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Planning Department
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Air Quality and Greenhouse Gas Emissions Analysis Report for a 10.126 Acre Commercial Project Development in City of Lancaster,California

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Air Quality and Greenhouse Gas Emissions Analysis Report for a 10.126-Acre Commercial Project Development in Lancaster, California

Prepared For
City of Lancaster
Planning Department
Attention: Jocelyn Swain
Senior Planner

Project Address
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LIST OF ABBREVIATED TERMS

(1)	Reference
%	Percent
AB	Assembly Bill
AB 32	Global Warming Solutions Act of 2006
AB 1493	Pavley Fuel Efficiency Standards
AB 1881	California Water Conservation in Landscaping Act of 2006
APA	Administrative Procedure Act
AQIA	Air Quality Impact Analysis
AVAQMD	Antelope Valley Air Quality Management District
BAU	Business As Usual
BSC	Building Standards Commission
CAA	Federal Clean Air Act
CalEEMod	California Emissions Estimator Model™
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGAPS	California LBNL GHG Analysis of Policies Spreadsheet
CALGreen	Californina Green Building Standards Code
CalRecycle	California's Department of Resources Recycling and Recovery
CalSTA	California State Transportation Agency
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resource Board
CCR	California Code of Regulations
CDFA	California Department of Food and Agriculture
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFC	Chlorofluorocarbons
CH_4	Methane
City	City of Lancaster
CNRA	California Natural Resources Agency
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
Convention	United Nations Framework Convention on Climate Change

COP	UNCFCC Conference of the Parties
CPUC	California Public Utilities Commission
CTC	California Transportation Commission
DOF	Department of Finance
EPA	Environmental Protection Agency
FED	Functional Equivelent Document
GCC	Global Climate Change
Gg	Gigagram
GHG	Greenhouse Gas
GHGA	Greenhouse Gas Analysis
Gpd/acre	Gallons per Day per Acre
GO-Biz	Governor's Office of Business and Economic Development
GWP	Global Warming Potential
H_2O	Water Vapor
HD	Heavy-Duty
HFC	Hydrofluorocarbons
I-15	Interstate 15
IBank	California Infrastructure and Economic Development Bank
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Resource Planning
LBNL	Lawrence Berkeley National Laboratory
LCA	Life-Cycle Analysis
LCFS	Low Carbon Fuel Standard
MD	Medium-Duty
MMT	Million Metric Tons
$MMTCO_2e$	Million Metric Ton of Carbon Dioxide Equivalent
MPG	Miles Per Gallon
MT	Metric Tons
MT/yr	Metric Tons per Year
$MTCO_2e$	Metric Ton of Carbon Dioxide Equivalent
MY	Model Year
N_20	Nitrogen Dioxide
NDC	Nationally Determined Contributions
NHTSA	National Highway Traffic Safety Administration
NO_X	Oxides of Nitrogen
NF_3	Nitrogen Trifluoride
OAL	Office of Administrative Law
Ordinance	Model Water Efficient Landscape Ordinance

OPR	Govenor's Office of Planning and Research
PDF	Project Design Features
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	Corner of Ave L & 15th Street. Street
PSD	Prevention Significant Deterioration
RPS	Renewables Portfolio Standard
SB	Senate Bill
SB 32	Senate Bill 32
SB 375	Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies
SCAQMD	South Coast Air Quality Management District
Scoping Plan	CARB's Climate Change Scoping Plan
sf	Square Feet
SF_6	Sulfur Hexafluoride
SGC	Strategic Growth Council
SLPS	Short-Lived Climate Pollutant Strategy
SO_X	Oxides of Sulfur
SWRCB	California State Water Resources Control Board
tpy	Tons Per Year
tsf	Thousand Square Feet
UNFCCC	United Nations' Framework Convention on Climate Change
Update	CARB approved First Updated to the Scoping Plan
VMT	Vehicle-Miles Traveled
VOC	Volatile Organic Compounds
ZE/NZE	Zero- and near-zero-emission
ZEV	Zero Emission Vehicle

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August 15, 2024

Subject: Air Quality and Greenhouse Gas Emissions Analysis Report for a 10.126 Acre Mixed Use Project Development in Lancaster, California

Dear Mr. Torkan:

Shahryar Yadegari engineering group is pleased to provide this for Air Quality (AQ) and Greenhouse Gas (GHG). This AQ and GHG report includes CalEEMod emissions, estimates, criteria, pollutant analysis for the proposed 10.126 acre mixed use project development located at the Corner of Ave L & 15th St. West, CA. These evaluations will support a categorical exemption for a Mitigated Negative Declaration (MND) from the city under the California Environmental Quality Act (CEQA). The project is located within the jurisdiction of the Antelope Valley Air Quality Management District the project site comprises of a 10 acre vacant parcel of land where a mixed use project will be developed. The parcels are vacant with a number of trees and will not require any demolition. The total estimated building is 342,351 square feet.
Reduction and mitigation of greenhouse gases such as VOC (Volatile Organic Compounds), CO (Carbon Monoxide), CO2 (Carbon Dioxide), NOX (Oxide of Nitrogen), is a comprehensive and effort in design, construction, and development. The task of limiting the emissions into the atmosphere includes, but not limited to, reducing the production of greenhouse gases in all level of development is our responsibility. These efforts shall be reduction of electrical consumption, fossil fuel consumption, increase in water consumption, VOC, CO2, CO, and fugitive dust during construction and after occupancy.
The City of Lancaster has adopted policies and implementation of AVAQMD regulation for a better Air Quality environment for its residence and a mandate to implement the laws during the construction and life of the project.

ASSUMPTIONS

Thefollowingbasicassumptionswereusedindevelopingtheemissionestimatesfortheproposed project using the California Emissions Estimator Model® (CalEEMod):

- Project design features including parcel dimensions and size of buildings were defined by the Applicant.
- Default construction equipment horsepower ratings and load factors contained in CalEEMod were applied to all phases of the project.

- Construction site watering for fugitive dust control was set to twice daily for the small parcel. Street sweeping around the construction site was assumed to control track-out dust. These measures substantially reduce fugitive dust impacts.

- Per the CalEEMod User's Guide, on-road water trucks used during construction were counted in the on-road vendor trip survey that was conducted for all the phases of construction (e.g., site preparation, grading, building construction, etc.) during program development.
- Consumer product usage as applicable to land use.

- Energy efficiency and water conservation measures generally required by codes are implemented.

1 SITE PLAN

SCALE: 1" = 30'-0"

EXECUTIVE SUMMARY

The purpose of this technical report is to assess the potential air quality and greenhouse gas (GHG) emissions impacts associated with implementation of the proposed 10.126 Acres of Mixed Use Development project located within the City of Lancaster (City). This assessment utilizes the significance thresholds in Appendix G of the California Environmental Quality Act (CEQA) Guidelines.

Project Overview

The Plan Area includes approximately 10.26 acres of land, located at the Corner of Ave & 15th Street Lancaster, CA. The Plan Area is privately owned land.

The project site is located within the jurisdiction of the City of Lancaster and Antelope Valley Air Quality Management District (AVAQMD). Construction and operational criteria air pollutant and GHG emissions were estimated using the California Emissions Estimator Model (CalEEMod) Version 2022.

Air Quality

The air quality impact analysis evaluated the potential for adverse impacts to air quality due to construction and operational emissions resulting from the project. Impacts were evaluated for their significance based on the AVAQMD mass dailty criteria air pollutant thresholds of significance. Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants include ozone (O3), nitrogen oxide (NO2), carbon monoxide (CO), sulfur dioxide (SO2), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM10), particulate matter with an aerodyanmic diameter less than or qual to 2.5 microns (PM2.5), and lead. Pollutants that are evaluated include volatile organic compounds (VOCs), oxides of nitrogen (NOx), CO, sulfure oxides (SOx), PM10, and PM2.5. VOCs and NOx are important because they are precursors to O3.

Construction Criteria Air Pollutant Emissions

Construction of the project would result in the temporary and long term air & environmental pollutants. The long term pollutants could be caused by house hold combustion devices, all appliances used in the hotel, apartments, fast food, food preparations. Increase in the vehicle movement trip generation. Increase in the use of electricity by all the occupants. In term of construction it would be a temporary addition of pollutants to the local environment construction is anticipated to include site grading, utility installation, paving, building construction and architectural coating. The timing for the grading utilities installation, and paving phases were given by the applicant. The grading activities would not result in any soil import or export and would be a zero export import. Addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off gassing) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). Estimated maximum daily construction emissions would not exceed the AVAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during construction in all construction years (2026– 2027). Therefore, project construction impacts would be less than significant.

1 INTRODUCTION

1.1 Project Location and Description

The project site includes approximately 10.126 acres of land located at Corner of Ave L & 15th Street West Lancaster, CA. The site comprises of four vacant Assessor's Parcel Numbers, 3109-026-032, 3109-026-040, 3109-026-042, and 3109-026-044. Ultimately, the project will have six parcels in which will have no effect on this report.

The project would include removal of four parcels , creating six parcels with seven buildings. The project is design in contemporary style to create an inviting environment with shades and walking paths in the parking area. The project also would provide sitting area-and walking areas for the hotel-guests. residences and customers-as well as the restaurants. The pool and the club house would also be open to the residences for entertainment.

The project consists of seven separate buildings on six parcels,
Building A - Multi family project 90 units(81,348 s.f)
Building B - Multi family project 91 units(82,580 s.f)
Building C - Hotel with 235 Guest rooms (162,352 s.f)
Building D - Club house for community (3,800 s.f)
Building E - Fast food restaurant/ Drive Thru (2,650 s.f)
Building F - Site down restaurant / (7,500 s.f)
Building G - Drive Thru restaurant / (2,650 s.f)

2.1 Environmental Setting

2.1.1 Pollutants and Effects

2.1.1.1 *Criteria Air Pollutants*

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The national and California standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include O_3, nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), and lead. These pollutants, as well as toxic air contaminants (TACs), are discussed in the following paragraphs.[1] In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants.

Ozone. O_3 is a strong-smelling, pale blue, reactive, toxic chemical gas consisting of three oxygen atoms. It is a secondary pollutant formed in the atmosphere by a photochemical process involving the sun's energy and O_3 precursors. These precursors are mainly oxides of nitrogen (NO_x) and volatile organic compounds (VOCs). The maximum effects of precursor emissions on O_3 concentrations usually occur several hours after they are emitted and many miles from the source. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. O_3 exists in the upper atmosphere O_3 layer (stratospheric O_3) and at the Earth's surface in the troposphere (ground-level O_3).[2] The O_3 that the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) regulate as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. Ground-level O_3 is a harmful air pollutant that causes numerous adverse health effects and is thus considered "bad" O_3. Stratospheric, or "good," O_3 occurs naturally in the upper atmosphere, where it reduces the amount of ultraviolet light (i.e., solar radiation) entering the Earth's atmosphere. Without the protection of the beneficial stratospheric O_3 layer, plant and animal life would be seriously harmed.

O_3 in the troposphere causes numerous adverse health effects; short-term exposures (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes (EPA 2018). These health problems are particularly acute in sensitive receptors such as the sick, the elderly, and young children.

Inhalation of O_3 causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms. Exposure to O_3 can reduce the volume of air that the lungs

[1] The descriptions of each of the criteria air pollutants and associated health effects are based on the U.S. Environmental Protection Agency's (EPA's) Criteria Air Pollutants (EPA 2018a) and the California Air Resources Board's (CARB's) Glossary of Air Pollutant Terms (CARB 2022 a).

[2] The troposphere is the layer of the Earth's atmosphere nearest to the surface of the Earth. The troposphere extends outward about 5 miles at the poles and about 10 miles at the equator.

breathe in and cause shortness of breath. O_3 in sufficient doses increases the permeability of lung cells, rendering them more susceptible to toxins and microorganisms. The occurrence and severity of health effects from O_3 exposure vary widely among individuals, even when the dose and the duration of exposure are the same. Research shows adults and children who spend more time outdoors participating in vigorous physical activities are at greater risk from the harmful health effects of O_3 exposure. While there are relatively few studies of O_3's effects on children, the available studies show that children are no more or less likely to suffer harmful effects than adults. However, there are a number of reasons why children may be more susceptible to O_3 and other pollutants. Children and teens spend nearly twice as much time outdoors and engaged in vigorous activities as adults. Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults. Also, children are less likely than adults to notice their own symptoms and avoid harmful exposures. Further research may be able to better distinguish between health effects in children and adults. Children, adolescents and adults who exercise or work outdoors, where O_3 concentrations are the highest, are at the greatest risk of harm from this pollutant (CARB 2022b).

Nitrogen Dioxide and Oxides of Nitrogen. NO_2 is a brownish, highly reactive gas that is present in all urban atmospheres. The major mechanism for the formation of NO_2 in the atmosphere is the oxidation of the primary air pollutant nitric oxide, which is a colorless, odorless gas. NO_x plays a major role, together with VOCs, in the atmospheric reactions that produce O_3. NO_x is formed from fuel combustion under high temperature or pressure. In addition, NO_x is an important precursor to acid rain and may affect both terrestrial and aquatic ecosystems. The two major emissions sources are transportation and stationary fuel combustion sources (such as electric utility and industrial boilers).

A large body of health science literature indicates that exposure to NO_2 can induce adverse health effects. The strongest health evidence, and the health basis for the ambient air quality standards (AAQS) for NO_2, results from controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics. In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses. Infants and children are particularly at risk because they have disproportionately higher exposure to NO_2 than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration. Several studies have shown that long-term NO_2 exposure during childhood, the period of rapid lung growth, can lead to smaller lungs at maturity in children with higher levels of exposure compared to children with lower exposure levels. In addition, children with asthma have a greater degree of airway responsiveness compared with adult asthmatics. In adults, the greatest risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease (CARB 2022c).

Carbon Monoxide. CO is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon, or fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, such as the project location, automobile exhaust accounts for the majority of CO emissions. CO is a nonreactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial

and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions—primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November to February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent.

CO is harmful because it binds to hemoglobin in the blood, reducing the ability of blood to carry oxygen. This interferes with oxygen delivery to the body's organs. The most common effects of CO exposure are fatigue, headaches, confusion and reduced mental alertness, light-headedness, and dizziness due to inadequate oxygen delivery to the brain. For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress. Inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance. Unborn babies whose mothers experience high levels of CO exposure during pregnancy are at risk of adverse developmental effects. Unborn babies, infants, elderly people, and people with anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO (CARB 2022d).

Sulfur Dioxide. SO_2 is a colorless, pungent gas formed primarily from incomplete combustion of sulfur-containing fossil fuels. The main sources of SO_2 are coal and oil used in power plants and industries; as such, the highest levels of SO_2 are generally found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels.

Controlled human exposure and epidemiological studies show that children and adults with asthma are more likely to experience adverse responses with SO_2 exposure, compared with the non-asthmatic population. Effects at levels near the 1-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath, and chest tightness, especially during exercise or physical activity. Also, exposure at elevated levels of SO_2 (above 1 part per million [ppm]) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of mortality. The elderly and people with cardiovascular disease or chronic lung disease (such as bronchitis or emphysema) are most likely to experience these adverse effects (CARB 2022e).

SO_2 is of concern both because it is a direct respiratory irritant and because it contributes to the formation of sulfate and sulfuric acid in particulate matter (NRC 2005). People with asthma are of particular concern, both because they have increased baseline airflow resistance and because their SO_2-induced increase in airflow resistance is greater than in healthy people, and it increases with the severity of their asthma (NRC 2005). SO_2 is thought to induce airway constriction via neural reflexes involving irritant receptors in the airways (NRC 2005).

Particulate Matter. Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter. Coarse particulate matter

(PM_{10}) consists of particulate matter that is 10 microns or less in diameter and is about 1/7 the diameter of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. Fine particulate matter ($PM_{2.5}$) consists of particulate matter that is 2.5 microns or less in diameter and is roughly 1/28 the diameter of a human hair. $PM_{2.5}$ results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as SO_x, NO_x, and VOCs.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles
can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances such as lead, sulfates, and nitrates can cause lung damage directly or be absorbed into the blood stream, causing damage elsewhere in the body. Additionally, these substances can transport adsorbed gases such as chlorides or ammonium into the lungs, also causing injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissue. Suspended particulates also produce haze and reduce regional visibility and damage and discolor surfaces on which they settle.

A number of adverse health effects have been associated with exposure to both $PM_{2.5}$ and PM_{10}. For $PM_{2.5}$, short-term exposures (up to 24-hour duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases. In addition, of all of the common air pollutants, $PM_{2.5}$ is associated with the greatest proportion of adverse health effects related to air pollution, both in the United States and worldwide based on the World Health Organization's Global Burden of Disease Project. Short-term exposures to PM_{10} have been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits (CARB 2022a).

Long-term exposure (months to years) to $PM_{2.5}$ has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children. The effects of long-term exposure to PM_{10} are less clear, although several studies suggest a link between long-term PM_{10} exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer (CARB 2022a).

Lead. Lead in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturing of batteries, paints, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phaseout of leaded gasoline reduced the overall inventory of airborne lead by

nearly 95%. With the phaseout of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emissions sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth. Children are highly susceptible to the effects of lead. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

Sulfates. Sulfates are the fully oxidized form of sulfur, which typically occur in combination with metals or hydrogen ions. Sulfates are produced from reactions of SO_2 in the atmosphere and can result in respiratory impairment, as well as reduced visibility.

Vinyl Chloride. Vinyl chloride is a colorless gas with a mild, sweet odor, which has been detected near landfills, sewage plants, and hazardous waste sites, due to the microbial breakdown of chlorinated solvents. Short-term exposure to high levels of vinyl chloride in air can cause nervous system effects, such as dizziness, drowsiness, and headaches. Long-term exposure through inhalation can cause liver damage, including liver cancer.

Hydrogen Sulfide. Hydrogen sulfide is a colorless and flammable gas that has a characteristic odor of rotten eggs. Sources of hydrogen sulfide include geothermal power plants, petroleum refineries, sewers, and sewage treatment plants. Exposure to hydrogen sulfide can result in nuisance odors, as well as headaches and breathing difficulties at higher concentrations.

Visibility-Reducing Particles. Visibility-reducing particles are any particles in the air that obstruct the range of visibility. Effects of reduced visibility can include obscuring the viewshed of natural scenery, reducing airport safety, and discouraging tourism. Sources of visibility-reducing particles are the same as for $PM_{2.5}$ described above.

Volatile Organic Compounds. Hydrocarbons are organic gases that are formed from hydrogen and carbon and sometimes other elements. Hydrocarbons that contribute to formation of O_3 are referred to and regulated as VOCs (also referred to as reactive organic gases). Combustion engine exhaust, oil refineries, and fossil-fueled power plants are the primary sources of hydrocarbons. Other sources include evaporation from petroleum fuels, solvents, dry cleaning solutions, and paint.

The primary health effects of VOCs result from the formation of O_3 and its related health effects. High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. Carcinogenic (i.e., cancer-causing) forms of hydrocarbons, such as benzene, are considered toxic air contaminants (TACs). There are no separate health standards for VOCs as a group.

2.1.2.2 *Non-Criteria Air Pollutants*

Toxic Air Contaminants. A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic noncancer health effects. A toxic substance released into the air is considered a TAC. TACs are identified by federal and state agencies based on a review of available scientific

evidence. In California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. In addition, the California Air Toxics "Hot Spots" Information and Assessment Act, Assembly Bill (AB) 2588, was enacted by the legislature in 1987 to address public concern over the release of TACs into the atmosphere. The law requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hotspots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years.

Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources, such as dry cleaners,

gas stations, combustion sources, and laboratories; mobile sources, such as automobiles; and area sources, such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

Diesel Particulate Matter. Diesel particulate matter (DPM) is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More than 90% of DPM is less than 1 micrometer in diameter (about 1/70th the diameter of a human hair), and thus is a subset of $PM_{2.5}$. DPM is typically composed of carbon particles ("soot," also called black carbon, or BC) and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3butadiene. The CARB classified "particulate emissions from diesel-fueled engines" (i.e., DPM; 17 CCR 93000) as a TAC in August 1998. DPM is emitted from a broad range of diesel engines: onroad diesel engines of trucks, buses, and cars and off-road diesel engines including locomotives, marine vessels, and heavy-duty construction equipment, among others. Approximately 70% of all airborne cancer risk in California is associated with DPM (CARB 2000). To reduce the cancer risk associated with DPM, CARB adopted a diesel risk reduction plan in 2000 (CARB 2000). Because it is part of $PM_{2.5}$, DPM also contributes to the same non-cancer health effects as $PM_{2.5}$ exposure. These effects include premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies. Those most vulnerable to non-cancer health effects are children whose lungs are still developing and the elderly who often have chronic health problems.

Odorous Compounds. Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The ability to detect odors varies considerably among the population and overall is quite subjective. People may have different reactions to the same odor. For instance, an odor that is offensive to one person may be perfectly acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one.

Known as odor fatigue, a person can become desensitized to almost any odor, and recognition may only occur with an alteration in the intensity. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors.

2.1.2 Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. Facilities and structures where these air pollution-sensitive people live or spend considerable amounts of time are known as sensitive receptors. Land uses where air pollution sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses) (CARB 2005).

The nearest existing sensitive receptors are located adjacent to the project site's northern boundary. The sensetive receptors include a shopping center that includes Cosco (Discount Store)with day population of approximately 150 visitors and customers ,Receptors also include visitors and residents of the project.

2.2 Regulatory Setting

2.2.1 Federal Regulations

2.2.1.1 *Criteria Air Pollutants*

The federal Clean Air Act, passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The EPA is responsible for implementing most aspects of the Clean Air Act, including setting National Ambient Air Quality Standards (NAAQS) for major air pollutants; setting hazardous air pollutants (HAPs) standards; approving state attainment plans; setting motor vehicle emission standards; issuing stationary source emission standards and permits; and establishing acid rain control measures, stratospheric O_3 protection measures, and enforcement provisions. Under the Clean Air Act, NAAQS are established for the following criteria pollutants: O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead.

The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The NAAQS (other than for O_3, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. NAAQS for O_3, NO_2, SO_2, PM_{10}, and $PM_{2.5}$ are based on statistical calculations over 1- to 3-year periods, depending on the pollutant. The Clean Air Act requires the EPA to reassess the NAAQS at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the NAAQS must prepare a state implementation plan (SIP) that demonstrates how those areas will attain the standards within mandated time frames.

2.2.1.2 *Hazardous Air Pollutants*

The 1977 federal Clean Air Act amendments required the EPA to identify National Emission Standards for Hazardous Air Pollutants to protect public health and welfare. HAPs include certain VOCs, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific

studies of exposure to humans and other mammals. Under the 1990 Clean Air Act amendments, which expanded the control program for HAPs, 187 substances and chemical families were identified as HAPs.

2.2.2 State Regulations

2.2.2.1 *Criteria Air Pollutants*

The federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the NAAQS to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for ensuring implementation of the California Clean Air Act of 1988, responding to the federal Clean Air Act, and regulating emissions from motor vehicles and consumer products.

CARB has established California Ambient Air Quality Standards (CAAQS), which are generally more restrictive than the NAAQS. The CAAQS describe adverse conditions; that is, pollution levels must be below these standards before a basin can attain the standard. Air quality is considered "in attainment" if pollutant levels are continuously below the CAAQS and violate the standards no more than once each year. The CAAQS for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, PM_{10}, and $PM_{2.5}$ and visibility-reducing particles are values not to be exceeded. All others are not to be equaled or exceeded. The NAAQS and CAAQS are presented in Table 1.

2.2.2.2 *Toxic Air Contaminants*

The state Air Toxics Program was established in 1983 under AB 1807 (Tanner). The California TAC list identifies more than 700 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. In accordance with AB 2728, the state list includes the (federal) HAPs. The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588) seeks to identify and evaluate risk from air toxics sources; however, AB 2588 does not regulate air toxics emissions. TAC emissions from individual facilities are quantified and prioritized. "High-priority" facilities are required to perform a health risk assessment, and if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

In 2000, CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines. The regulation is anticipated to result in an 80% decrease in statewide diesel health risk in 2020 compared with the diesel risk in 2000 (CARB 2000). Additional regulations apply to new trucks and diesel fuel, including the On Road Heavy Duty Diesel Vehicle (In-Use) Regulation, the On-Road Heavy Duty (New) Vehicle Program, the In-Use Off-Road Diesel Vehicle Regulation, and the New Off-Road Compression Ignition (Diesel) Engines and Equipment Program. All of these regulations and programs have timetables by which manufacturers must comply and existing operators must upgrade their diesel-powered equipment. Several Airborne Toxic Control Measures that reduce diesel emissions including in-use off-road diesel-fueled fleets (13 CCR 2449 et seq.) and in-use on-road diesel fueled vehicles (13 CCR 2025).

AIR QUALITY AND GREENHOUSE GAS IMPACTS ANALYSIS

The Air Quality Section of Appendix G of the California Environmental Quality Act (CEQA) Guidelines (Environmental Checklist Form) contains air quality and GHG significance criteria. Where applicable, quantitative significance criteria established by the local air quality management district (AQMD) or air pollution control district (APCD) may be relied upon to make significance determinations based on mass emissions of criteria pollutants and GHGs, as determined in this report.

Project Emissions Estimation

The construction and operation analysis was performed using CalEEMod® (California Emissions Estimation Model, version 2022 1.1.26), the official statewide land use computer model designed to provide a uniform platform for estimating potential criteria pollutant and GHG emissions associated with both construction and operations of land use projects under CEQA. The model quantifies direct emissions from construction and operations (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. The mobile source emission factors used in the model – published by the California Air Resources Board (CARB) – include the Pavley standards and Low Carbon Fuel standards. The model also identifies project design features, regulatory measures, and mitigation measures to reduce criteria pollutant and GHG emissions along with calculating the benefits achieved from the selected measures. CalEEMod was developed by the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the AVAQMD, the Bay Area Air Quality Management District (BAAQMD), the San Joaquin Valley Air Pollution Control District (SJVAPCD), and other California air districts. Default land use data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) were provided by the various California air districts to account for local requirements and conditions. As the official assessment methodology for land use projects in California, CalEEMod is relied upon herein for construction and operational emissions quantification, which forms the basis for the impact analysis.

Based on information received from the Applicant, land use data used for CalEEMod input is presented in Table 1. The AVAQMD quantitative significance thresholds shown in Table 2 were used to evaluate project emissions impacts (AVAQMD 2016).

Criteria Pollutants from Project Construction

A project's construction phase produces many types of emissions, but PM_{10} (including $PM_{2.5}$) in fugitive dust and diesel engine exhaust are the pollutants of greatest concern. Fugitive dust emissions can result from a variety of construction activities, including excavation, grading, demolition, vehicle travel on paved and unpaved surfaces, and vehicle exhaust. Construction related emissions can cause substantial increases in localized concentrations of PM_{10}, as well as affecting PM_{10} compliance with ambient air quality standards on a regional basis. Particulate emissions from construction activities can lead to adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. The use of diesel-powered construction equipment emits ozone precursors oxides of nitrogen (NO_x) and reactive organic gases (ROG), and diesel particulate matter (DPM), the latter being a composite of toxic air

contaminants (TACs) containing a variety of hazardous substances. Large construction projects using multiple large earthmoving equipment are evaluated to determine if operations may exceed the District's daily threshold for NO_x emissions and could temporarily expose area residents to hazardous levels of DPM. Use of architectural coatings and other materials associated with finishing buildings may also emit ROG and TACs. CEQA significance thresholds address the impacts of construction activity emissions on local and regional air quality. Thresholds are also provided for other potential impacts related to project construction, such as odors and TACs.

The AVAQMD's approach to CEQA analyses of fugitive dust impacts is to require implementation of effective and comprehensive dust control measures rather than to require detailed quantification of emissions. PM_{10} emitted during construction can vary greatly depending on the level of activity, the specific operations taking place, the equipment being operated, local soils, weather conditions, and other factors, making quantification difficult. Despite this variability in emissions, experience has shown that there are several feasible control measures that can be reasonably implemented to significantly reduce fugitive dust emissions from construction. For larger projects, the AVAQMD has determined that compliance with an approved fugitive dust control plan comprising Best Management Practices (BMPs), primarily through frequent water application, constitutes sufficient mitigation to reduce PM_{10} impacts to a level considered less than significant.

Criteria Pollutants from Project Operation

The term "project operations" refers to the full range of activities that can or may generate criteria pollutant, GHG, and TAC emissions when the project is functioning in its intended use. For projects, such as office parks, shopping centers, apartment buildings, residential subdivisions, and other indirect sources, motor vehicles traveling to and from the project represents the primary source of air pollutant emissions. For industrial projects and some commercial projects, equipment operation and manufacturing processes, i.e., permitted stationary sources, can be of greatest concern from an emissions standpoint. CEQA significance thresholds address the impacts of operational emission sources on local and regional air quality. Thresholds are also provided for other potential impacts related to project operations, such as odors.

Results of Criteria Emissions Analysis

Table 3 shows unmitigated and mitigated criteria construction emissions and evaluates mitigated emissions against AVAQMD significance thresholds.

EXECUTIVE SUMMARY

ES.1 SUMMARY OF FINDINGS

The results of this *Corner of Ave L & 15th Street. Greenhouse Gas Analysis* (GHGA) 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
GHG Impact #1: The Project would not generate direct or indirect GHG emission that would result in a significant impact on the environment.	3.8	*Less Than Significant*	*N/A*
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.	3.8	*Less Than Significant*	*N/A*

ES.2 REGULATORY REQUIREMENTS

The Project would be required to comply with all mandates imposed by the State of California and the Antelope Valley Air Quality Management District (AVAQMD). Those that are applicable to the Project and that would assist in the reduction of GHG emissions are:

- Global Warming Solutions Act of 2006 (AB 32) (2).
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (SB 375) (3).
- Pavley Fuel Efficiency Standards (AB 1493). Establishes fuel efficiency ratings for new vehicles (4).
- Title 24 California Code of Regulations (California Building Code). Establishes energy efficiency requirements for new construction (5).
- Title 20 California Code of Regulations (Appliance Energy Efficiency Standards). Establishes energy efficiency requirements for appliances (6).
- Title 17 California Code of Regulations (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 (AB 1881). 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 80 percent (%) by 2030 and 33% 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).

ES.3 MITIGATION MEASURES

Because the proposed Project does not result in a potentially significant environmental impact associated with greenhouse gas emissions, impacts would be less than significant, and no mitigation is required.

1 INTRODUCTION

1.1 Project Location and Description
The project site includes approximately 10.126 acres of land located at Corner of Ave L & 15th Street West Lancaster, CA. The site comprises of four vacant Assessor's Parcel Numbers 3109-026-032, 3109-026-040, 3109-026-042, and 3109-026-044. Ultimately, the project will have six parcels in which will have no effect for this report.

1.2 Description

The project would include removal of four parcels and the creation of six parcels with seven buildings. The project is designed in contemporary style to create an inviting environment with shading and walking paths in the parking area. The project also would provide seating and walking areas for the hotel guests, residents, and customers, as well as the restaurants. The pool and club house would be open to the residents for entertainment.

The project consists of seven separate buildings on six parcels;
Building A - Multi family project 90 units (81,348 s.f.)
Building B - Multi family project 91 units (82,580 s.f.)
Building C - Hotel with 235 Guest rooms (162,352 s.f.)
Building D - Club house for community (3,800 s.f.)
Building E - Fast food restaurant/ Drive Thru (2,650 s.f.)
Building F - Site down restaurant/ (7,500 s.f.)
Building G - Drive thru restaurant/ (2,650 s.f.)

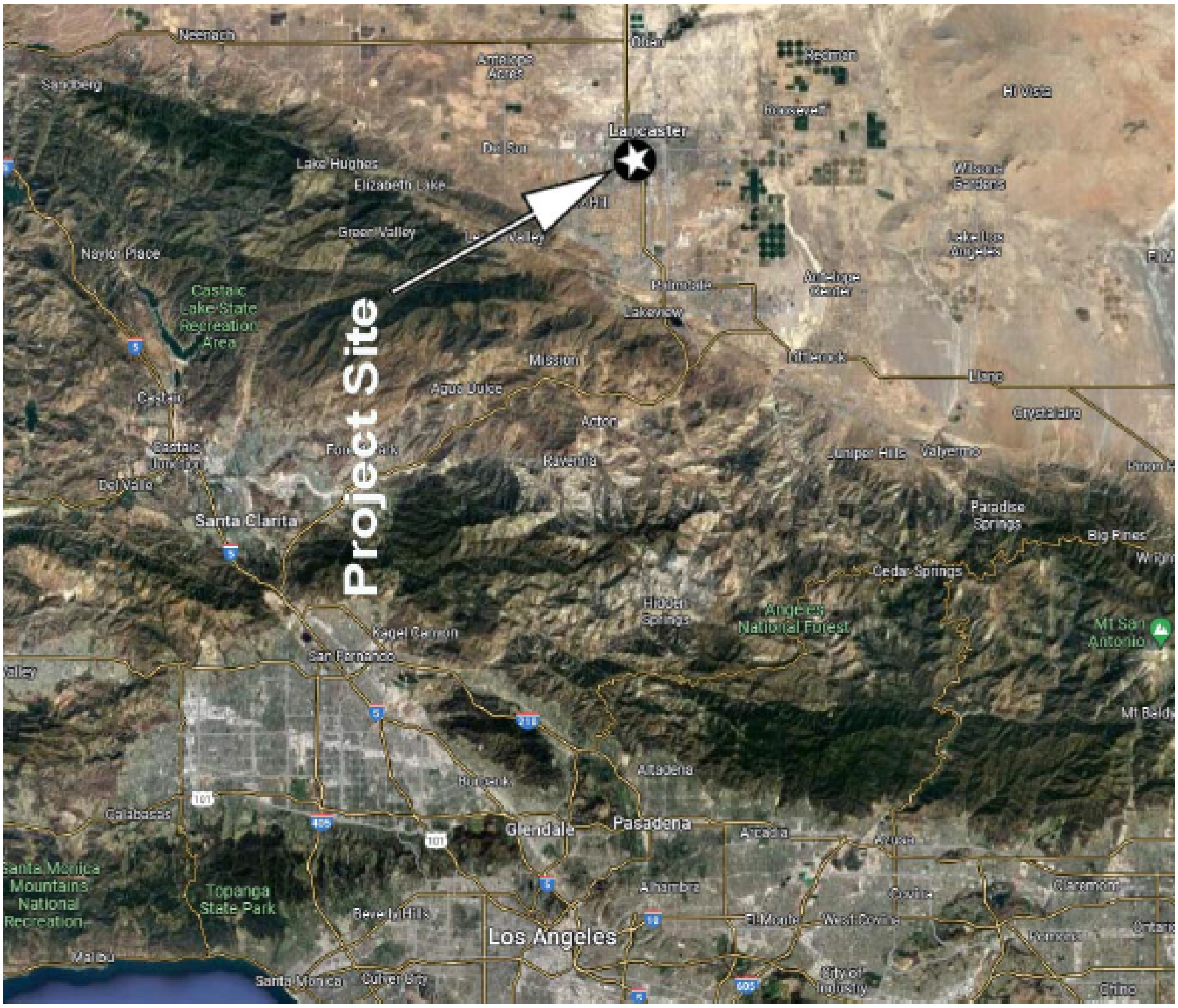
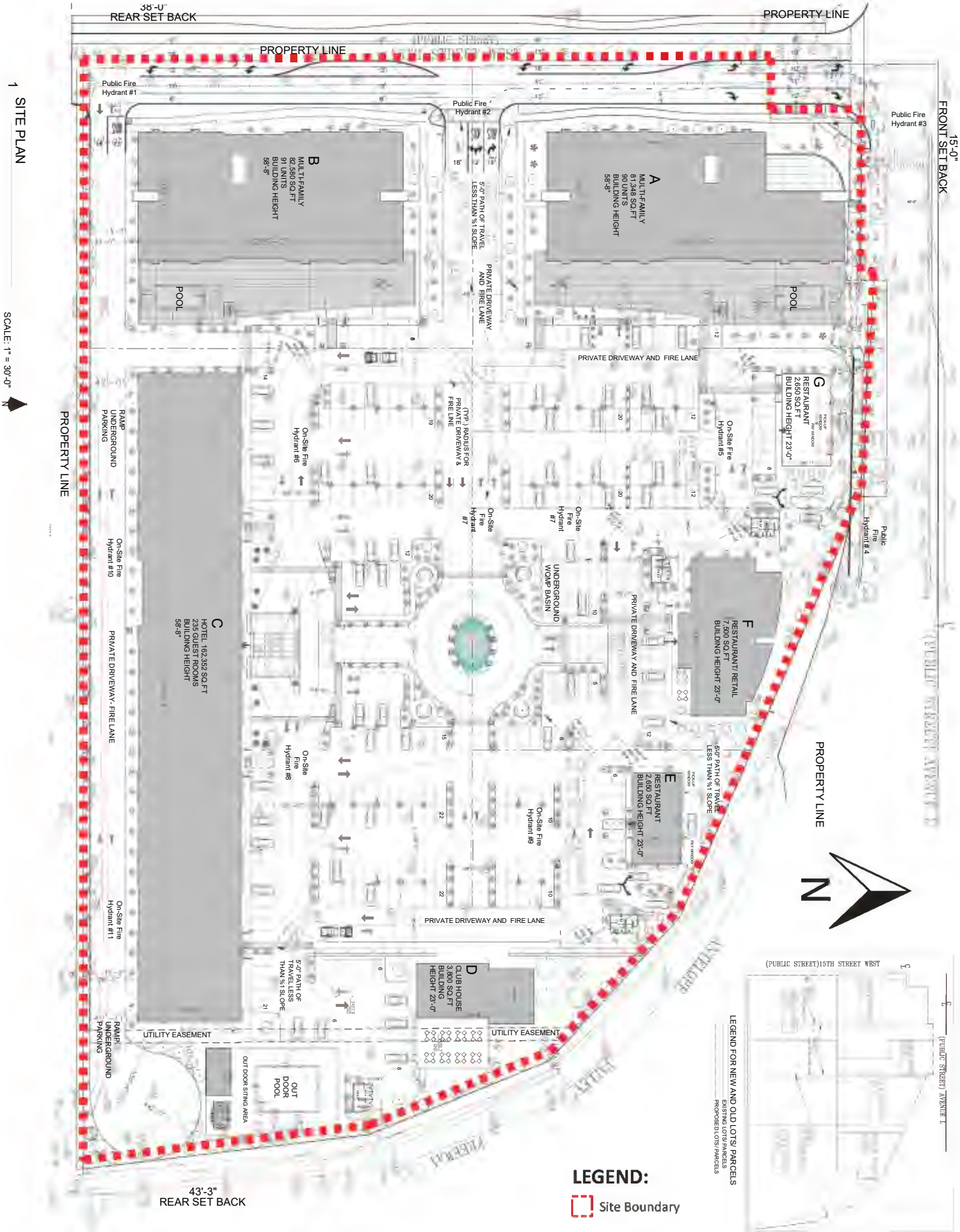

Project Site
Neenach
Lancaster
Sandberg
Lake Hughes
Elizabeth Lake
Green Valley
Naylor Place
Castaic Lake State Recreation Area
Palmdale
Lakeview
Mission
Agua Dulce
Acton
Castaic
Llano
Juniper Hills
Santa Clarita
Paradise Springs
Cedar Springs
Angeles National Forest
Kagel Canyon
San Fernando
Altadena
Burbank
Glendale
Pasadena
Calabasas
Arcadia
Alhambra
Topanga State Park
Santa Monica Mountains National Recreation
Malibu
Beverly Hills
Los Angeles
El Monte
Santa Monica
Culver City
Claremont
Chino

EXHIBIT 1-A: LOCATION MAP

EXHIBIT 1-B: SITE PLAN



2 CLIMATE CHANGE SETTING

2.1 INTRODUCTION TO GLOBAL CLIMATE CHANGE

GCC is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. Most 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. Most 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), nitrogen trifluoride (NF_3), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from a minimum of 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 GHGS

2.3.1 GHGS 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: GHGS

GHGs	Description	Sources	Health Effects
(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 (15).	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 (16).	Outdoor levels of CO_2 are not high enough to result in negative health effects. 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 30,000 ppm averaged over a 15 minute period (17).

GHGs	Description	Sources	Health Effects
Methane (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 (18).	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.
Nitrous Oxide (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 such as fossil fuel-fired power plants, nylon production, nitric 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	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) (19).

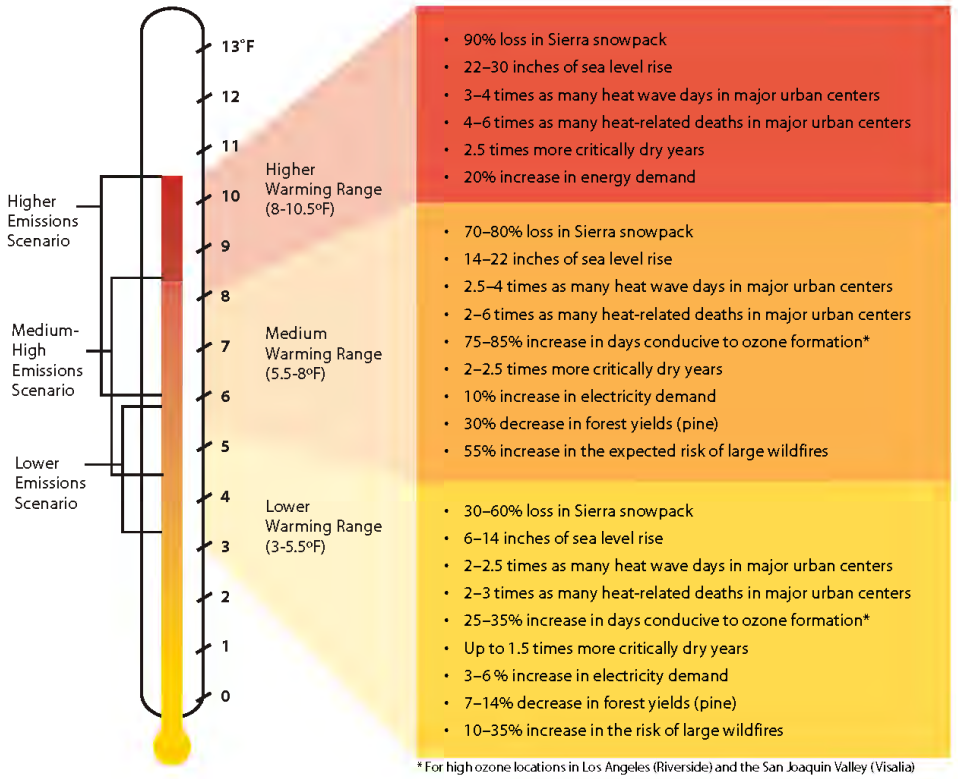
GHGs	Description	Sources	Health Effects
		used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. N_2O can be transported into the stratosphere, be deposited on the earth's surface, and be converted to other compounds by chemical reaction (19).	
Chlorofluorocarbons (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 atmosphere for over 100 years (20).	In confined indoor locations, working with CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.

GHGs	Description	Sources	Health Effects
Hydrofluorocarbons (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 (HFC-23), 1,1,1,2-tetrafluoroethane (HFC-134a), and 1,1-difluoroethane (HFC-152a). Prior to 1990, the only significant emissions were of HFC-23. HCF-134a 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.
Perfluorochemicals (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.
Sulfur Hexafluoride (SF_6)	SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900) (21). 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 as a tracer gas for leak detection.	In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.

GHGs	Description	Sources	Health Effects
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 (22).	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 (23).

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 (24). Exhibit 2-A presents the potential impacts of global warming (25).

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*

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 different 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 2nd 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 5th Assessment Report range from 1 for CO_2 to 23,500 for SF_6 (26).

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

Gas	Atmospheric Lifetime (years)	GWP (100-year time horizon)		
		2nd Assessment Report	4th Assessment Report	5th Assessment Report
CO_2	See*	1	1	1
CH_4	12 .4	21	25	28
N_2O	121	310	298	265
HFC-23	222	11,700	14,800	12,400
HFC-134a	13.4	1,300	1,430	1,300
HFC-152a	1.5	140	124	138
SF_6	3,200	23,900	22,800	23,500
NF_3	740	-	17,200	16,100

*As per Appendix 8.A. of IPCC's 5th Assessment Report, no single lifetime can be given.
Source: IPCC Fourth Assessment Report: https://www.ipcc.ch/publications_and_data/ar4/wg1/en/ch2s2-10-2.html
IPCC Fifth Assessment Report: https://www.ipcc.ch/pdf/assessmentreport/ar5/wg1/WG1AR5_Chapter08_FINAL.pdf

2.5 GHG EMISSIONS INVENTORIES

2.5.1 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 2018. Based on the latest available data, the sum of these emissions totaled approximately 28,768,440 gigagram (Gg) CO_2e[1] (27) (28) as summarized on Table 2-3.

[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 2018 data, the United Nations' Framework Convention on Climate Change (UNFCCC) data for the most recent year were used U.N. Framework Convention on Climate Change, "Annex I Parties – GHG total without LULUCF," The most recent GHG emissions for China and India are from 2014 and 2010, respectively.

2.5.2 UNITED STATES

As noted in Table 2-3, the United States, as a single country, was the number two producer of GHG emissions in 2018.

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

Emitting Countries	GHG Emissions (Gg CO_2e)
China	12,300,200
United States	6,676,650
European Union (28-member countries)	4,232,274
Russian Federation	2,220,123
India	2,100,850
Japan	1,238,343
Total	**28,768,440**

2.5.3 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 United States (U.S.) emissions inventory total (29). The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2020 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2019 GHG emissions period, California emitted an average 418.1 million metric tons of CO_2e per year ($MMTCO_2e/yr$) or 418,100 Gg CO_2e (6.26% of the total United States GHG emissions) (30).

2.6 EFFECTS OF CLIMATE CHANGE IN CALIFORNIA

2.6.1 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. Based on *Our Changing Climate Assessing the Risks to California by the California Climate Change Center*, large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced (31).

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

[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.

significant 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.

2.6.2 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..

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.

2.6.3 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.

2.6.4 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 would 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.

2.6.5 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.

2.7 REGULATORY SETTING

2.7.1 INTERNATIONAL

Climate change is a global issue involving GHG emissions from all around the world; therefore, countries such as the ones discussed below have made an effort to reduce GHGs.

IPCC

In 1988, the United Nations (U.N.) and the World Meteorological Organization established the IPCC to assess the scientific, technical, and socioeconomic information relevant to understanding the scientific basis of risk of human-induced climate change, its potential impacts, and options for adaptation and mitigation.

UNITED NATION'S FRAMEWORK CONVENTION ON CLIMATE CHANGE (UNFCCC)

On March 21, 1994, the U.S. joined a number of countries around the world in signing the Convention. Under the UNFCCC, governments gather and share information on GHG emissions, national policies, and best practices; launch national strategies for addressing GHG emissions and adapting to expected impacts, including the provision of financial and technological support to developing countries; and cooperate in preparing for adaptation to the impacts of climate change.

INTERNATIONAL CLIMATE CHANGE TREATIES

The Kyoto Protocol is an international agreement linked to the UNFCCC. The major feature of the Kyoto Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions at an average of 5% against 1990 levels over the five-year period 2008–2012. The Convention (as discussed above) encouraged industrialized countries to stabilize emissions; however, the Protocol commits them to do so. Developed countries have contributed more emissions over the last 150 years; therefore, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities."

In 2001, President George W. Bush indicated that he would not submit the treaty to the U.S. Senate for ratification, which effectively ended American involvement in the Kyoto Protocol. In December 2009, international leaders met in Copenhagen to address the future of international climate change commitments post-Kyoto. No binding agreement was reached in Copenhagen; however, the UN Climate Change Committee identified the long-term goal of limiting the maximum global average temperature increase to no more than 2 degrees Celsius (°C) above pre-industrial levels, subject to a review in 2015. The Committee held additional meetings in Durban, South Africa in November 2011; Doha, Qatar in November 2012; and Warsaw, Poland in November 2013. The meetings gradually gained consensus among participants on individual climate change issues.

On September 23, 2014, more than 100 Heads of State and Government and leaders from the private sector and civil society met at the Climate Summit in New York hosted by the U.N. At the Summit, heads of government, business and civil society announced actions in areas that would have the greatest impact on reducing emissions, including climate finance, energy, transport, industry, agriculture, cities, forests, and building resilience.

Parties to the UNFCCC reached a landmark agreement on December 12, 2015, in Paris, charting a fundamentally new course in the two-decade-old global climate effort. Culminating a four-year negotiating round, the new treaty ends the strict differentiation between developed and developing countries that characterized earlier efforts, replacing it with a common framework that commits all countries to put forward their best efforts and to strengthen them in the years ahead. This includes, for the first time, requirements that all parties report regularly on their emissions and implementation efforts and undergo international review.

The agreement and a companion decision by parties were the key outcomes of the conference, known as the 21st session of the UNFCCC Conference of the Parties (COP) 21. Together, the Paris Agreement and the accompanying COP decision:

- Reaffirm the goal of limiting global temperature increase well below 2°C, while urging efforts to limit the increase to 1.5 degrees;
- Establish binding commitments by all parties to make "nationally determined contributions" (NDCs), and to pursue domestic measures aimed at achieving them;
- Commit all countries to report regularly on their emissions and "progress made in implementing and achieving" their NDCs, and to undergo international review;
- Commit all countries to submit new NDCs every five years, with the clear expectation that they would "represent a progression" beyond previous ones;
- Reaffirm the binding obligations of developed countries under the UNFCCC to support the efforts of developing countries, while for the first time encouraging voluntary contributions by developing countries too;
- Extend the current goal of mobilizing $100 billion a year in support by 2020 through 2025, with a new, higher goal to be set for the period after 2025;
- Extend a mechanism to address "loss and damage" resulting from climate change, which explicitly would not "involve or provide a basis for any liability or compensation;"
- Require parties engaging in international emissions trading to avoid "double counting;" and
- Call for a new mechanism, similar to the Clean Development Mechanism under the Kyoto Protocol, enabling emission reductions in one country to be counted toward another country's NDC (C2ES 2015a) (32).

2.7.2 NATIONAL

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 United States Supreme Court (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 Supreme 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 Supreme Court declined to review an Appeals Court ruling that upheld the EPA Administrator's findings (33).

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% 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 declared that the MY 2022-2025 GHG standards are not appropriate and should be revised (34). This Final

Determination serves to initiate a notice to further consider appropriate standards for MY 2022-2025 light-duty vehicles. On August 2, 2018, the NHTSA in conjunction with the EPA, released a notice of proposed rulemaking, the *Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule). The SAFE Vehicles Rule was proposed to amend exiting Corporate Average Fuel Economy (CAFE) and tailpipe CO_2 standards for passenger cars and light trucks and to establish new standards covering model years 2021 through 2026. As of March 31, 2020, the NHTSA and EPA finalized the SAFE Vehicle Rule which increased stringency of CAFE and CO_2 emissions standards by 1.5% each year through model year 2026 (35).

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 would 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 would 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 (MW) would be required to meet an output-based standard of 1,000 pounds (lbs) of CO_2 per MW-hour (MWh), based on the performance of widely used natural gas combined cycle technology. It should be noted that on February 9, 2016, the 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 (36):

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 would 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 would 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.

EXECUTIVE ORDER 13990

On January 20, 2021, Federal agencies were directed to immediately review, and take action to address, Federal regulations promulgated and other actions taken during the last 4 years that conflict with national objectives to improve public health and the environment; ensure access to clean air and water; limit exposure to dangerous chemicals and pesticides; hold polluters accountable, including those who disproportionately harm communities of color and low-income communities; reduce greenhouse gas emissions; bolster resilience to the impacts of climate change; restore and expand our national treasures and monuments; and prioritize both environmental justice and employment.

2.7.3 CALIFORNIA

2.7.3.1 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, NF_3, has also been added to the list of GHGs. CARB is the state agency charged with monitoring and regulating sources of GHGs. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. 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."*

SB 375

On September 30, 2008, SB 375 was signed by Governor Schwarzenegger. 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,

[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 $MMTCO_2e$ (29). This is less than the 2020 emissions target of 431 $MMTCO_2e$.

California would not be able to achieve the goals of AB 32." SB 375 does the following: it (1) requires metropolitan planning organizations (MPOs) 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.

SB 375 requires MPOs to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. Although SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.

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 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 MMs required by an applicable prior environmental document.

AB 1493 - Pavley Fuel Efficiency Standards

Enacted on July 22, 2002, California AB 1493, also known as the Pavley Fuel Efficiency Standards, 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 MY. 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 (ACC) program. The ACC program combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for MY 2017 through 2025. The regulation would reduce GHGs from new cars by 34% from 2016 levels by 2025. The new rules would 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 EV and hydrogen fuel cell cars. The

package would also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California.

CLEAN ENERGY AND POLLUTION REDUCTION ACT OF 2015 (SB 350)

In October 2015, the legislature approved, and Governor Jerry Brown 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 EV 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 would be achieved through the California Public Utilities Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which would facilitate the growth of renewable energy markets in the western United States.

SB 32

On September 8, 2016, Governor Brown signed 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).

2017 CARB SCOPING PLAN

In November 2017, CARB released the *Final 2017 Scoping Plan Update* (*2017 Scoping Plan*), which identifies the State's post-2020 reduction strategy. The *2017 Scoping Plan* 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.

The *2017 Scoping Plan* establishes a new emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030 (37).

California's climate strategy would require contributions from all sectors of the economy, including the land base, and would 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 would 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 *2017 Scoping Plan* framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing zero-emission vehicles (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 ZEV trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing CH_4 and HCF 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 *2017 Scoping Plan* 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 *2017 Scoping Plan* 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 evidence-based bright-line numeric thresholds—consistent with the *2017 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 MMs 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 ($MTCO_2e$/yr), 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 (38) (39).

CAP-AND-TRADE PROGRAM

The *2017 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 would 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 would 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 would decline over time, achieving GHG emission reductions throughout the program's duration.

Covered entities that emit more than 25,000 $MTCO_2e$/yr must comply with the Cap-and-Trade Program. Triggering of the 25,000 $MTCO_2e$/yr "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 (40).

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."* (41)

The Cap-and-Trade Program covers approximately 80% of California's GHG emissions (37). 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.

2022 CARB SCOPING PLAN

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) (42). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with CEQA Guidelines section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation - the regulations that will impact this sector are adopted and enforced by CARB on vehicle manufacturers and outside the jurisdiction and control of local governments. As stated in the Plan's executive summary:

> "The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on and accelerating carbon reduction programs that have been in place for a decade and a half. That means rapidly moving to zero-emission transportation; electrifying the cars, buses, trains, and trucks that now constitute California's single largest source of planet-warming pollution."

> "[A]pproval of this plan catalyzes a number of efforts, including the development of new regulations as well as amendments to strengthen regulations and programs already in place, not just at CARB but across state agencies."

Under the 2022 Scoping Plan, the State will lead efforts to meet the 2045 carbon neutrality goal through implementation of the following objectives:

- Reimagine roadway projects that increase VMT in a way that meets community needs and reduces the need to drive.
- Double local transit capacity and service frequencies by 2030.
- Complete the High-Speed Rail (HSR) System and other elements of the intercity rail network by 2040.
- Expand and complete planned networks of high-quality active transportation infrastructure.
- Increase availability and affordability of bikes, e-bikes, scooters, and other alternatives to light-duty vehicles, prioritizing needs of underserved communities.
- Shift revenue generation for transportation projects away from the gas tax into more durable sources by 2030.
- Authorize and implement roadway pricing strategies and reallocate revenues to equitably improve transit, bicycling, and other sustainable transportation choices.
- Prioritize addressing key transit bottlenecks and other infrastructure investments to improve transit operational efficiency over investments that increase VMT.
- Develop and implement a statewide transportation demand management (TDM) framework with VMT mitigation requirements for large employers and large developments.
- Prevent uncontrolled growth of autonomous vehicle (AV) VMT, particularly zero-passenger miles.
- Channel new mobility services towards pooled use models, transit complementarity, and lower VMT outcomes.
- Establish an integrated statewide system for trip planning, booking, payment, and user accounts that enables efficient and equitable multimodal systems.
- Provide financial support for low-income and disadvantaged Californians' use of transit and new mobility services.
- Expand universal design features for new mobility services.
- Accelerate infill development in existing transportation-efficient places and deploy strategic resources to create more transportation-efficient locations.
- Encourage alignment in land use, housing, transportation, and conservation planning in adopted regional plans (RTP/SCS and RHNA) and local plans (e.g., general plans, zoning, and local transportation plans).
- Accelerate production of affordable housing in forms and locations that reduce VMT and affirmatively further fair housing policy objectives.
- Reduce or eliminate parking requirements (and/or enact parking maximums, as appropriate) and promote redevelopment of excess parking, especially in infill locations.
- Preserve and protect existing affordable housing stock and protect existing residents and businesses from displacement and climate risk.

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects, in fact CARB states in Appendix D (page 4): "…focuses primarily on climate action plans (CAPs) and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting."

Additionally on Page 21 in Appendix D, CARB states: "The recommendations outlined in this section apply only to residential and mixed-use development project types. California currently faces both a housing crisis and a climate crisis, which necessitates prioritizing recommendations for residential projects to address the housing crisis in a manner that simultaneously supports the State's GHG and regional air quality goals. CARB plans to continue to explore new approaches for other land use types in the future." As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development.

2.7.3.2 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 S-3-05

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 would 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 (LCFS)

Governor Schwarzenegger 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. 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, 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 (43).

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 Brown issued an executive order to establish a California GHG reduction target of 40% below 1990 levels by 2030. The Governor's executive order aligned California's GHG reduction targets with those of leading international governments ahead of the U.N. 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 *2017 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 as to 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.

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 of electricity 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 (kWh) 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 EPA (CalEPA), the California 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 N-79-20 AND ADVANCED CLEAN CARS II

On August 25, 2022 CARB approved the Advanced Clean Cars II rule, which codifies the goals set out in Executive Order N-79-20 and establishes a year-by-year roadmap such that by 2035, 100% of new cars and light trucks sold in California will be zero-emission vehicles. Under this regulation, automakers are required to accelerate deliveries of zero-emission light-duty vehicles, beginning with model year 2026. CARB estimates that the regulation would reduce GHG emissions from light-duty vehicles by 50% by 2040, and that from 2026 to 2040, GHG emissions would be reduced by a cumulative 395 million metric tons.

2.7.3.3 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 SECTIONS 1601 ET SEQ. – APPLIANCE EFFICIENCY REGULATIONS

The Appliance Efficiency Regulations regulate 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 (RV) or other mobile equipment (CEC 2012).

TITLE 24 CCR PART 6 – CALIFORNIA ENERGY CODE

The California Energy Code 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.

TITLE 24 CCR PART 11 – CALIFORNIA GREEN BUILDING STANDARDS CODE

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code 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. 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 August 1, 2009, and is administered by the California Building Standards Commission.

CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that will be effective on January 1, 2023. The CEC anticipates that the 2022 energy code will provide $1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons (44). The Project would be required to comply with the applicable standards in place at the time plan check submittals are made. These require, among other items (45):

NONRESIDENTIAL MANDATORY MEASURES

- 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 for clean air vehicles. 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).
- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty EV supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- 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 reuse or recycled. For a phased 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 not 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 potable water uses 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 Landscape Ordinance (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 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- Outdoor water uses 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).

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 MY 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

In September 2011, CARB has adopted a 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 GHG Regulation), and in-use fleet retrofit requirements such as the Truck and Bus Regulation. 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 began with 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 MY HDT vehicles, including trailers. 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)."

In 2012, Public Resources Code Section 21083.05 was amended to state:

> *"The Office of Planning and Research and the Natural Resources Agency shall periodically update the guidelines for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption, to incorporate new information or criteria established by the State Air Resources Board pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code."*

On December 28, 2018, the Natural Resources Agency announced the OAL approved the amendments to the *CEQA Guidelines* for implementing 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 15064.4 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 insignificant 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 (46).

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 CCR §§15000, et seq.). Based on these thresholds, a project would result in a significant impact related to GHG if it would (47):

- 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?

The evaluation of an impact under CEQA requires measuring data from a project against both existing conditions and a "threshold of significance." For establishing significance thresholds, the Office of Planning and Research's amendments to the CEQA Guidelines Section 15064.7(c) state "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

CEQA Guidelines Section 15064.4(a) further states, ". . . A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use . . .; or (2) Rely on a qualitative analysis or performance-based standards."

CEQA Guidelines Section 15064.4 provides that a lead agency should consider the following factors, among others, in assessing the significance of impacts from greenhouse gas emissions:

- **Consideration #1**: The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
- **Consideration #2**: Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- **Consideration #3**: The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial

evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

4.0 METHODOLOGY AND MODELING PARAMETERS

The following paragraphs explains the methodology and modeling parameters that will be used to estimate air quality and GHG emissions and energy demand associated with construction and operations of the Project.

4.1 CRITERIA POLLUTANT AND GHG EMISSION METHODS

The method and model we have used is the California Emissions Estimator Model (CalEEMod) is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod quantifies direct GHG emissions, such as construction and operational activities and vehicle use, and indirect emissions, such as energy use, solid waste disposal, vegetation planting and/or removal, and water use. Further, CalEEMod identifies mitigation measures to reduce criteria pollutant and GHG emissions along with calculating the benefits achieved from measures chosen by the user.

CalEEMod was developed for the California Air Pollution Control Officers Association in collaboration with the California Air Districts. Default data (e.g., emission factors, trip lengths, meteorology, source inventory) have been provided by the various California Air Districts to account for local requirements and conditions. CalEEMod is a comprehensive tool for quantifying air quality impacts from land use projects located throughout California. The model can be used for a variety of situations where an air quality analysis is necessary or desirable, such as preparing CEQA or National Environmental Policy Act documents, conducting pre-project planning, and, verifying compliance with local air quality rules and regulations, etc.

CalEEMod Version 2022.1.1.19 was used to estimate construction and operational impacts of the Project.

4.1.1 Modeling Assumptions

Project construction is anticipated to include site grading, utility installation, paving, building construction, and architectural coating. The timing for the grading, utility installation, and paving phases were provided by the Project applicant, and the timing for building construction and architectural coating was left as CalEEMod default values. Table 3 shows the anticipated construction schedule. Construction was modeled to commence in August 2026 and conclude in May 2028, resulting in a construction duration of approximately 2 years. The grading activities would not require any soil import or export and would be balanced across the site.

Table 3. Construction Schedule

Construction Task	Start Date	End Date	Workdays
Grading	7/1/2026	7/11/2026	10
Utility Installation	8/12/2026	1/1/2027	150
Paving	1/2/2026	1/12/2027	360
Building Construction	2/13/2026	4/8/2028	700
Architectural Coating	4/9/2028	5/6/2028	35

Note: Workdays refers to working days only, excluding holidays and weekends.

The off-road equipment fleet for construction was developed in coordination with the Project applicant (see Appendix A for full equipment list). CalEEMod default values were used to estimate the number of worker trips. Vendor trips were added to the grading, utility installation, and paving phases to account for water trucks.

The operational vehicle trip rates and lengths were left as default values. As noted previously, the Project would not include natural gas. Operational emissions from all sources were estimated at full buildout of the Project, which is anticipated to occur in 2027.

The CalEEMod results are included as Appendix A.

4.2 ENERGY CALCULATION METHODS

Project energy demand during construction and operation was determined based on the CalEEMod modeling and vehicle and equipment emission factors from CARB's EMFAC2021 (v1.0.2) and EMFAC OFFROAD2021 (v1.0.4). The energy calculations are included.

Air Quality Impact Analysis

5.0 AIR QUALITY IMPACT ANALYSIS

5.1 CEQA GUIDELINES

According to the CEQA Guidelines' Appendix G Environmental Checklist, the following questions are analyzed and evaluated to determine whether impacts related to air quality are considered to be significant environmental effects.

Where available, the significance criteria established by the applicable air quality management or air pollution district may be relied upon to make the following determinations.

Where the Project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

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

c) Expose sensitive receptors to substantial pollutant concentrations?

d) Result in other emissions (such as those leading to odors) affecting a substantial number of people?

5.1.1 Thresholds of Significance

While the final determination of whether a project is significant is within the purview of the Lead Agency pursuant to Section 15064(b) of the CEQA Guidelines, the AVAQMD has adopted thresholds of significance for individual development projects, as presented in Table 4 (AVAQMD 2016).

Table 4. AVAQMD Significance Thresholds for Criteria Pollutants

Pollutant	Threshold of Significance	
	Pounds/Day	Tons/Year
ROG	137	25
NO_X	137	25
CO	548	100
SO_X	137	25
PM_{10}	82	15
$PM_{2.5}$	65	12
H_2S	54	10
Pb	3	0.6

Note: The AVAQMD CEQA & Conformity Guidelines uses the term “volatile organic compounds (VOC)” rather than ROG. VOC and ROG refer to the same category of gases.

Source: AVAQMD 2016.

The thresholds apply to both construction and operational impacts. If the Lead Agency finds that a project has the potential to exceed these air pollution thresholds, the project should be considered to have significant air quality impacts.

5.2 AIR IMPACT ANALYSIS

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

Impact Analysis

Air districts are required to prepared air quality plans to identify strategies to bring regional emissions into compliance with federal and state air quality standards. Air districts establish emissions thresholds for individual projects to demonstrate the point at which a project would be considered to increase the air quality violations. A project would conflict with the applicable air quality plan if they exceeded any emissions thresholds for which the region is in nonattainment for.

As noted previously, the AVAQMD region is designated as nonattainment for the federal and state ozone standards, the state standard for PM_{10} (AVAQMD 2016). Accordingly, AVAQMD has prepared air quality plans, including the 2023 Ozone Plan, to achieve attainment of the applicable ozone standards. The AVAQMD’s adopted thresholds of significance indicate the levels of emissions that projects may emit while the region still moves towards attainments of the CAAQS and NAAQS. Projects that exceed thresholds would be considered to conflict with the 2023 Ozone Plan.

As described under Impact AIR-2, the Project would not exceed the thresholds established by the AVAQMD. As a result, the Project would not conflict with or obstruct implementation of the applicable air quality plan.

Conclusion

The Project would not conflict with or obstruct implementation of the applicable air quality plan, and the impact is less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

None Required.

Air Quality Impact Analysis

Level of Significance After Mitigation

Less Than Significant Impact.

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

Impact Analysis

In developing thresholds of significance for air pollutants, the AVAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions are considered to result in significant adverse air quality impacts to the region's existing air quality conditions.

Construction Emissions

Construction emissions associated with the Project are shown in Table 5. As shown in the table, the emissions from construction would be below the applicable AVAQMD thresholds.

Table 5. Construction Criteria Pollutant Emissions

Year	Maximum Daily Emissions (lbs per day)						Total Annual Emissions (tons per year)					
	ROG	NOx	CO	SOx	PM_{10}	$PM_{2.5}$	ROG	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
2025	8.27	69.1	62.6	0.19	11.9	6.5	1.21	2.91	1.91	0.00	0.30	0.15
2026	3.39	25	24.1	0.08	2.14	1.9	1.15	2.29	1.94	0.00	0.10	0.08
2027	42.9	10.6	17.6	0.06	1.65	1.39	1.47	1.35	0.72	0.00	0.04	0.03
AVAQMD Thresholds	**137**	**137**	**548**	**137**	**82**	**64**	**25**	**25**	**100**	**25**	**15**	**12**
Exceed Thresholds?	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***

Source: Appendix A.

Operational Emissions

Emissions during operation of the Project would be generated primarily from commercial and residents vehicle trips to and from the site, as well as from area sources, such as consumer products and landscaping equipment. Operational emissions are presented in Table 6. As shown therein, the emissions would be below the applicable thresholds of significance.

Table 6. Operational Criteria Pollutant Emissions

Source	Maximum Daily Emissions (lbs/day)						Total Annual Emissions (tons/year)					
	ROG	NOx	CO	SOx	PM_{10}	$PM_{2.5}$	ROG	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
Mobile	3.61	1.99	19.2	0.08	4.29	1.20	0.62	1.35	3.85	0.01	0.82	0.33
Area	89.5	1.78	111	0.22	15.8	17.5	5.01	1.07	5.62	0.01	0.78	0.64
Project Total	*92.1*	*4.6*	*131*	*0.26*	*18.6*	*17.5*	*4.52*	*0.72*	*8.48*	*0.01*	*2.18*	*0.94*
AVAQMD Thresholds	**137**	**137**	**548**	**137**	**82**	**64**	**25**	**25**	**100**	**25**	**15**	**12**
Exceed Thresholds?	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***

Note: Totals may not appear to sum due to rounding.
Source: Appendix A.

Conclusion

As shown in Table 5 and Table 6, criteria pollutant emissions would not exceed any threshold of significance during Project construction or operation. Therefore, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard, and the impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

None Required.

Level of Significance After Mitigation

Less Than Significant Impact.

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

Impact Analysis

This discussion addresses whether the Project would expose sensitive receptors to construction-generated fugitive dust (PM_{10}), Valley fever infection, naturally occurring asbestos (NOA), construction-generated DPM, or operational related TACs. According to CARB, some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Heightened sensitivity may be caused by health problems, proximity to the emissions source, or duration of exposure to air pollutants. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Accordingly, land uses that are typically

Air Quality Impact Analysis

considered to be sensitive receptors include residences, schools, childcare centers, playgrounds, retirement homes, convalescent homes, hospitals, and medical clinics. The nearest sensitive receptors to the Project site are the single-family residences located approximately 150 feet to the west, across 70th Street West.

Construction Emissions

During construction associated with the Project, the potential exists for emissions of fugitive dust, C. immitis spores, NOA, and DPM to be released. Each TAC is discussed separately below.

Fugitive Dust

Fugitive dust (PM_{10}) would be generated from site grading and other earth-moving activities. Most of this fugitive dust would remain localized and would be deposited near the Project site. However, the potential for impacts from fugitive dust exists unless control measures are implemented to reduce the emissions from the Project site. However, AVAQMD Rule 403, Fugitive Dust, limits the discharge of PM emissions. Additionally, during construction, water trucks would be used during phases with exposed soils to further reduce dust emissions (AVAQMD 2010). Furthermore, as demonstrated in Table 5, PM_{10} emissions from construction would not exceed the AVAQMD's threshold of significance. Thus, emissions of fugitive dust from construction of the Project would not adversely affect sensitive receptors.

Valley Fever

As noted previously, Valley fever is an infection caused by inhalation of the spores of a fungus, C. immitis, that lives in soil. Activities or conditions that increase the amount of fugitive dust contribute to greater exposure, and they include dust storms, grading, and recreational off-road activities. The California Central Coast, including parts of Los Angeles County, is considered an endemic area for Valley fever.

Construction activities would generate dust that could contain C. immitis spores. However, as noted above, the Project would minimize the generation of fugitive dust during construction activities by complying with AVAQMD Rule 403, Fugitive Dust. Additionally, during construction, water trucks would be used during phases with exposed soils to further reduce dust emissions. Overall, construction would not result in sensitive receptor exposure to C. immitis spores.

Naturally Occurring Asbestos

Construction in areas of rock formations that contain NOA could release asbestos to the air and pose a health hazard. A review of the map with areas more likely to have rock formations containing NOA in California indicates that there is no asbestos in the immediate Project area (USGS 2011). Therefore, construction of the Project would not expose sensitive receptors to NOA.

Air Quality Impact Analysis

Diesel Particulate Matter

Exposure to DPM from diesel vehicles and off-road construction equipment can result in health risks to nearby sensitive receptors. While the Project would involve the use of diesel fueled vehicles and off-road equipment, construction would be temporary. In addition, the modeled Project construction emissions are well below the AVAQMD thresholds for criteria pollutant emissions, which includes diesel particulate matter.

Operational Emissions

The greatest potential for exposure to TACs during long-term operations is from the use of heavy-duty diesel trucks and stationary generators that use diesel fuel. The Project is a single-family residential development. Once operational, the majority of vehicle trips to the Project site would be from residents and, as a result, the Project would attract very few diesel truck trips. Additionally, the Project would not include any stationary generators on-site. For these reasons, once operational, the Project would not be expected to expose nearby sensitive receptors to substantial amounts of TACs.

During operations, dust emissions would be negligible because most of the Project area would be occupied by buildings, pavement, and landscaped areas. This would preclude the possibility of Project operations resulting in exposure to fugitive dust emissions and C. immitis spores that may result in Valley fever infection.

Once operational, the Project would be considered a sensitive receptor location and future residents could be exposed to TAC emissions from nearby mobile and stationary sources. In the California Building Industry Association v. Bay Area Air Quality Management District (62 Cal.4th 369 [2015] [Case No. S213478]), the California Supreme Court held that “agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project’s future users or residents. When a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project’s impact on the environment—and not the environment’s impact on the project—that compels an evaluation of how future residents or users could be affected by exacerbated conditions.” Although the Court ruled that impacts from the existing environment on projects are not required to be addressed under CEQA, land uses such as gasoline stations, dry cleaners, distribution centers, freeways, and auto body shops can expose residents to high levels of TAC emissions if they are in proximity of the project site. The AVAQMD CEQA & Conformity Guidelines contain screening distances for siting sensitive receptor land uses. Additional analysis is required for projects that would site a sensitive use within 1,000 feet of an industrial project, distribution center, or major roadway; within 500 feet of a dry cleaner; or within 300 feet of a gas station. The Project site is not located within the screening distances for the foregoing land uses, and the nearest freeway, State Route 14, is located over 5.5 miles to the east. Therefore, future residents of the Project would not be exposed to substantial pollutant concentrations.

Air Quality Impact Analysis

Conclusion

Based on the analysis above, the Project would not expose sensitive receptors to substantial pollutant concentrations, and the impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

None Required.

Level of Significance After Mitigation

Less Than Significant Impact.

Impact AIR-4 Result in other emissions (such as those leading to odors) affecting a substantial number of people?

Impact Analysis

While offensive odors rarely cause any physical harm, they can still be unpleasant, leading to distress among the public and often generating citizen complaints. The occurrence and severity of odor impacts depends on numerous factors, including nature, frequency, and intensity of the source, the wind speed and direction, and the sensitivity of the receptor. The nearest sensitive receptors to the Project site are the single-family residences located approximately 150 feet to the west, across 70th Street West.

Construction activities associated with the Project could result in short-term odorous emissions from diesel exhaust associated with diesel-fueled equipment. However, these emissions would be intermittent and would dissipate rapidly from the source. Project construction would also be required to comply with all applicable AVAQMD rules and regulations, particularly associated with permitting of air pollutant sources. Compliance with the aforementioned regulations would help to minimize emissions, including emissions leading to odors.

Land uses typically considered as associated with the production of odors during operations include wastewater treatment facilities, waste disposal facilities, and agricultural operations. The Project does not include any land uses that are typically associated with emitting objectionable odors.

Finally, AVAQMD regulates objectionable odors through Rule 402, Nuisance, which dictates that emissions that cause nuisance or annoyance to the public are prohibited (AVAQMD 2002). Thus, although not anticipated, if odor complaints are made after the Project is developed, the AVAQMD would ensure that such odors are addressed, and any potential odor effects are minimized or eliminated.

Air Quality Impact Analysis

Conclusion

The Project would not result in other emissions, such as those leading to odors, affecting a substantial number of people. Therefore, the impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

None Required.

Level of Significance After Mitigation

Less Than Significant Impact.

6.0 GREENHOUSE GAS IMPACT ANALYSIS

6.1 CEQA GUIDELINES

The CEQA Guidelines define a significant effect on the environment as "a substantial, or potentially substantial, adverse change in the environment." To determine if a project would have a significant impact on GHGs, the type, level, and impact of emissions generated by the project must be evaluated.

The following GHG significance thresholds are contained in Appendix G of the CEQA Guidelines:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

6.1.1 Thresholds of Significance

The AVAQMD threshold of significance for GHGs is 548,000 pounds/day and 100,000 tons/year (AVAQMD 2016). However, it is noted that this threshold was adopted prior to SB 32 and AB 1279. Thus, pursuant to CEQA Guidelines Section 15183.5, this document also evaluates project significance through consistency with the City's CAP. The Project is considered to have a significant impact related to GHG emissions if it would exceed the AVAQMD thresholds and/or conflict with the City's CAP.

The Project is also evaluated for consistency with the following applicable plans that were adopted for the purpose of reducing GHG emissions: the CARB's 2022 Scoping Plan, SCAG's 2020-2045 RTP/SCS, and the City of Lancaster General Plan.

6.2 GHG IMPACT ANALYSIS

Impact GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact Analysis

Potential impacts related to GHG emissions resulting from implementation of the Project are considered in comparison with the AVAQMD's thresholds of significance and the City's CAP below.

Construction Emission Inventory

Construction GHGs would be emitted by the off-road construction equipment and vehicle travel by workers and material deliveries to the Project site. The estimated construction GHG emissions are shown

in Table 7. As shown in the table, the emissions from construction would be below the applicable AVAQMD thresholds.

Table 7. Construction Greenhouse Gas Emissions

Year	Maximum Daily Emissions (lbs CO_2e per day)	Total Annual Emissions ($MTCO_2e$ per year)
2025	16,147	391
2026	5,011	290
2027	2,872	91.1
AVAQMD Thresholds	**548,000**	**100,000**[1]
Exceed Thresholds?	***No***	***No***

Notes:

1. The AVAQMD threshold of significance for GHG emissions is presented in imperial tons, whereas the estimated GHG emissions from Project construction are presented in metric tons. Nevertheless, the Project GHG emissions are well below the threshold.

Source: Appendix A.

Operational Emission Inventory

Operational, or long-term, emissions occur over the life of the Project. Operational activities of the Project would generate GHG emissions primarily from mobile sources. Operational GHG emissions are shown in Table 8. As shown therein, the emissions would be below the applicable thresholds of significance.

Table 8. Operational Greenhouse Gas Emissions

Source	Maximum Daily Emissions (lbs CO_2e per day)	Total Annual Emissions ($MTCO_2e$ per year)
Mobile	3,834	495
Area	2,281	89.1
Energy[1]	372	62.1
Water	81.1	13.9
Waste	83.0	13.7
Refrigerants	0.78	0.13
Total	*6,652*	*851*
AVAQMD Thresholds	**548,000**	**100,000**[2]
Exceed Thresholds?	***No***	***No***

Notes

1. The energy source emissions presented above do not account for the reduction in emissions due to on-site solar panels. This is a conservative approach to analysis.
2. The AVAQMD threshold of significance for GHG emissions is presented in imperial tons, whereas the estimated GHG emissions from Project operation are presented in metric tons. Nevertheless, the Project GHG emissions are well below the threshold.

Source: Appendix A.

Consistency with City of Lancaster CAP

The Project's consistency with the applicable GHG reduction measures included in the CAP is evaluated in Table 9 below.

Table 9. Project Consistency with City of Lancaster CAP

Measure	Consistency Determination
Transportation	
Measure 4.1.2b: Bike Lanes. Installation of Class I, Class II, and Class III bike lanes to provide safe cycling facilities for residents.	**Consistent.** The Project would not include installation of bike lanes. However, the proposed driveway would provide direct access to Ave L & 15 Street.
Measure 4.1.2c: Pedestrian Amenities. Provide pedestrian amenities throughout the City to encourage walking instead of driving.	**Consistent.** All internal roadways would include a paved sidewalk to support pedestrian circulation throughout the Project site. To contact the commercial, residential, hotel, and community together.
Energy	
Measure 4.2.2a2: Energy Audit – Commercial and Residential. Increase energy conservation, efficiency, and savings through community education.	**Consistent.** This measure is primarily intended for implementation at the municipal level. Nevertheless, the Project would be constructed in accordance with the efficiency standards established in the 2022 California Building Standards Code. Additionally, implementation of the Project would not preclude the City's achievement of this measure.
Measure 4.2.2c: Lancaster Choice Energy Programs. Develop energy efficiency programs that will provide opportunities for residential and commercial buildings to become more energy efficient, reduce usage, and save money.	**Consistent.** The Project would be automatically enrolled in service with LCE through SCE infrastructure. Future residents may elect to opt out of LCE and receive electricity from SCE instead.
Water	
Measure 4.4.2a: Sensor Technology. Implement installation of water sensor technologies in order to increase efficient irrigation practices.	**Consistent.** The landscape would be a drip irrigation with rain sensors.
Waste	
Measure 4.5.1a: Composting. Implement programs to increase composting in residential and commercial settings.	**Consistent.** This measure is primarily intended for implementation at the municipal level. Nevertheless, as required by Lancaster Municipal Code Chapter 13.18, Mandatory Organic Waste Disposal Reduction, future residents of the Project shall place organic waste in designated containers and/or manage their organic waste on-site. Further, implementation of the Project would not preclude the City's achievement of this measure.
Measure 4.5.1b: Recycling Incentives. Incentivize the residential and business community to recycle more materials by expanding recycling opportunities and providing economic benefits for recycling.	**Consistent.** This measure is primarily intended for implementation at the municipal level. Nevertheless, consistent with Lancaster Municipal Code Section 13.18.030, Requirements for Single-Family Generators, separated recyclable materials shall be places in the designated container. Further, implementation of the Project would not preclude the City's achievement of this measure. All commercial spaces will have separate Green, recycle, and regular trash separated for municipal pick up.

Measure	Consistency Determination
Built Environment	
Measure 4.6.1a: Zero Net Energy Housing. Establish innovative business models encouraging the development of zero net energy housing and develop a zero net energy affordable housing project.	**Consistent.** This measure is primarily intended for implementation at the municipal level. Nevertheless, the proposed residential units would be all-electric and would include rooftops solar panels. In addition, the units would be Energy Star Certified. All the commercial appliances also would be electric.

Source: City of Lancaster 2016.

Based on the above, the Project would be consistent with the applicable measures from the City's CAP.

Conclusion

As demonstrated in Table 7, Table 8, and Table 9, the Project would not result in GHG emissions that would have a significant impact on the environment, and the impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

None Required.

Level of Significance After Mitigation

Less Than Significant Impact.

Impact GHG-2 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Analysis

The Project would include construction of 56 residential units on a vacant lot. The structures would include all electric buildings with solar paneling to generate renewable electricity on-site. In addition, the Project will be required to adhere to Title 24 and the latest California Building Standards.

Pursuant to Appendix G of the CEQA Guidelines, a significant GHG impact is identified if the project could conflict with applicable GHG reduction plans, policies, or regulations. The Project would be subject to complying with the City's CAP, CARB's 2022 Scoping Plan, SCAG's Connect SoCal, and the City's General Plan, each of which includes policies and regulations adopted for the purpose of reducing GHG emissions. Project consistency with the City CAP is evaluated under Impact GHG-1 and the other plans are evaluated below.

Greenhouse Gas Impact Analysis

Consistency with the CARB's 2022 Scoping Plan

CARB approved the 2022 Scoping Plan in December 2022. The 2022 Scoping Plan builds upon previous iterations of state scoping plans to achieve carbon neutrality and reduce anthropogenic GHG emissions below 85 percent below 1990 no later than 2045, as directed by AB 1279 (CARB 2022). Table 10 identifies the Scoping Plan policies that are applicable to the proposed Project.

Table 10. Project Consistency with 2022 Scoping Plan Greenhouse Gas Reduction Strategies

Measure	Consistency Determination
Ex. charging station	**Consistent.** 2022 California Building Standards Code, all units would include EV-capable infrastructure to accommodate future installation of a Level 2 EV charger. Including commercial uses.
Coordinate supply of liquid fossil fuels with declining CA fuel demand	**Not Applicable.** This measure is aimed at petroleum refineries and fossil fuel extraction operations. The Project would not interfere with this goal.
Generate clean electricity	**Consistent.** The Project would include rooftop solar panels to generate clean electricity. **Including commercial uses.**
Decarbonize Buildings	**Consistent.** The Project would not include any natural gas infrastructure and would include rooftop solar panels to generate clean electricity. With the exception of restaurants.
Decarbonize Industrial Energy Supply	**Not Applicable.** The Project is a mix use land use and would not affect the greater industrial sector.
Reduce non-combustion emissions (Methane)	**Consistent.** The Project would not include any land uses that generate significant levels of methane, such as landfills or dairy farms.
Reduce non-combustion emissions (Hydrofluorocarbons [HFCs])	**Consistent.** The Project would comply with all state regulations governing SLCPs, including HFCs.
Compensate for remaining emissions	**Not Applicable.** This measure is aimed at the state government to reduce statewide emissions to meet AB 1279 goals.

Source: CARB 2022.

This analysis finds the Project would be consistent with the applicable strategies recommended in the 2022 Scoping Plan.

Consistency with the SCAG's Connect SoCal

In September 2020, the SCAG Regional Council approved the 2020-2045 Connect SoCal RTP/SCS. The primary goal of Connect SoCal is to achieve sustainable regional growth while reducing GHG emissions

through transportation and land use planning. Project consistency with the specific goals of Connect SoCal which are applicable to the Project are evaluated in Table 11.

Table 11. Project Consistency with Connect SoCal Greenhouse Gas Reduction Strategies

Goal	Consistency Determination
Goal 5: Reduce greenhouse gas emissions and improve air quality.	**Consistent.** The Project would be all-electric and include rooftop solar panels to generate clean electricity and, as a result, the structures would not generate substantial air quality or GHG emissions during operations.
Goal 6: Support healthy and equitable communities.	**Consistent.** See discussion above. With the exception of restaurants.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**Consistent.** The Project would include paved sidewalks and direct access to the existing side walk lanes in the Project area. The Antelope Valley Transit Authority (AVTA) provides public transit services in the Project area. The nearest AVTA stop to the Project site is Ave L & 10th stop. Thus, public transit would be accessible to future residents of the Project. Therefore future residents and customers of the Project would have access to alternative modes of transportation.

Source: SCAG 2020.

Connect SoCal identifies areas throughout Southern California that should be prioritized for residential growth. Such areas are located in close proximity to public transit and, therefore, residents in these areas are expected to generate reduced mobile emissions. Although the Project site was not identified as a Priority Growth Area, Transit Priority Area, or High Quality Transit Area, the Project is proposed on a site that is zoned for single-family residential use. Therefore, the increase in housing units and associated increase in mobile emissions associated with the Project was accounted for in the regional growth projections included in Connect SoCal. Based on the above, the Project is considered consistent with the overarching goals of Connect SoCal.

Consistency with the City's General Plan

Table 12 evaluates the Project's consistency with the General Plan policies and actions related to GHG emissions that are applicable to the Project.

Table 12. Project Consistency with General Plan Greenhouse Gas Reduction Strategies

Measure	Consistency Determination
Policy 3.3.1. Minimize the amount of vehicular miles traveled.	**Consistent.** The Project would include paved sidewalks on all internal roadways and would provide a direct connection to the existing side walk on Ave L & 15th. In addition, future residents of the Project would have access to public transit services provided by AVTA. The nearest AVTA stop to the Project site is located at the intersection of Ave L & 10th. By providing alternative modes of transportation that

Measure	Consistency Determination
	reduce the reliance on single-passenger vehicles, the Project would reduce vehicle miles traveled (VMT).
Policy 3.3.2. Facilitate the development and use of public transportation and travel modes such as bicycle riding and walking.	**Consistent.** See discussion above.
Policy 3.3.3: Minimize air pollutant emissions generated by new and existing development.	**Consistent.** The Project would be all-electric and include solar energy generation, which would minimize air pollutant and GHG emissions. Furthermore, as demonstrated throughout this document, the Project would not result in air pollutant emissions that exceed the applicable thresholds.
Specific Action 3.3.3(c). Consider the development of an action plan to address the requirements of the Global Warming Solution Act of 2006 (AB 32) regarding the reduction of greenhouse gas emissions.	**Consistent.** Consistent with this action, the City of Lancaster prepared and adopted their CAP in 2016. Project consistency with the CAP is evaluated in Table 9. As demonstrated therein, the Project is consistent with the applicable measures in the City's CAP.

Source: City of Lancaster 2009.

This analysis finds the Project would be consistent with the applicable GHG reduction policies and actions in the General Plan.

Conclusion

The Project would not conflict with an applicable plan adopted for the purpose of reducing GHG emissions; therefore, impacts would be considered less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

None Required.

Level of Significance After Mitigation

Less Than Significant Impact.

Energy Impact Analysis

7.0 ENERGY IMPACT ANALYSIS

7.1 CEQA GUIDELINES

The CEQA Guidelines define a significant effect on the environment as “a substantial, or potentially substantial, adverse change in the environment.” To determine whether a project would have a significant impact on energy the following must be evaluated.

Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

7.2 ENERGY IMPACT ANALYSIS

Impact ENR-1 Result in potential significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact Analysis

The energy requirements for the Project were determined using the construction and operational estimates generated from the calculation worksheets for energy consumption (Appendix B). This impact addresses the energy consumption from both construction and operations, discussed separately below.

Construction Energy Demand

During construction of the Project, energy resources would be consumed in the form of diesel and gasoline fuel from the use of off-road equipment (i.e., tractors, excavators, cranes) and on-road vehicles (i.e., construction employee commutes, haul trucks). Temporary electricity may be required to provide as-necessary lighting and electric equipment; such electricity demand would be met by portable generator sets and, possibly, local distribution. Fuel demand associated with portable generators is incorporated in the off-road equipment estimate provided below. In the event local distribution is required during construction, the demand would be negligible. Natural gas is not anticipated to be required during construction of the Project.

Off-Road Equipment

Construction activities associated with the Project, including grading, utility installation, paving, building construction, and architectural coating, were estimated to consume 66,899 gallons of diesel fuel from the use of off-road equipment. For comparison, in 2021, approximately 3.7 billion gallons of diesel fuel was

consumed within California (U.S. Energy Information Administration [USEIA] 2023). Thus, the diesel fuel required to power the off-road equipment during construction of the Project would represent approximately 0.002 percent of the state's annual diesel demand.

On-Road Vehicles

On-road vehicles for construction workers and vendors would require fuel for travel to and from the site during construction. Table 13 provides an estimate of the total on-road vehicle fuel usage during construction.

Table 13. Construction On-Road Vehicle Fuel Consumption

Project Component	Average Fuel Economy (miles/gallon)	Total VMT	Total Fuel Consumption (gallons)
Worker Trips	28.10	337,410	13,321
Vendor Trips	12.10	43,511	4,001
Total Construction On-Road Trips		**380,921**	**17,333**

Notes:
Calculations use unrounded numbers; totals may not appear to sum exactly due to rounding.
VMT = vehicle miles traveled
Source: Appendix B.

As shown in the table, construction of the Project was estimated to consume 17,333 gallons of fuel from on-road vehicles. For comparison, in 2021, approximately 10.2 billion gallons of gasoline for motor vehicles was consumed within California (USEIA 2023). Thus, the fuel required to power the on-road motor vehicles during construction of the Project would represent approximately 0.0002 percent of the state's annual gasoline demand.

Conclusion

Overall, construction activities associated with the Project would result in the consumption of petroleum-based fuels. However, there are no unusual Project characteristics that would necessitate the use of construction equipment or vehicles that would be less energy efficient than at comparable construction sites in other parts of the state. Therefore, it is expected that construction fuel consumption associated with the proposed Project would not be any more inefficient, wasteful, or unnecessary than at other construction sites in the region.

Operational Energy Demand

During operations of the Project, energy would be required to power the proposed residential buildings and to fuel the vehicles travelling to and from the site.

Energy Impact Analysis

Building Energy

The proposed residences would require energy for normal operations, such as lighting and temperature controls. The Project would not consume any natural gas. Over the course of a year, operational electricity consumption would total 390,089 kilowatt-hours. It is noted that the proposed buildings would be constructed in compliance with the energy efficiency standards set forth in the 2022 California Building Standards Code. Therefore, the Project's total energy consumption and would not result in the inefficient, wasteful, or unnecessary use of energy.

Transportation Energy

Future residents of the Project would travel to and from the site during normal operations. Table 14 provides an estimate of the daily and annual fuel consumed by vehicles traveling to and from the Project site. These estimates were derived using the same assumptions used in the operational air quality and GHG analysis for the Project.

Table 14. Long-Term Operational Vehicle Fuel Consumption

Vehicle Type	Percent of Vehicle Trips	Annual VMT	Average Fuel Economy (miles/gallon)	Total Annual Fuel Consumption (gallons)
Passenger Cars (LDA)	70	1,051,946	31	43,420
Light Trucks and Medium Duty Vehicles (LDT1, LDT2, MDV)	21	397,001	24	21,192
Light-Heavy to Heavy-Heavy Diesel Trucks (LHD1, LHD2, MHDT, HHDT)	5	97,200	11	10,100
Motorcycles (MCY)	2	20,120	42	456
Other (OBUS, UBUS, SBUS, MH)	2	14,110	7	3,110
Total	**-**	**2,455,371**	**-**	**78,278**

Source: Appendix B.

As noted previously, in 2021, California consumed approximately 10.2 billion gallons of gasoline (USEIA 2023). The Project's anticipated consumption of 78,278 gallons of fuel per year represents approximately 0.001 percent of the state's annual demand for gasoline. Further, over the Project lifetime, vehicle fuel efficiency is anticipated to increase as a result of federal and state laws governing fleet standards. As such, the amount of fuel consumed as a result of vehicular trips to and from the Project site during operation would decrease over time. The Project would not be any more inefficient, wasteful, or unnecessary than other vehicle uses in the region.

Energy Impact Analysis

Conclusion

Based on the analysis above, the Project would not result in a potential significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources; therefore, the impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Impact ENR-2 Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact Analysis

The Project would comply with the applicable federal, state, and local regulations aimed at reducing energy consumption. Local regulations have been developed in accordance with federal and state energy regulations, such as the California Building Energy Efficiency Standards (California Code of Regulations Title 24, Part 6), the CALGreen Code (California Code of Regulations Title 24, Part 11), and SB 743, which are also aimed at reducing energy consumption. Consistent with the CALGreen code, the single-family residences would include solar paneling. Additionally, the residential homes would be Energy Star Certified, which is an energy efficiency program run by the USEPA and Department of Energy. Energy Star Certification demonstrates that the Project would be at least 75 percent more efficient than similar buildings nationwide as verified by a third-party (Energy Star 2023). The Project would also support the state's RPS requirements by automatically enrolling residents in LCE electricity service.

Conclusion

The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency; therefore, the impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Energy Impact Analysis

Level of Significance After Mitigation

Less Than Significant Impact.

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9 CERTIFICATION

The contents of this greenhouse gas study report represent an accurate depiction of the greenhouse gas impacts associated with the proposed Corner of Ave L & 15th Street. Project. The information contained in this greenhouse gas report is based on the best available data at the time of preparation. If you have any questions, please contact me directly at Atabak80@gmail.com.

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APPENDIX 3.1:

CALEEMOD CONSTRUCTION EMISSIONS MODEL OUTPUTS

(Construction) Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Lancaster mixed use project, Corner of Ave L & 15th Street. (Construction)
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	4.50
Precipitation (days)	13.0
Location	34.66040225621194, -118.15669887007078
County	Los Angeles-Mojave Desert
City	Lancaster
Air District	Antelope Valley AQMD
Air Basin	Mojave Desert
TAZ	3655
EDFZ	7
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Mixed use project	—	---	10.126	342,880	71,776	0.00	—	—
Parking Lot	799	Space	250,951	0.00	0.00	0.00	—	—

Other Asphalt Surfaces	—	—	—	0.00	0.00	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.89	52.0	63.9	70.6	0.11	3.14	5.94	9.09	2.90	2.75	5.08	—	15,538	15,538	0.51	0.66	20.6	15,768
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.60	3.03	21.5	29.4	0.04	1.17	2.60	3.76	1.07	0.63	1.70	—	6,696	6,696	0.23	0.35	0.41	6,807
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.89	6.81	11.4	17.0	0.02	0.59	1.44	2.03	0.54	0.35	0.89	—	3,752	3,752	0.13	0.19	3.60	3,816
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.35	1.24	2.08	3.11	< 0.005	0.11	0.26	0.37	0.10	0.06	0.16	—	621	621	0.02	0.03	0.60	632

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	8.89	7.56	63.9	70.6	0.11	3.14	5.94	9.09	2.90	2.75	5.08	—	15,538	15,538	0.51	0.66	20.6	15,768
2027	5.04	52.0	29.2	50.4	0.06	1.48	3.21	4.69	1.37	0.77	2.14	—	9,285	9,285	0.32	0.39	17.9	9,427
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.60	3.03	21.5	29.4	0.04	1.17	2.60	3.76	1.07	0.63	1.70	—	6,696	6,696	0.23	0.35	0.41	6,807
2027	3.33	2.86	20.1	28.4	0.04	1.05	2.60	3.65	0.97	0.63	1.60	—	6,638	6,638	0.23	0.35	0.39	6,749
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.62	1.36	11.0	12.7	0.02	0.56	1.17	1.74	0.52	0.35	0.87	—	2,793	2,793	0.09	0.13	2.14	2,836
2027	1.89	6.81	11.4	17.0	0.02	0.59	1.44	2.03	0.54	0.35	0.89	—	3,752	3,752	0.13	0.19	3.60	3,816
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.30	0.25	2.00	2.33	< 0.005	0.10	0.21	0.32	0.09	0.06	0.16	—	462	462	0.02	0.02	0.35	469
2027	0.35	1.24	2.08	3.11	< 0.005	0.11	0.26	0.37	0.10	0.06	0.16	—	621	621	0.02	0.03	0.60	632

3. Construction Emissions Details

3.1. Site Preparation (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	5.83	4.90	47.0	38.0	0.05	2.53	—	2.53	2.33	—	2.33	—	5,530	5,530	0.22	0.04	—	5,549

Dust From Material Movement	—	—	—	—	—	—	5.66	5.66	—	2.69	2.69	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.13	1.29	1.04	< 0.005	0.07	—	0.07	0.06	—	0.06	—	152	152	0.01	< 0.005	—	152
Dust From Material Movement	—	—	—	—	—	—	0.16	0.16	—	0.07	0.07	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.24	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	25.1	25.1	< 0.005	< 0.005	—	25.2
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.13	0.12	0.12	2.03	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	270	270	0.01	0.01	1.21	274
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	61.8	61.8	< 0.005	0.01	0.17	64.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	6.76	6.76	< 0.005	< 0.005	0.01	6.85
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.69	1.69	< 0.005	< 0.005	< 0.005	1.77
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	1.12	1.12	< 0.005	< 0.005	< 0.005	1.13
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.29
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	5.00	4.20	40.9	32.7	0.06	1.96	—	1.96	1.80	—	1.80	—	6,715	6,715	0.27	0.05	—	6,738
Dust From Material Movement	—	—	—	—	—	—	2.67	2.67	—	0.98	0.98	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.41	0.34	3.36	2.69	0.01	0.16	—	0.16	0.15	—	0.15	—	552	552	0.02	< 0.005	—	554
Dust From Material Movement	—	—	—	—	—	—	0.22	0.22	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.61	0.49	< 0.005	0.03	—	0.03	0.03	—	0.03	—	91.4	91.4	< 0.005	< 0.005	—	91.7
Dust From Material Movement	—	—	—	—	—	—	0.04	0.04	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.13	0.13	2.26	0.00	0.00	0.02	0.02	0.00	0.00	0.00	—	300	300	0.01	0.01	1.34	305
Vendor	0.01	0.01	0.20	0.08	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	0.01	—	185	185	< 0.005	0.03	0.52	194
Hauling	0.04	0.03	1.40	0.33	0.01	0.02	0.10	0.11	0.02	0.04	0.05	—	1,370	1,370	< 0.005	0.22	2.98	1,438
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.14	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	22.5	22.5	< 0.005	< 0.005	0.05	22.8
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	15.3	15.3	< 0.005	< 0.005	0.02	15.9

Hauling	< 0.005	< 0.005	0.12	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	113	113	< 0.005	0.02	0.11	118
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	3.73	3.73	< 0.005	< 0.005	0.01	3.78
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.52	2.52	< 0.005	< 0.005	< 0.005	2.64
Hauling	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	18.7	18.7	< 0.005	< 0.005	0.02	19.6

3.5. Building Construction (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.47	2.07	18.3	16.2	0.03	1.14	—	1.14	1.05	—	1.05	—	2,806	2,806	0.11	0.02	—	2,815
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.47	2.07	18.3	16.2	0.03	1.14	—	1.14	1.05	—	1.05	—	2,806	2,806	0.11	0.02	—	2,815
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.71	0.59	5.22	4.62	0.01	0.33	—	0.33	0.30	—	0.30	—	802	802	0.03	0.01	—	804
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.13	0.11	0.95	0.84	< 0.005	0.06	—	0.06	0.05	—	0.05	—	133	133	0.01	< 0.005	—	133
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.16	1.07	1.07	18.3	0.00	0.00	0.13	0.13	0.00	0.00	0.00	—	2,430	2,430	0.10	0.08	10.9	2,467
Vendor	0.08	0.06	1.87	0.75	0.01	0.03	0.10	0.13	0.03	0.04	0.06	—	1,731	1,731	< 0.005	0.25	4.90	1,811
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.06	0.90	1.21	12.4	0.00	0.00	0.13	0.13	0.00	0.00	0.00	—	2,157	2,157	0.11	0.08	0.28	2,184
Vendor	0.07	0.05	1.97	0.78	0.01	0.03	0.10	0.13	0.03	0.04	0.06	—	1,733	1,733	< 0.005	0.25	0.13	1,808
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.30	0.26	0.37	3.97	0.00	0.00	0.04	0.04	0.00	0.00	0.00	—	634	634	0.03	0.02	1.34	643
Vendor	0.02	0.02	0.56	0.22	< 0.005	0.01	0.03	0.04	0.01	0.01	0.02	—	495	495	< 0.005	0.07	0.61	517
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.07	0.72	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	105	105	0.01	< 0.005	0.22	106
Vendor	< 0.005	< 0.005	0.10	0.04	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	81.9	81.9	< 0.005	0.01	0.10	85.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.31	1.93	17.1	16.0	0.03	1.03	—	1.03	0.94	—	0.94	—	2,805	2,805	0.11	0.02	—	2,815
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.31	1.93	17.1	16.0	0.03	1.03	—	1.03	0.94	—	0.94	—	2,805	2,805	0.11	0.02	—	2,815
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.24	1.04	9.16	8.59	0.01	0.55	—	0.55	0.51	—	0.51	—	1,504	1,504	0.06	0.01	—	1,509
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.23	0.19	1.67	1.57	< 0.005	0.10	—	0.10	0.09	—	0.09	—	249	249	0.01	< 0.005	—	250
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	1.11	0.97	0.99	17.2	0.00	0.00	0.13	0.13	0.00	0.00	0.00	—	2,388	2,388	0.10	0.08	10.1	2,425
Vendor	0.06	0.06	1.79	0.70	0.01	0.03	0.10	0.13	0.03	0.04	0.06	—	1,709	1,709	< 0.005	0.25	4.90	1,788
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.96	0.87	1.07	11.6	0.00	0.00	0.13	0.13	0.00	0.00	0.00	—	2,122	2,122	0.11	0.08	0.26	2,149
Vendor	0.06	0.05	1.89	0.72	0.01	0.03	0.10	0.13	0.03	0.04	0.06	—	1,711	1,711	< 0.005	0.25	0.13	1,785
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.52	0.47	0.61	6.99	0.00	0.00	0.07	0.07	0.00	0.00	0.00	—	1,171	1,171	0.06	0.04	2.35	1,187
Vendor	0.03	0.03	1.02	0.38	0.01	0.01	0.05	0.07	0.01	0.02	0.03	—	917	917	< 0.005	0.13	1.13	958
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.09	0.11	1.28	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	194	194	0.01	0.01	0.39	197
Vendor	0.01	0.01	0.19	0.07	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	0.01	—	152	152	< 0.005	0.02	0.19	159
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.01	0.85	7.81	10.0	0.01	0.39	—	0.39	0.36	—	0.36	—	1,512	1,512	0.06	0.01	—	1,517
Paving	—	0.95	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.43	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Paving	—	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.08	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Paving	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.09	1.59	0.00	0.00	0.01	0.01	0.00	0.00	0.00	—	221	221	0.01	0.01	0.94	225
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.07	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	11.1	11.1	< 0.005	< 0.005	0.02	11.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	1.83	1.83	< 0.005	< 0.005	< 0.005	1.86
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.22	0.18	1.21	1.53	< 0.005	0.04	—	0.04	0.04	—	0.04	—	178	178	0.01	< 0.005	—	179
Architectural Coatings	—	46.8	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.13	0.17	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19.5	19.5	< 0.005	< 0.005	—	19.6
Architectural Coatings	—	5.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.23	3.23	< 0.005	< 0.005	—	3.24
Architectural Coatings	—	0.94	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.19	0.20	3.39	0.00	0.00	0.03	0.03	0.00	0.00	0.00	—	472	472	0.02	0.02	2.00	479
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.28	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	47.3	47.3	< 0.005	< 0.005	0.09	47.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	7.82	7.82	< 0.005	< 0.005	0.02	7.94
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	7/4/2026	7/16/2026	5.00	12.0	—
Grading	Grading	7/17/2026	8/16/2026	5.00	30.0	—
Building Construction	Building Construction	8/17/2026	9/15/2027	5.00	485	—
Paving	Paving	7/2/2027	7/22/2027	5.00	20.0	—
Architectural Coating	Architectural Coating	6/17/2027	9/15/2027	5.00	120	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Building Construction	Cranes	Diesel	Average	1.00	8.00	367	0.29

Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	8.00	37.0	0.48
Site Preparation	Crawler Tractors	Diesel	Average	4.00	8.00	87.0	0.43
Grading	Crawler Tractors	Diesel	Average	2.00	8.00	87.0	0.43
Building Construction	Crawler Tractors	Diesel	Average	3.00	8.00	87.0	0.43

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	18.0	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	2.00	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	0.00	0.00	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	6.00	10.2	HHDT,MHDT
Grading	Hauling	20.0	20.0	HHDT
Grading	Onsite truck	0.00	0.00	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	162	18.5	LDA,LDT1,LDT2

Building Construction	Vendor	56.0	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	0.00	0.00	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	0.00	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	0.00	0.00	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	32.0	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	0.00	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	0.00	0.00	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	237,600	336,700	577,200	192,400	18,943

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)

Site Preparation	0.00	0.00	35.0	0.00	—
Grading	4,700	0.00	120	0.00	—
Paving	0.00	0.00	0.00	0.00	7.25

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	3	74%	74%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Mixed use project	342,880	0%
Parking Lot	250,951	100%
Other Asphalt Surfaces	0	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	532	0.03	< 0.005
2027	0.00	532	0.03	< 0.005

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	30.3	annual days of extreme heat
Extreme Precipitation	1.70	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	1.96	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	4	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack	N/A	N/A	N/A	N/A
Air Quality	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	4	1	1	4
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack	N/A	N/A	N/A	N/A

Air Quality	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	88.7
AQ-PM	6.32
AQ-DPM	16.0
Drinking Water	50.7
Lead Risk Housing	90.6
Pesticides	56.5
Toxic Releases	98.8
Traffic	14.4
Effect Indicators	—
CleanUp Sites	50.3
Groundwater	0.00
Haz Waste Facilities/Generators	91.6
Impaired Water Bodies	0.00
Solid Waste	22.1

Sensitive Population	—
Asthma	91.7
Cardio-vascular	85.3
Low Birth Weights	88.0
Socioeconomic Factor Indicators	—
Education	92.7
Housing	79.6
Linguistic	61.5
Poverty	91.8
Unemployment	94.3

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	19.82548441
Employed	6.723983062
Median HI	14.29488002
Education	—
Bachelor's or higher	8.520467086
High school enrollment	100
Preschool enrollment	7.070447838
Transportation	—
Auto Access	35.49339151
Active commuting	40.30540228
Social	—
2-parent households	65.41768254

Voting	20.50558193
Neighborhood	—
Alcohol availability	80.5338124
Park access	17.07943026
Retail density	41.52444501
Supermarket access	9.893494161
Tree canopy	19.99230078
Housing	—
Homeownership	42.78198383
Housing habitability	5.735916848
Low-inc homeowner severe housing cost burden	13.43513409
Low-inc renter severe housing cost burden	0.384960862
Uncrowded housing	10.95855255
Health Outcomes	—
Insured adults	37.31553959
Arthritis	60.6
Asthma ER Admissions	25.2
High Blood Pressure	51.5
Cancer (excluding skin)	87.6
Asthma	13.4
Coronary Heart Disease	37.1
Chronic Obstructive Pulmonary Disease	17.9
Diagnosed Diabetes	19.9
Life Expectancy at Birth	11.5
Cognitively Disabled	41.3
Physically Disabled	65.4
Heart Attack ER Admissions	37.4

Mental Health Not Good	8.1
Chronic Kidney Disease	27.1
Obesity	13.8
Pedestrian Injuries	19.6
Physical Health Not Good	9.8
Stroke	26.0
Health Risk Behaviors	—
Binge Drinking	66.7
Current Smoker	7.4
No Leisure Time for Physical Activity	14.6
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	10.6
Elderly	98.5
English Speaking	11.0
Foreign-born	64.9
Outdoor Workers	5.9
Climate Change Adaptive Capacity	—
Impervious Surface Cover	82.8
Traffic Density	17.5
Traffic Access	23.0
Other Indices	—
Hardship	89.2
Other Decision Support	—
2016 Voting	5.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	88.0
Healthy Places Index Score for Project Location (b)	13.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Total Project area is 10.126 acres
Construction: Construction Phases	Construction anticipated to start in July 2026 and end in December 2027
Construction: Off-Road Equipment	Construction equipment based on equipment used for other industrial projects within the area
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Site Preparation, Grading, and Building Construction
Construction: Architectural Coatings	Rule 1113

APPENDIX 3.2:

CALEEMOD OPERATIONAL EMISSIONS MODEL

Corner of Ave L & 15th Street. Mix Use Project Development (Construction) Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Lancaster mixed use project, Corner of Ave L & 15th Street. (Construction)
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	4.50
Precipitation (days)	13.0
Location	34.66040225621194, -118.15669887007078
County	Los Angeles-Mojave Desert
City	Lancaster
Air District	Antelope Valley AQMD
Air Basin	Mojave Desert
TAZ	3655
EDFZ	7
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Mixed use project	0	1000sqft	10.126	342,880	71,776	0.00	—	—
User Defined	0	User Defined Unit	250,951	0.00	0.00	0.00	—	—

Parking Lot	799	Space	0.00	0.00	0.00	0.00	—	—
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.21	14.6	6.26	47.9	0.09	0.11	2.35	2.46	0.11	0.44	0.55	365	11,365	11,730	37.4	1.21	426	13,451
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.98	11.6	6.55	24.3	0.08	0.09	2.35	2.44	0.08	0.44	0.52	365	10,777	11,142	37.4	1.22	393	12,834
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.67	12.3	4.92	27.5	0.06	0.07	1.72	1.80	0.07	0.32	0.40	365	8,603	8,969	37.4	1.01	403	10,607
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.67	2.24	0.90	5.02	0.01	0.01	0.31	0.33	0.01	0.06	0.07	60.5	1,424	1,485	6.19	0.17	66.7	1,756

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	3.24	2.98	6.11	31.2	0.09	0.09	2.35	2.44	0.08	0.44	0.52	—	9,054	9,054	0.24	0.76	33.4	9,321
Area	2.97	11.6	0.14	16.7	< 0.005	0.02	—	0.02	0.03	—	0.03	—	68.8	68.8	< 0.005	< 0.005	—	69.1
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	1,747	1,747	0.17	0.02	—	1,757
Water	—	—	—	—	—	—	—	—	—	—	—	171	495	665	17.5	0.42	—	1,229
Waste	—	—	—	—	—	—	—	—	—	—	—	195	0.00	195	19.5	0.00	—	682
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	392	392
Total	6.21	14.6	6.26	47.9	0.09	0.11	2.35	2.46	0.11	0.44	0.55	365	11,365	11,730	37.4	1.21	426	13,451
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.98	2.72	6.55	24.3	0.08	0.09	2.35	2.44	0.08	0.44	0.52	—	8,535	8,535	0.25	0.78	0.87	8,773
Area	—	8.89	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	1,747	1,747	0.17	0.02	—	1,757
Water	—	—	—	—	—	—	—	—	—	—	—	171	495	665	17.5	0.42	—	1,229
Waste	—	—	—	—	—	—	—	—	—	—	—	195	0.00	195	19.5	0.00	—	682
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	392	392
Total	2.98	11.6	6.55	24.3	0.08	0.09	2.35	2.44	0.08	0.44	0.52	365	10,777	11,142	37.4	1.22	393	12,834
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.20	2.01	4.85	19.2	0.06	0.06	1.72	1.78	0.06	0.32	0.38	—	6,328	6,328	0.19	0.57	10.6	6,513
Area	1.47	10.2	0.07	8.25	< 0.005	0.01	—	0.01	0.01	—	0.01	—	33.9	33.9	< 0.005	< 0.005	—	34.1
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	1,747	1,747	0.17	0.02	—	1,757
Water	—	—	—	—	—	—	—	—	—	—	—	171	495	665	17.5	0.42	—	1,229
Waste	—	—	—	—	—	—	—	—	—	—	—	195	0.00	195	19.5	0.00	—	682
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	392	392

Total	3.67	12.3	4.92	27.5	0.06	0.07	1.72	1.80	0.07	0.32	0.40	365	8,603	8,969	37.4	1.01	403	10,607
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.40	0.37	0.89	3.51	0.01	0.01	0.31	0.33	0.01	0.06	0.07	—	1,048	1,048	0.03	0.09	1.75	1,078
Area	0.27	1.87	0.01	1.51	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.62	5.62	< 0.005	< 0.005	—	5.64
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	289	289	0.03	< 0.005	—	291
Water	—	—	—	—	—	—	—	—	—	—	—	28.2	81.9	110	2.90	0.07	—	204
Waste	—	—	—	—	—	—	—	—	—	—	—	32.3	0.00	32.3	3.23	0.00	—	113
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	64.9	64.9
Total	0.67	2.24	0.90	5.02	0.01	0.01	0.31	0.33	0.01	0.06	0.07	60.5	1,424	1,485	6.19	0.17	66.7	1,756

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	3.04	2.82	1.54	29.5	0.05	0.02	0.22	0.24	0.02	0.07	0.09	—	4,862	4,862	0.22	0.15	20.9	4,933
User Defined Industrial	0.19	0.16	4.57	1.66	0.04	0.06	0.31	0.37	0.06	0.10	0.16	—	4,192	4,192	0.02	0.62	12.6	4,388
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	3.24	2.98	6.11	31.2	0.09	0.09	0.53	0.62	0.08	0.17	0.25	—	9,054	9,054	0.24	0.76	33.4	9,321
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	2.80	2.58	1.73	22.6	0.04	0.02	0.22	0.24	0.02	0.07	0.09	—	4,340	4,340	0.24	0.16	0.54	4,394
User Defined Industrial	0.18	0.15	4.82	1.68	0.04	0.06	0.31	0.37	0.06	0.10	0.16	—	4,195	4,195	0.02	0.62	0.33	4,380
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	2.98	2.72	6.55	24.3	0.08	0.09	0.53	0.62	0.08	0.17	0.25	—	8,535	8,535	0.25	0.78	0.87	8,773
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.38	0.35	0.24	3.29	0.01	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	540	540	0.03	0.02	1.09	548
User Defined Industrial	0.02	0.02	0.65	0.22	0.01	0.01	0.04	0.05	0.01	0.01	0.02	—	508	508	< 0.005	0.07	0.66	531
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.40	0.37	0.89	3.51	0.01	0.01	0.07	0.08	0.01	0.02	0.03	—	1,048	1,048	0.03	0.09	1.75	1,078

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,720	1,720	0.16	0.02	—	1,730
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	26.6	26.6	< 0.005	< 0.005	—	26.8
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,747	1,747	0.17	0.02	—	1,757
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	1,720	1,720	0.16	0.02	—	1,730
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	26.6	26.6	< 0.005	< 0.005	—	26.8
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,747	1,747	0.17	0.02	—	1,757
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	285	285	0.03	< 0.005	—	286
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	4.41	4.41	< 0.005	< 0.005	—	4.43
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	289	289	0.03	< 0.005	—	291

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.3. Area Emissions by Source

4.3.2. Unmitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	8.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.64	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	2.97	2.74	0.14	16.7	< 0.005	0.02	—	0.02	0.03	—	0.03	—	68.8	68.8	< 0.005	< 0.005	—	69.1
Total	2.97	11.6	0.14	16.7	< 0.005	0.02	—	0.02	0.03	—	0.03	—	68.8	68.8	< 0.005	< 0.005	—	69.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	8.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coatings	—	0.64	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	8.89	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	1.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.27	0.25	0.01	1.51	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.62	5.62	< 0.005	< 0.005	—	5.64
Total	0.27	1.87	0.01	1.51	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.62	5.62	< 0.005	< 0.005	—	5.64

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mixed use rated	—	—	—	—	—	—	—	—	—	—	—	171	495	665	17.5	0.42	—	1,229
User Defined	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	171	495	665	17.5	0.42	—	1,229
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	171	495	665	17.5	0.42	—	1,229
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	171	495	665	17.5	0.42	—	1,229
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	28.2	81.9	110	2.90	0.07	—	204
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	28.2	81.9	110	2.90	0.07	—	204

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	195	0.00	195	19.5	0.00	—	682
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	195	0.00	195	19.5	0.00	—	682
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	195	0.00	195	19.5	0.00	—	682
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	195	0.00	195	19.5	0.00	—	682
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	32.3	0.00	32.3	3.23	0.00	—	113
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	32.3	0.00	32.3	3.23	0.00	—	113

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	392	392
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	392	392
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	392	392
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	392	392
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-No Rail	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	64.9	64.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	64.9	64.9

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Unrefrigerated Warehouse-No Rail	608	51.4	20.6	162,266	6,383	540	216	1,703,633
User Defined Industrial	90.0	7.62	3.04	24,021	1,479	125	50.0	394,781
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Commercial Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
66,400	582,500	649,408	192,400	39,500

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Mixed use	1,801,004	349	0.0330	0.0040	0.00
User Defined Industrial	0.00	349	0.0330	0.0040	0.00
Parking Lot	27,856	349	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	349	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Mixed use	88,985,000	1,367,379
User Defined Industrial	0.00	0.00
Parking Lot	0.00	0.00
Other Asphalt Surfaces	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Mixed use	362	0.00
User Defined Industrial	0.00	0.00
Parking Lot	0.00	0.00
Other Asphalt Surfaces	0.00	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Commercial	Cold storage	User Defined	150	7.50	7.50	7.50	25.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type
—	—

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	30.3	annual days of extreme heat
Extreme Precipitation	1.70	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	1.96	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack	N/A	N/A	N/A	N/A
Air Quality	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A

Drought	N/A	N/A	N/A	N/A
Snowpack	N/A	N/A	N/A	N/A
Air Quality	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	88.7
AQ-PM	6.32
AQ-DPM	16.0
Drinking Water	50.7
Lead Risk Housing	90.6
Pesticides	56.5
Toxic Releases	98.8
Traffic	14.4
Effect Indicators	—
CleanUp Sites	50.3
Groundwater	0.00
Haz Waste Facilities/Generators	91.6

Impaired Water Bodies	0.00
Solid Waste	22.1
Sensitive Population	—
Asthma	91.7
Cardio-vascular	85.3
Low Birth Weights	88.0
Socioeconomic Factor Indicators	—
Education	92.7
Housing	79.6
Linguistic	61.5
Poverty	91.8
Unemployment	94.3

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	19.82548441
Employed	6.723983062
Median HI	—
Education	—
Bachelor's or higher	8.520467086
High school enrollment	100
Preschool enrollment	7.070447838
Transportation	—
Auto Access	35.49339151
Active commuting	40.30540228

Social	—
2-parent households	65.41768254
Voting	20.50558193
Neighborhood	—
Alcohol availability	80.5338124
Park access	17.07943026
Retail density	41.52444501
Supermarket access	9.893494161
Tree canopy	19.99230078
Housing	—
Homeownership	42.78198383
Housing habitability	5.735916848
Low-inc homeowner severe housing cost burden	13.43513409
Low-inc renter severe housing cost burden	0.384960862
Uncrowded housing	10.95855255
Health Outcomes	—
Insured adults	37.31553959
Arthritis	60.6
Asthma ER Admissions	25.2
High Blood Pressure	51.5
Cancer (excluding skin)	87.6
Asthma	13.4
Coronary Heart Disease	37.1
Chronic Obstructive Pulmonary Disease	17.9
Diagnosed Diabetes	19.9
Life Expectancy at Birth	11.5
Cognitively Disabled	41.3

Physically Disabled	65.4
Heart Attack ER Admissions	37.4
Mental Health Not Good	8.1
Chronic Kidney Disease	27.1
Obesity	13.8
Pedestrian Injuries	19.6
Physical Health Not Good	9.8
Stroke	26.0
Health Risk Behaviors	—
Binge Drinking	66.7
Current Smoker	7.4
No Leisure Time for Physical Activity	14.6
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	10.6
Elderly	98.5
English Speaking	11.0
Foreign-born	64.9
Outdoor Workers	5.9
Climate Change Adaptive Capacity	—
Impervious Surface Cover	82.8
Traffic Density	17.5
Traffic Access	23.0
Other Indices	—
Hardship	89.2
Other Decision Support	—

2016 Voting	5.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	88.0
Healthy Places Index Score for Project Location (b)	13.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Total Project area is 10.126 acres
Construction: Construction Phases	Construction anticipated to start in July 2026 and end in December 2027
Construction: Off-Road Equipment	Construction equipment based on equipment used for other industrial projects within the area
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Site Preparation, Grading, and Building Construction
Construction: Architectural Coatings	Rule 1113

Operations: Vehicle Data	Trip characteristics based on information provided in the Traffic analysis
Operations: Fleet Mix	Passenger Car Mix estimated based on the CalEEMod default fleet mix and the ratio of the vehicle classes (LDA, LDT1, LDT2, MDV, & MCY). Truck Mix based on information in the Traffic analysis
Operations: Energy Use	Natural gas will not be used
Operations: Refrigerants	Per 17 CCR 95371, new refrigeration equipment containing >50 lbs of refrigerant in new facilities is prohibited from utilizing refrigerants with a GWP of 150 or greater as of 1 Jan 2022