | Sulfur Hexaflouride |
| SGC | Strategic Growth Council |
| SLPS | Short-Lived Climate Pollutant Strategy |
| SP | Service Population |
| SR-79 | State Route 79 |
| SWCRB | State Water Resources Control Board |
| TAZ | Traffic Analysis Zones |
| TIA | Traffic Impact Analysis |
| UNFCCC | United Nations' Framework Convention on Climate Change |
| URBEMIS | Urban Emissions |
| UTR | Utility Tractors |
| VMT | Vehicle Miles Traveled |
| VOC | Volatile Organic Compounds |
| WRI | World Resources Institute |
| ZE/NZE | Zero and Near-Zero Emissions |
| ZEV | Zero-Emissions Vehicles |

# EXECUTIVE SUMMARY

## ES.1 SUMMARY OF FINDINGS

The results of this Dauchy Street *Greenhouse Gas Analysis* are summarized below based on the significance criteria in Section 3 of this report consistent with Appendix G of the California Environmental Quality Act (CEQA) Guidelines (1). Table ES-1 shows the findings of significance for potential greenhouse gas (GHG) impacts under CEQA.

**TABLE ES-1: SUMMARY OF CEQA SIGNIFICANCE FINDINGS**

| Analysis | Report Section | Significance Findings | |
|---|---|---|---|
| | | Unmitigated | Mitigated |
| Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment | 3.7 | *Less Than Significant* | *n/a* |
| Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs | 3.8 | *Less Than Significant* | *n/a* |

## ES.2 PROJECT REQUIREMENTS

The Project would be required to comply with regulations imposed by the State of California and the South Coast Air Quality Management District (SCAQMD) aimed at the reduction of air pollutant emissions. Those that are directly and indirectly applicable to the Project and that would assist in the reduction of GHG emissions include:

- Global Warming Solutions Act of 2006 (AB32) (2).
- Regional GHG Emissions Reduction Targets (2)/Sustainable Communities Strategies (SB 375) (3).
- Pavley Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles (4).
- Title 24 California Code of Regulations (CCR) (California Building Code). Establishes energy efficiency requirements for new construction (5).
- Title 20 CCR (Appliance Energy Efficiency Standards). Establishes energy efficiency requirements for appliances (6).
- Title 17 CCR (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020 (7).
- California Water Conservation in Landscaping Act of 2006 (AB1881). Requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or equivalent by January 1, 2010 to ensure efficient landscapes in new development and reduced water waste in existing landscapes (8).

- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions (9).
- Renewable Portfolio Standards (SB 1078). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2010 and 33 percent by 2020 (10).
- Senate Bill 32 (SB 32). Requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15 (11).

Promulgated regulations that will affect the Project's emissions are accounted for in the Project's GHG calculations provided in this report. In particular, the Pavley Standards, Low Carbon Fuel Standards, and Renewable Portfolio Standards (RPS) will be in effect for the AB 32 target year of 2020, and therefore are accounted for in the Project's emission calculations.

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# 1 INTRODUCTION

This report presents the results of the GHGA prepared by Urban Crossroads, Inc., for the proposed Dauchy Street ("Project"). The purpose of this GHGA is to evaluate Project-related construction and operational emissions and determine the level of GHG impacts as a result of constructing and operating the proposed Project.

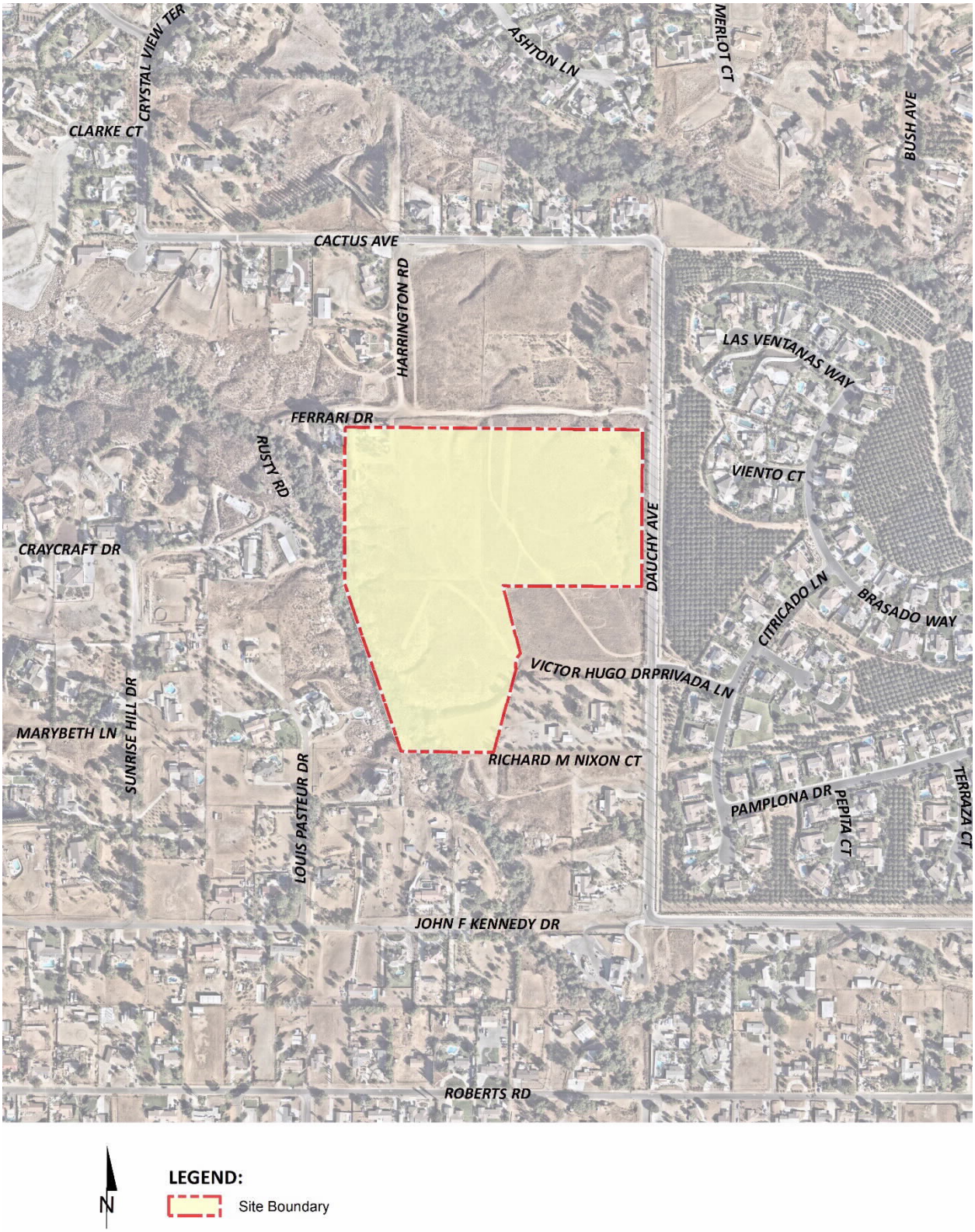
## 1.1 SITE LOCATION

The proposed Dauchy Street site is located south of Ferrari Drive (APN 276-040-011 and -012), and west of Dauchy Avenue (APN 276-050-029), in the City of Riverside, as shown on Exhibit 1-A. Based on the City of Riverside zoning map, the project site is zoned R-1-1/2-Acre-WC – Single Family Residential and Water Course Overlay Zones (APN 276-040-011 and -012) and RC-WC – Residential Conservation and Water Course Overlay Zones (APN 276-050-029), which allows for development of single-family dwellings. The General Plan designates the Project area as VLDR-OS – Very Low Density Residential and Open Space (APN 276-040-011 and -012) and HR-OS – Hillside Residential and Open Space (APN 276-050-029).

## 1.2 PROJECT DESCRIPTION

The Project consists of the development of 53 residential dwelling units on three parcels (APN:276-050-029,276-040-011 and -012), as shown on Exhibit 1-B. The current acreage of the three parcels involved in the project is 24.45 acres. With the street vacations indicated Lots "A" and "H" on the Tentative Tract Map, the amount of acreage will increase to 24.73 acres. Accordingly, street improvements on the project frontage along Ferrari Drive and Dauchy Avenue will include curbs, gutters, and sidewalks. Ferrari Drive will also include street side landscaping. Victor Hugo Drive will be paved on its full width. Accordingly, curbs and sidewalks will be installed on the north side of Victor Hugo Drive.

## EXHIBIT 1-A: PROJECT LOCATION

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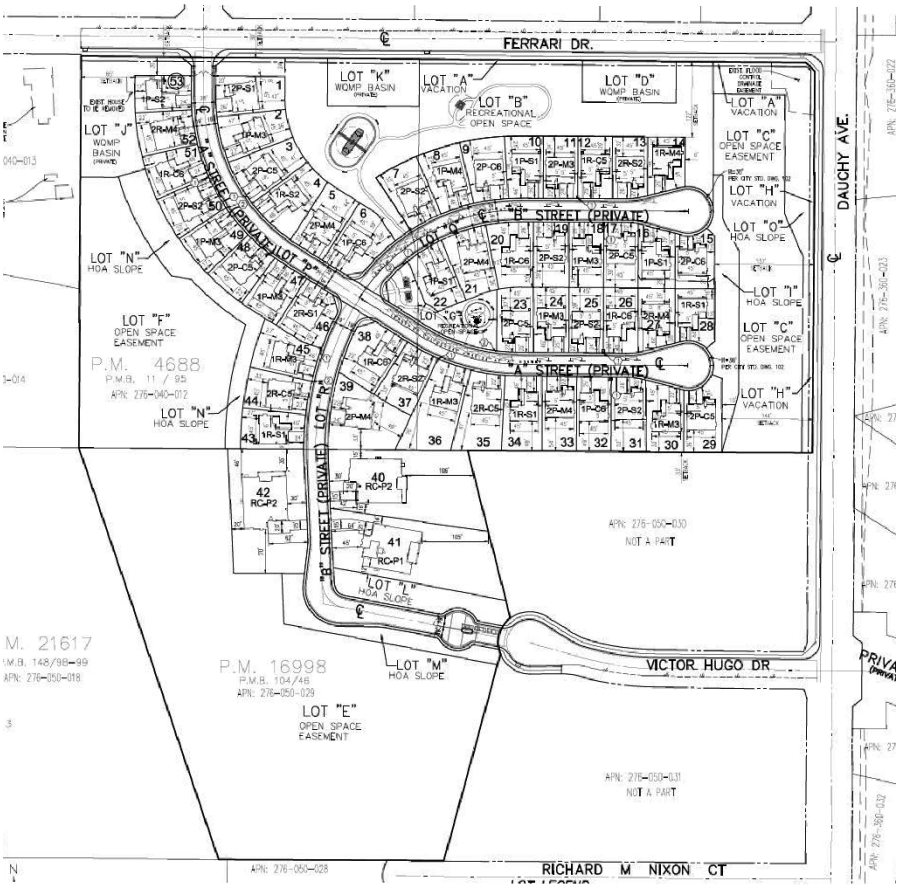
Source: NearMap2020

## EXHIBIT 1-B: SITE PLAN

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# 2 CLIMATE CHANGE SETTING

## 2.1 INTRODUCTION TO GLOBAL CLIMATE CHANGE

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxide ($N_2O$), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years.

An individual project like the proposed Project evaluated in this GHGA cannot generate enough GHG emissions to affect a discernible change in global climate. However, the proposed Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. Because these changes may have serious environmental consequences, Section 3.0 will evaluate the potential for the proposed Project to have a significant effect upon the environment as a result of its potential contribution to the greenhouse effect.

## 2.2 GLOBAL CLIMATE CHANGE DEFINED

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, $CO_2$, $N_2O$, $CH_4$, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride ($SF_6$). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radioactive heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages.

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature.

## 2.3 GREENHOUSE GASES

### GREENHOUSE GASES AND HEALTH EFFECTS

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. Many gases demonstrate these properties and as discussed in Table 2-1. For the purposes of this analysis, emissions of $CO_2$, $CH_4$, and $N_2O$ were evaluated (see Table 3-1 later in

this report) because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases.

**TABLE 2-1: GREENHOUSE GASES**

| Greenhouse Gases | Description | Sources | Health Effects |
|---|---|---|---|
| Water | Water is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. A climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change.<br><br>As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to 'hold' more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a "positive feedback loop." The extent to | The main source of water vapor is evaporation from the oceans (approximately 85%). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves. | There are no known direct health effects related to water vapor at this time. It should be noted however that when some pollutants react with water vapor, the reaction forms a transport mechanism for some of these pollutants to enter the human body through water vapor. |

**TABLE 2-1: GREENHOUSE GASES**

| Greenhouse Gases | Description | Sources | Health Effects |
|---|---|---|---|
| | which this positive feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the earth's surface and heat it up) (12). | | |
| $CO_2$ | $CO_2$ is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, $CO_2$ concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30%. Left unchecked, the concentration of $CO_2$ in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources (13). | $CO_2$ is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil, natural gas, and wood. $CO_2$ is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks (14). | Outdoor levels of $CO_2$ are not high enough to result in negative health effects.<br><br>According to the National Institute for Occupational Safety and Health (NIOSH) high concentrations of $CO_2$ can result in health effects such as: headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. It should be noted that current concentrations of $CO_2$ in the earth's atmosphere are estimated to be approximately 370 ppm, the actual reference exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour workweek and short-term reference exposure levels of |

**TABLE 2-1: GREENHOUSE GASES**

| Greenhouse Gases | Description | Sources | Health Effects |
|---|---|---|---|
| | | | 30,000 ppm averaged over a 15 minute period (15). |
| $CH_4$ | $CH_4$ is an extremely effective absorber of radiation, although its atmospheric concentration is less than $CO_2$ and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs. | $CH_4$ has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of $CH_4$. Other anthropocentric sources include fossil-fuel combustion and biomass burning (16). | $CH_4$ is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to high levels of $CH_4$ can cause asphyxiation, loss of consciousness, headache and dizziness, nausea and vomiting, weakness, loss of coordination, and an increased breathing rate. |
| $N_2O$ | $N_2O$, also known as laughing gas, is a colorless GHG. Concentrations of $N_2O$ also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb). | $N_2O$ is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric | $N_2O$ can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage) (17). |

**TABLE 2-1: GREENHOUSE GASES**

| Greenhouse Gases | Description | Sources | Health Effects |
|---|---|---|---|
| | | acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant, i.e., in whipped cream bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. $N_2O$ can be transported into the stratosphere, be deposited on the earth's surface, and be converted to other compounds by chemical reaction (17). | |
| Chlorofluorocarbons (CFCs) | CFCs are gases formed synthetically by replacing all hydrogen atoms in $CH_4$ or ethane ($C_2H_6$) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the earth's surface). | CFCs have no natural source but were first synthesized in 1928. They were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the | In confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation. |

**TABLE 2-1: GREENHOUSE GASES**

| Greenhouse Gases | Description | Sources | Health Effects |
|---|---|---|---|
| | | atmosphere for over 100 years (18). | |
| HFCs | HFCs are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential (GWP). The HFCs with the largest measured atmospheric abundances are (in order), fluoroform ($CHF_3$), 1,1,1,2-tetrafluoroethane ($CH_2FCF$), and 1,1-difluoroethane ($CH_3CF_2$). Prior to 1990, the only significant emissions were of $CHF_3$. $CH_2FCF$ emissions are increasing due to its use as a refrigerant. | HFCs are manmade for applications such as automobile air conditioners and refrigerants. | No health effects are known to result from exposure to HFCs. |
| PFCs | PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above earth's surface, are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane ($CF_4$) and hexafluoroethane ($C_2F_6$). The EPA estimates that concentrations of $CF_4$ in the atmosphere are over 70 parts per trillion (ppt). | The two main sources of PFCs are primary aluminum production and semiconductor manufacture. | No health effects are known to result from exposure to PFCs. |
| $SF_6$ | $SF_6$ is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900) (19). The EPA indicates that concentrations in the 1990s were about 4 ppt. | $SF_6$ is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and | In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing. |

**TABLE 2-1: GREENHOUSE GASES**

| Greenhouse Gases | Description | Sources | Health Effects |
|---|---|---|---|
| | | as a tracer gas for leak detection. | |
| Nitrogen Trifluoride ($NF_3$) | $NF_3$ is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that $NF_3$ has a 100-year GWP of 17,200 (20). | $NF_3$ is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display (LCD) panels, types of solar panels, and chemical lasers. | Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis (21). |

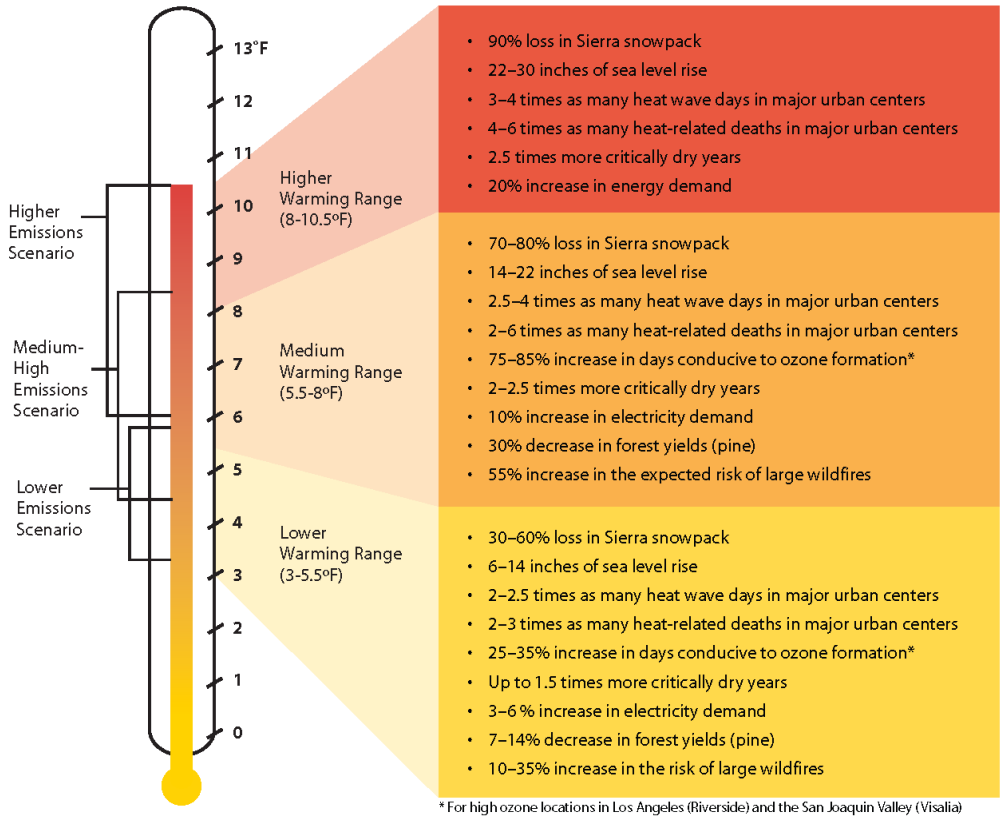
The potential health effects related directly to the emissions of $CO_2$, $CH_4$, and $N_2O$ as they relate to development projects such as the proposed Project are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport that higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change will likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas (22). Exhibit C presents the potential impacts of global warming (23).

## 2.4 GLOBAL WARMING POTENTIAL

GHGs have varying GWP values. GWP of a GHG indicates the amount of warming a gas causes over a given period of time and represents the potential of a gas to trap heat in the atmosphere. $CO_2$ is utilized as the reference gas for GWP, and thus has a GWP of 1. $CO_2$ equivalent ($CO_2e$) is a term used for describing the difference GHGs in a common unit. $CO_2e$ signifies the amount of $CO_2$ which would have the equivalent GWP.

The atmospheric lifetime and GWP of selected GHGs are summarized at Table 2-2. As shown in the table below, GWP for the Second Assessment Report, the Intergovernmental Panel on Climate Change (IPCC)'s scientific and socio-economic assessment on climate change, range from 1 for $CO_2$ to 23,900 for $SF_6$ and GWP for the IPCC's 5$^{th}$ Assessment Report range from 1 for $CO_2$ to 23,500 for $SF_6$ (24).

## EXHIBIT 2-A: SUMMARY OF PROJECTED GLOBAL WARMING IMPACT, 2070-2099 (AS COMPARED WITH 1961-1990)




Source: Barbara H. Allen-Diaz. "Climate change affects us all." *University of California, Agriculture and Natural Resources*, 2009.

## TABLE 2-2: GWP AND ATMOSPHERIC LIFETIME OF SELECT GHGS

| Gas | Atmospheric Lifetime (years) | Global Warming Potential (100-year time horizon) | |
|---|---|---|---|
| | | Second Assessment Report | 5th Assessment Report |
| $CO_2$ | See* | 1 | 1 |
| $CH_4$ | 12 .4 | 21 | 28 |
| $N_2O$ | 121 | 310 | 265 |
| HFC-23 | 222 | 11,700 | 12,400 |
| HFC-134a | 13.4 | 1,300 | 1,300 |
| HFC-152a | 1.5 | 140 | 138 |
| $SF_6$ | 3,200 | 23,900 | 23,500 |

*As per Appendix 8.A. of IPCC's 5th Assessment Report, no single lifetime can be given.
Source: Table 2.14 of the IPCC Fourth Assessment Report, 2007

## 2.5 GREENHOUSE GAS EMISSIONS INVENTORIES

### GLOBAL

Worldwide anthropogenic GHG emissions are tracked by the IPCC for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2017. Based on the latest available data, the sum of these emissions totaled approximately 29,216,501 gigagram (Gg) $CO_2e$[1] (25) (26) as summarized on Table 2-3.

*United States*

As noted in Table 2-3, the United States, as a single country, was the number two producer of GHG emissions in 2017.

**TABLE 2-3: TOP GHG PRODUCING COUNTRIES AND THE EUROPEAN UNION** [2]

| Emitting Countries | GHG Emissions (Gg $CO_2e$) |
|---|---|
| China | 11,911,710 |
| United States | 6,456,718 |
| European Union (28-member countries) | 4,323,163 |
| India | 3,079,810 |
| Russian Federation | 2,155,470 |
| Japan | 1,289,630 |
| **Total** | **29,216,501** |

### STATE OF CALIFORNIA

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls, but is still a substantial contributor to the U.S. emissions inventory total (27). The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2019 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2017 GHG emissions period, California emitted an average 424.1 million metric tons of $CO_2e$ ($MMTCO_2e$) per year (28).

[1] The global emissions are the sum of Annex I and non-Annex I countries, without counting Land-Use, Land-Use Change and Forestry (LULUCF). For countries without 2017 data, the UNFCCC data for the most recent year were used. United Nations Framework Convention on Climate Change, "Annex I Parties – GHG total without LULUCF," The most recent GHG emissions for China and India are from 2014.

[2] Used http://unfccc.int data for Annex I countries. Consulted the CAIT Climate Data Explorer in https://www.climatewatchdata.org site to reference Non-Annex I countries of China and India.

## 2.6 EFFECTS OF CLIMATE CHANGE IN CALIFORNIA

### PUBLIC HEALTH

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35% under the lower warming range to 75 to 85% under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. The Climate Scenarios report indicates that large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced.

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a large increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat.

### WATER RESOURCES

A vast network of man-made reservoirs and aqueducts captures and transports water throughout the state from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages.

If temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90%. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding.

The State's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta – a major fresh water supply.

### AGRICULTURE

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. First, California farmers could possibly lose as much as 25% of the water supply needed. Although higher $CO_2$ levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth.

Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a threshold. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures could worsen the quantity and quality of yield for a number of California's agricultural products. Products likely to be most affected include wine grapes, fruits and nuts.

In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion could occur in many species while range contractions may be less likely in rapidly evolving species with significant populations already established. Should range contractions occur, new or different weed species could fill the emerging gaps. Continued GCC could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates.

### RISING SEA LEVELS

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the state's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12-14 inches.

### FORESTS AND LANDSCAPES

GCC has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55%, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks will not be uniform throughout the state. In contrast, wildfires in northern California could increase by up to 90% due to decreased precipitation.

Moreover, continued GCC has the potential to alter natural ecosystems and biological diversity within the state. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80% by the end of the century as a result of increasing temperatures. The productivity of the state's forests has the potential to decrease as a result of GCC.

## 2.7 REGULATORY SETTING

### FEDERAL

Prior to the last decade, there have been no concrete federal regulations of GHGs or major planning for climate change adaptation. The following are actions regarding the federal government, GHGs, and fuel efficiency.

**GHG Endangerment**. In *Massachusetts v. Environmental Protection Agency* 549 U.S. 497 (2007), decided on April 2, 2007, the Supreme Court found that four GHGs, including $CO_2$, are air pollutants subject to regulation under Section 202(a)(1) of the Clean Air Act (CAA). The Court held that the EPA Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under section 202(a) of the CAA:

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs— $CO_2$, $CH_4$, $N_2O$, HFCs, PFCs, and $SF_6$—in the atmosphere threaten the public health and welfare of current and future generations.
- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles, as discussed in the section "Clean Vehicles" below. After a lengthy legal challenge, the U.S. Supreme Court declined to review an Appeals Court ruling that upheld the EPA Administrator's findings (29).

**Clean Vehicles**. Congress first passed the Corporate Average Fuel Economy law in 1975 to increase the fuel economy of cars and light duty trucks. The law has become more stringent over time. On May 19, 2009, President Obama put in motion a new national policy to increase fuel economy for all new cars and trucks sold in the U.S. On April 1, 2010, the EPA and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) announced a joint final rule establishing a national program that would reduce GHG emissions and improve fuel economy for new cars and trucks sold in the U.S.

The first phase of the national program applies to passenger cars, light-duty trucks, and medium-duty (MD) passenger vehicles, covering model years 2012 through 2016. They require these vehicles to meet an estimated combined average emissions level of 250 grams of $CO_2$ per mile, equivalent to 35.5 miles per gallon (mpg) if the automobile industry were to meet this $CO_2$ level solely through fuel economy improvements. Together, these standards would cut $CO_2$ emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012–2016). The EPA and the NHTSA issued final rules on a second-phase joint rulemaking establishing national standards for light-duty vehicles for model years 2017 through 2025 in August 2012. The new standards for model years 2017

through 2025 apply to passenger cars, light-duty trucks, and MD passenger vehicles. The final standards are projected to result in an average industry fleetwide level of 163 grams/mile of $CO_2$ in model year 2025, which is equivalent to 54.5 mpg if achieved exclusively through fuel economy improvements.

The EPA and the U.S. Department of Transportation issued final rules for the first national standards to reduce GHG emissions and improve fuel efficiency of heavy-duty trucks (HDT) and buses on September 15, 2011, effective November 14, 2011. For combination tractors, the agencies are proposing engine and vehicle standards that begin in the 2014 model year and achieve up to a 20% reduction in $CO_2$ emissions and fuel consumption by the 2018 model year. For HDT and vans, the agencies are proposing separate gasoline and diesel truck standards, which phase in starting in the 2014 model year and achieve up to a 10-percent reduction for gasoline vehicles and a 15% reduction for diesel vehicles by the 2018 model year (12 and 17% respectively if accounting for air conditioning leakage). Lastly, for vocational vehicles, the engine and vehicle standards would achieve up to a 10% reduction in fuel consumption and $CO_2$ emissions from the 2014 to 2018 model years.

On April 2, 2018, the EPA signed the Mid-term Evaluation Final Determination, which finds that the model year 2022-2025 GHG standards are not appropriate and should be revised (30). This Final Determination serves to initiate a notice to further consider appropriate standards for model year 2022-2025 light-duty vehicles. On August 24, 2018, the EPA and NHTSA published a proposal to freeze the model year 2020 standards through model year 2026 and to revoke California's waiver under the CAA to establish more stringent standards (31).

**Mandatory Reporting of GHGs**. The Consolidated Appropriations Act of 2008, passed in December 2007, requires the establishment of mandatory GHG reporting requirements. On September 22, 2009, the EPA issued the Final Mandatory Reporting of GHGs Rule, which became effective January 1, 2010. The rule requires reporting of GHG emissions from large sources and suppliers in the U.S. and is intended to collect accurate and timely emissions data to inform future policy decisions. Under the rule, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons per year (MT/yr) or more of GHG emissions are required to submit annual reports to the EPA.

**New Source Review**. The EPA issued a final rule on May 13, 2010, that establishes thresholds for GHGs that define when permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities. This final rule "tailors" the requirements of these CAA permitting programs to limit which facilities will be required to obtain Prevention of Significant Deterioration and Title V permits. In the preamble to the revisions to the Federal Code of Regulations, the EPA states:

> *"This rulemaking is necessary because without it the Prevention of Significant Deterioration and Title V requirements would apply, as of January 2, 2011, at the 100 or 250 tons per year levels provided under the CAA, greatly increasing the number of required permits, imposing undue costs on small sources, overwhelming the resources of permitting authorities, and severely impairing the functioning of the programs. EPA is relieving these resource burdens by phasing in the*

> *applicability of these programs to GHG sources, starting with the largest GHG emitters. This rule establishes two initial steps of the phase-in. The rule also commits the agency to take certain actions on future steps addressing smaller sources but excludes certain smaller sources from Prevention of Significant Deterioration and Title V permitting for GHG emissions until at least April 30, 2016."*

The EPA estimates that facilities responsible for nearly 70% of the national GHG emissions from stationary sources will be subject to permitting requirements under this rule. This includes the nation's largest GHG emitters—power plants, refineries, and cement production facilities.

**Standards of Performance for GHG Emissions for New Stationary Sources: Electric Utility Generating Units**. As required by a settlement agreement, the EPA proposed new performance standards for emissions of $CO_2$ for new, affected, fossil fuel-fired electric utility generating units on March 27, 2012. New sources greater than 25 megawatts would be required to meet an output-based standard of 1,000 pounds of $CO_2$ per megawatt-hour, based on the performance of widely used natural gas combined cycle technology. It should be noted that on February 9, 2016 the U.S. Supreme Court issued a stay of this regulation pending litigation. Additionally, the current EPA Administrator has also signed a measure to repeal the Clean Power Plan, including the $CO_2$ standards. The Clean Power Plan was officially repealed on June 19, 2019, when the EPA issued the final Affordable Clean Energy rule (ACE). Under ACE, new state emission guidelines were established that provided existing coal-fired electric utility generating units with achievable standards.

**Cap-and-Trade**. Cap-and-trade refers to a policy tool where emissions are limited to a certain amount and can be traded or provides flexibility on how the emitter can comply. Successful examples in the U.S. include the Acid Rain Program and the $N_2O$ Budget Trading Program and Clean Air Interstate Rule in the northeast. There is no federal GHG cap-and-trade program currently; however, some states have joined to create initiatives to provide a mechanism for cap-and-trade.

The Regional GHG Initiative is an effort to reduce GHGs among the states of Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont. Each state caps $CO_2$ emissions from power plants, auctions $CO_2$ emission allowances, and invests the proceeds in strategic energy programs that further reduce emissions, save consumers money, create jobs, and build a clean energy economy. The Initiative began in 2008 and in 2020 has retained all participating states.

The Western Climate Initiative (WCI) partner jurisdictions have developed a comprehensive initiative to reduce regional GHG emissions to 15% below 2005 levels by 2020. The partners were originally California, British Columbia, Manitoba, Ontario, and Quebec. However, Manitoba and Ontario are not currently participating. California linked with Quebec's cap-and-trade system January 1, 2014, and joint offset auctions took place in 2015. While the WCI has yet to publish whether it has successfully reached the 2020 emissions goal initiative set in 2007, SB 32, requires that California, a major partner in the WCI, adopt the goal of reducing statewide GHG emissions to 40% below the 1990 level by 2030.

**SmartWay Program.** The SmartWay Program is a public-private initiative between the EPA, large and small trucking companies, rail carriers, logistics companies, commercial manufacturers, retailers, and other federal and state agencies. Its purpose is to improve fuel efficiency and the environmental performance (reduction of both GHG emissions and air pollution) of the goods movement supply chains. SmartWay is comprised of four components (32):

1. SmartWay Transport Partnership: A partnership in which freight carriers and shippers commit to benchmark operations, track fuel consumption, and improve performance annually.
2. SmartWay Technology Program: A testing, verification, and designation program to help freight companies identify equipment, technologies, and strategies that save fuel and lower emissions.
3. SmartWay Vehicles: A program that ranks light-duty cars and small trucks and identifies superior environmental performers with the SmartWay logo.
4. SmartWay International Interests: Guidance and resources for countries seeking to develop freight sustainability programs modeled after SmartWay.

SmartWay effectively refers to requirements geared towards reducing fuel consumption. Most large trucking fleets driving newer vehicles are compliant with SmartWay design requirements. Moreover, over time, all HDTs will have to comply with the CARB GHG Regulation that is designed with the SmartWay Program in mind, to reduce GHG emissions by making them more fuel-efficient. For instance, in 2015, 53 foot or longer dry vans or refrigerated trailers equipped with a combination of SmartWay-verified low-rolling resistance tires and SmartWay-verified aerodynamic devices would obtain a total of 10% or more fuel savings over traditional trailers.

Through the SmartWay Technology Program, the EPA has evaluated the fuel saving benefits of various devices through grants, cooperative agreements, emissions and fuel economy testing, demonstration projects and technical literature review. As a result, the EPA has determined the following types of technologies provide fuel saving and/or emission reducing benefits when used properly in their designed applications, and has verified certain products:

- Idle reduction technologies – less idling of the engine when it is not needed would reduce fuel consumption.
- Aerodynamic technologies minimize drag and improve airflow over the entire tractor-trailer vehicle. Aerodynamic technologies include gap fairings that reduce turbulence between the tractor and trailer, side skirts that minimize wind under the trailer, and rear fairings that reduce turbulence and pressure drop at the rear of the trailer.
- Low rolling resistance tires can roll longer without slowing down, thereby reducing the amount of fuel used. Rolling resistance (or rolling friction or rolling drag) is the force resisting the motion when a tire rolls on a surface. The wheel will eventually slow down because of this resistance.
- Retrofit technologies include things such as diesel particulate filters, emissions upgrades (to a higher tier), etc., which would reduce emissions.
- Federal excise tax exemptions.

## STATE

### Legislative Actions to Reduce GHGs

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation such as the landmark AB 32 was specifically enacted to address GHG emissions. Other legislation such as Title 24 and Title 20 energy standards were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions. This section describes the major provisions of the legislation.

**AB 32**. The California State Legislature enacted AB 32, which required that GHGs emitted in California be reduced to 1990 levels by the year 2020 (this goal has been met[3]). GHGs as defined under AB 32 include $CO_2$, $CH_4$, $N_2O$, HFCs, PFCs, and $SF_6$. Since AB 32 was enacted, a seventh chemical, nitrogen trifluoride, has also been added to the list of GHGs. The CARB is the state agency charged with monitoring and regulating sources of GHGs. AB 32 states the following:

> *"Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems."*

**Senate Bill 32.** On September 8, 2016, Governor Jerry Brown signed the Senate Bill (SB) 32 and its companion bill, AB 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80% below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature (11).

**CARB Scoping Plan Update**. In November 2017, CARB released the *Final 2017 Scoping Plan Update*, which identifies the State's post-2020 reduction strategy. The *Final 2017 Scoping Plan Update* reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the LCFS, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce $CH_4$ emissions from agricultural and other wastes.

[3] Based upon the 2019 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2017 GHG emissions period, California emitted an average 424.1 $MMTCO_2e$ (30). This is less than the 2020 emissions target of 431 $MMTCO_2e$.

The *Final 2017 Scoping Plan Update* establishes a new emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030 (33).

California's climate strategy will require contributions from all sectors of the economy, including the land base, and will include enhanced focus on zero- and near-zero-emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants ($CH_4$, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries will further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the *Final 2017 Scoping Plan Update* framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing ZEV buses and trucks.
- LCFS, with an increased stringency (18% by 2030).
- Implementing SB 350, which expands the RPS to 50% RPS and doubles energy efficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of zero-emission vehicles (ZEV) trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing $CH_4$ and hydroflurocarbon emissions by 40% and anthropogenic black carbon emissions by 50% by year 2030.
- Continued implementation of SB 375.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- 20% reduction in GHG emissions from refineries by 2030.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Note, however, that the *Final 2017 Scoping Plan Update* acknowledges that:

> *"[a]chieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA."*

In addition to the statewide strategies listed above, the *Final 2017 Scoping Plan Update* also identifies local governments as essential partners in achieving the State's long-term GHG reduction goals and identifies local actions to reduce GHG emissions. As part of the recommended actions, CARB recommends that local governments achieve a community-wide

goal to achieve emissions of no more than 6 metric tons of $CO_2e$ ($MTCO_2e$) or less per capita by 2030 and 2 $MTCO_2e$ or less per capita by 2050. For CEQA projects, CARB states that lead agencies may develop evidenced-based bright-line numeric thresholds—consistent with the Scoping Plan and the State's long-term GHG goals—and projects with emissions over that amount may be required to incorporate on-site design features and mitigation measures that avoid or minimize project emissions to the degree feasible; or, a performance-based metric using a CAP or other plan to reduce GHG emissions is appropriate.

According to research conducted by the Lawrence Berkeley National Laboratory (LBNL) and supported by CARB, California, under its existing and proposed GHG reduction policies, could achieve the 2030 goals under SB 32. The research utilized a new, validated model known as the California LBNL GHG Analysis of Policies Spreadsheet (CALGAPS), which simulates GHG and criteria pollutant emissions in California from 2010 to 2050 in accordance to existing and future GHG-reducing policies. The CALGAPS model showed that by 2030, emissions could range from 211 to 428 $MTCO_2e$ per year, indicating that "even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40% below the 1990 level [of SB 32]." CALGAPS analyzed emissions through 2050 even though it did not generally account for policies that might be put in place after 2030. Although the research indicated that the emissions would not meet the State's 80% reduction goal by 2050, various combinations of policies could allow California's cumulative emissions to remain very low through 2050 (34) (35).

**Cap-and-Trade Program**. The Scoping Plan identifies a Cap-and-Trade Program as one of the key strategies for California to reduce GHG emissions. According to CARB, a cap-and-trade program will help put California on the path to meet its goal of achieving a 40% reduction in GHG emissions from 1990 levels by 2030. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap will be able to trade permits to emit GHGs within the overall limit.

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from regulated entities by more than 16% between 2013 and 2020, and by an additional 40% by 2030. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program's duration.

Covered entities that emit more than 25.000 $MTCO_2e$ per year must comply with the Cap-and-Trade Program. Triggering of the 25.000 $MTCO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of GHG Emissions (Mandatory Reporting Rule or "MRR").

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender "compliance instruments" for each

$MTCO_2e$ of GHG they emit. There also are requirements to surrender compliance instruments covering 30% of the prior year's compliance obligation by November of each year (36).

The Cap-and-Trade Program provides a firm cap, which provides the highest certainty of achieving the 2030 target. An inherent feature of the Cap-and-Trade program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. As summarized by CARB in the *First Update to the Climate Change Scoping Plan*:

> *"The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced. In other words, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program if there is a reduction in GHG emissions from other covered entities. Such a focus on aggregate GHG emissions is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative."* (37)

The Cap-and-Trade Program covered approximately 80% of California's GHG emissions (33). The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported.

**SB 375 – the Sustainable Communities and Climate Protection Act of 2008**. Passing the Senate on August 30, 2008, Senate Bill (SB) 375 was signed by the Governor on September 30, 2008. According to SB 375, the transportation sector is the largest contributor of GHG emissions, which emits over 40% of the total GHG emissions in California. SB 375 states, "Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32." SB 375 does the following: it (1) requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, (2) aligns planning for transportation and housing, and (3) creates specified incentives for the implementation of the strategies.

Concerning CEQA, SB 375, as codified in Public Resources Code Section 21159.28, states that CEQA findings for certain projects are not required to reference, describe, or discuss (1) growth inducing impacts, or (2) any project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network, if the project:

1. Is in an area with an approved sustainable communities strategy or an alternative planning strategy that the CARB accepts as achieving the GHG emission reduction targets.
2. Is consistent with that strategy (in designation, density, building intensity, and applicable policies).
3. Incorporates the mitigation measures required by an applicable prior environmental document.

**AB 1493**. California AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the EPA's denial of an implementation waiver. The EPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011.

The standards phase in during the 2009 through 2016 model years. When fully phased in, the near-term (2009–2012) standards will result in about a 22% reduction compared with the 2002 fleet, and the mid-term (2013–2016) standards will result in about a 30% reduction. Several technologies stand out as providing significant reductions in emissions at favorable costs. These include discrete variable valve lift or camless valve actuation to optimize valve operation rather than relying on fixed valve timing and lift as has historically been done; turbocharging to boost power and allow for engine downsizing; improved multi-speed transmissions; and improved air conditioning systems that operate optimally, leak less, and/or use an alternative refrigerant.

The second phase of the implementation for the Pavley bill was incorporated into Amendments to the Low-Emission Vehicle Program (LEV III) or the Advanced Clean Cars program. The Advanced Clean Car program combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for model years 2017 through 2025. The regulation will reduce GHGs from new cars by 34% from 2016 levels by 2025. The new rules will clean up gasoline and diesel-powered cars, and deliver increasing numbers of zero-emission technologies, such as full battery electric cars, newly emerging plug-in hybrid electric vehicles and hydrogen fuel cell cars. The package will also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California.

**SB 350— Clean Energy and Pollution Reduction Act of 2015.** In October 2015, the legislature approved, and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Provisions for a 50% reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40% by 2024, and 25% by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.

- Reorganize the Independent System Operator to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

**EXECUTIVE ORDERS RELATED TO GHG EMISSIONS**

California's Executive Branch has taken several actions to reduce GHGs through the use of Executive Orders. Although not regulatory, they set the tone for the state and guide the actions of state agencies.

**Executive Order B-55-18 and SB 100.** Executive Order B-55-18 and SB 100. SB 100 and Executive Order B-55-18 were signed by Governor Brown on September 10, 2018. Under the existing RPS, 25% of retail sales are required to be from renewable sources by December 31, 2016, 33% by December 31, 2020, 40% by December 31, 2024, 45% by December 31, 2027, and 50% by December 31, 2030. SB 100 raises California's RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

**Executive Order S-3-05**. Former California Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following reduction targets for GHG emissions:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80% below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an executive order, the goals are not legally enforceable for local governments or the private sector.

**Executive Order S-01-07 – Low Carbon Fuel Standard**. The Governor signed Executive Order S-01-07 on January 18, 2007. The order mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10% by 2020. The CARB adopted the LCFS on April 23, 2009.

The LCFS was challenged in the U.S. District Court in Fresno in 2011. The court's ruling issued on December 29, 2011, included a preliminary injunction against CARB's implementation of the rule. The Ninth Circuit Court of Appeals stayed the injunction on April 23, 2012, pending final ruling on

appeal, allowing CARB to continue to implement and enforce the regulation. The Ninth Circuit Court's decision, filed September 18, 2013, vacated the preliminary injunction. In essence, the court held that LCFS adopted by CARB were not in conflict with federal law. On August 8, 2013, the Fifth District Court of Appeal (California) ruled CARB failed to comply with CEQA and the Administrative Procedure Act (APA) when adopting regulations for LCFS. In a partially published opinion, the Court of Appeal reversed the trial court's judgment and directed issuance of a writ of mandate setting aside Resolution 09-31 and two executive orders of CARB approving LCFS regulations promulgated to reduce GHG emissions. However, the court tailored its remedy to protect the public interest by allowing the LCFS regulations to remain operative while CARB complies with the procedural requirements it failed to satisfy.

To address the Court ruling, CARB was required to bring a new LCFS regulation to the Board for consideration in February 2015. The proposed LCFS regulation was required to contain revisions to the 2010 LCFS as well as new provisions designed to foster investments in the production of the low-carbon intensity fuels, offer additional flexibility to regulated parties, update critical technical information, simplify and streamline program operations, and enhance enforcement. On November 16, 2015 the Office of Administrative Law (OAL) approved the Final Rulemaking Package. The new LCFS regulation became effective on January 1, 2016.

In 2018, the CARB approved amendments to the regulation, which included strengthening the carbon intensity benchmarks through 2030 in compliance with the SB 32 GHG emissions reduction target for 2030. The amendments included crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector (38).

**Executive Order S-13-08**. Executive Order S-13-08 states that "climate change in California during the next century is expected to shift precipitation patterns, accelerate sea level rise and increase temperatures, thereby posing a serious threat to California's economy, to the health and welfare of its population and to its natural resources." Pursuant to the requirements in the Order, the 2009 California Climate Adaptation Strategy (CNRA 2009) was adopted, which is the "…first statewide, multi-sector, region-specific, and information-based climate change adaptation strategy in the United States." Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

**Executive Order B-30-15**. On April 29, 2015, Governor Edmund G. Brown Jr. issued an executive order to establish a California GHG reduction target of 40% below 1990 levels by 2030. The Governor's executive order aligns California's GHG reduction targets with those of leading international governments ahead of the United Nations Climate Change Conference in Paris late 2015. The Order sets a new interim statewide GHG emission reduction target to reduce GHG emissions to 40% below 1990 levels by 2030 in order to ensure California meets its target of reducing GHG emissions to 80% below 1990 levels by 2050 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of $MMTCO_2e$. The Order also requires the state's climate adaptation plan to be updated every three years, and for the State to continue its climate change research program, among other provisions. As with Executive Order S-3-05, this Order is not legally enforceable for local governments and the private sector.

Legislation that would update AB 32 to make post 2020 targets and requirements a mandate is in process in the State Legislature.

#### CALIFORNIA REGULATIONS AND BUILDING CODES

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California's energy consumption relatively flat even with rapid population growth.

**Title 20 CCR**. CCR, Title 20: Division 2, Chapter 4, Article 4, Sections 1601-1608: Appliance Efficiency Regulations regulates the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. 23 categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles or other mobile equipment (CEC 2012).

**Title 24 CCR**. CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020.

The CEC indicates that the 2019 Title 24 standards will require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, update indoor and outdoor lighting for nonresidential buildings. The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar photovoltaic systems, homes built under the 2019 standards will about 53% less energy than homes built under the 2016 standards. Nonresidential buildings will use approximately 30% less energy due to lighting upgrades (39).

CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2011, and is administered by the California Building Standards Commission (BSC). CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that have become effective on January 1, 2020. Local jurisdictions are permitted to adopt more stringent requirements, as state law provides methods for local enhancements. CALGreen recognizes that many jurisdictions have developed existing construction and demolition ordinances and defers to them as the ruling guidance provided, they establish a minimum 65% diversion requirement. The code also provides exemptions for areas not served by construction and demolition recycling

infrastructure. The State Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy, which is generally enforced by the local building official. 2019 CALGreen standards are applicable to the Project and require (40):

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- Designated parking. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phase project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
    - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
    - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
    - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
    - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of note more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).

- Outdoor portable water use in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient (MWELO), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gal/day (5.303.1.1 and 5.303.1.2).
- Outdoor water use in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

**MWELO**. The MWELO was required by AB 1881, the Water Conservation Act. The bill required local agencies to adopt a local landscape ordinance at least as effective in conserving water as the Model Ordinance by January 1, 2010. Governor Brown's Drought Executive Order of April 1, 2015 (Executive Order B-29-15) directed Department of Water Resources (DWR) to update the Ordinance through expedited regulation. The California Water Commission approved the revised Ordinance on July 15, 2015 effective December 15, 2015. New development projects that include landscape areas of 500 sf or more are subject to the Ordinance. The update requires:

- More efficient irrigation systems;
- Incentives for graywater usage;
- Improvements in on-site stormwater capture;
- Limiting the portion of landscapes that can be planted with high water use plants; and
- Reporting requirements for local agencies.

**CARB Refrigerant Management Program.** CARB adopted a regulation in 2009 to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is set forth in sections 95380 to 95398 of Title 17, CCR. The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with refrigeration systems with more than 50 pounds of a high GWP refrigerant. The refrigerant management program is designed to (1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and (3) verify GHG emission reductions.

**Tractor-Trailer GHG Regulation**. The tractors and trailers subject to this regulation must either use EPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the HD tractors that pull them on California highways. These owners are responsible for replacing or retrofitting their affected vehicles with compliant aerodynamic technologies and low rolling resistance tires.

Sleeper cab tractors model year 2011 and later must be SmartWay certified. All other tractors must use SmartWay verified low rolling resistance tires. There are also requirements for trailers to have low rolling resistance tires and aerodynamic devices.

**Phase I and 2 Heavy-Duty Vehicle GHG Standards.** CARB has adopted a new regulation for GHG emissions from HDTs and engines sold in California. It establishes GHG emission limits on truck and engine manufacturers and harmonizes with the EPA rule for new trucks and engines nationally. Existing HD vehicle regulations in California include engine criteria emission standards, tractor-trailer GHG requirements to implement SmartWay strategies (i.e., the Heavy-Duty Tractor-Trailer Greenhouse Gas Regulation), and in-use fleet retrofit requirements such as the Truck and Bus Regulation. In September 2011, the EPA adopted their new rule for HDTs and engines. The EPA rule has compliance requirements for new compression and spark ignition engines, as well as trucks from Class 2b through Class 8. Compliance requirements begin with model year (MY) 2014 with stringency levels increasing through MY 2018. The rule organizes truck compliance into three groupings, which include a) HD pickups and vans; b) vocational vehicles; and c) combination tractors. The EPA rule does not regulate trailers.

CARB staff has worked jointly with the EPA and the NHTSA on the next phase of federal GHG emission standards for medium-duty trucks (MDT) and HDT vehicles, called federal Phase 2. The federal Phase 2 standards were built on the improvements in engine and vehicle efficiency required by the Phase 1 emission standards and represent a significant opportunity to achieve further GHG reductions for 2018 and later model year HDT vehicles, including trailers. But as discussed above, the EPA and NHTSA have proposed to roll back GHG and fuel economy standards for cars and light-duty trucks, which suggests a similar rollback of Phase 2 standards for MDT and HDT vehicles may be pursued.

**SB 97 and the CEQA Guidelines Update**. Passed in August 2007, SB 97 added Section 21083.05 to the Public Resources Code. The code states "(a) On or before July 1, 2009, the Office of Planning and Research (OPR) shall prepare, develop, and transmit to the Resources Agency guidelines for the mitigation of GHG emissions or the effects of GHG emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption. (b) On or before January 1, 2010, the Resources Agency shall certify and adopt guidelines prepared and developed by the OPR pursuant to subdivision (a)." Section 21097 was also added to the Public Resources Code. It provided CEQA protection until January 1, 2010 for transportation projects funded by the Highway Safety, Traffic Reduction, Air Quality, and Port Security Bond Act of 2006 or projects funded by the Disaster Preparedness and Flood Prevention Bond Act of 2006, in stating that the failure to analyze adequately the effects of GHGs would not violate CEQA.

On December 28, 2018, the Natural Resources Agency announced the OAL approved the amendments to the CEQA Guidelines for implementing the CEQA. The CEQA Amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents. The CEQA Amendments fit within the existing CEQA framework by amending existing CEQA Guidelines to reference climate change.

Section 15064.3 was added the CEQA Guidelines and states that in determining the significance of a project's GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. Additionally, a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use (41).

#### REGIONAL

The project is within the South Coast Air Basin (SCAB), which is under the jurisdiction of the SCAQMD.

### SCAQMD

SCAQMD is the agency responsible for air quality planning and regulation in the SCAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions.

In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold, that could be applied by lead agencies. The working group has not provided additional guidance since release of the interim guidance in 2008. The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current interim thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years

and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:

  - Residential and Commercial land use: 3,000 $MTCO_2e$ per year
  - Industrial land use: 10,000 $MTCO_2e$ per year
  - Based on land use type: residential: 3,500 $MTCO_2e$ per year; commercial: 1,400 $MTCO_2e$ per year; or mixed use: 3,000 $MTCO_2e$ per year

- Tier 4 has the following options:
  - Option 1: Reduce BAU emissions by a certain percentage; this percentage is currently undefined.
  - Option 2: Early implementation of applicable AB 32 Scoping Plan measures
  - Option 3: 2020 target for service populations (SP), which includes residents and employees: 4.8 $MTCO_2e$/SP/year for projects and 6.6 $MTCO_2e$/SP/year for plans;
  - Option 3, 2035 target: 3.0 $MTCO_2e$/SP/year for projects and 4.1 $MTCO_2e$/SP/year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap $CO_2$ concentrations at 450 ppm, thus stabilizing global climate.

SCAQMD only has authority over GHG emissions from development projects that include air quality permits. At this time, it is unknown if the project would include stationary sources of emissions subject to SCAQMD permits. Notwithstanding, if the Project requires a stationary permit, it would be subject to the applicable SCAQMD regulations.

SCAQMD Regulation XXVII, adopted in 2009 includes the following rules:

- Rule 2700 defines terms and post global warming potentials.
- Rule 2701, SoCal Climate Solutions Exchange, establishes a voluntary program to encourage, quantify, and certify voluntary, high quality certified GHG emission reductions in the SCAQMD.
- Rule 2702, GHG Reduction Program created a program to produce GHG emission reductions within the SCAQMD. The SCAQMD will fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

**LOCAL**

**City of Riverside General Plan 2025**

The City of Riverside 2025 General Plan, adopted in November 2007, outlines the following policies in the Air Quality Element that are applicable to the Proposed Project (43).

Policy AQ-1.3 Separate, buffer and protect sensitive receptors from significant sources of pollution to the greatest extent possible.

Objective AQ-4 Reduce particulate matter, as defined by the EPA, as either airborne photochemical precipitates or windborne dust.

Policy AQ-4.2 Reduce particulate matter from agriculture (e.g., require use of clean non-diesel equipment and particulate traps), construction, demolition, debris hauling, street cleaning, utility maintenance, railroad rights-of-way and off-road vehicles to the extent possible, as provided in SCAQMD Rule 403.

Policy AQ-4.5 Require the suspension of all grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour.

Objective AQ-5: Increase energy efficiency and conservation in an effort to reduce air pollution.

Policy AQ-5.1: Utilize source reduction, recycling and other appropriate measures to reduce the amount of solid waste disposed of in landfills.

**City of Riverside Municipal Code**

Title 19, Chapter 19.570 - Water Efficient Landscaping and Irrigation

Consistent with the Governor's Executive Order No. B-29-15, and the State Model Water Efficient Landscape Ordinance, the City of Riverside adopted Chapter 19.570 of to:

1. Promote the values and benefits of landscaping practices that integrate and go beyond the conservation and efficient use of water;

2. Establish a structure for planning, designing, installing, maintaining, and managing water efficient landscapes in new construction and rehabilitated projects by encouraging the use of a watershed approach that requires cross-sector collaboration of industry, government and property owners to achieve the many benefits possible;

3. Reduce water demands from landscapes without a decline in landscape quality or quantity;

4. Retain flexibility and encourage creativity through appropriate design;

5. Establish provisions for water management practices and water waste prevention for existing landscapes;

6. Use water efficiently without waste by setting a Maximum Applied Water Allowance (MAWA) as an upper limit for water use and reduce water use to the lowest practical amount;

7. Assure the attainment of water efficient landscape goals by requiring that landscapes not exceed a maximum water demand (evapotranspiration adjustment factor of .55 for residential and .45 nonresidential) of its reference evapotranspiration ($ET_o$) or any lower percentage as may be required;

8. Achieve water conservation by raising the public awareness of the need to conserve water through education and motivation to embrace an effective water demand management program; and

9. Promote the use of recycled water for landscaping.

Any new or rehabilitated landscape is required to prepare and submit an application to the Planning Division for review and approval by the Community and Economic Development Director or his/her designee (42). The planting plan, irrigation plan, and soils management plan shall be reviewed to ensure that all components of the plans adhere to the requirements of Chapter 19.570. No certificate of occupancy or other final City approval shall be issued until the City reviews and approves the landscape and irrigation plans, and the landscape and irrigation are installed in accordance with the approved plans.

**City of Riverside Restorative Growthprint Climate Action Plan**

The City of Riverside collaborated with the Western Riverside Council of Governments (WRCOG) on a Subregional Climate Action Plan (CAP). The City of Riverside Restorative Growthprint Climate Action Plan (RRG CAP) builds on the WRCOG Subregional CAP commitments and provides the City GHG reduction goals beyond 2020 to 2035. Through the WRCOG Subregional CAP process, the City has adopted a 2020 community wide GHG emissions target of 2,224,908 $MTCO_2e$, which represents a 15 percent reduction from the City's 2010 GHG emissions baseline inventory, and a 2035 emissions target of 1,532,274 $MTCO_2e$, 49 percent below the 2007 baseline. These reduction targets are consistent with the statewide AB 32 goal of reducing emissions to 1990 levels and fulfill the requirements of SB 375.

The RRG-CAP contains GHG reduction measures organized into four primary sectors to meet these targets (44):

- **Energy**: Promote energy efficiency and renewable energy for municipal operations and the community
- **Transportation and Land Use**: Measures to reduce single-occupancy travel, increase non-motorized travel, improve transit access, encourage alternative fuels, and promote sustainable growth patterns.
- **Water**: Measures to reduce water demand by community and municipal operations and to conserve potable water.
- **Solid Waste**: Measures to reduce solid waste during construction and operational activities.

## 2.8 Discussion on Establishment of Significance Thresholds

The City of Riverside has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. A screening threshold of 3,000 $MTCO_2e$ per year to determine if additional analysis is required is an acceptable approach for small projects. This approach is a widely accepted screening threshold used by the City of Riverside and numerous cities in the South Coast Air Basin and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* ("SCAQMD Interim GHG Threshold"). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required (45). As noted by the SCAQMD:

> *"…the…screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects...the policy objective of [SCAQMD's]*

> *recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90 percent of all new or modified stationary source projects. A GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than one percent of future 2050 statewide GHG emissions target (85 [MMTCO$_2$e/yr]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology] (BACT) for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility."* (45)

Thus, and based on guidance from the SCAQMD, if a non-industrial project would emit GHGs less than 3,000 MTCO$_2$e per year, the project is not considered a substantial GHG emitter and the GHG impact is less than significant, requiring no additional analysis and no mitigation. On the other hand, if a non-industrial project would emit GHGs in excess of 3,000 MTCO$_2$e per year, then the project could be considered a substantial GHG emitter, requiring additional analysis and potential mitigation.

As previously discussed, a screening threshold of 3,000 MTCO$_2$e per year is an acceptable approach for small projects to determine if additional analysis is required and is therefore applied for this Project.

# 3 PROJECT GREENHOUSE GAS IMPACT

## 3.1 INTRODUCTION

The Project has been evaluated to determine if it will result in a significant GHG impact. The significance of these potential impacts is described in the following section.

## 3.2 STANDARDS OF SIGNIFICANCE

The criteria used to determine the significance of potential Project-related GHG impacts are taken from the Initial Study Checklist in Appendix G of the State CEQA Guidelines (14 California Code of Regulations §§15000, et seq.). Based on these thresholds, a project would result in a significant impact related to GHG if it would (1):

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

## 3.3 CALIFORNIA EMISSIONS ESTIMATOR MODEL™

On October 17, 2017, the SCAQMD, in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the California Emissions Estimator Model™ (CalEEMod) v2016.3.2. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, $NO_X$, $SO_X$, CO, $PM_{10}$, and $PM_{2.5}$) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures (46). Accordingly, the latest version of CalEEMod™ has been used for this Project to determine GHG emissions. Output from the model runs for construction and operational activity are provided in Appendices 3.1 through 3.4. CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water.

### 3.3.1 EMFAC2017 EMISSION RATES

On August 19, 2019, the EPA approved the 2017 version of the EMissions FACtor model (EMFAC) web database for use in State Implementation Plan and transportation conformity analyses. EMFAC2017 is a mathematical model that was developed to calculate emission rates, fuel consumption, vehicle miles traveled (VMT) from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources (47). This GHGA utilizes annual EMFAC2017 emission factors in order to derive vehicle emissions associated with Project operational activities.

Because the EMFAC2017 emission rates are associated with vehicle fuel types while CalEEMod vehicle emission factors are aggregated to include all fuel types for each individual vehicle class, the EMFAC2017 emission rates for different fuel types of a vehicle class are averaged by activity

or by population and activity to derive CalEEMod emission factors. The equations applied to obtain CalEEMod vehicle emission factors for each emission type are detailed in CalEEMod User's Guide *Appendix A: Calculation Details for CalEEMod* (48).

## 3.4 CONSTRUCTION AND OPERATIONAL LIFE-CYCLE ANALYSIS NOT REQUIRED

A full life-cycle analysis (LCA) for construction and operational activity is not included in this analysis due to the lack of consensus guidance on LCA methodology at this time (49). Life-cycle analysis (i.e., assessing economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in the project development, infrastructure and on-going operations) depends on emission factors or econometric factors that are not well established for all processes. At this time, an LCA would be extremely speculative and thus has not been prepared.

Additionally, the SCAQMD recommends analyzing direct and indirect project GHG emissions generated within California and not life-cycle emissions because the life-cycle effects from a project could occur outside of California, might not be very well understood or documented, and would be challenging to mitigate (50). Additionally, the science to calculate life cycle emissions is not yet established or well defined; therefore, SCAQMD has not recommended, and is not requiring, life-cycle emissions analysis.

## 3.5 CONSTRUCTION EMISSIONS

Project construction actvities would generate $CO_2$ and $CH_4$ emissions The report *Dauchy Street Air Quality Impact Analysis Report* (Urban Crossroads, Inc.) contains detailed information regarding Project construction activities (51). As discussed in the AQIA, Construction related emissions are expected from the following construction activities:

- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

### 3.5.1 CONSTRUCTION DURATION

For purposes of analysis, construction of Project is expected to commence June 1, 2022, and be completed by September 19, 2023. The construction schedule utilized in the analysis, shown in Table 3-1, represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines*15064* (52).

**TABLE 3-1: CONSTRUCTION DURATION**

| Phase Name | Start Date | End Date | Days |
|---|---|---|---|
| Site Preparation | 6/1/2022 | 6/14/2022 | 10 |
| Grading | 6/15/2022 | 7/26/2022 | 30 |
| Building Construction | 7/27/2022 | 9/19/2023 | 300 |
| Paving | 7/26/2023 | 9/19/2023 | 40 |
| Architectural Coating | 7/26/2023 | 9/19/2023 | 40 |
| Source: CalEEMod 2016. | | | |

### 3.5.2 CONSTRUCTION EQUIPMENT

Site specific construction fleet may vary due to specific project needs at the time of construction. The associated construction equipment was generally based on CalEEMod 2016.3.2 defaults, and the Project applicant has confirmed that the equipment list is reasonable for the Project's construction. A detailed summary of construction equipment assumptions by phase is provided at Table 3-2. Please refer to specific detailed modeling inputs/outputs contained in Appendices 3.1 and 3.2 of this GHGA.

### 3.5.3 CONSTRUCTION EMISSIONS SUMMARY

For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life then adding that number to the annual operational phase GHG emissions (53). As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 3-3.

## 3.6 OPERATIONAL EMISSIONS

Operational activities associated with the proposed Project will result in emissions of $CO_2$, $CH_4$, and $N_2O$ from the following primary sources:

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions
- Water Supply, Treatment, and Distribution
- Solid Waste

**TABLE 3-2: CONSTRUCTION EQUIPMENT ASSUMPTIONS**

| Phase Name | Equipment | Amount | Hours Per Day |
|---|---|---|---|
| Site Preparation | Crawler Tractors | 4 | 8 |
| | Rubber Tired Dozers | 3 | 8 |
| Grading | Crawler Tractors | 2 | 8 |
| | Excavators | 2 | 8 |
| | Graders | 1 | 8 |
| | Rubber Tired Dozers | 1 | 8 |
| | Scrapers | 2 | 8 |
| Building Construction | Air Compressors | 1 | 8 |
| | Cranes | 1 | 8 |
| | Forklifts | 3 | 8 |
| | Generator Sets | 1 | 8 |
| | Tractors/Loaders/Backhoes | 3 | 8 |
| Paving | Pavers | 2 | 8 |
| | Paving Equipment | 2 | 8 |
| | Rollers | 2 | 8 |
| Architectural Coating | Air Compressors | 1 | 8 |
| Source: CalEEMod 2016. | | | |

**TABLE 3-3: CONSTRUCTION GHG EMISSIONS**

| Year | Emissions (MT/yr) | | | |
|---|---|---|---|---|
| | $CO_2$ | $CH_4$ | $N_2O$ | Total $CO_2e$ |
| 2022 | 314.17 | 0.08 | 0.00 | 316.16 |
| 2023 | 343.24 | 0.07 | 0.00 | 345.07 |
| Total Annual Construction Emissions | 657.41 | 0.15 | 0.00 | 661.23 |
| **Amortized Construction Emissions ($MTCO_2e$)** | **21.91** | **0.01** | **0.00** | **22.04** |

### 3.6.1 AREA SOURCE EMISSIONS

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. The emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod.

### 3.6.2 ENERGY SOURCE EMISSIONS

Combustion Emissions Associated with Natural Gas and Electricity

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits $CO_2$ and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building; the building energy use emissions do not include street lighting[4]. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. To account for the effects of RPS and SB 100 on the energy sector emissions, the intensity factors for calculating energy related emissions have been adjusted to reflect the current status of Southern California Edison's renewable energy sources.

Title 24 Energy Efficiency Standards

California's Energy Efficiency Standards for Residential and Nonresidential Buildings was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020. The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar photovoltaic systems, homes built under the 2019 standards will about 53% less energy than homes built under the 2016 standards. (39). The CalEEMod defaults for Title 24 – Electricity, Title 24 – Natural Gas, and Lighting Energy were reduced by 53% for residential uses reflect consistency with the 2019 Title 24 standards.

### 3.6.3 Mobile Source Emissions

Project mobile source GHG impacts are dependent on both overall daily vehicle trip generation and the effect of the Project on peak hour traffic volumes and traffic operations in the vicinity of the Project. The Project-related GHG impacts are derived primarily from vehicle trips generated by the Project. Trip characteristics available from CalEEMod for the region were used.

### 3.6.4 Water Supply, Treatment and Distribution

Indirect GHG emissions result from the production of electricity used to convey, treat and distribute water and wastewater. The amount of electricity required to convey, treat and distribute water depends on the volume of water as well as the sources of the water. CalGreen requires a 20 percent reduction in indoor water use. Therefore, CalEEMod default parameters were modified to reflect this requirement.

### 3.6.5 Solid Waste

GHG emissions from waste generation were also calculated in CalEEMod and are based on the IPCC's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste (CAPCOA 2017). Waste disposal rates by land use and overall composition of municipal solid waste in California was primarily based on data provided by the California

[4] The CalEEMod emissions inventory model does not include indirect emission related to street lighting. Indirect emissions related to street lighting are expected to be negligible and cannot be accurately quantified at this time as there is insufficient information as to the number and type of street lighting that would occur.

Department of Resources Recycling and Recovery (CalRecycle). CalEEMod based solid waste generation on a 2008 waste characterization study. Since the publication of the 2008 survey, statewide diversion has increased by approximately 25 percent. This additional reduction has been included in the modeling.

## 3.7 EMISSIONS SUMMARY

The annual GHG emissions associated with the operation of the proposed Project are estimated to be 906.49 $MTCO_2e$ per year as summarized in Table 3-4.

**TABLE 3-4: PROJECT GHG EMISSIONS**

| Emission Source | Emissions (MT/yr) | | | |
|---|---|---|---|---|
| | $CO_2$ | $CH_4$ | $N_2O$ | Total $CO_2e$ |
| Annual construction-related emissions amortized over 30 years | 21.91 | 0.01 | 0.00 | 22.04 |
| Area Source | 12.42 | 0.00 | 0.00 | 12.51 |
| Energy Source | 149.61 | 0.01 | 0.00 | 150.27 |
| Mobile Source | 628.18 | 0.03 | 0.00 | 628.91 |
| Waste | 0.00 | 12.65 | 0.75 | 31.34 |
| Water Usage | 15.59 | 16.41 | 0.09 | 19.19 |
| **Total $CO_2e$ (All Sources)** | **864.27** | | | |
| **SCAQMD Recommended Screening Threshold** | **3,000** | | | |

Source: CalEEMod model output, See Appendices 3.1 through 3.2 for detailed model outputs.

## 3.8 GREENHOUSE GAS EMISSIONS FINDINGS AND RECOMMENDATIONS

***GHG Impact 1: The Project would not generate direct or indirect GHG emission that would result in a significant impact on the environment.***

The City of Riverside has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. A screening threshold of 3,000 $MTCO_2e$ per year to determine if additional analysis is required is an acceptable approach for small projects. This approach is a widely accepted screening threshold used by the City and numerous cities in the SCAB and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* ("SCAQMD Interim GHG Threshold"). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required (54).

As shown on Table 3-4, the Project will result in approximately 907 $MTCO_2e$ per year; the proposed Project would not exceed the SCAQMD/City's screening threshold of 3,000 $MTCO_2e$ per year. Thus, project-related emissions would not have a significant direct or indirect impact on GHG and climate change and no mitigation or further analysis is required.

***GHG Impact #2: The Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.***

As previously stated, pursuant to 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions (41). As such, the Project's consistency with AB 32, SB 32, and the County's CAP are discussed below.

### SB 32/2017 SCOPING PLAN CONSISTENCY

The 2017 Scoping Plan Update reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Table 3-5 summarizes the project's consistency with the 2017 Scoping Plan. As summarized, the project will not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories.

**TABLE 3-5: 2017 SCOPING PLAN CONSISTENCY SUMMARY[5]**

| Action | Responsible Parties | Consistency |
|---|---|---|
| **Implement SB 350 by 2030** | | |
| Increase the Renewables Portfolio Standard to 50 percent of retail sales by 2030 and ensure grid reliability. | CPUC, CEC, CARB | Consistent. The Project would use energy from RPU. RPU has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. The Project would not interfere with or obstruct RPU energy source diversification efforts. |
| Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030. | | Consistent. Although this measure is directed towards policymakers, the proposed Project would be designed and constructed to implement the energy efficiency measures for new commercial developments and would include several measures designed to reduce energy consumption. |
| Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly- owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs. | | Consistent. The proposed Project would be designed and constructed to implement the energy efficiency measures, where applicable by including several measures designed to reduce energy consumption. The proposed Project includes energy efficient lighting and fixtures that meet the current Title 24 Standards throughout the Project Site and would be a modern development with energy efficient boilers, heaters, and air conditioning systems. |
| **Implement Mobile Source Strategy (Cleaner Technology and Fuels)** | | |

[5] Measures can be found at the following link: https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf

**TABLE 3-5: 2017 SCOPING PLAN CONSISTENCY SUMMARY[5]**

| Action | Responsible Parties | Consistency |
|---|---|---|
| At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025. | CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies | Not applicable. This measure is not within the purview of this Project. |
| At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030. | | Not applicable. This measure is not within the purview of this Project. |
| Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations. | | Not applicable. This measure is not within the purview of this Project. |
| Medium- and Heavy-Duty GHG Phase 2. | | Not applicable. This measure is not within the purview of this Project. |
| Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-$NO_X$ standard. | | Not applicable. This measure is not within the purview of this Project. |
| Last Mile Delivery: New regulation that would result in the use of low $NO_X$ or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030. | | Not applicable. This measure is not within the purview of this Project. |
| Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the | | Not applicable. This measure is not within the purview of this Project. |

**TABLE 3-5: 2017 SCOPING PLAN CONSISTENCY SUMMARY[5]**

| Action | Responsible Parties | Consistency |
|---|---|---|
| Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion." | | |
| Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets). | CARB | Not applicable. The Project is not within the purview of SB 375 and would therefore not conflict with this measure. |
| **By 2019, adjust performance measures used to select and design transportation facilities** | | |
| Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.). | CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GO-Biz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans | Not applicable. Although this is directed towards CARB and Caltrans, the proposed Project would be designed to promote and support pedestrian activity on-site and in the Project Site area. The Project Site is within proximity to residential neighborhoods. |
| By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts). | CalSTA, Caltrans, CTC, OPR, SGC, CARB | Not applicable. This measure is not within the purview of this Project. |
| **Implement California Sustainable Freight Action Plan** | | |
| Improve freight system efficiency. | CalSTA, CalEPA, CNRA, | Not applicable. This measure is not within the purview of this Project. |

**TABLE 3-5: 2017 SCOPING PLAN CONSISTENCY SUMMARY[5]**

| Action | Responsible Parties | Consistency |
|---|---|---|
| Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030. | CARB, Caltrans, CEC, GO-Biz | Not applicable. This measure is not within the purview of this Project. |
| Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18 percent. | CARB | Not applicable. This measure is not within the purview of this Project. |
| **Implement the Short-Lived Climate Pollutant Strategy by 2030** | | |
| 40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. | CARB, CalRecycle, CDFA, SWRCB, Local Air Districts | Not applicable. This measure is not within the purview of this Project. |
| 50 percent reduction in black carbon emissions below 2013 levels. | | Not applicable. This measure is not within the purview of this Project. |
| By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383. | CARB, CalRecycle, CDFA SWRCB, Local Air Districts | Not applicable. Although this measure is directed towards policymakers, the proposed Project would comply with AB 939, which sets a statewide policy that not less than 65 percent of solid waste generated be source reduced, recycled, or composted. Additionally, the proposed Project would be required to have a recycling program and recycling collection. During construction, the proposed Project shall recycle and reuse construction and demolition waste per City Solid Waste procedures. |
| Implement the post-2020 Cap-and-Trade Program with declining annual caps. | CARB | Not applicable. This measure is not within the purview of this Project. |
| **By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink** | | |
| Protect land from conversion through conservation easements and other incentives. | CNRA, Departments Within CDFA, CalEPA, | Not applicable. This measure is not within the purview of this Project. |

**TABLE 3-5: 2017 SCOPING PLAN CONSISTENCY SUMMARY[5]**

| Action | Responsible Parties | Consistency |
|---|---|---|
| Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity | CARB | Not applicable. This measure is not within the purview of this Project. |
| Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments | | Not applicable. This measure is not within the purview of this Project. |
| Establish scenario projections to serve as the foundation for the Implementation Plan | | Not applicable. This measure is not within the purview of this Project. |
| Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018 | CARB | Not applicable. This measure is not within the purview of this Project. |
| Implement Forest Carbon Plan | CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within | Not applicable. This measure is not within the purview of this Project. |
| Identify and expand funding and financing mechanisms to support GHG reductions across all sectors. | State Agencies & Local Agencies | Not applicable. This measure is not within the purview of this Project. |

As shown above, the Project would not conflict with any of the 2017 Scoping Plan elements as any regulations adopted would apply directly or indirectly to the Project. Further, recent studies show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 (55).

### CITY OF RIVERSIDE RRG CAP

The RRG CAP includes individual measures that would reduce GHG emissions in the City. Consistency with these measures are discussed in Table 3-6.

**TABLE 3-6: RRG CAP PROJECT CONSISTENCY**

| Measure | Description | Project Consistency |
|---|---|---|
| **State and Regulatory Measures** | | |
| SR-1<br>Renewable Portfolio Standards | Utilities must secure 33% of their power from renewable sources by 2020. | Not Applicable. Establishes the minimum statewide renewable energy mix. |
| SR-2<br>2013 California Building Energy Efficiency Standards<br>(Title 24, Part 6) | Mandatory energy efficiency standards for buildings. | Consistent. The project will include a variety of building, water, and solid waste efficiencies consistent with current Title 24 requirements. |
| SR-3<br>HERO Residential Program | Financing for homeowners to make energy efficient, renewable energy, and water conservation improvements. | Not applicable. This objective is aimed at government agencies, not private developers. |
| SR-4<br>HERO Commercial Program | Financing for business owners to make energy efficient, renewable energy, and water conservation improvements. | Not applicable. This objective is aimed at government agencies, not private developers. |
| SR-6<br>Pavley & Low Carbon Fuel Standard | Requirements for vehicles to use cleaner fuels. | Not applicable. This objective is aimed at government agencies, not private developers. |
| SR-7<br>Metrolink Expansions | Additional Metrolink transit service provided to Western Riverside County. | Not applicable. The Project is a residential development. As such, this measure is not within the purview of this Project. |
| SR-8<br>Express Lanes | Additional express lanes added along major freeways in Western Riverside County. | Not applicable. The Project is a residential development. As such, this measure is not within the purview of this Project. |
| SR-9<br>Congestion Pricing | Expansion of the toll lanes along the State Route 91 (SR-91). | Not applicable. This objective is aimed at government agencies, not private developers. |
| SR-10<br>Telecommuting | Work arrangement in which employees do not commute to a central place of work. | Not applicable. The Project is a residential development. As such, this measure is not within the purview of this Project. |
| SR-11<br>Goods Movement | Efficient movement of goods through inland Southern California. | Not applicable. The Project is a residential development. As such, this measure is not within the purview of this Project. |

**TABLE 3-6: RRG CAP PROJECT CONSISTENCY**

| Measure | Description | Project Consistency |
|---|---|---|
| SR-12<br>Electric Vehicle Plan and Infrastructure | Facilitate electric vehicle use by providing necessary infrastructure. | Not applicable. The Project is a residential development. As such, no specific infrastructure is necessary. |
| SR-13<br>Construction and Demolition Waste Diversion | Meet mandatory requirement to divert 50% of C&D waste from landfills by 2020 and exceed requirement by diverting 75% of C&D waste from landfills by 2035. | Consistent. The Project will be required recycle a minimum of 50 percent from construction activities and operations per State and City requirements |
| **Local Reduction Measures** | | |
| E-1<br>Traffic and Street Lights | Replace traffic and streetlights with high-efficiency bulbs. | Not applicable. This objective is aimed at government agencies, not private developers. Nonetheless, the project would comply with applicable energy efficiency requirements related to lighting detailed in the Green Building Standards Code (Title 24, California Code of Regulations). |
| E-2<br>Shade Trees | Strategically plant trees at new residential developments to reduce the urban heat island effect. | Consistent. The Project landscaping would include trees throughout the development in the common open spaces. |
| E-3<br>Local Utility Programs - Electricity | Financing and incentives for business and homeowners to make energy efficient, renewable energy, and water conservation improvements. | Not applicable. This objective is aimed at government agencies, not private developers. Nonetheless, the project would comply with applicable energy efficiency requirements related to lighting detailed in the Green Building Standards Code (Title 24, California Code of Regulations). |
| E-4<br>Renewable Energy Production on Public Property | Large scale renewable energy installation on publicly owner property and in public rights of way. | Not applicable. This objective is aimed at government agencies, not private developers. |
| E5<br>University of California, Riverside (UCR) Carbon Neutral Program | Collaborate with UCR to achieve a carbon neutral campus. | Not applicable. This objective is aimed at government agencies and the University of California Riverside, not private developers. |
| T-1<br>Bicycle Infrastructure Improvements | Expand on-street and off-street bicycle infrastructure, including bicycle lanes and bicycle trails. | Not applicable. This objective is aimed at government agencies, not private developers. |

**TABLE 3-6: RRG CAP PROJECT CONSISTENCY**

| Measure | Description | Project Consistency |
|---|---|---|
| T-2<br>Bicycle Parking | Provide additional options for bicycle parking. | Not applicable. This objective is aimed at commercial facilities, not single family residences. |
| T-3<br>End of Trip Facilities | Encourage use of non-motorized transportation modes by providing appropriate facilities and amenities for commuters. | Not applicable. This objective is aimed at commercial facilities, not single family residences. |
| T-4<br>Promotional Transportation Demand Management | Encourage Transportation Demand Management (TDM) strategies. | Not applicable. This objective is aimed at large employment centers with 100 or more employees. The Project is a residential development. As such, this measure is not within the purview of this Project. |
| T-5<br>Traffic Signal Coordination | Incorporate technology to synchronize and coordinate traffic signals along local arterials. | Not applicable. This objective is aimed at government agencies, not private developers. |
| T-6<br>Density | Improve jobs-housing balance and reduce vehicle miles traveled by increasing household and employment densities. | Consistent. The Project proposes a residential development. As such, the proposed residential use would increase household density and is ,located near commercial development which would also help to reduce vehicle miles traveled by local residents. |
| T-7<br>Mixed-Used Development | Provide a variety of development types and uses. | Not applicable. The project is a residential development and not mixed use. The measure is not applicable. . |
| T-8<br>Pedestrian Only Areas | Encourage walking by providing pedestrian-only community areas. | Consistent. The Project provides a pedestrian network along internal streets and along the project boundary. |
| T-9<br>Limited Parking | Reduce requirements for vehicle parking in new development projects. | Consistent. The Project would provide the minimum parking required comply with applicable City parking requirements. |
| T-10<br>Bus Rapid Transit Services | Implement bus rapid transit service in the subregion to provide alternative transportation options. | Not applicable. This objective is aimed at government agencies, not private developers. |
| T-11<br>Voluntary Transportation Demand Management | Encourage employers to create TDM programs for their employees. | Not applicable. This objective is aimed at large employment centers with 100 or more employees. The Project is a residential development. As such, this measure is not within the purview of this Project. |

**TABLE 3-6: RRG CAP PROJECT CONSISTENCY**

| Measure | Description | Project Consistency |
|---|---|---|
| T-12<br>Accelerated Bike Plan Implementation | Accelerate the implementation of all or specified components of a jurisdiction's adopted bike plan. | Not applicable. This objective is aimed at government agencies, not private developers. However, the proposed Project would not obstruct the implementation of the adopted bike plan. |
| T-13<br>Fixed Guideway Transit | By 2020, complete feasibility study and by 2025 introduce a fixed-route transit service in the jurisdiction. | Not applicable. This objective is aimed at government agencies, not private developers. |
| T-14<br>Neighborhood Electric Vehicle Programs | Implement development requirements to accommodate Neighborhood Electric Vehicles and supporting infrastructure. | Not applicable. This objective is aimed at government agencies, not private developers. |
| T-15<br>Subsidized Transit | Increase access to transit by providing free or reduced passes. | Not applicable. This objective is aimed at large employment centers with 100 or more employees. The Project is a single-family residential development. As such, this measure is not within the purview of this Project. |
| T-16<br>Bike Share Program | Create nodes offering bike sharing at key locations throughout the City. | Not applicable. This objective is aimed at government agencies, not private developers. |
| T-17<br>Car Share Program | Offer Riverside residents the opportunity to use car sharing to satisfy short-term mobility needs. | Consistent. The Project would only provide parking areas for residents and while it would not directly support car sharing it would not inhibit the opportunity to use car sharing. |
| T-18<br>SB 743 as Alternative to LOS | Use SB 743 to incentivize development in the downtown and other areas served by transit. | Not applicable. This objective is aimed at government agencies, not private developers. |
| W-1<br>Water Conservation and Efficiency | Reduce per capita water use by 20% by 2020. | Consistent. The proposed Project would be required to be consistent with applicable water efficiency requirements detailed in the Green Building Standards Code (Title 24, California Code of Regulations). As such, the Project would be equipped with low-flow plumbing fixtures that reduce water use. |
| SW-1<br>Yard Waste Collection | Provide green waste collection bins community-wide. | Consistent. The Project would comply with applicable solid waste requirements. |
| SW-2<br>Food Scrap and Paper Diversion | Divert food and paper waste from landfills by implementing commercial | Consistent. The Project would be required to participate in applicable waste diversion programs. The Project would also be subject |

**TABLE 3-6: RRG CAP PROJECT CONSISTENCY**

| Measure | Description | Project Consistency |
|---|---|---|
| | and residential collection programs. | to all applicable State and City requirements for solid waste reduction. |

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# 5 CERTIFICATIONS

The contents of this GHG study report represent an accurate depiction of the GHG impacts associated with the proposed Dauchy Street Project. The information contained in this GHG report is based on the best available data at the time of preparation. If you have any questions, please contact me directly at (619) 788-1971.

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# APPENDIX 3-1:

## CALEEMOD EMISSIONS MODEL OUTPUTS

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# APPENDIX 3-2:

# EMFAC2017 OUTPUTS

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