APPENDIX A

AIR QUALITY IMPACT ANALYSIS

Loma Linda Medical Office Building

AIR QUALITY IMPACT ANALYSIS

CITY OF LOMA LINDA

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LIST OF ABBREVIATED TERMS

%	Percent
°F	Degrees Fahrenheit
(1)	Reference
$\mu g/m^3$	Microgram per Cubic Meter
1993 CEQA Handbook	SCAQMD's *CEQA Air Quality Handbook (1993)*
2024-2050 RTP/SCS	*2024-2050 Regional Transportation Plan/Sustainable Communities Strategy*
AB 2595	California Clean Air Act
AQIA	Air Quality Impact Analysis
AQMP	Air Quality Management Plan
BACT	Best Available Control Technology
BC	Black Carbon
Brief	*Brief of Amicus Curiae by the SCAQMD in the Friant Ranch Case*
C_2Cl_4	Perchloroethylene
C_4H_6	1,3-butadiene
C_6H_6	Benzene
C_2H_3Cl	Vinyl Chloride
C_2H_4O	Acetaldehyde
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CEQA Guidelines	*CEQA Statute and Guidelines*
CH_2O	Formaldehyde
City	City of Loma Linda
CO	Carbon Monoxide
COH	Coefficient of Haze
COHb	Carboxyhemoglobin
EIR	Environmental Impact Report

EMFAC	EMissions FACtor Model
EPA	Environmental Protection Agency
GHG	Greenhouse Gas
H_2S	Hydrogen Sulfide
HI	Hazard Index
hp	Horsepower
lbs	Pounds
lbs/day	Pounds Per Day
LST	Localized Significance Threshold
LST Methodology	*Final Localized Significance Threshold Methodology*
MICR	Maximum Individual Cancer Risk
MM	Mitigation Measures
MWELO	California Department of Water Resources' Model Water Efficient
N_2	Nitrogen
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NO	Nitric Oxide
NO_2	Nitrogen Dioxide
NO_X	Nitrogen Oxides
O_2	Oxygen
O_3	Ozone
O_2 Deficiency	Chronic Hypoxemia
ODC	Ozone Depleting Compounds
Pb	Lead
PM_{10}	Particulate Matter 10 microns in diameter or less
$PM_{2.5}$	Particulate Matter 2.5 microns in diameter or less
ppm	Parts Per Million
Project	Loma Linda Medical Office Building
RECLAIM	Regional Clean Air Incentives Market
ROG	Reactive Organic Gases
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
sf	Square Feet
SIPs	State Implementation Plans
SO_2	Sulfur Dioxide
SO_4	Sulfates

SO_X	Sulfur Oxides
SRA	Source Receptor Area
TAC	Toxic Air Contaminant
Title 24	California Building Code
TITLE I	Non-Attainment Provisions
TITLE II	Mobile Sources Provisions
VOC	Volatile Organic Compounds

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EXECUTIVE SUMMARY

ES.1 SUMMARY OF FINDINGS

The results of this *Loma Linda Medical Office Building Air Quality Impact Analysis* (AQIA) 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* (*CEQA Guidelines*) (1). Table ES-1 shows the findings of significance for each potential air quality impact under CEQA before and after any required mitigation measures (MM) described below.

TABLE ES-1: SUMMARY OF CEQA SIGNIFICANCE FINDINGS

Analysis	Report Section	Significance Findings	
		Unmitigated	Mitigated
Regional Construction Emissions	3.4	*Less Than Significant*	*n/a*
Localized Construction Emissions	3.7	*Less Than Significant*	*n/a*
Regional Operational Emissions	3.5	*Less Than Significant*	*n/a*
Localized Operational Emissions	3.8	*Less Than Significant*	*n/a*
CO "Hot Spot" Analysis	3.9	*Less Than Significant*	*n/a*
Air Quality Management Plan	3.10	*Less Than Significant*	*n/a*
Sensitive Receptors	3.11	*Less Than Significant*	*n/a*
Odors	3.12	*Less Than Significant*	*n/a*
Cumulative Impacts	3.13	*Less Than Significant*	*n/a*

ES.2 REGULATORY REQUIREMENTS

There are numerous requirements that development projects must comply with by law, and that were put in place by federal, State, and local regulatory agencies for the improvement of air quality.

Any operation or activity that might cause the emission of any smoke, fly ash, dust, fumes, vapors, gases, or other forms of air pollution, which can cause damage to human health, vegetation, or other forms of property, or can cause excessive soiling on any other parcel shall conform to the requirements of the South Coast Air Quality Management District (SCAQMD).

SCAQMD RULES

SCAQMD Rules that are currently applicable during construction activity for this Project are described below.

SCAQMD RULE 402

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Odor Emissions. All uses shall be operated in a manner such that no offensive odor is perceptible at or beyond the property line of that use.

SCAQMD RULE 403

This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent and reduce fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust and requires best available control measures to be applied to earth moving and grading activities.

Dust Control, Operations. Any operation or activity that might cause the emission of any smoke, fly ash, dust, fumes, vapors, gases, or other forms of air pollution, which can cause damage to human health, vegetation, or other forms of property, or can cause excessive soiling on any other parcel, shall conform to the requirements of the South Coast Air Quality Management District.

SCAQMD RULE 1113

This rule serves to limit the Volatile Organic Compound (VOC) content of architectural coatings used on projects in the SCAQMD. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use on projects.

SCAQMD RULE 1301

This rule is intended to provide that pre-construction review requirements to ensure that new or relocated facilities do not interfere with progress in attainment of the National Ambient Air Quality Standards (NAAQS), while future economic growth within the SCAQMD is not unnecessarily restricted. The specific air quality goal is to achieve no net increases from new or modified permitted sources of nonattainment air contaminants or their precursors. Rule 1301 also limits emission increases of ammonia, and Ozone Depleting Compounds (ODCs) from new, modified or relocated facilities by requiring the use of Best Available Control Technology (BACT).

SCAQMD RULE 401

A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the U.S. Bureau of Mines.

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1 INTRODUCTION

This report presents the results of the AQIA prepared by Urban Crossroads, Inc., for the proposed Loma Linda Medical Office Building (Project). The purpose of this AQIA is to evaluate the potential impacts to air quality associated with construction and operation of the Project and recommend measures to mitigate impacts considered potentially significant in comparison to thresholds established by the SCAQMD.

1.1 SITE LOCATION

The proposed Loma Linda Medical Office Building Project is located on the southeast corner of Barton Road and Anderson Street in the City of Loma Linda, as shown on Exhibit 1-A.

1.2 PROJECT DESCRIPTION

The Project is to consist of the development of a 105,000-square-foot, five-story medical office building. The preliminary site plan for the proposed Project is shown in Exhibit 1-B.

EXHIBIT 1-A: LOCATION MAP

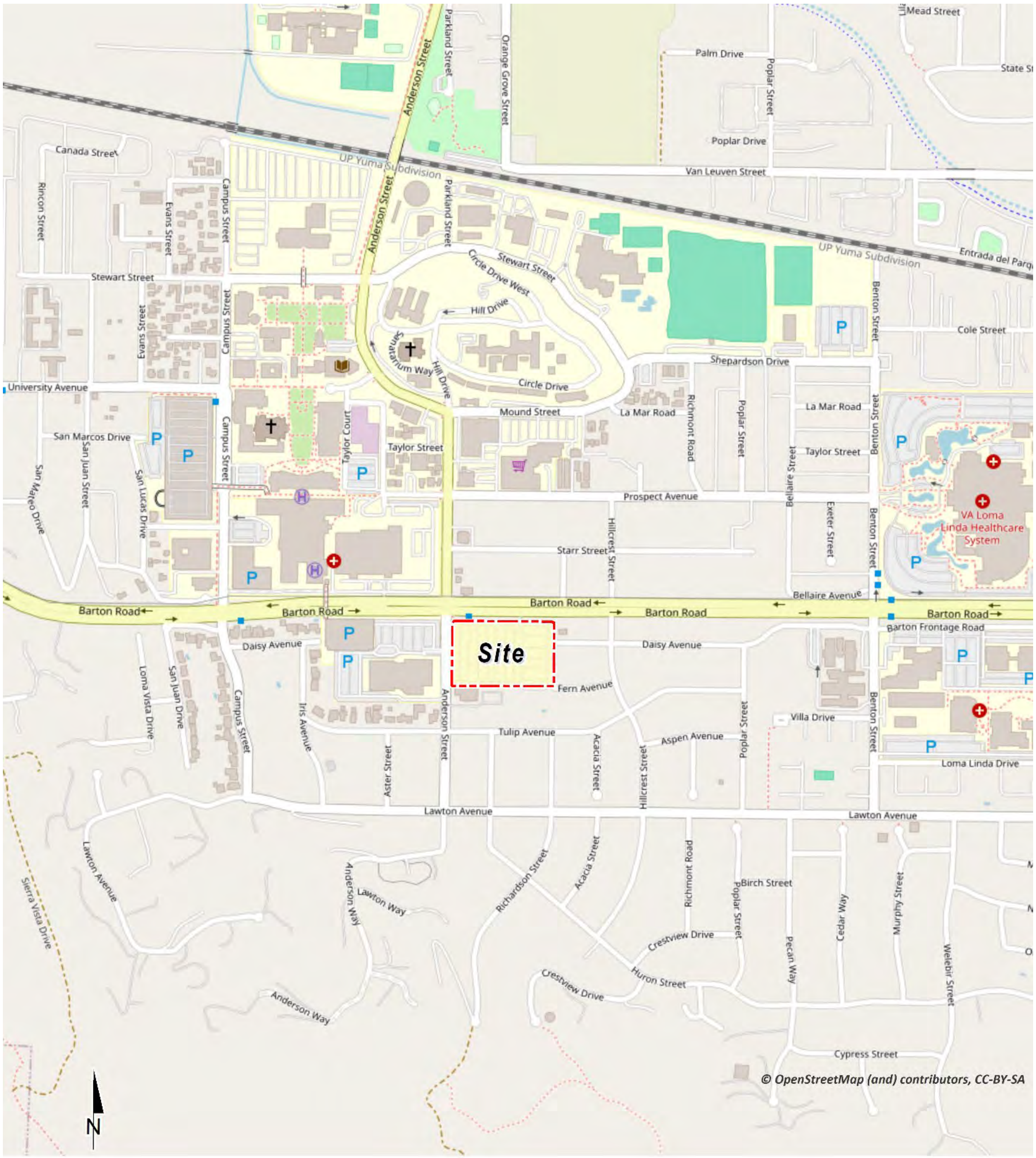
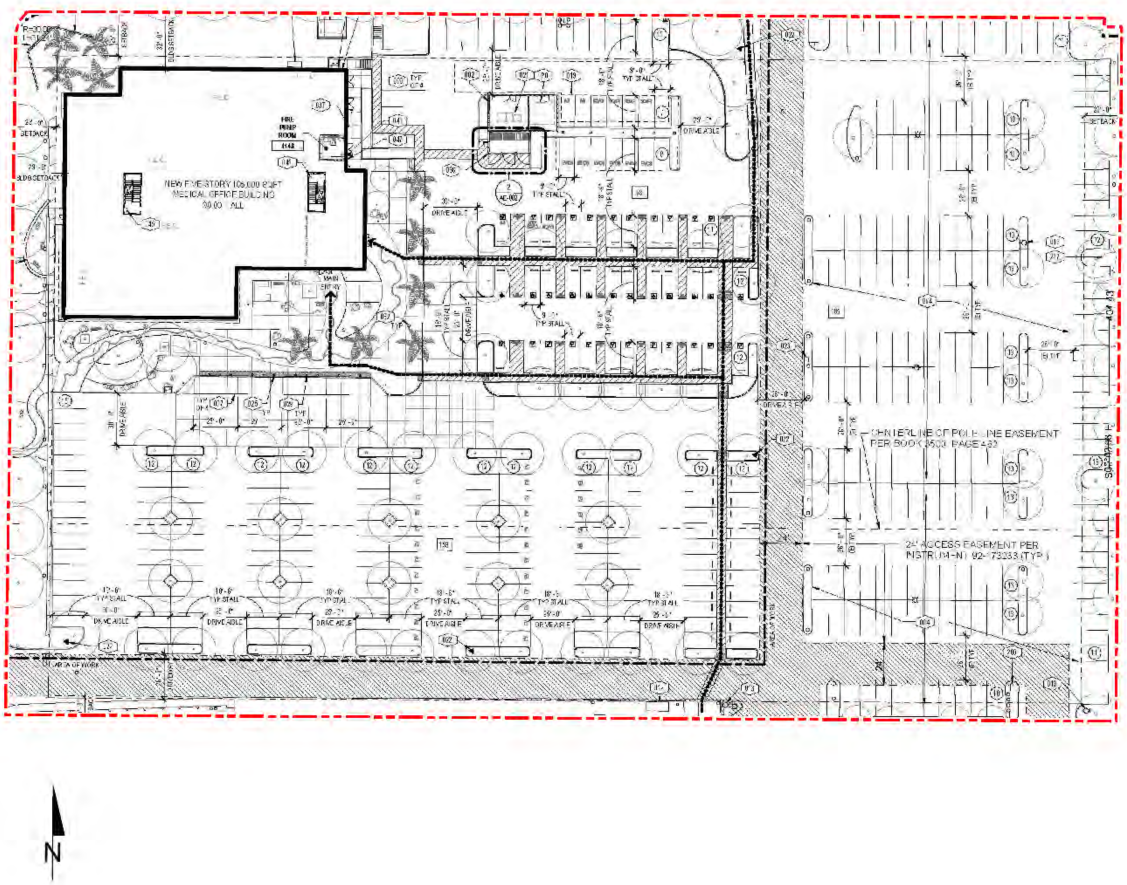


EXHIBIT 1-B: SITE PLAN



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2 AIR QUALITY SETTING

This section provides an overview of the existing air quality conditions in the Project area and region.

2.1 SOUTH COAST AIR BASIN (SCAB)

The Project site is located in the SCAB within the jurisdiction of SCAQMD (2). The SCAQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under the Act, the SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and State air quality standards. As previously stated, the Project site is located within the SCAB, a 6,745-square mile subregion of the SCAQMD, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County.

The SCAB is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Los Angeles County portion of the Mojave Desert Air Basin is bounded by the San Gabriel Mountains to the south and west, the Los Angeles / Kern County border to the north, and the Los Angeles / San Bernardino County border to the east. The Riverside County portion of the Salton Sea Air Basin is bounded by the San Jacinto Mountains in the west and spans eastward up to the Palo Verde Valley.

2.2 REGIONAL CLIMATE

The regional climate has a substantial influence on air quality in the SCAB. In addition, the temperature, wind, humidity, precipitation, and amount of sunshine influence the air quality.

The annual average temperatures throughout the SCAB vary from the low to middle 60s degrees Fahrenheit (°F). Due to a decreased marine influence, the eastern portion of the SCAB shows greater variability in average annual minimum and maximum temperatures. January is the coldest month throughout the SCAB, with average minimum temperatures of 47°F in downtown Los Angeles and 36°F in San Bernardino. All portions of the SCAB have recorded maximum temperatures above 100°F.

Although the climate of the SCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of SCAB climate. Humidity restricts visibility in the SCAB, and the conversion of sulfur dioxide (SO_2) to sulfates (SO_4) is heightened in air with high relative humidity. The marine layer provides an environment for that conversion process, especially during the spring and summer months. The annual average relative humidity within the SCAB is 71% along the coast and 59% inland. Since the ocean effect is dominant, periods of heavy early morning fog are frequent and low stratus clouds are a characteristic feature. These effects decrease with distance from the coast.

More than 90% of the SCAB's rainfall occurs from November through April. The annual average rainfall varies from approximately nine inches in Riverside to fourteen inches in downtown Los

Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists of widely scattered thunderstorms near the coast and slightly heavier shower activity in the eastern portion of the SCAB with frequency being higher near the coast.

Due to its generally clear weather, about three-quarters of available sunshine is received in the SCAB. The remaining one-quarter is absorbed by clouds. The ultraviolet portion of this abundant radiation is a key factor in photochemical reactions. On the shortest day of the year there are approximately 10 hours of possible sunshine, and on the longest day of the year there are approximately 14½ hours of possible sunshine.

The importance of wind to air pollution is considerable. The direction and speed of the wind determines the horizontal dispersion and transport of the air pollutants. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Anas" each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind. Summer wind flows are created by the pressure differences between the relatively cold ocean and the unevenly heated and cooled land surfaces that modify the general northwesterly wind circulation over southern California. Nighttime drainage begins with the radiational cooling of the mountain slopes. Heavy, cool air descends the slopes and flows through the mountain passes and canyons as it follows the lowering terrain toward the ocean. Another characteristic wind regime in the SCAB is the "Catalina Eddy," a low level cyclonic (counterclockwise) flow centered over Santa Catalina Island which results in an offshore flow to the southwest. On most spring and summer days, some indication of an eddy is apparent in coastal sections.

In the SCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution. During the summer, warm high-pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine subsidence/inversion. This boundary prevents vertical mixing which effectively acts as an impervious lid to pollutants over the entire SCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level.

A second inversion-type forms in conjunction with the drainage of cool air off the surrounding mountains at night followed by the seaward drift of this pool of cool air. The top of this layer forms a sharp boundary with the warmer air aloft and creates nocturnal radiation inversions. These inversions occur primarily in the winter when nights are longer and onshore flow is weakest. They are typically only a few hundred feet above mean sea level. These inversions effectively trap pollutants, such as NO_X and CO from vehicles, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline.

2.3 WIND PATTERNS AND PROJECT LOCATION

The distinctive climate of the Project area and the SCAB is determined by its terrain and geographical location. The SCAB is located in a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter.

Wind patterns across the south coastal region are characterized by westerly and southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Winds are characteristically light although the speed is somewhat greater during the dry summer months than during the rainy winter season.

2.4 AIR POLLUTANTS

2.4.1 CRITERIA POLLUTANTS

Air quality regulations were first promulgated with the Federal Clean Air Act (CAA) of 1970. Air quality is defined by ambient air concentrations of seven “criteria air pollutants,” which are a group of common air pollutants identified by the United States Environmental Protection Agency (U.S. EPA) to be of concern with respect to the health and welfare of the general public. Federal and State governments regulate criteria air pollutants by using ambient standards based on criteria regarding the health and/or environmental effects of each pollutant. The seven “criteria” air pollutants defined by the U.S. EPA are: (1) carbon monoxide (CO); (2) sulfur dioxide (SO_2); (3) nitrogen dioxide (NO_2); (4) ozone (O_3); (5) respirable particulate matter with a diameter of 10 microns or less (PM_{10}), (6) fine particulate matter with a diameter of 2.5 microns or less ($PM_{2.5}$), and (7) lead (Pb).

Criteria pollutants are pollutants that are regulated through the development of human health based and/or environmentally based criteria for setting permissible levels. Criteria pollutants, their typical sources, and health effects are identified below (3).

TABLE 2-1: CRITERIA POLLUTANTS

Criteria Pollutant	Description	Sources	Health Effects
CO	CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone (O_3), motor vehicles operating at slow speeds are the primary source of CO in the SCAB. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.	Any source that burns fuel such as automobiles, trucks, heavy construction equipment, farming equipment and residential heating.	Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of decreased oxygen (O_2) supply to the heart. Inhaled CO has no direct toxic effect on the lungs but exerts its effect on tissues by interfering with O_2 transport and competing with O_2 to combine with hemoglobin present in the blood to form

Criteria Pollutant	Description	Sources	Health Effects
			carboxyhemoglobin (COHb). Hence, conditions with an increased demand for O_2 supply can be adversely affected by exposure to CO. Individuals most at risk include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic hypoxemia (O_2 deficiency) as seen at high altitudes.
SO_2	SO_2 is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO_2 oxidizes in the atmosphere, it forms SO_4. Collectively, these pollutants are referred to as sulfur oxides (SO_X).	Coal or oil burning power plants and industries, refineries, diesel engines	A few minutes of exposure to low levels of SO_2 can result in airway constriction in some asthmatics, all of whom are sensitive to its effects. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, are observed after acute exposure to SO_2. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO_2. Animal studies suggest that despite SO_2 being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract. Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO_2 levels. In these studies, efforts to separate the effects

Criteria Pollutant	Description	Sources	Health Effects
			of SO_2 from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically, or one pollutant alone is the predominant factor.
NO_2	NO_2 is a key component of nitrogen oxides (NO_X), which also includes nitric oxide (NO) and nitrous oxide (N_2O). NO_X compounds are primarily produced during combustion processes when nitrogen (N_2) reacts with oxygen (O_2). Both NO and NO_2 serve as precursors in the formation of O_3 and $PM_{2.5}$, making their monitoring crucial for air quality assessments. NO_2, being the more abundant form of NO_X in the atmosphere, has a relatively short lifespan of one to seven days, which enhances its significance as a major air pollutant. As a criteria air pollutant, NO_2 poses various health risks, including respiratory issues and increased vulnerability to infections. It also absorbs blue light, imparting a brownish-red hue to the atmosphere and contributing to reduced visibility and smog formation. Given that NO emissions largely convert to NO_2, the examination of NO_X emissions becomes essential when assessing potential air quality impacts. The concentrations of NO_2 are closely related to traffic density, often resulting in higher exposure levels for commuters in heavy traffic compared to what regional monitoring stations may indicate.	Any source that burns fuel such as automobiles, trucks, heavy construction equipment, farming equipment and residential heating.	Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to NO_2 at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO_2 in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups. In animals, exposure to levels of NO_2 considerably higher than ambient concentrations result in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of O_3 exposure increases when animals are exposed to a combination of O_3 and NO_2.

Criteria Pollutant	Description	Sources	Health Effects
O_3	O_3 is a highly reactive and unstable gas that is formed when VOCs and NO_X, both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.	Formed when ROGs and NO_X react in the presence of sunlight. ROG sources include any source that burns fuels, (e.g., gasoline, natural gas, wood, oil) solvents, petroleum processing and storage and pesticides.	Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible sub-groups for O_3 effects. Short-term exposure (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. Elevated O_3 levels are associated with increased school absences. In recent years, a correlation between elevated ambient O_3 levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple outdoor sports and reside in communities with high O_3 levels. O_3 exposure under exercising conditions is known to increase the severity of the responses described above. Animal studies suggest that exposure to a combination of pollutants that includes O_3 may be more toxic than exposure to O_3 alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to

Criteria Pollutant	Description	Sources	Health Effects
			subsequent lung structural changes.
Particulate Matter	PM_{10}: A major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. Particulate matter pollution is a major cause of reduce visibility (haze) which is caused by the scattering of light and consequently the significant reduction air clarity. The size of the particles (10 microns or smaller, about 0.0004 inches or less) allows them to easily enter the lungs where they may be deposited, resulting in adverse health effects. Additionally, it should be noted that PM_{10} is considered a criteria air pollutant. $PM_{2.5}$: A similar air pollutant to PM_{10} consisting of tiny solid or liquid particles which are 2.5 microns or smaller (which is often referred to as fine particles). These particles are formed in the atmosphere from primary gaseous emissions that include SO_4 formed from SO_2 release from power plants and industrial facilities and nitrates that are formed from NO_X release from power plants, automobiles, and other types of combustion sources. The chemical composition of fine particles highly depends on location, time of year, and weather conditions. $PM_{2.5}$ is a criteria air pollutant.	Sources of PM_{10} include road dust, windblown dust and construction. Also formed from other pollutants (acid rain, NO_X, SO_X, organics). Incomplete combustion of any fuel. $PM_{2.5}$ comes from fuel combustion in motor vehicles, equipment, and industrial sources, residential and agricultural burning. Also formed from reaction of other pollutants (acid rain, NO_X, SO_X, organics).	A consistent correlation between elevated ambient fine particulate matter (PM_{10} and $PM_{2.5}$) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in lifespan, and an increased mortality from lung cancer. Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long term exposure to particulate matter. The elderly, people with pre-existing respiratory or cardiovascular disease, and children appear to be more susceptible to the effects of high levels of PM_{10} and $PM_{2.5}$.

Criteria Pollutant	Description	Sources	Health Effects
Pb	Pb is a heavy metal that is highly persistent in the environment and is considered a criteria pollutant. In the past, the primary source of Pb in the air was emissions from vehicles burning leaded gasoline. The major sources of Pb emissions are ore and metals processing, particularly Pb smelters, and piston-engine aircraft operating on leaded aviation gasoline. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. It should be noted that the Project does not include operational activities such as metal processing or Pb acid battery manufacturing. As such, the Project is not anticipated to generate a quantifiable amount of Pb emissions.	Metal smelters, resource recovery, leaded gasoline, deterioration of Pb paint.	Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. Exposure to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased Pb levels are associated with increased blood pressure. Pb poisoning can cause anemia, lethargy, seizures, and death; although it appears that there are no direct effects of Pb on the respiratory system. Pb can be stored in the bone from early age environmental exposure, and elevated blood Pb levels can occur due to breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland) and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be exposed to higher levels of Pb because of previous environmental Pb exposure of their mothers.

2.4.2 ADDITIONAL POLLUTANTS

The SCAQMD's primary focus is to achieve the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for criteria pollutants. However, it also has a broader mandate to control emissions of air contaminants and safeguard public health. As a result, SCAQMD regulates additional pollutants beyond criteria pollutants, including reactive organic gases (ROGs), VOCs, and odors. Additional pollutants, their typical sources, and health effects are identified below (3).

TABLE 2-2: ADDITIONAL POLLUTANTS

Pollutant	Description	Sources	Health Effects
VOC	VOCs are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form O_3 to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant. The terms VOC and ROG (see below) interchangeably.	Organic chemicals are widely used as ingredients in household products. Paints, varnishes, and wax all contain organic solvents, as do many cleaning, disinfecting, cosmetic, degreasing and hobby products. Fuels are made up of organic chemicals. All of these products can release organic compounds while you are using them, and, to some degree, when they are stored.	Breathing VOCs can irritate the eyes, nose, and throat, can cause difficulty breathing and nausea, and can damage the central nervous system as well as other organs. Some VOCs can cause cancer. Not all VOCs have all these health effects, though many have several.
ROG	Similar to VOC, ROGs are also precursors in forming O_3 and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and NO_X react in the presence of sunlight. ROGs are a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant. The terms ROG and VOC (see previous) interchangeably.	Sources similar to VOCs.	Health effects similar to VOCs.

Pollutant	Description	Sources	Health Effects
Odor	Odor means the perception experienced by a person when one or more chemical substances in the air come into contact with the human olfactory nerves (4).	Odors can come from many sources including animals, human activities, industry, natures, and vehicles.	Offensive odors can potentially affect human health in several ways. First, odorant compounds can irritate the eye, nose, and throat, which can reduce respiratory volume. Second, studies have shown that the VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system. Finally, unpleasant odors can trigger memories or attitudes linked to unpleasant odors, causing cognitive and emotional effects such as stress.

2.5 EXISTING AIR QUALITY

Existing air quality is measured at established SCAQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. NAAQS and California Ambient Air Quality Standards (CAAQS) currently in effect are shown in Table 2-3 (5).

The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the State and federal standards. At the time of this AQIA, the most recent State and federal standards were updated by CARB on May 4, 2016, as presented in Table 2-3. The air quality in a region is considered to be in attainment by the State if the measured ambient air pollutant levels for O_3, CO (except 8-hour Lake Tahoe), SO_2 (1 and 24 hour), NO_2, PM_{10}, and $PM_{2.5}$ do not exceed standards. All others are not to be equaled or exceeded. It should be noted that the three-year period is presented for informational purposes and is not the basis for how the State assigns attainment status. Attainment status for a pollutant means that the SCAQMD meets the standards set by the EPA or the California EPA (CalEPA). Conversely, nonattainment means that an area has monitored air quality that does not meet the NAAQS or CAAQS standards. In order to improve air quality in nonattainment areas, CARB has implemented a State Implementation Plan (SIP). The SIP outlines the measures that the State will take to improve air quality. Once nonattainment areas meet the standards and additional redesignation requirements, the EPA will designate the area as a maintenance area (6).

TABLE 2-3: AMBIENT AIR QUALITY STANDARDS (1 OF 2)

Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards [1]		National Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O_3)[8]	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
Respirable Particulate Matter (PM10)[9]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		—		
Fine Particulate Matter (PM2.5)[9]	24 Hour	—	—	35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	9 µg/m^3	15 µg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m^3)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		—	—	
Nitrogen Dioxide (NO_2)[10]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemiluminescence	100 ppb (188 µg/m^3)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		0.053 ppm (100 µg/m^3)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[11]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	—	Ultraviolet Flourescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas)[11]	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas)[11]	—	
Lead[12,13]	30 Day Average	1.5 µg/m^3	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m^3 (for certain areas)[12]	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m^3		
Visibility Reducing Particles[14]	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[12]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

See footnotes on next page …

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TABLE 2-3: AMBIENT AIR QUALITY STANDARDS (2 OF 2)

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
9. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM10 standards (primary and secondary) of 150 $\mu g/m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
11. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

    Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

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2.6 REGIONAL AIR QUALITY

Air pollution contributes to a wide variety of adverse health effects. The EPA has established NAAQS for six of the most common air pollutants: CO, Pb, O_3, particulate matter (PM_{10} and $PM_{2.5}$), NO_2, and SO_2 which are known as criteria pollutants. The SCAQMD monitors levels of various criteria pollutants at 35 permanent monitoring stations and 2 single-pollutant source Pb air monitoring sites throughout the air district (7). On January 25, 2024, CARB adopted the proposed 2023 amendments to the state and national area designations See Table 2-4 for attainment designations for the SCAB (8). Appendix 2.1 provides geographic representation of the state and federal attainment status for applicable criteria pollutants within the SCAB.

TABLE 2-4: ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SCAB

Criteria Pollutant	State Designation	Federal Designation
O_3 – 1-hour standard	Nonattainment	--
O_3 – 8-hour standard	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO_2	Attainment	Unclassifiable/Attainment
SO_2	Attainment	Unclassifiable/Attainment
Pb[1]	Attainment	Unclassifiable/Attainment

Note: See Appendix 2.1 for a detailed map of State/National Area Designations within the SCAB
"-" = No standard.

2.7 LOCAL AIR QUALITY

The SCAQMD has designated general forecast areas and air monitoring areas (referred to as Source Receptor Areas [SRA]) throughout the district in order to provide Southern California residents about the air quality conditions. The Project site is located within SRA 35. Within SRA 35, the East San Bernardino Valley monitoring station is located approximately 6.53 miles east of the Project site and only reports air quality data for O_3 and PM_{10}. Therefore, the following stations' air quality data is reported herein.

- SRA 35 (East San Bernardino Valley – 6.35 miles east of the Project site) - O_3 and PM_{10}
- SRA 34 (Central San Bernardino Valley 2 – 4.15 miles north of the Project site) – CO, NO_2 and $PM_{2.5}$

Data from the Central San Bernardino Valley 2 monitoring station was utilized only in instances where data was not available from the East San Bernardino Valley monitoring station.

The most recent three (3) years of data available is shown on Table 2-5 and identifies the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality at the Development Site. Data for O_3, CO, NO_2, PM_{10},

[1] The Federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SCAB.

and $PM_{2.5}$ for 2021 through 2023 was obtained from the SCAQMD Air Quality Data Tables (9). Additionally, data for SO_2 has been omitted as attainment is regularly met in the SCAB and few monitoring stations measure SO_2 concentrations.

TABLE 2-5: PROJECT AREA AIR QUALITY MONITORING SUMMARY 2021-2023

Pollutant	Standard	Year		
		2021	2022	2023
O_3				
Maximum Federal 1-Hour Concentration (ppm)		0.145	0.135	0.143
Maximum Federal 8-Hour Concentration (ppm)		0.119	0.109	0.118
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	74	63	54
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	118	106	83
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	2.0	1.7	1.6
Maximum Federal 8-Hour Concentration	> 20 ppm	1.6	1.4	1.2
NO_2				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.056	0.053	0.056
Annual Federal Standard Design Value		0.015	0.016	0.014
PM_{10}				
Maximum Federal 24-Hour Concentration ($\mu g/m^3$)	> 150 $\mu g/m^3$	44	50	58
Annual Federal Arithmetic Mean ($\mu g/m^3$)		23.2	22.0	21.2
Number of Days Exceeding Federal 24-Hour Standard	> 150 $\mu g/m^3$	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 $\mu g/m^3$	0	0	0
$PM_{2.5}$				
Maximum Federal 24-Hour Concentration ($\mu g/m^3$)	> 35 $\mu g/m^3$	57.9	40.1	25.4
Annual Federal Arithmetic Mean ($\mu g/m^3$)	> 12 $\mu g/m^3$	11.9	11.26	10.16
Number of Days Exceeding Federal 24-Hour Standard	> 35 $\mu g/m^3$	1	2	0

ppm = Parts Per Million
$\mu g/m^3$ = Microgram per Cubic Meter
Source: Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ was obtained from SCAQMD Air Quality Data Tables.

2.8 REGULATORY BACKGROUND

2.8.1 FEDERAL REGULATIONS

The EPA is responsible for setting and enforcing the NAAQS for O_3, CO, NO_X, SO_2, PM_{10}, and Pb (10). The EPA has jurisdiction over emissions sources that are under the authority of the federal government including aircraft, locomotives, and emissions sources outside state waters (Outer Continental Shelf). The EPA also establishes emission standards for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission requirements of CARB.

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The CAA establishes the federal air quality standards, the NAAQS, and specifies future dates for achieving compliance (11). The CAA also mandates that states submit and implement SIPs for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards would be met.

The 1990 amendments to the CAA that identify specific emission reduction goals for areas not meeting the NAAQS require a demonstration of reasonable further progress toward attainment and incorporate additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions) (12) (13). Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants O_3, NO_2, SO_2, PM_{10}, CO, $PM_{2.5}$, and Pb. The NAAQS were amended in July 1997 to include an additional standard for O_3 and to adopt a NAAQS for $PM_{2.5}$. Table 2-4 (previously presented) provides the NAAQS within the SCAB.

Mobile source emissions are regulated in accordance with Title II provisions. These provisions require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas. Automobile manufacturers are also required to reduce tailpipe emissions of hydrocarbons and NO_X. NO_X is a collective term that includes all forms of NO_X which are emitted as byproducts of the combustion process.

2.8.2 CALIFORNIA REGULATIONS

CARB

CARB, which became part of the CalEPA in 1991, is responsible for ensuring implementation of the California Clean Air Act (AB 2595), responding to the federal CAA, and for regulating emissions from consumer products and motor vehicles. AB 2595 mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the state ambient air quality standards by the earliest practical date. CARB established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, establishes standards for SO_4, visibility, hydrogen sulfide (H_2S), and vinyl chloride (C_2H_3Cl). However, at this time, H_2S and C_2H_3Cl are not measured at any monitoring stations in the SCAB because they are not considered to be a regional air quality problem. Generally, the CAAQS are more stringent than the NAAQS (14) (10).

Local air quality management districts, such as the SCAQMD, regulate air emissions from stationary sources such as commercial and industrial facilities. All air pollution control districts have been formally designated as attainment or non-attainment for each CAAQS.

Serious non-attainment areas are required to prepare Air Quality Management Plans (AQMP) that include specified emission reduction strategies in an effort to meet clean air goals. These plans are required to include:

- Application of Best Available Retrofit Control Technology to existing sources;

- Developing control programs for area sources (e.g., architectural coatings and solvents) and indirect sources (e.g., motor vehicle use generated by residential and commercial development);
- A District permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions;
- Implementing reasonably available transportation control measures and assuring a substantial reduction in growth rate of vehicle trips and miles traveled;
- Significant use of low emissions vehicles by fleet operators;
- Sufficient control strategies to achieve a 5% or more annual reduction in emissions or 15% or more in a period of three years for ROGs, NO_X, CO and PM_{10}. However, air basins may use alternative emission reduction strategy that achieves a reduction of less than 5% per year under certain circumstances.

TITLE 24 ENERGY EFFICIENCY STANDARDS AND CALIFORNIA GREEN BUILDING STANDARDS

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 became 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 (15). The Project would be required to comply with the applicable standards in place at the time building permit document submittals are made. These require, among other items (16):

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).
- 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 electric vehicle 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).

2.8.3 AQMP

Currently, the NAAQS and CAAQS are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of AQMP to meet the state and federal ambient air quality standards (17). AQMPs are updated regularly to ensure an effective reduction in emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. A detailed discussion on the AQMP and Project consistency with the AQMP is provided in Section 3.10.

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3 PROJECT AIR QUALITY IMPACT

3.1 INTRODUCTION

This study quantifies air quality emissions generated by construction and operation of the Project and addresses whether the Project conflicts with implementation of the SCAQMD's AQMP and Lead Agency planning regulations. The analysis of Project-generated air emissions determines whether the Project would result in a cumulatively considerable net increase of any criteria pollutant for which the SCAB is in non-attainment under an applicable NAAQS and CAAQS. Additionally, the Project has been evaluated to determine whether the Project would expose sensitive receptors to substantial pollutant concentrations and the impacts of odors. The significance of these potential impacts is described in the following sections.

3.2 STANDARDS OF SIGNIFICANCE

The criteria used to determine the significance of potential Project-related air quality impacts are taken from the *State CEQA Guidelines* (14 CCR §§15000, et seq.). Based on these thresholds, a project would result in a significant impact related to air quality if it would (18):

- Conflict with or obstruct implementation of the applicable air quality plan.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.
- Expose sensitive receptors to substantial pollutant concentrations.
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The SCAQMD has developed regional and localized significance thresholds for criteria pollutants, as summarized at Table 3-1 (19). The SCAQMD's *CEQA Air Quality Significance Thresholds* (March 2023) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

TABLE 3-1: MAXIMUM DAILY REGIONAL EMISSIONS THRESHOLDS

Pollutant	Regional Construction Threshold	Regional Operational Thresholds
NO_X	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Pb	3 lbs/day	3 lbs/day

lbs/day = Pounds Per Day

3.3 MODELS EMPLOYED TO ANALYZE AIR QUALITY

3.3.1 CALIFORNIA EMISSIONS ESTIMATOR MODEL (CALEEMOD)

Land uses such as the Project affect air quality through construction-source and operational-source emissions. The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, as such the latest version available at the time of this report has been utilized in this analysis. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from MMs (20). Accordingly, the latest version of CalEEMod has been used for this Project to determine construction and operational air quality emissions. Output from the model run for both construction and operational activity for the proposed Project is provided in Appendix 3.1.

3.4 PROJECT CONSTRUCTION EMISSIONS

3.4.1 CONSTRUCTION ACTIVITIES

Construction activities associated with the Project will result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Construction related emissions are expected from the following construction activities:

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

DEMOLITION ACTIVITIES

As previously discussed, the Project site is currently developed with existing asphalt totaling approximately 5,971 tons of debris, which would be demolished. It is estimated that the demolished material will be hauled off-site and since the exact location of where the demolished material is not known at this time, a 20-mile distance is utilized consistent with CalEEMod defaults.

GRADING ACTIVITIES

Dust is typically a major concern during grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called “fugitive emissions.” Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. Based on information provided by the project team, the Project would not require import/export of soil, and a balanced site is expected earthwork activities.

ON-ROAD TRIPS

Construction generates on-road vehicle emissions from vehicle usage for workers, hauling, and vendors commuting to and from the site. The number of workers, hauling, and vendor trips are presented below in Table 3-2. It should be noted that for Vendor Trips specifically, CalEEMod only assigns Vendor Trips to the Building Construction phase. Vendor trips would likely occur during all phases of construction. As such, the CalEEMod defaults for Vendor Trips have been adjusted based on a ratio of the total vendor trips to the number of days of each subphase of activity. Additionally, because paving and architectural coating activities overlap with building construction, the vendor trips assigned to building construction activities are assumed to be the same trips used to cover paving and architectural coating.

TABLE 3-2: CONSTRUCTION TRIP ASSUMPTIONS

Construction Activity	Worker Trips Per Day	Vendor Trips Per Day	Hauling Trips Per Day
Demolition	15	1	74
Site Preparation	18	1	0
Grading	15	1	0
Building Construction	34	14	0
Paving	15	0	0
Architectural Coating	7	0	0

3.4.2 CONSTRUCTION DURATION

Construction is anticipated to begin in April 2025 and will last through April 2026. The construction schedule utilized in the analysis, shown in Table 3-3, represents a "conservative" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent[2]. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per *CEQA Guidelines* (1).

[2] As shown in the CalEEMod User's Guide Version 2022, Appendix G "Table G-11. Statewide Average Annual Offoad Equipment Emission Factors" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

TABLE 3-3: CONSTRUCTION DURATION

Construction Activity	Start Date	End Date	Days
Demolition	4/1/2025	4/28/2025	20
Site Preparation	4/29/2025	5/12/2025	10
Grading	5/13/2025	6/9/2025	20
Building Construction	6/10/2025	4/27/2026	230
Paving	3/31/2026	4/27/2026	20
Architectural Coating	3/31/2026	4/27/2026	20

3.4.3 CONSTRUCTION EQUIPMENT

Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 3-4 will operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the code.

TABLE 3-4: CONSTRUCTION EQUIPMENT ASSUMPTIONS

Construction Activity	Equipment	Amount	Hours Per Day
Demolition	Concrete/Industrial Saws	1	8
	Excavators	3	8
	Rubber Tired Dozers	2	8
Site Preparation	Rubber Tired Dozers	3	8
	Crawler Tractors	4	8
Grading	Excavators	1	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Crawler Tractors	3	8
Building Construction	Cranes	1	8
	Forklifts	3	8
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	8
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

[1] In order to account for fugitive dust emissions, Crawler Tractors were used in lieu of Tractors/Loaders/Backhoes.

3.4.4 CONSTRUCTION EMISSIONS SUMMARY

IMPACTS WITHOUT MITIGATION

CalEEMod calculates maximum daily emissions for summer and winter periods. The estimated maximum daily construction emissions without mitigation are summarized on Table 3-5. Detailed construction model outputs are presented in Appendix 3.1. Under the assumed scenarios, emissions resulting from the Project construction will not exceed criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant.

TABLE 3-5: OVERALL CONSTRUCTION EMISSIONS SUMMARY – WITHOUT MITIGATION

Year	Emissions (lbs/day) [1]					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
2025	4.13	37.54	33.79	0.07	7.82	4.52
2026	28.98	19.61	29.75	0.04	1.61	0.91
Winter						
2025	1.37	11.98	16.38	0.03	1.03	0.57
2026	28.96	19.65	28.77	0.04	1.61	0.91
Maximum Daily Emissions	**28.98**	**37.54**	**33.79**	**0.07**	**7.82**	**4.52**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod construction-source (unmitigated) emissions are presented in Appendix 3.1.

3.5 PROJECT OPERATIONAL EMISSIONS

Operational activities associated with the Project will result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Operational emissions are expected from the following primary sources:

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions
- Stationary Emissions

3.5.1 AREA SOURCE EMISSIONS

ARCHITECTURAL COATINGS

Over a period of time, the buildings that are part of this Project will require maintenance and will therefore produce emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings. The emissions associated with architectural coatings were calculated using CalEEMod.

CONSUMER PRODUCTS

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants. The emissions associated with use of consumer products were calculated based on defaults provided within CalEEMod.

LANDSCAPE MAINTENANCE EQUIPMENT

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that on October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by January 1, 2024, which is now effective. For purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod.

3.5.2 ENERGY SOURCE EMISSIONS

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity are generally excluded from the evaluation of significance. Electricity and natural gas usage associated with the Project were calculated by CalEEMod using default parameters.

3.5.3 MOBILE SOURCE EMISSIONS

The Project related operational air quality emissions derive primarily from vehicle trips generated by the Project, including employee trips to and from the site associated with the proposed uses. It should be noted that the proposed Medical Office Building would serve as an addition to the existing Loma Linda University Medical Center, increasing capacity to accommodate current patients and employees. Based on information provided by the Project Applicant, 50% of the trips associated with the proposed Medical Office Building are anticipated to be new. Accordingly, the CalEEMod default trip rates used in this analysis were reduced by 50% to reflect only the new traffic generated by the Project. Trip length characteristics available from the *Loma Linda Medical Office Building Vehicle Miles Traveled (VMT) Analysis* were utilized in this analysis (21).

FUGITIVE DUST RELATED TO VEHICULAR TRAVEL

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of brake and tire wear particulates. The emissions estimate for travel on paved roads were calculated using CalEEMod.

3.5.4 STATIONARY SOURCE EMISSIONS

The proposed Project was conservatively assumed to include installation of one 300-horsepower diesel-powered fire pump and one 400-horsepower diesel-powered emergency generator at the medical office building. The fire pump and emergency generator were estimated to operate for up to 1 hour per day, 1 day per week for up to 50 hours per year for maintenance and testing purposes. Emissions associated with the stationary diesel-powered fire pump and emergency generator were calculated using CalEEMod.

3.5.6 OPERATIONAL EMISSIONS SUMMARY

CalEEMod utilizes summer and winter EMFAC2021 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season. As such, operational activities for summer and winter scenarios are presented in Table 3-6. Detailed operational model outputs are presented in Appendix 3.1. Notwithstanding, the Project operational activities would not exceed the numerical thresholds of significance established by the SCAQMD for emissions of any criteria pollutant. As such, operational impacts would be considered less-than-significant.

TABLE 3-6: SUMMARY OF PEAK OPERATIONAL EMISSIONS

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile Source	6.75	5.47	51.29	0.12	10.67	2.77
Area Source	3.15	0.04	4.57	0.00	0.01	0.01
Energy Source	0.04	0.77	0.65	0.00	0.06	0.06
Stationary Source	1.15	3.21	2.93	0.01	0.17	0.17
Total Maximum Daily Emissions	**11.09**	**9.49**	**59.43**	**0.13**	**10.91**	**3.00**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Mobile Source	6.27	5.87	43.65	0.11	10.67	2.77
Area Source	2.40	0.00	0.00	0.00	0.00	0.00
Energy Source	0.04	0.77	0.65	0.00	0.06	0.06
Stationary Source	1.15	3.21	2.93	0.01	0.17	0.17
Total Maximum Daily Emissions	**9.86**	**9.86**	**47.23**	**0.12**	**10.90**	**2.99**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod operational-source emissions are presented in Appendix 3.1.

3.6 LOCALIZED SIGNIFICANCE

BACKGROUND ON LST DEVELOPMENT

The analysis makes use of methodology included in the SCAQMD *Final Localized Significance Threshold Methodology* (LST Methodology). The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as LSTs.

The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4[3]. LSTs represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.

LSTs were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. To address the issue of localized significance, the SCAQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. The analysis makes use of methodology included in the *LST Methodology* (22).

APPLICABILITY OF LSTS FOR THE PROJECT

For this Project, the appropriate SRA for the LST analysis is the SCAQMD East San Bernardino Valley (SRA 35). LSTs apply to CO, NO_2, PM_{10}, and $PM_{2.5}$. The SCAQMD produced look-up tables for projects less than or equal to 5 acres in size.

In order to determine the appropriate methodology for determining localized impacts that could occur as a result of Project-related construction, the following process is undertaken:

- Identify the maximum daily on-site emissions that will occur during construction activity:
  - The maximum daily on-site emissions could be based on information provided by the Project Applicant; or
  - The SCAQMD's *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds* and CalEEMod User's Guide *Appendix A: Calculation Details for CalEEMod* can be used to determine the maximum site acreage that is actively disturbed based on the construction equipment fleet and equipment hours as estimated in CalEEMod (23) (24).
- If the total acreage disturbed is less than or equal to 5 acres per day, then the SCAQMD's screening look-up tables are utilized to determine if a Project has the potential to result in a significant impact. The look-up tables establish a maximum daily emissions threshold in lbs/day that can be compared to CalEEMod outputs.

[3] The purpose of SCAQMD's Environmental Justice program is to ensure that everyone has the right to equal protection from air pollution and fair access to the decision-making process that works to improve the quality of air within their communities. Further, the SCAQMD defines Environmental Justice as "…equitable environmental policymaking and enforcement to protect the health of all residents, regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location, from the health effects of air pollution."

- If the total acreage disturbed is greater than 5 acres per day, then LST impacts may still be conservatively evaluated using the LST look-up tables for a 5-acre disturbance area. Use of the 5-acre disturbance area thresholds can be used to show that even if the daily emissions from all construction activity were emitted within a 5-acre area, and therefore concentrated over a smaller area which would result in greater site adjacent concentrations, the impacts would still be less than significant if the applicable 5-acre thresholds are utilized.
- The *LST Methodology* presents mass emission rates for each SRA, project sizes of 1, 2, and 5 acres, and nearest receptor distances of 25, 50, 100, 200, and 500 meters. For project sizes between the values given, or with receptors at distances between the given receptors, the methodology uses linear interpolation to determine the thresholds.

EMISSIONS CONSIDERED

Based on SCAQMD's *LST Methodology*, emissions for concern during construction activities are on-site NO_X, CO, $PM_{2.5}$, and PM_{10}. The *LST Methodology* clearly states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs (25)." As such, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered.

MAXIMUM DAILY DISTURBED-ACREAGE

The "acres disturbed" for analytical purposes are based on specific equipment type for each subcategory of construction activity and the estimated maximum area a given piece of equipment can pass over in an 8-hour workday (as shown on Table 3-7). The equipment-specific grading rates are summarized in the SCAQMD's *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds* and CalEEMod User's Guide *Appendix C: Emission Calculation Details for CalEEMod* (23) (26). The disturbed area per day is representative of a piece of equipment making multiple passes over the same land area. In other words, one Rubber Tired Dozer can make multiple passes over the same land area totaling 0.5 acres in a given 8-hour day. Based on Table 3-7, the Project's construction activities could actively disturb approximately 1 acre per day during demolition, 3.5 acres per day during site preparation, and 2.5 acres per day during grading activities.

TABLE 3-7: MAXIMUM DAILY DISTURBED-ACREAGE

Construction Phase	Equipment Type	Equipment Quantity	Acres graded per 8-hour day	Operating Hours per Day	Acres graded per day
Demolition	Rubber Tired Dozers	2	0.5	8	1
Total acres disturbed per day during Demolition					1
Site Preparation	Crawler Tractors	4	0.5	8	2
	Rubber Tired Dozers	3	0.5	8	1.5
Total acres disturbed per day during Site Preparation					3.5
Grading	Crawler Tractors	3	0.5	8	1.5
	Graders	1	0.5	8	0.5
	Rubber Tired Dozers	1	0.5	8	0.5
Total acres disturbed per day during Grading					2.5

Source: CalEEMod, User Manual Appendix A.

RECEPTORS

As previously stated, LSTs represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable NAAQS and CAAQS at the nearest residence or sensitive receptor. Receptor locations are off-site locations where individuals may be exposed to emissions from Project activities.

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, and individuals with pre-existing respiratory or cardiovascular illness. Structures that house these persons or places where they gather are defined as "sensitive receptors". These structures typically include uses such as residences, hotels, and hospitals where an individual can remain for 24 hours. Consistent with the LST Methodology, the nearest land use where an individual could remain for 24 hours to the Project site has been used to determine construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$, since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time[4].

LSTs apply, even for non-sensitive land uses, consistent with *LST Methodology* and SCAQMD guidance. Per the *LST Methodology*, commercial, educational, and industrial facilities are not included in the definition of sensitive receptor because employees and patrons do not typically remain onsite for a full 24 hours but are typically onsite for 8 hours or less. However, *LST Methodology* explicitly states that "*LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours* (25)." Therefore, any adjacent land use where an individual could remain for 1 or 8-hours, that is located at a closer distance to the Project site than the receptor used for PM_{10} and $PM_{2.5}$ analysis, must be considered to determine construction and operational LST air impacts for emissions of NO_2 and CO since these pollutants have an averaging time of 1 and 8-hours.

RECEPTORS

Receptors relative to the Project area are described below and shown on Exhibit 3-A. Localized air quality impacts were evaluated at receptor land uses nearest the Project site.

R1: Location R1 represents the existing residence 24946 Barton Road located roughly 164 feet north of the Project site.

R2: Location R2 represents the existing residence at 25010 Daisy Avenue located roughly 47 feet east of the Project site.

R3: Location R3 represents the existing residence at 25010 Fern Avenue located roughly 51 feet east of the Project site.

[4] It should be noted that a school use is not included in SCAQMD's specific definition of sensitive land uses for LST purposes, since the LST definition includes locations where an individual has a likelihood to remain for 24-hours per day. School receptors are considered for localized emissions of NO_2 and CO – which have averaging times of 1 and 8-hours as noted above.

R4: Location R4 represents the existing Ronald McDonald House Charity House at 11365 Anderson Street located roughly 33 feet south of the Project site.

R5: Location R5 represents the existing residence at 24934 Tulip Avenue located roughly 151 feet south of the Project site.

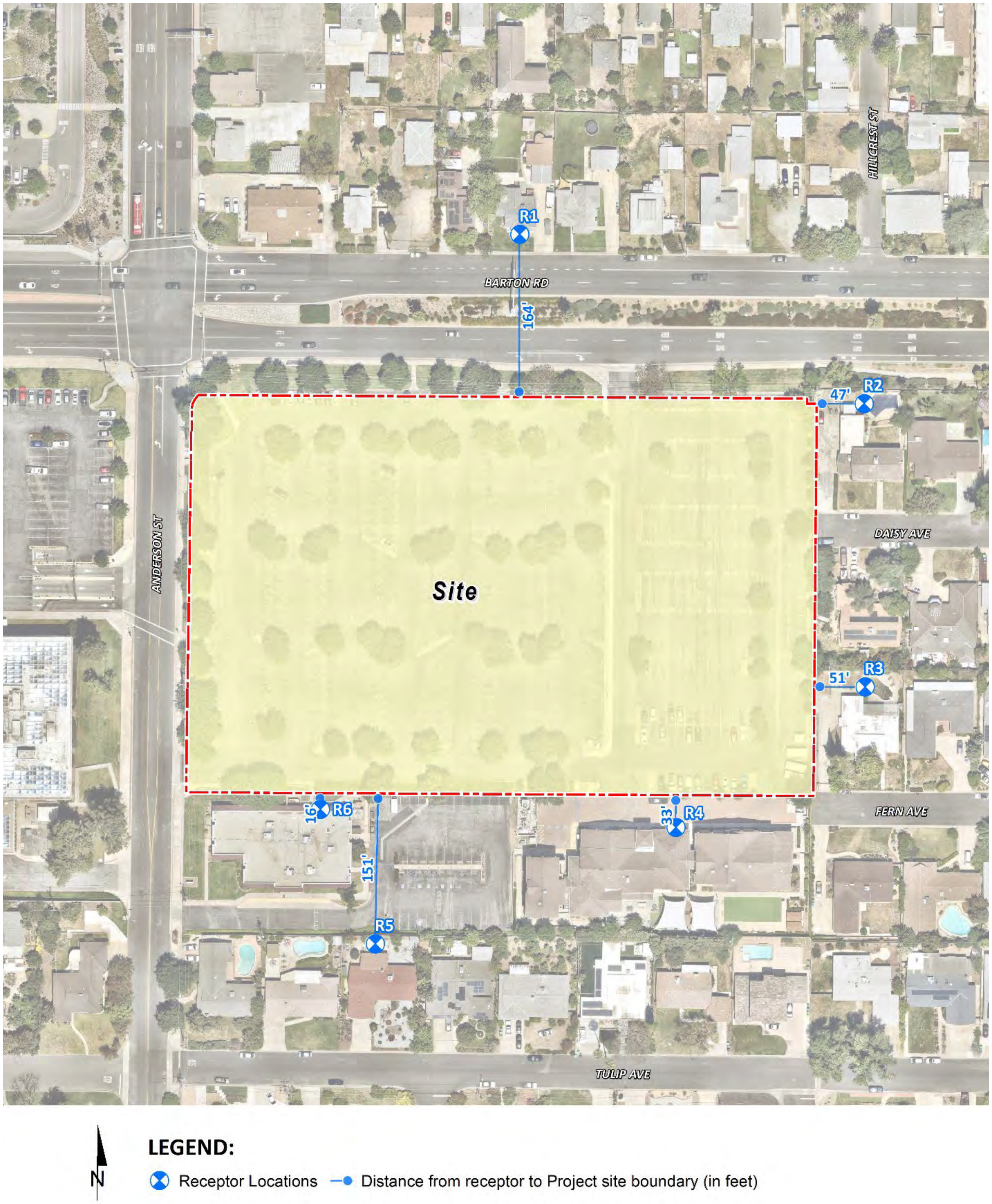
R6: Location R6 represents the existing Loma Linda University Kidney Center at 11375 Anderson Street located roughly 16 feet south of the Project site.

The SCAQMD recommends that the nearest sensitive receptor be considered when determining the Project's potential to cause an individual a cumulatively significant impact. The nearest land use where an individual could remain for 24 hours to the Project site has been used to determine localized construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$ (since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time). The nearest receptor used for evaluation of localized impacts of PM_{10} and $PM_{2.5}$ is represented by location R4, which represents the existing Ronald McDonald House Charity House located at 11365 Anderson Street, approximately 33 feet (10 meters) south of the Project site.

As previously stated, and consistent with *LST Methodology*, the nearest commercial, educational, or industrial use to the Project site is used to determine construction and operational LST air impacts for emissions of NO_X and CO as the averaging periods for these pollutants are shorter (8 hours or less) and it is reasonable to assumed that an individual could be present at these sites for periods of one to 8 hours. The nearest receptor used for evaluation of localized impacts of NO_X and CO is represented by location R6, which represents the existing Loma Linda University Kidney Center located at 11375 Anderson Street, approximately 16 feet (5 meters) south of the Project site.

It should be noted that the *LST Methodology* explicitly states that "*It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters* (27)." As such a 25-meter receptor distance will be used for evaluation of localized PM_{10}, $PM_{2.5}$, NO_X and CO.

EXHIBIT 3-A: SENSITIVE RECEPTOR LOCATIONS



3.7 CONSTRUCTION-SOURCE EMISSIONS LST ANALYSIS

3.7.1 LOCALIZED THRESHOLDS FOR CONSTRUCTION ACTIVITY

Since the total acreage disturbed is less than five acres per day for demolition, site preparation, and grading activities, the SCAQMD's screening look-up tables were utilized to determine impacts for phases. It should be noted that since the look-up tables identify thresholds at only 1 acre, 2 acres, and 5 acres, linear regression has been utilized to determine localized significance thresholds. Consistent with SCAQMD guidance, the thresholds presented in Table 3-8 were calculated by interpolating the threshold values for the Project's disturbed acreage.

TABLE 3-8: MAXIMUM DAILY LOCALIZED CONSTRUCTION EMISSIONS THRESHOLDS

Construction Localized Thresholds				
Construction Phase	**NO_X**	**CO**	**PM_{10}**	**PM_{10}**
Demolition	118 lbs/day	775 lbs/day	4 lbs/day	4 lbs/day
Site Preparation	220 lbs/day	1,625 lbs/day	11 lbs/day	7 lbs/day
Grading	187 lbs/day	1,324 lbs/day	8 lbs/day	6 lbs/day

Source: Localized Thresholds presented in this table are based on the SCAQMD Final LST Methodology, July 2008

3.7.2 CONSTRUCTION-SOURCE LOCALIZED EMISSIONS

IMPACTS WITHOUT MITIGATION

Table 3-9 identifies the localized impacts at the nearest receptor location in the vicinity of the Project. For analytical purposes, emissions associated with peak demolition, site preparation, and grading activities are considered for purposes of LSTs since these phases represent the maximum localized emissions that would occur. Any other construction phases of development that overlap would result in lesser emissions and consequently lesser impacts than what is disclosed herein. Without mitigation, localized construction emissions would not exceed the applicable SCAQMD LSTs for emissions of any criteria pollutant. Outputs from the model runs for unmitigated construction LSTs are provided in Appendix 3.1.

Table 3-9 identifies the localized impacts at the nearest receptor location in the vicinity of the Project. Without mitigation, localized construction emissions would not exceed the applicable SCAQMD LSTs for emissions of any criterial pollutant. Outputs from the model runs for unmitigated construction LSTs are provided in Appendix 3.1.

TABLE 3-9: LOCALIZED CONSTRUCTION-SOURCE EMISSIONS – WITHOUT MITIGATION

Construction Activity	Year	Emissions (lbs/day)			
		NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition	**Maximum Daily Emissions**	**22.20**	**19.92**	**2.58**	**1.10**
	SCAQMD Localized Threshold	118	775	4	4
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Site Preparation	**Maximum Daily Emissions**	**37.46**	**32.43**	**7.59**	**4.46**
	SCAQMD Localized Threshold	220	1,625	11	7
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Grading	**Maximum Daily Emissions**	**20.64**	**19.61**	**3.40**	**1.99**
	SCAQMD Localized Threshold	187	1,324	8	6
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod unmitigated localized construction-source emissions are presented in Appendix 3.1.

3.8 OPERATIONAL-SOURCE EMISSIONS LST ANALYSIS

As previously stated, the total development is proposed to consist of a 105,000-square-foot, five-story medical office building. According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project, if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The proposed Project does not include such uses, and thus, due to the lack of significant stationary source emissions, no long-term localized significance threshold analysis is needed.

3.9 CO "HOT SPOT" ANALYSIS

A CO hotspot is defined as a localized concentration of carbon monoxide exceeding the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. At the time the most recent CEQA Air Quality Handbook (1993) was published by SCAQMD, the air basin was designated as non-attainment, requiring projects to perform hotspot analyses to ensure they did not worsen the existing conditions. Over the last two decades, background CO concentrations have been significantly reduced due to regulatory controls on tailpipe emissions, which have culminated in the air basin achieving attainment status for CO.

The 2003 AQMP's findings underscore that CO hotspots are highly unlikely due to the reduced background concentrations and the effectiveness of California's air quality management strategies. The substantial reduction in CO levels from the vehicle fleet and the state's attainment status for CO further diminish the need for detailed microscale hotspot analyses, reinforcing that existing monitoring and regulatory frameworks adequately address potential air quality concerns.

In 2003, the SCAQMD as part of its AQMP development process, prepared modeling to determine the potential for CO Hotspots at the four busiest intersections in the air basin. As summarized in the 2003 AQMP, even at one of the busiest intersections at that time, only 0.7 ppm of CO is attributable to vehicular traffic and the remaining 7.7 ppm were due to ambient background conditions. As shown on Table 2-5 in this report, the background 1-hour and 8-hour concentrations are well below the applicable AAQS. The 2003 AQMP's findings underscore that CO hotspots are highly unlikely due to the reduced background concentrations and the effectiveness of California's air quality management strategies. The substantial reduction in CO levels from the vehicle fleet and the state's attainment status for CO further diminish the need for detailed microscale hotspot analyses, reinforcing that existing monitoring and regulatory frameworks adequately address potential air quality concerns.

As such, Project-related traffic at any intersections within the Project area would not cause or contribute to a CO hotspot since the background concentrations are low and any contribution from Project traffic would be negligible.

3.10 AQMP

The Project site is located within the SCAB, which is characterized by relatively poor air quality. The SCAQMD has jurisdiction over an approximately 10,743 square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what use to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the SCAG, county transportation commissions, local governments, as well as State and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet State and federal ambient air quality standards.

Currently, these State and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of AQMPs to meet the State and federal ambient air quality standards. AQMPs are updated regularly to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

In December 2022, the SCAQMD released the *Final 2022 AQMP* (*2022 AQMP*). The *2022 AQMP* continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels (28). The *2022 AQMP* incorporates scientific and technological information and planning assumptions, including the *2020-2045 RTP/SCS*, a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements (29).The Project's consistency with the AQMP will be determined using the *2022 AQMP* as discussed below.

It should be noted that although SCAG has released an updated 2024-2050 RTP, the 2022 AQMP is based on the 2020-2045 RTP.

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the *1993 CEQA Handbook* (30). These indicators are discussed below:

3.10.1 CONSISTENCY CRITERION NO. 1

The proposed Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

The violations that Consistency Criterion No. 1 refers to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded.

Construction Impacts – Consistency Criterion 1

Consistency Criterion No. 1 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if LSTs or regional significance thresholds were exceeded. As evaluated, the Project's regional and localized construction-source emissions would not exceed applicable regional significance threshold and LST thresholds. As such, a less than significant impact is expected.

Operational Impacts – Consistency Criterion 1

The Project would not exceed the applicable regional or localized thresholds for operational activity. As such, the Project would not have the potential to result in a significant impact with respect to this criterion and the Project would be consistent with the AQMP.

On the basis of the preceding discussion, the Project is determined to be consistent with the first criterion.

3.10.2 CONSISTENCY CRITERION NO. 2

The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.

The *2022 AQMP* demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in City of Loma Linda General Plan is considered to be consistent with the AQMP.

Construction Impacts – Consistency Criterion 2

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. As such, when considering that no emissions thresholds will be exceeded, a less than significant impact would result.

Operational Impacts – Consistency Criterion 2

The City of Loma Linda General Plan designates the Project Site as "Institutional-Health Care (I-HC)" land and zoning uses. The "Institutional-Health Care (I-HC)" designation is intended for educational institutions and religious assembly uses, hospitals, medical clinics, medical research facilities, rehabilitation centers, and residential facilities that provide a high degree of medical care and supervision (31).

The total development is proposed to consist of a 105,000-square-foot, five-story medical office building. The proposed uses by the Project are permitted and no General Plan Land Use Amendment or Zone Change would be required to implement the Project. Since the Project's proposed land and zoning use is consistent with the General Plan and as the Project's construction and operational-source air pollutant emissions would not exceed the regional or localized significance thresholds, the Project is determined to be consistent with the second criterion.

On the basis of the preceding discussion, the Project is determined to be consistent with the second criterion.

AQMP CONSISTENCY CONCLUSION

The Project would not result in or cause NAAQS or CAAQS violations as the Project. Additionally, the proposed land uses are consistent with the City's designated uses. As such, the Project is therefore considered to be consistent with the AQMP.

3.11 POTENTIAL IMPACTS TO SENSITIVE RECEPTORS

The potential impact of Project-generated air pollutant emissions at sensitive receptors has also been considered. Results of the LST analysis indicate that the Project will not exceed the SCAQMD localized significance thresholds during construction. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations during Project construction.

Additionally, the Project will not exceed the SCAQMD localized significance thresholds during operational activity. Further, the Project traffic would not create or result in a CO "hotspot." Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations as the result of Project operations.

3.11.1 FRIANT RANCH CASE

In December 2018, in the case of *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, the California Supreme Court held that an Environmental Impact Report's (EIR) air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided.

Most local agencies, including the City of Loma Linda, lack the data to do their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally-specific thresholds of significance based on potential health impacts from an individual development project. The use of national or "generic" data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in causing asthma), existing scientific tools cannot accurately estimate health impacts of the Project's air emissions without undue speculation. Instead, readers are directed to the Project's air quality impact analysis above, which provides extensive information concerning the quantifiable and non-quantifiable health risks related to the Project's construction and long-term operation.

Notwithstanding, this AQIA does evaluate the proposed Project's localized impact to air quality for emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$ by comparing the proposed project's on-site emissions to the SCAQMD's applicable LST thresholds. The LST analysis above determined that the Project would not result in emissions exceeding SCAQMD's LSTs. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$.

As the Project's emissions would comply with federal, state, and local air quality standards, the proposed Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level and would not provide a reliable indicator of health effects if modeled.

3.12 ODORS

The potential for the Project to generate objectionable odors has also been considered. Land uses generally associated with odor complaints include:

- Agricultural uses (livestock and farming)
- Wastewater treatment plants
- Food processing plants
- Chemical plants
- Composting operations
- Refineries
- Landfills
- Dairies
- Fiberglass molding facilities

The Project does not propose land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required (32).

3.13 CUMULATIVE IMPACTS

As previously shown in Table 2-4, the CAAQS designates the Project site as nonattainment for O_3 PM_{10}, and $PM_{2.5}$ while the NAAQS designates the Project site as nonattainment for O_3 and $PM_{2.5}$.

The SCAQMD has published a report on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (33). In this report the SCAQMD clearly states (Page D-3):

> *"…the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.*
>
> *Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which SCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable.

CONSTRUCTION IMPACTS

The Project-specific evaluation of emissions presented in the preceding analysis demonstrates that proposed Project construction-source air pollutant emissions would not result in exceedances of regional thresholds. Therefore, proposed Project construction-source emissions would be considered less than significant on a project-specific and cumulative basis.

OPERATIONAL IMPACTS

The Project-specific evaluation of emissions presented in the preceding analysis demonstrates that proposed Project operational-source air pollutant emissions would not result in exceedances of regional thresholds. Therefore, proposed Project operational-source emissions would be considered less than significant on a project-specific and cumulative basis.

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5 CERTIFICATIONS

The contents of this air study report represent an accurate depiction of the environmental impacts associated with the proposed Loma Linda Medical Office Building. The information contained in this air quality impact assessment report is based on the best available data at the time of preparation. If you have any questions, please contact me directly at hqureshi@urbanxroads.com.

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EDUCATION

Master of Science in Environmental Studies
California State University, Fullerton • May 2010

Bachelor of Arts in Environmental Analysis and Design
University of California, Irvine • June 2006

PROFESSIONAL AFFILIATIONS

AEP – Association of Environmental Planners
AWMA – Air and Waste Management Association
ASTM – American Society for Testing and Materials

PROFESSIONAL CERTIFICATIONS

Planned Communities and Urban Infill – Urban Land Institute • June 2011
Indoor Air Quality and Industrial Hygiene – EMSL Analytical • April 2008
Principles of Ambient Air Monitoring – CARB • August 2007
AB2588 Regulatory Standards – Trinity Consultants • November 2006
Air Dispersion Modeling – Lakes Environmental • June 2006

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APPENDIX 2.1:

STATE/FEDERAL ATTAINMENT STATUS OF CRITERIA POLLUTANTS

Appendix C
Maps and Tables of Area Designations for State and National Ambient Air Quality Standards

Appendix C
Maps and Tables of Area Designations for State and National Ambient Air Quality Standards

This attachment fulfills the requirement of Health and Safety Code section 40718 for CARB to publish maps that identify areas where one or more violations of any State ambient air quality standard (State standard) or national ambient air quality standard (national standard) have been measured. The national standards are those promulgated under section 109 of the federal Clean Air Act (42 U.S.C. 7409).

This attachment is divided into three parts. The first part comprises a table showing the levels, averaging times, and measurement methods for each of the State and national standards. This is followed by a section containing maps and tables showing the area designations for each pollutant for which there is a State standard in the California Code of Regulations, title 17, section 70200. The last section contains maps and tables showing the most current area designations for the national standards.

(Updated 5/4/16)

Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards [1]		National Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O_3)[8]	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
Respirable Particulate Matter (PM10)[9]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		—		
Fine Particulate Matter (PM2.5)[9]	24 Hour	—	—	35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	12.0 µg/m^3	15 µg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m^3)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		—	—	
Nitrogen Dioxide (NO_2)[10]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemiluminescence	100 ppb (188 µg/m^3)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		0.053 ppm (100 µg/m^3)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[11]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	—	Ultraviolet Flourescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas)[11]	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas)[11]	—	
Lead[12,13]	30 Day Average	1.5 µg/m^3	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m^3 (for certain areas)[12]	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m^3		
Visibility Reducing Particles[14]	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	**No National Standards**		
Sulfates	24 Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[12]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

See footnotes on next page …

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1- and 24-hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 μg/m^3 is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

4. Any equivalent measurement method which can be shown to the satisfaction of the CARB to give equivalent results at or near the level of the air quality standard may be used.

5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

7. Reference method as described by the U.S. EPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the U.S. EPA.

8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

9. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 μg/m^3 to 12.0 μg/m^3. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 μg/m^3, as was the annual secondary standard of 15 μg/m^3. The existing 24-hour PM10 standards (primary and secondary) of 150 μg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

11. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

    Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

12. The CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 μg/m^3)as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

14. In 1989, the CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

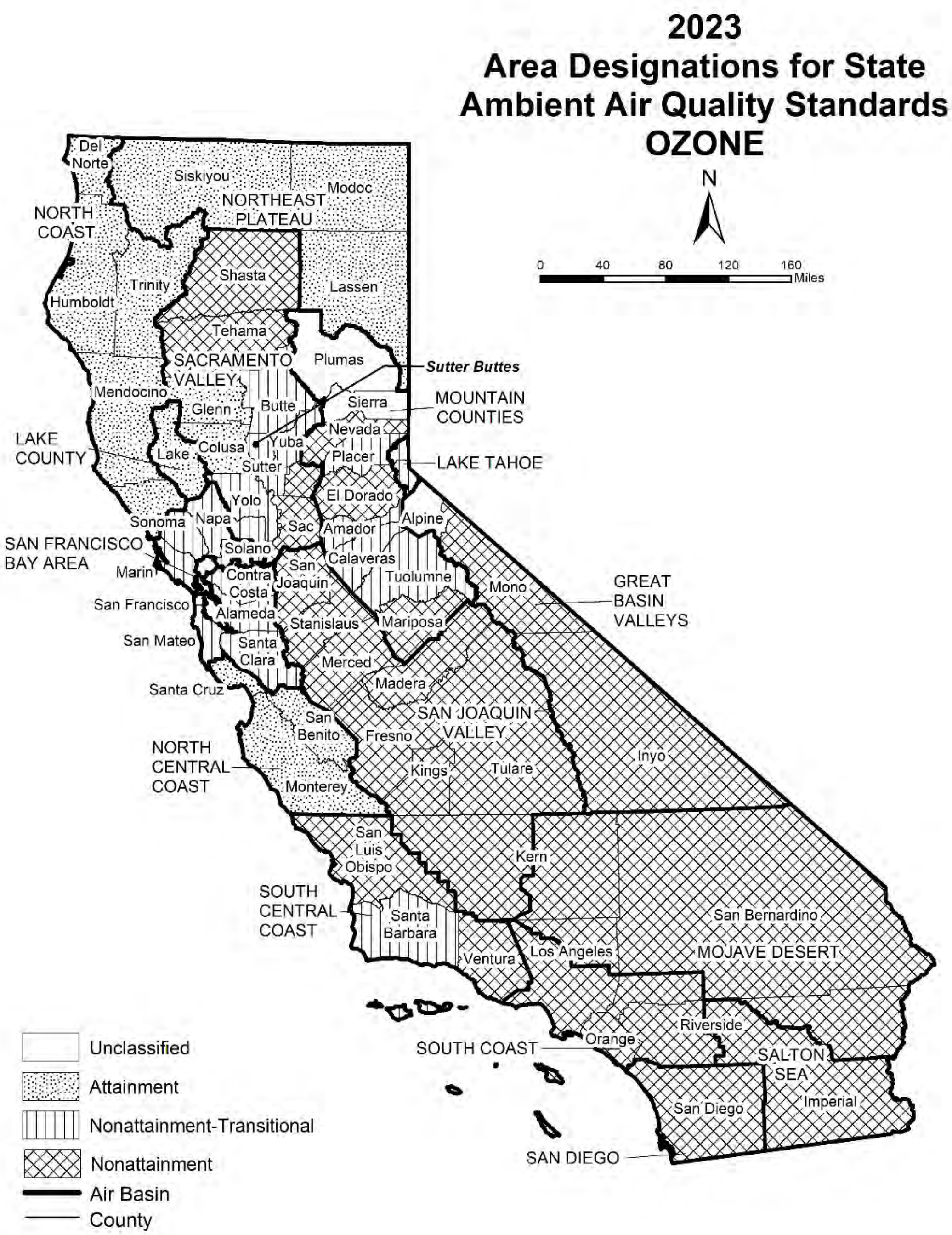
Area Designations for the State Ambient Air Quality Standards

The following maps and tables show the area designations for each pollutant with a State standard set forth in the California Code of Regulations, title 17, section 60200. Each area is identified as attainment, nonattainment, nonattainment-transitional, or unclassified for each pollutant, as shown below:

Designation	Abbreviation
Attainment	A
Nonattainment	N
Nonattainment-Transitional	NA-T
Unclassified	U

In general, CARB designates areas by air basin for pollutants with a regional impact and by county for pollutants with a more local impact. However, when there are areas within an air basin or county with distinctly different air quality deriving from sources and conditions not affecting the entire air basin or county, CARB may designate a smaller area. Generally, when boundaries of the designated area differ from the air basin or county boundaries, the description of the specific area is referenced at the bottom of the summary table.

Figure 1



Last Updated: November 2023
Air Quality Planning and Science Division, CARB

Table 1
California Ambient Air Quality Standards Area Designations for Ozone[1]

Area	N	NA-T	U	A
GREAT BASIN VALLEYS AIR BASIN				
Alpine County			U	
Inyo County	N			
Mono County	N			
LAKE COUNTY AIR BASIN				A
LAKE TAHOE AIR BASIN		NA-T		
MOJAVE DESERT AIR BASIN	N			
MOUNTAIN COUNTIES AIR BASIN				
Amador County		NA-T		
Calaveras County		NA-T		
El Dorado County (portion)	N			
Mariposa County	N			
Nevada County	N			
Placer County (portion)		NA-T		
Plumas County			U	
Sierra County			U	
Tuolumne County		NA-T		
NORTH CENTRAL COAST AIR BASIN				A
NORTH COAST AIR BASIN				A
NORTHEAST PLATEAU AIR BASIN				A
SACRAMENTO VALLEY AIR BASIN				
Butte County		NA-T		
Colusa and Glenn Counties				A
Shasta County	N			
Sutter/Yuba Counties				
Sutter Buttes		NA-T		
Remainder of Sutter County		NA-T		
Yuba County		NA-T		
Yolo/Solano Counties		NA-T		
Remainder of Air Basin	N			
SALTON SEA AIR BASIN	N			
SAN DIEGO AIR BASIN	N			
SAN FRANCISCO BAY AREA AIR BASIN		NA-T		
SAN JOAQUIN VALLEY AIR BASIN	N			
SOUTH CENTRAL COAST AIR BASIN				
San Luis Obispo County	N			
Santa Barbara County		NA-T		
Ventura County	N			
SOUTH COAST AIR BASIN	N			

[1] AB 3048 (Olberg) and AB 2525 (Miller) signed into law in 1996, made changes to Health and Safety Code, section 40925.5. One of the changes allows nonattainment districts to become nonattainment-transitional for ozone by operation of law.

Figure 2


2023
Area Designations for State
Ambient Air Quality Standards
PM10
N
0
40
80
120
160
Miles
Del Norte
Siskiyou
Modoc
NORTHEAST PLATEAU
NORTH COAST
Trinity
Shasta
Lassen
Humboldt
Tehama
SACRAMENTO VALLEY
Plumas
Mendocino
Glenn
Butte
Sierra
MOUNTAIN COUNTIES
Nevada
LAKE COUNTY
Lake
Colusa
Yuba
Placer
LAKE TAHOE
Sutter
Yolo
El Dorado
Sonoma
Napa
Sac
Amador
Alpine
Yosemite NP
SAN FRANCISCO BAY AREA
Solano
Calaveras
Marin
Contra Costa
San Joaquin
Tuolumne
Mono
GREAT BASIN VALLEYS
San Francisco
Alameda
Stanislaus
Mariposa
San Mateo
Santa Clara
Merced
Santa Cruz
Madera
San Benito
SAN JOAQUIN VALLEY
Fresno
NORTH CENTRAL COAST
Kings
Tulare
Inyo
Monterey
San Luis Obispo
Kern
SOUTH CENTRAL COAST
Santa Barbara
San Bernardino
Ventura
Los Angeles
MOJAVE DESERT
Riverside
SOUTH COAST
Orange
SALTON SEA
San Diego
Imperial
SAN DIEGO
Unclassified
Attainment
Nonattainment
Air Basin
County
Last Updated: November 2023
Air Quality Planning and Science Division, CARB

Table 2
California Ambient Air Quality Standards Area Designations for Suspended Particulate Matter (PM_{10})

Area	N	U	A
GREAT BASIN VALLEYS AIR BASIN	N		
LAKE COUNTY AIR BASIN			A
LAKE TAHOE AIR BASIN	N		
MOJAVE DESERT AIR BASIN	N		
MOUNTAIN COUNTIES AIR BASIN			
Amador County		U	
Calaveras County	N		
El Dorado County (portion)	N		
Mariposa County			
- Yosemite National Park	N		
- Remainder of County		U	
Nevada County	N		
Placer County (portion)	N		
Plumas County	N		
Sierra County	N		
Tuolumne County		U	

Area	N	U	A
NORTH CENTRAL COAST AIR BASIN	N		
NORTH COAST AIR BASIN			
Del Norte, Mendocino, Sonoma (portion) and Trinity Counties			A
Remainder of Air Basin	N		
NORTHEAST PLATEAU AIR BASIN			
Siskiyou County			A
Remainder of Air Basin		U	
SACRAMENTO VALLEY AIR BASIN			
Shasta County			A
Remainder of Air Basin	N		
SALTON SEA AIR BASIN	N		
SAN DIEGO AIR BASIN	N		
SAN FRANCISCO BAY AREA AIR BASIN	N		
SAN JOAQUIN VALLEY AIR BASIN	N		
SOUTH CENTRAL COAST AIR BASIN	N		
SOUTH COAST AIR BASIN	N		

Figure 3

2023
Area Designations for State
Ambient Air Quality Standards
PM2.5
N
0 40 80 120 160 Miles
Del Norte
Siskiyou
Modoc
NORTHEAST PLATEAU
NORTH COAST
Shasta
Lassen
Trinity
Humboldt
Tehama
Portola Valley
SACRAMENTO VALLEY
Plumas
Mendocino
Glenn
Butte
Sierra
MOUNTAIN COUNTIES
Nevada
LAKE COUNTY
Colusa
Yuba
Lake
Sutter
Placer
LAKE TAHOE
Yolo
El Dorado
Sonoma
Napa
Sac
Amador
Alpine
SAN FRANCISCO BAY AREA
Solano
Marin
Contra Costa
San Joaquin
Calaveras
Tuolumne
Mono
GREAT BASIN VALLEYS
San Francisco
Alameda
Stanislaus
Mariposa
San Mateo
Santa Clara
Merced
Santa Cruz
Madera
San Benito
SAN JOAQUIN VALLEY
Fresno
NORTH CENTRAL COAST
Inyo
Kings
Tulare
Monterey
San Luis Obispo
Kern
County Portion of Federal Ozone AQMA
SOUTH CENTRAL COAST
Santa Barbara
San Bernardino
Ventura
Los Angeles
MOJAVE DESERT
Riverside
SOUTH COAST
Orange
SALTON SEA
Imperial
San Diego
SAN DIEGO
Calexico
Unclassified
Attainment
Nonattainment
Air Basin
County
Last Updated: November 2023
Air Quality Planning and Science Division, CARB

Table 3
California Ambient Air Quality Standards Area Designations for Fine Particulate Matter ($PM_{2.5}$)

Area	N	U	A
GREAT BASIN VALLEYS AIR BASIN			A
LAKE COUNTY AIR BASIN			A
LAKE TAHOE AIR BASIN			A
MOJAVE DESERT AIR BASIN			A
MOUNTAIN COUNTIES AIR BASIN			
Plumas County			
- Portola Valley[1]	N		
- Remainder Plumas County		U	
Remainder of Air Basin		U	
NORTH CENTRAL COAST AIR BASIN			A
NORTH COAST AIR BASIN			A
NORTHEAST PLATEAU AIR BASIN			A
SACRAMENTO VALLEY AIR BASIN			
Butte County			A
Colusa County			A
Glenn County			A
Placer County (portion)			A
Sacramento County			A
Shasta County			A
Sutter and Yuba Counties	N		
Remainder of Air Basin		U	

Area	N	U	A
SALTON SEA AIR BASIN			
Imperial County			
- City of Calexico[2]	N		
Remainder of Air Basin			A
SAN DIEGO AIR BASIN	N		
SAN FRANCISCO BAY AREA AIR BASIN	N		
SAN JOAQUIN VALLEY AIR BASIN	N		
SOUTH CENTRAL COAST AIR BASIN			A
SOUTH COAST AIR BASIN	N		

[1] California Code of Regulations, title 17, section 60200(c)
[2] California Code of Regulations, title 17, section 60200(a)

Figure 4

2023
Area Designations for State
Ambient Air Quality Standards
CARBON MONOXIDE
N
0
40
80
120
160
Miles
Del Norte
Siskiyou
Modoc
NORTHEAST PLATEAU
NORTH COAST
Shasta
Lassen
Trinity
Humboldt
Tehama
SACRAMENTO VALLEY
Plumas
Mendocino
Glenn
Butte
Sierra
MOUNTAIN COUNTIES
Nevada
LAKE COUNTY
Lake
Colusa
Yuba
Placer
LAKE TAHOE
Sutter
El Dorado
Yolo
Sonoma
Napa
Sac
Amador
Alpine
SAN FRANCISCO BAY AREA
Solano
Marin
Contra Costa
San Joaquin
Calaveras
Tuolumne
Mono
GREAT BASIN VALLEYS
San Francisco
Alameda
Stanislaus
Mariposa
San Mateo
Santa Clara
Merced
Santa Cruz
Madera
San Benito
SAN JOAQUIN VALLEY
Fresno
NORTH CENTRAL COAST
Inyo
Kings
Tulare
Monterey
San Luis Obispo
Kern
SOUTH CENTRAL COAST
Santa Barbara
San Bernardino
Ventura
Los Angeles
MOJAVE DESERT
Riverside
SOUTH COAST
Orange
SALTON SEA
Imperial
San Diego
SAN DIEGO
Unclassified
Attainment
Air Basin
County
Last Updated: November 2023
Air Quality Planning and Science Division, CARB

Table 4
California Ambient Air Quality Standards Area Designations for Carbon Monoxide*

Area	N	NA-T	U	A
GREAT BASIN VALLEYS AIR BASIN				
Alpine County			U	
Inyo County				A
Mono County				A
LAKE COUNTY AIR BASIN				A
LAKE TAHOE AIR BASIN				A
MOJAVE DESERT AIR BASIN				
Kern County (portion)			U	
Los Angeles County (portion)				A
Riverside County (portion)			U	
San Bernardino County (portion)				A
MOUNTAIN COUNTIES AIR BASIN				
Amador County			U	
Calaveras County			U	
El Dorado County (portion)			U	
Mariposa County			U	
Nevada County			U	
Placer County (portion)			U	
Plumas County				A
Sierra County			U	
Tuolumne County				A
NORTH CENTRAL COAST AIR BASIN				
Monterey County				A
San Benito County			U	
Santa Cruz County			U	
NORTH COAST AIR BASIN				
Del Norte County			U	
Humboldt County				A
Mendocino County				A
Sonoma County (portion)			U	
Trinity County			U	
NORTHEAST PLATEAU AIR BASIN			U	

Area	N	NA-T	U	A
SACRAMENTO VALLEY AIR BASIN				
Butte County				A
Colusa County			U	
Glenn County			U	
Placer County (portion)				A
Sacramento County				A
Shasta County			U	
Solano County (portion)				A
Sutter County				A
Tehama County			U	
Yolo County				A
Yuba County			U	
SALTON SEA AIR BASIN				A
SAN DIEGO AIR BASIN				A
SAN FRANCISCO BAY AREA AIR BASIN				A
SAN JOAQUIN VALLEY AIR BASIN				
Fresno County				A
Kern County (portion)				A
Kings County			U	
Madera County			U	
Merced County			U	
San Joaquin County				A
Stanislaus County				A
Tulare County				A
SOUTH CENTRAL COAST AIR BASIN				A
SOUTH COAST AIR BASIN				A

* The area designated for carbon monoxide is a county or portion of a county

Figure 5

2023
Area Designations for State
Ambient Air Quality Standards
NITROGEN DIOXIDE
N
0 40 80 120 160 Miles
Del Norte
Siskiyou
Modoc
NORTHEAST PLATEAU
NORTH COAST
Shasta
Lassen
Trinity
Humboldt
Tehama
SACRAMENTO VALLEY
Plumas
Mendocino
Glenn
Butte
Sierra
MOUNTAIN COUNTIES
Nevada
LAKE COUNTY
Lake
Colusa
Yuba
Placer
LAKE TAHOE
Sutter
Yolo
El Dorado
Sonoma
Napa
Sac
Amador
Alpine
SAN FRANCISCO BAY AREA
Solano
Calaveras
Marin
Contra Costa
San Joaquin
Tuolumne
Mono
GREAT BASIN VALLEYS
San Francisco
Alameda
Stanislaus
Mariposa
San Mateo
Santa Clara
Merced
Santa Cruz
Madera
San Benito
SAN JOAQUIN VALLEY
NORTH CENTRAL COAST
Fresno
Inyo
Kings
Tulare
Monterey
San Luis Obispo
Kern
SOUTH CENTRAL COAST
Santa Barbara
San Bernardino
Los Angeles
MOJAVE DESERT
Ventura
CA 60 (Portion)
Riverside
SOUTH COAST
Orange
SALTON SEA
Imperial
San Diego
SAN DIEGO
Calexico
Attainment
Nonattainment
Air Basin
County
Last Updated: November 2023
Air Quality Planning and Science Division, CARB

Table 5
California Ambient Air Quality Standards Area Designations for Nitrogen Dioxide

Area	N	U	A
GREAT BASIN VALLEYS AIR BASIN			A
LAKE COUNTY AIR BASIN			A
LAKE TAHOE AIR BASIN			A
MOJAVE DESERT AIR BASIN			A
MOUNTAIN COUNTIES AIR BASIN			A
NORTH CENTRAL COAST AIR BASIN			A
NORTH COAST AIR BASIN			A
NORTHEAST PLATEAU AIR BASIN			A

Area	N	U	A
SACRAMENTO VALLEY AIR BASIN			A
SALTON SEA AIR BASIN			A
SAN DIEGO AIR BASIN			A
SAN FRANCISCO BAY AREA AIR BASIN			A
SAN JOAQUIN VALLEY AIR BASIN			A
SOUTH CENTRAL COAST AIR BASIN			A
SOUTH COAST AIR BASIN			
CA 60 Near-road Portion of San Bernardino, Riverside, and Los Angeles Counties			A
Remainder of Air Basin			A

Figure 6


2023
Area Designations for State
Ambient Air Quality Standards
SULFUR DIOXIDE
N
0 40 80 120 160 Miles
Del Norte
Siskiyou
Modoc
NORTHEAST PLATEAU
NORTH COAST
Trinity
Shasta
Lassen
Humboldt
Tehama
SACRAMENTO VALLEY
Plumas
Mendocino
Glenn
Butte
Sierra
MOUNTAIN COUNTIES
LAKE COUNTY
Lake
Colusa
Yuba
Nevada
Placer
LAKE TAHOE
Sutter
Yolo
El Dorado
Sonoma
Napa
Sac
Amador
Alpine
SAN FRANCISCO BAY AREA
Solano
Marin
Contra Costa
San Joaquin
Calaveras
Tuolumne
Mono
GREAT BASIN VALLEYS
San Francisco
Alameda
Stanislaus
Mariposa
San Mateo
Santa Clara
Merced
Madera
Santa Cruz
San Benito
SAN JOAQUIN VALLEY
Fresno
Inyo
NORTH CENTRAL COAST
Kings
Tulare
Monterey
San Luis Obispo
Kern
SOUTH CENTRAL COAST
Santa Barbara
San Bernardino
Ventura
Los Angeles
MOJAVE DESERT
Riverside
SOUTH COAST
Orange
SALTON SEA
San Diego
Imperial
SAN DIEGO
Attainment
Air Basin
County
Last Updated: November 2023
Air Quality Planning and Science Division, CARB

Table 6
California Ambient Air Quality Standards Area Designations for Sulfur Dioxide*

Area	N	A
GREAT BASIN VALLEYS AIR BASIN		A
LAKE COUNTY AIR BASIN		A
LAKE TAHOE AIR BASIN		A
MOJAVE DESERT AIR BASIN		A
MOUNTAIN COUNTIES AIR BASIN		A
NORTH CENTRAL COAST AIR BASIN		A
NORTH COAST AIR BASIN		A
NORTHEAST PLATEAU AIR BASIN		A

Area	N	A
SACRAMENTO VALLEY AIR BASIN		A
SALTON SEA AIR BASIN		A
SAN DIEGO AIR BASIN		A
SAN FRANCISCO BAY AREA AIR BASIN		A
SAN JOAQUIN VALLEY AIR BASIN		A
SOUTH CENTRAL COAST AIR BASIN		A
SOUTH COAST AIR BASIN		A

* The area designated for sulfur dioxide is a county or portion of a county. Since all areas in the State are in attainment for this standard, air basins are indicated here for simplicity.

Figure 7


2023
Area Designations for State
Ambient Air Quality Standards
SULFATES
N
0 40 80 120 160 Miles
Del Norte
Siskiyou
Modoc
NORTHEAST PLATEAU
NORTH COAST
Trinity
Shasta
Lassen
Humboldt
Tehama
SACRAMENTO VALLEY
Plumas
Mendocino
Glenn
Butte
Sierra
MOUNTAIN COUNTIES
Nevada
LAKE COUNTY
Lake
Colusa
Yuba
Placer
LAKE TAHOE
Sutter
Yolo
El Dorado
Sonoma
Napa
Sac
Amador
Alpine
SAN FRANCISCO BAY AREA
Solano
Marin
Contra Costa
San Joaquin
Calaveras
Tuolumne
Mono
GREAT BASIN VALLEYS
San Francisco
Alameda
Stanislaus
Mariposa
San Mateo
Santa Clara
Merced
Madera
Santa Cruz
San Benito
SAN JOAQUIN VALLEY
Fresno
NORTH CENTRAL COAST
Inyo
Kings
Tulare
Monterey
San Luis Obispo
Kern
SOUTH CENTRAL COAST
Santa Barbara
Ventura
Los Angeles
San Bernardino
MOJAVE DESERT
Riverside
SOUTH COAST
Orange
SALTON SEA
San Diego
Imperial
SAN DIEGO
Attainment
Air Basin
County
Last Updated: November 2023
Air Quality Planning and Science Division, CARB

Table 7
California Ambient Air Quality Standards Area Designations for Sulfates

Area	N	U	A
GREAT BASIN VALLEYS AIR BASIN			A
LAKE COUNTY AIR BASIN			A
LAKE TAHOE AIR BASIN			A
MOJAVE DESERT AIR BASIN			A
MOUNTAIN COUNTIES AIR BASIN			A
NORTH CENTRAL COAST AIR BASIN			A
NORTH COAST AIR BASIN			A
NORTHEAST PLATEAU AIR BASIN			A

Area	N	U	A
SACRAMENTO VALLEY AIR BASIN			A
SALTON SEA AIR BASIN			A
SAN DIEGO AIR BASIN			A
SAN FRANCISCO BAY AREA AIR BASIN			A
SAN JOAQUIN VALLEY AIR BASIN			A
SOUTH CENTRAL COAST AIR BASIN			A
SOUTH COAST AIR BASIN			A

Figure 8


2023
Area Designations for State
Ambient Air Quality Standards
LEAD
N
0 40 80 120 160 Miles
Del Norte
Siskiyou
Modoc
NORTHEAST PLATEAU
NORTH COAST
Shasta
Lassen
Trinity
Humboldt
Tehama
SACRAMENTO VALLEY
Plumas
Mendocino
Glenn
Butte
Sierra
MOUNTAIN COUNTIES
Nevada
LAKE COUNTY
Lake
Colusa
Yuba
Placer
LAKE TAHOE
Sutter
Yolo
El Dorado
Sonoma
Napa
Sac
Amador
Alpine
SAN FRANCISCO BAY AREA
Solano
Marin
San Joaquin
Calaveras
Contra Costa
Tuolumne
Mono
GREAT BASIN VALLEYS
San Francisco
Alameda
Stanislaus
Mariposa
San Mateo
Santa Clara
Merced
Madera
Santa Cruz
San Benito
SAN JOAQUIN VALLEY
Fresno
NORTH CENTRAL COAST
Inyo
Kings
Tulare
Monterey
San Luis Obispo
Kern
SOUTH CENTRAL COAST
Santa Barbara
San Bernardino
Ventura
Los Angeles
MOJAVE DESERT
Riverside
SOUTH COAST
Orange
SALTON SEA
Imperial
San Diego
SAN DIEGO
Attainment
Air Basin
County
Last Updated: November 2023
Air Quality Planning and Science Division, CARB

Table 8
California Ambient Air Quality Standards Area Designations for Lead (particulate)*

Area	N	U	A
GREAT BASIN VALLEYS AIR BASIN			A
LAKE COUNTY AIR BASIN			A
LAKE TAHOE AIR BASIN			A
MOJAVE DESERT AIR BASIN			A
MOUNTAIN COUNTIES AIR BASIN			A
NORTH CENTRAL COAST AIR BASIN			A
NORTH COAST AIR BASIN			A
NORTHEAST PLATEAU AIR BASIN			A
SACRAMENTO VALLEY AIR BASIN			A

Area	N	U	A
SALTON SEA AIR BASIN			A
SAN DIEGO AIR BASIN			A
SAN FRANCISCO BAY AREA AIR BASIN			A
SAN JOAQUIN VALLEY AIR BASIN			A
SOUTH CENTRAL COAST AIR BASIN			A
SOUTH COAST AIR BASIN			A

* The area designated for lead is a county or portion of a county. Since all areas in the State are in attainment for this standard, air basins are indicated here for simplicity.

Figure 9

2023
Area Designations for State Ambient Air Quality Standards
HYDROGEN SULFIDE
N
0 40 80 120 160 Miles
Del Norte
Siskiyou
Modoc
NORTHEAST PLATEAU
NORTH COAST
Trinity
Shasta
Lassen
Humboldt
Tehama
SACRAMENTO VALLEY
Plumas
Mendocino
Glenn
Butte
Sierra
MOUNTAIN COUNTIES
Nevada
LAKE COUNTY
Lake
Colusa
Yuba
Sutter
Placer
LAKE TAHOE
Geyser Geothermal
Yolo
El Dorado
City of Sutter Creek
Sonoma
Napa
Sac
Amador
Alpine
SAN FRANCISCO BAY AREA
Solano
Marin
Contra Costa
San Joaquin
Calaveras
Tuolumne
Mono
GREAT BASIN VALLEYS
San Francisco
Alameda
Stanislaus
Mariposa
San Mateo
Santa Clara
Merced
Madera
Santa Cruz
San Benito
SAN JOAQUIN VALLEY
Fresno
NORTH CENTRAL COAST
Kings
Tulare
Inyo
Searles Valley
Monterey
San Luis Obispo
Kern
SOUTH CENTRAL COAST
Santa Barbara
San Bernardino
Ventura
Los Angeles
MOJAVE DESERT
Coachella Valley
Riverside
SOUTH COAST
Orange
SALTON SEA
Imperial
San Diego
SAN DIEGO
Unclassified
Attainment
Nonattainment
Air Basin
County
Last Updated: November 2023
Air Quality Planning and Science Division, CARB

Table 9
California Ambient Air Quality Standards Area Designations for Hydrogen Sulfide*

Area	N	NA-T	U	A
GREAT BASIN VALLEYS AIR BASIN				
Alpine County			U	
Inyo County				A
Mono County				A
LAKE COUNTY AIR BASIN				A
LAKE TAHOE AIR BASIN			U	
MOJAVE DESERT AIR BASIN				
Kern County (portion)			U	
Los Angeles County (portion)			U	
Riverside County (portion)			U	
San Bernardino County (portion)				
- Searles Valley Planning Area[1]	N			
- Remainder of County			U	
MOUNTAIN COUNTIES AIR BASIN				
Amador County				
- City of Sutter Creek	N			
- Remainder of County			U	
Calaveras County			U	
El Dorado County (portion)			U	
Mariposa County			U	
Nevada County			U	
Placer County (portion)			U	
Plumas County			U	
Sierra County			U	
Tuolumne County			U	

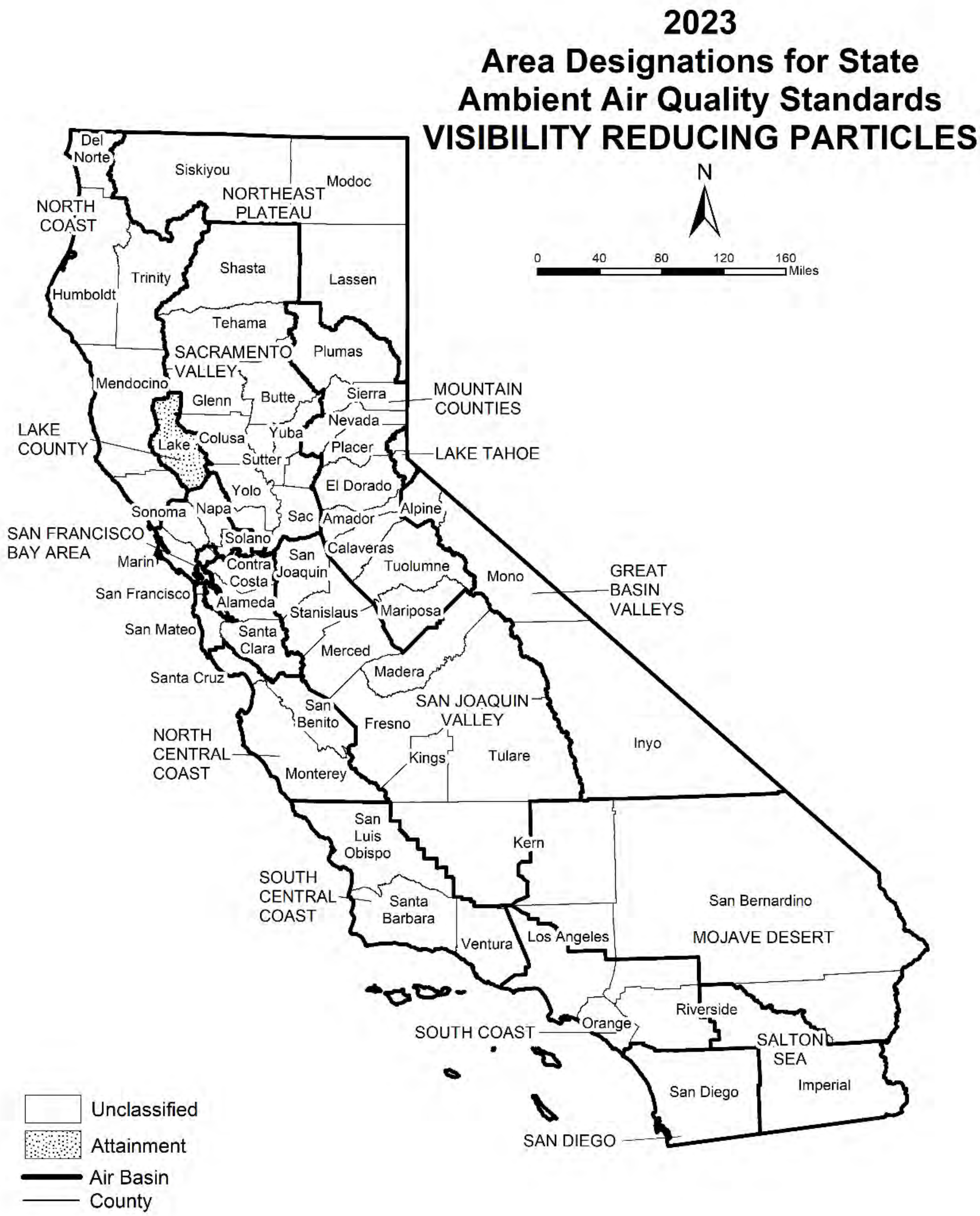
Area	N	NA-T	U	A
NORTH CENTRAL COAST AIR BASIN			U	
NORTH COAST AIR BASIN				
Del Norte County			U	
Humboldt County				A
Mendocino County			U	
Sonoma County (portion)				
- Geyser Geothermal Area[2]				A
- Remainder of County			U	
Trinity County			U	
NORTHEAST PLATEAU AIR BASIN			U	
SACRAMENTO VALLEY AIR BASIN			U	
SALTON SEA AIR BASIN				
Riverside County (portion)	N			
Imperial County			U	
SAN DIEGO AIR BASIN			U	
SAN FRANCISCO BAY AREA AIR BASIN			U	
SAN JOAQUIN VALLEY AIR BASIN			U	
SOUTH CENTRAL COAST AIR BASIN				
San Luis Obispo County				A
Santa Barbara County				A
Ventura County			U	
SOUTH COAST AIR BASIN			U	

* The area designated for hydrogen sulfide is a county or portion of a county

[1] 52 Federal Register 29384 (August 7, 1987)

[2] California Code of Regulations, title 17, section 60200(d)

Figure 10



Last Updated: November 2023
Air Quality Planning and Science Division, CARB

Table 10
California Ambient Air Quality Standards Area Designations for Visibility Reducing Particles

Area	N	NA-T	U	A
GREAT BASIN VALLEYS AIR BASIN			U	
LAKE COUNTY AIR BASIN				A
LAKE TAHOE AIR BASIN			U	
MOJAVE DESERT AIR BASIN			U	
MOUNTAIN COUNTIES AIR BASIN			U	
NORTH CENTRAL COAST AIR BASIN			U	
NORTH COAST AIR BASIN			U	
NORTHEAST PLATEAU AIR BASIN			U	

Area	N	NA-T	U	A
SACRAMENTO VALLEY AIR BASIN			U	
SALTON SEA AIR BASIN			U	
SAN DIEGO AIR BASIN			U	
SAN FRANCISCO BAY AREA AIR BASIN			U	
SAN JOAQUIN VALLEY AIR BASIN			U	
SOUTH CENTRAL COAST AIR BASIN			U	
SOUTH COAST AIR BASIN			U	

Area Designations for the National Ambient Air Quality Standards

The following maps and tables show the area designations for each pollutant with a national ambient air quality standard. Additional information about the federal area designations is available on the U.S. EPA website:

https://www.epa.gov/green-book

Over the last several years, U.S. EPA has been reviewing the levels of the various national standards. The agency has already promulgated new standard levels for some pollutants and is considering revising the levels for others. Information about the status of these reviews is available on the U.S. EPA website:

https://www.epa.gov/criteria-air-pollutants

Designation Categories

Suspended Particulate Matter (PM_{10}). The U.S. EPA uses three categories to designate areas with respect to PM_{10}:

- Attainment (A)
- Nonattainment (N)
- Unclassifiable (U)

Ozone, Fine Suspended Particulate Matter ($PM_{2.5}$), Carbon Monoxide (CO), and Nitrogen Dioxide (NO_2). The U.S. EPA uses two categories to designate areas with respect to these standards:

- Nonattainment (N)
- Unclassifiable/Attainment (U/A)

The national 1-hour ozone standard was revoked effective June 15, 2005, and the area designations map reflects the 2015 national 8-hour ozone standard of 0.070 ppm. Area designations were finalized on August 3, 2018.

On December 14, 2012, the U.S. EPA established a new national annual primary $PM_{2.5}$ standard of 12.0 µg/m^3. Area designations were finalized in December 2014. The current designation map reflects the most recently revised (2012) annual average standard of 12.0 µg/m^3 as well as the 24-hour standard of 35 µg/m^3, revised in 2006.

On January 22, 2010, the U.S. EPA established a new national 1-hour NO_2 standard of 100 parts per billion (ppb) and retained the annual average standard of 53 ppb. Designations for the primary NO_2 standard became effective on February 29, 2012. All areas of California meet this standard.

Sulfur Dioxide (SO_2). The U.S. EPA uses three categories to designate areas with respect to the 24-hour and annual average sulfur dioxide standards. These designation categories are:

- Nonattainment (N),
- Unclassifiable (U), and
- Unclassifiable/Attainment (U/A).

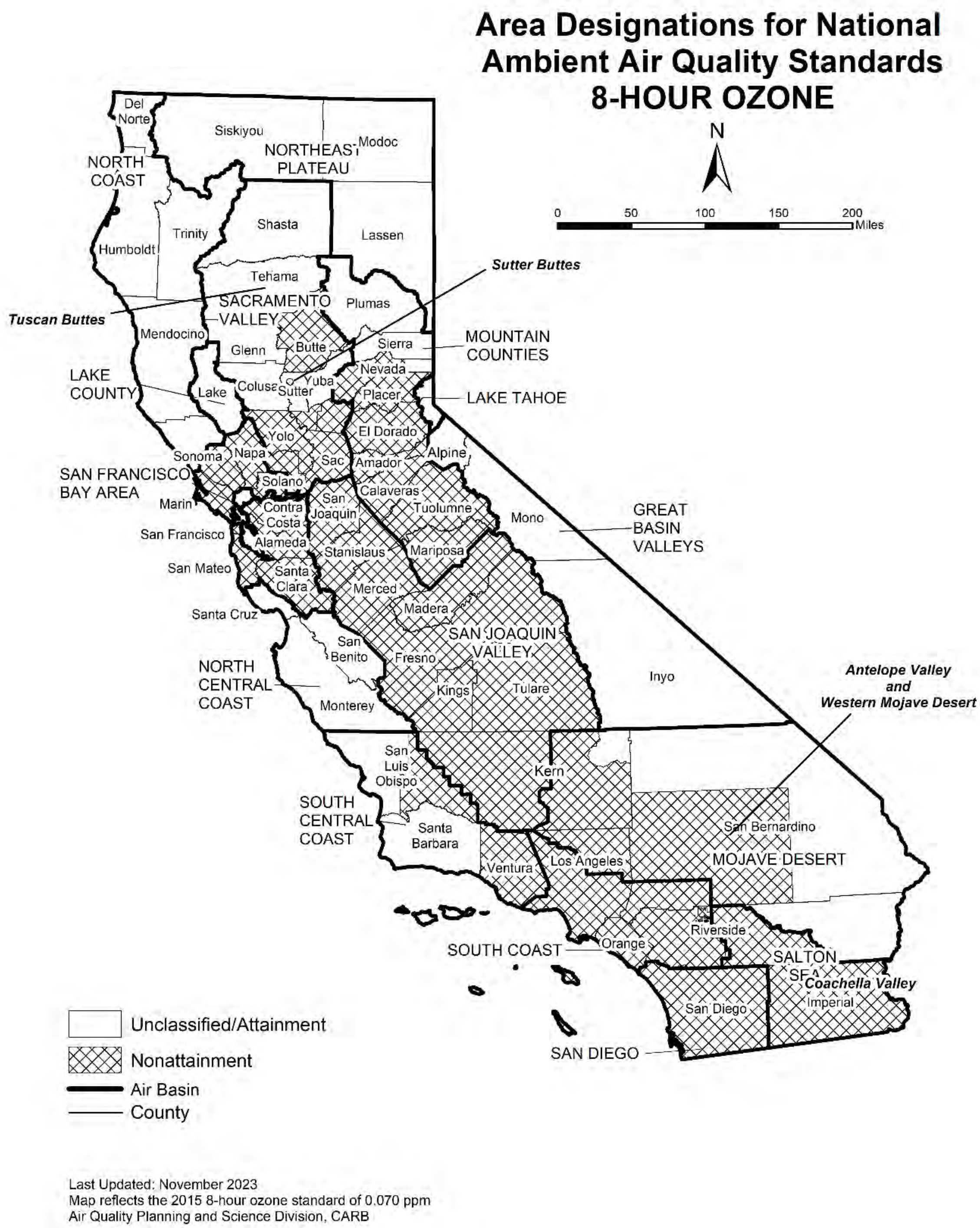
On June 2, 2010, the U.S. EPA established a new primary 1-hour SO_2 standard of 75 parts per billion (ppb). At the same time, U.S. EPA revoked the 24-hour and annual average standards. Area designations for the 1-hour SO_2 standard were finalized on December 21, 2017 and are reflected in the area designations map.

Lead (particulate). The U.S. EPA promulgated a new rolling 3-month average lead standard in October 2008 of 0.15 µg/m^3. Designations were made for this standard in November 2010.

Designation Areas

From time to time, the boundaries of the California air basins have been changed to facilitate the planning process. CARB generally initiates these changes, and they are not always reflected in the U.S. EPA's area designations. For purposes of consistency, the maps in this attachment reflect area designation boundaries and nomenclature as promulgated by the U.S. EPA. In some cases, these may not be the same as those adopted by CARB. For example, the national area designations reflect the former Southeast Desert Air Basin. In accordance with Health and Safety Code section 39606.1, CARB redefined this area in 1996 to be the Mojave Desert Air Basin and Salton Sea Air Basin. The definitions and boundaries for all areas designated for the national standards can be found in Title 40, Code of Federal Regulations (CFR), Chapter I, Subchapter C, Part 81.305. They are available on the web at: *https://ecfr.io/Title-40/se40.20.81_1305*

Figure 11



Area Designations for National Ambient Air Quality Standards 8-HOUR OZONE
N
0 50 100 150 200 Miles
Del Norte
Siskiyou
NORTHEAST PLATEAU
Modoc
NORTH COAST
Trinity
Shasta
Lassen
Humboldt
Tehama
Sutter Buttes
SACRAMENTO VALLEY
Plumas
Tuscan Buttes
Mendocino
Butte
Sierra
MOUNTAIN COUNTIES
Glenn
Nevada
LAKE COUNTY
Lake
Colusa
Sutter
Yuba
Placer
LAKE TAHOE
El Dorado
Yolo
Sonoma
Napa
Sac
Amador
Alpine
SAN FRANCISCO BAY AREA
Solano
Calaveras
Marin
Contra Costa
San Joaquin
Tuolumne
Mono
GREAT BASIN VALLEYS
San Francisco
Alameda
Stanislaus
Mariposa
San Mateo
Santa Clara
Merced
Santa Cruz
Madera
SAN JOAQUIN VALLEY
San Benito
Fresno
NORTH CENTRAL COAST
Kings
Tulare
Inyo
Antelope Valley and Western Mojave Desert
Monterey
San Luis Obispo
Kern
SOUTH CENTRAL COAST
Santa Barbara
San Bernardino
Ventura
Los Angeles
MOJAVE DESERT
Riverside
SOUTH COAST
Orange
SALTON SEA
Coachella Valley
San Diego
Imperial
SAN DIEGO
Unclassified/Attainment
Nonattainment
Air Basin
County
Last Updated: November 2023
Map reflects the 2015 8-hour ozone standard of 0.070 ppm
Air Quality Planning and Science Division, CARB

Table 11
National Ambient Air Quality Standards Area Designations for 8-Hour Ozone*

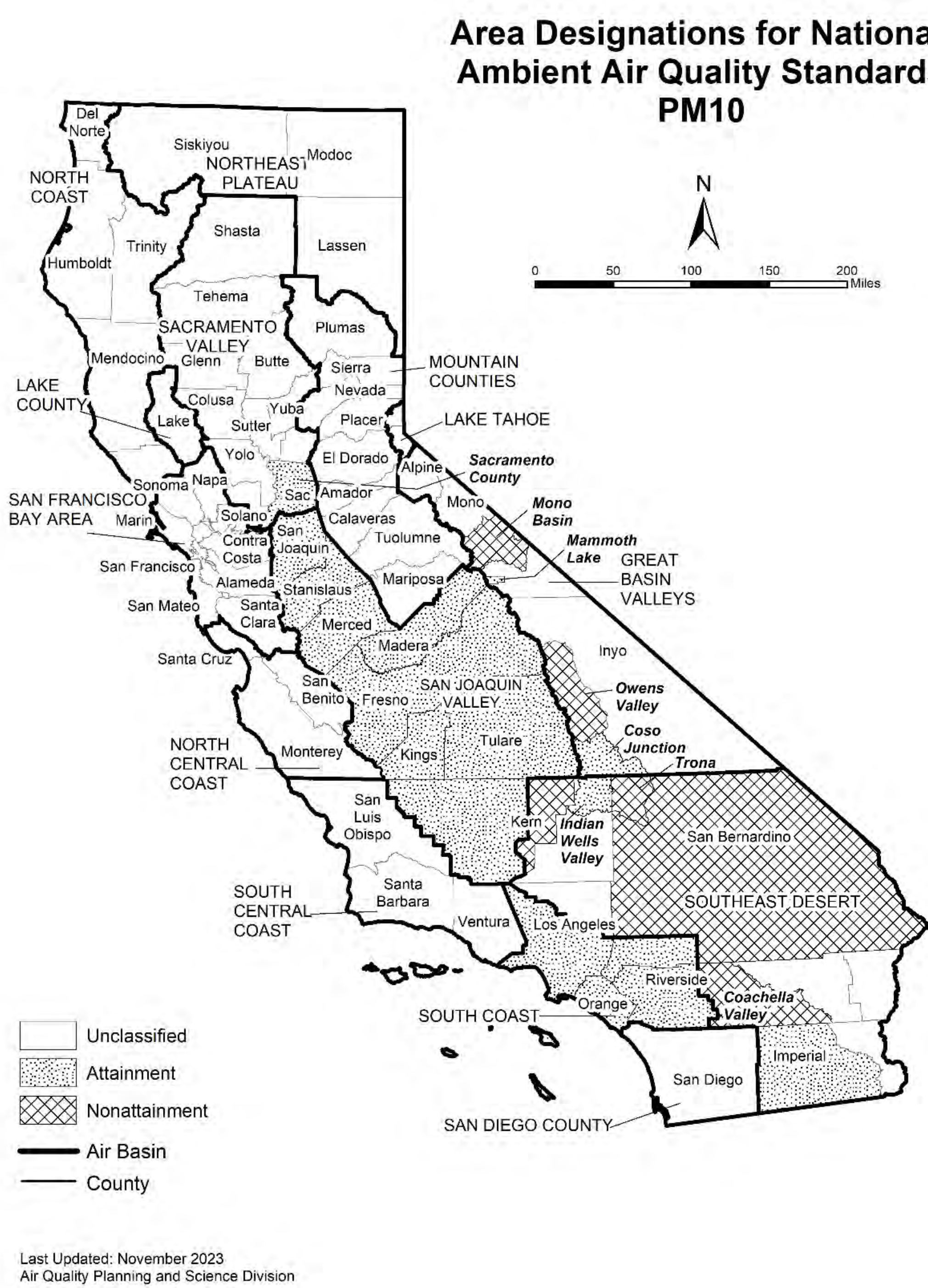
Area	N	U/A
GREAT BASIN VALLEYS AIR BASIN		U/A
LAKE COUNTY AIR BASIN		U/A
LAKE TAHOE AIR BASIN		U/A
MOUNTAIN COUNTIES AIR BASIN		
Amador County	N	
Calaveras County	N	
El Dorado County (portion)[1]	N	
Mariposa County	N	
Nevada County		
- Western Nevada County	N	
- Remainder of County		U/A
Placer County (portion)[1]	N	
Plumas County		U/A
Sierra County		U/A
Tuolumne County	N	
NORTH CENTRAL COAST AIR BASIN		U/A
NORTH COAST AIR BASIN		U/A
NORTHEAST PLATEAU AIR BASIN		U/A
SACRAMENTO VALLEY AIR BASIN		
Butte County	N	
Colusa County		U/A
Glenn County		U/A
Sacramento Metro Area[1]	N	
Shasta County		U/A
Sutter County		
- Sutter Buttes	N	
- Southern portion of Sutter County[1]	N	
- Remainder of Sutter County		U/A
Tehama County		
- Tuscan Buttes	N	
- Remainder of Tehama County		U/A
SACRAMENTO VALLEY AIR BASIN (cont.)		
Yolo County[1]	N	
Yuba County		U/A
SAN DIEGO COUNTY	N	
SAN FRANCISCO BAY AREA AIR BASIN	N	
SAN JOAQUIN VALLEY AIR BASIN	N	
SOUTH CENTRAL COAST AIR BASIN[2]		
San Luis Obispo County		
- Eastern San Luis Obispo County	N	
- Remainder of County		U/A
Santa Barbara County		U/A
Ventura County		
- Area excluding Anacapa and San Nicolas Islands	N	
- Channel Islands[2]		U/A
SOUTH COAST AIR BASIN[2]	N	
SOUTHEAST DESERT AIR BASIN		
Kern County (portion)	N	
- Indian Wells Valley		U/A
Imperial County	N	
Los Angeles County (portion)	N	
Riverside County (portion)		
- Coachella Valley	N	
- Non-AQMA portion		U/A
San Bernardino County		
- Western portion (AQMA)	N	
- Eastern portion (non-AQMA)		U/A

* Definitions and references for all areas can be found in 40 CFR, Chapter I, Part 81.305.
NOTE: This map and Table reflect the 2015 8-hour ozone standard of 0.070 ppm.

1 For this purpose, the Sacramento Metro Area comprises all of Sacramento and Yolo Counties, the Sacramento Valley Air Basin portion of Solano County, the southern portion of Sutter County, and the Sacramento Valley and Mountain Counties Air Basins portions of Placer and El Dorado counties.

2 South Central Coast Air Basin Channel Islands:
Santa Barbara County includes Santa Cruz, San Miguel, Santa Rosa, and Santa Barbara Islands.
Ventura County includes Anacapa and San Nicolas Islands.
South Coast Air Basin:
Los Angeles County includes San Clemente and Santa Catalina Islands.

Figure 12



Area Designations for National Ambient Air Quality Standards PM10
N
0 50 100 150 200 Miles
Del Norte
Siskiyou
NORTHEAST PLATEAU
Modoc
NORTH COAST
Shasta
Lassen
Trinity
Humboldt
Tehema
SACRAMENTO VALLEY
Plumas
Mendocino
Glenn
Butte
Sierra
MOUNTAIN COUNTIES
Nevada
LAKE COUNTY
Colusa
Yuba
Placer
LAKE TAHOE
Lake
Sutter
Yolo
El Dorado
Alpine
Sacramento County
Sonoma
Napa
Sac
Amador
SAN FRANCISCO BAY AREA
Marin
Solano
Mono
Mono Basin
Calaveras
San Joaquin
Contra Costa
Tuolumne
Mammoth Lake
San Francisco
GREAT BASIN VALLEYS
Alameda
Stanislaus
Mariposa
San Mateo
Santa Clara
Merced
Madera
Inyo
Santa Cruz
San Benito
SAN JOAQUIN VALLEY
Fresno
Owens Valley
Tulare
Coso Junction
NORTH CENTRAL COAST
Monterey
Kings
Trona
San Luis Obispo
Kern
Indian Wells Valley
San Bernardino
SOUTH CENTRAL COAST
Santa Barbara
SOUTHEAST DESERT
Ventura
Los Angeles
Riverside
Coachella Valley
Orange
SOUTH COAST
Imperial
San Diego
SAN DIEGO COUNTY
Unclassified
Attainment
Nonattainment
Air Basin
County
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Table 12
National Ambient Air Quality Standards Area Designations for Suspended Particulate Matter (PM_{10})*

Area	N	U	A
GREAT BASIN VALLEYS AIR BASIN			
Alpine County		U	
Inyo County			
- Owens Valley Planning Area	N		
- Coso Junction			A
- Remainder of County		U	
Mono County			
- Mammoth Lake Planning Area			A
- Mono Lake Basin	N		
- Remainder of County		U	
LAKE COUNTY AIR BASIN		U	
LAKE TAHOE AIR BASIN		U	
MOUNTAIN COUNTIES AIR BASIN		U	
NORTH CENTRAL COAST AIR BASIN		U	
NORTH COAST AIR BASIN		U	
NORTHEAST PLATEAU AIR BASIN		U	
SACRAMENTO VALLEY AIR BASIN			
Sacramento County[1]			A
Remainder of Air Basin		U	
SAN DIEGO COUNTY		U	

Area	N	U	A
SAN FRANCISCO BAY AREA AIR BASIN		U	
SAN JOAQUIN VALLEY AIR BASIN			A
SOUTH CENTRAL COAST AIR BASIN		U	
SOUTH COAST AIR BASIN			A
SOUTHEAST DESERT AIR BASIN			
Eastern Kern County			
- Indian Wells Valley			A
- Portion within San Joaquin Valley Planning Area	N		
- Remainder of County		U	
Imperial County			
- Imperial Valley Planning Area[2]			A
- Remainder of County		U	
Los Angeles County (portion)		U	
Riverside County (portion)			
- Coachella Valley	N		
- Non-AQMA portion		U	
San Bernardino County			
- Trona	N		
- Remainder of County	N		

* Definitions and references for all areas can be found in 40 CFR, Chapter I, Part 81.305.

[1] Air quality in Sacramento County meets the national PM_{10} standards. The request for redesignation to attainment was approved by U.S. EPA in September 2013.

[2] The request for redesignation to attainment for the Imperial Valley Planning Area was approved by U.S. EPA in September 2020, effective October 2020.

Figure 13


Area Designations for National Ambient Air Quality Standards PM2.5
N
0 50 100 150 200 Miles
Del Norte
Siskiyou
Modoc
NORTH COAST
NORTHEAST PLATEAU
Humboldt
Trinity
Shasta
Lassen
Tehama
SACRAMENTO VALLEY
Glenn
Butte
Plumas
Sierra
MOUNTAIN COUNTIES
Mendocino
LAKE COUNTY
Colusa
Nevada
Lake
Yuba
Placer
LAKE TAHOE
Sutter
Yolo
El Dorado
Sonoma
Napa
Sacramento
Alpine
Amador
SAN FRANCISCO BAY AREA
Marin
Solano
Calaveras
GREAT BASIN VALLEYS
Contra Costa
San Joaquin
Tuolumne
Mono
Alameda
Stanislaus
Mariposa
San Mateo
Santa Clara
Merced
Madera
Santa Cruz
Fresno
NORTH CENTRAL COAST
San Benito
Inyo
Tulare
Monterey
Kings
SAN JOAQUIN VALLEY
San Luis Obispo
Kern
San Bernardino
SOUTH CENTRAL COAST
Santa Barbara
SOUTHEAST DESERT
Ventura
Los Angeles
Riverside
SOUTH COAST
Orange
San Diego
Imperial
SAN DIEGO COUNTY
Unclassified/Attainment
Nonattainment
Air Basin
County
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Table 13
National Ambient Air Quality Standards Area Designations for Fine Particulate Matter ($PM_{2.5}$)

Area	N	U/A
GREAT BASIN VALLEYS AIR BASIN		U/A
LAKE COUNTY AIR BASIN		U/A
LAKE TAHOE AIR BASIN		U/A
MOUNTAIN COUNTIES AIR BASIN		
Plumas County		
- Portola Valley Portion of Plumas County	N	
- Remainder of Plumas County		U/A
Remainder of Air Basin		U/A
NORTH CENTRAL COAST AIR BASIN		U/A
NORTH COAST AIR BASIN		U/A
NORTHEAST PLATEAU AIR BASIN		U/A
SACRAMENTO VALLEY AIR BASIN		
Sacramento Metro Area[1]	N	
Remainder of Air Basin		U/A

Area	N	U/A
SAN DIEGO COUNTY		U/A
SAN FRANCISCO BAY AREA AIR BASIN[2]	N	
SAN JOAQUIN VALLEY AIR BASIN	N	
SOUTH CENTRAL COAST AIR BASIN		U/A
SOUTH COAST AIR BASIN[3]	N	
SOUTHEAST DESERT AIR BASIN		
Imperial County (portion)[4]	N	
Remainder of Air Basin		U/A

* Definitions and references for all areas can be found in 40 CFR, Chapter I, Part 81.305. This map reflects the 2006 24-hour $PM_{2.5}$ standard as well as the 1997 and 2012 $PM_{2.5}$ annual standards.

[1] For this purpose, Sacramento Metro Area comprises all of Sacramento and portions of El Dorado, Placer, Solano, and Yolo Counties. Air quality in this area meets the national $PM_{2.5}$ standards. A Determination of Attainment for the 2006 24-hour $PM_{2.5}$ standard was made by U.S. EPA in June 2017.

[2] Air quality in this area meets the national $PM_{2.5}$ standards. A Determination of Attainment for the 2006 24-hour $PM_{2.5}$ standard was made by U.S. EPA in June 2017.

[3] Those lands of the Santa Rosa Band of Cahulla Mission Indians in Riverside County are designated Unclassifiable/Attainment.

[4] That portion of Imperial County encompassing the urban and surrounding areas of Brawley, Calexico, El Centro, Heber, Holtville, Imperial, Seeley, and Westmorland. Air quality in this area meets the national $PM_{2.5}$ standards. A Determination of Attainment for the 2006 24-hour $PM_{2.5}$ standard was made by U.S. EPA in June 2017.

Figure 14


Area Designations for National Ambient Air Quality Standards
CARBON MONOXIDE
N
0 50 100 150 200 Miles
Del Norte
Siskiyou
Modoc
NORTHEAST PLATEAU
NORTH COAST
Shasta
Lassen
Humboldt
Trinity
Tehama
SACRAMENTO VALLEY
Plumas
Mendocino
Glenn
Butte
Sierra
MOUNTAIN COUNTIES
Nevada
Colusa
Yuba
Sutter
Placer
Lake
LAKE TAHOE
LAKE COUNTY
Yolo
El Dorado
Alpine
Napa
Sonoma
Sac
Amador
SAN FRANCISCO BAY AREA
Solano
Calaveras
Marin
San Joaquin
Contra Costa
Tuolumne
Mono
GREAT BASIN VALLEYS
San Francisco
Alameda
Stanislaus
Mariposa
San Mateo
Santa Clara
Merced
Santa Cruz
Madera
SAN JOAQUIN VALLEY
San Benito
Fresno
NORTH CENTRAL COAST
Inyo
Tulare
Monterey
Kings
San Luis Obispo
Kern
SOUTH CENTRAL COAST
SOUTHEAST DESERT
Santa Barbara
Ventura
Los Angeles
San Bernardino
Riverside
SOUTH COAST
Orange
San Diego
Imperial
SAN DIEGO COUNTY
Unclassified/Attainment
Air Basin
County
Last Updated: November 2023
Air Quality Planning and Science Division

Table 14
National Ambient Air Quality Standards Area Designations for Carbon Monoxide*

Area	N	U/A
GREAT BASIN VALLEYS AIR BASIN		U/A
LAKE COUNTY AIR BASIN		U/A
LAKE TAHOE AIR BASIN		U/A
MOUNTAIN COUNTIES AIR BASIN		U/A
NORTH CENTRAL COAST AIR BASIN		U/A
NORTH COAST AIR BASIN		U/A
NORTHEAST PLATEAU AIR BASIN		U/A

Area	N	U/A
SACRAMENTO VALLEY AIR BASIN		U/A
SAN DIEGO COUNTY		U/A
SAN FRANCISCO BAY AREA AIR BASIN		U/A
SAN JOAQUIN VALLEY AIR BASIN		U/A
SOUTH CENTRAL COAST AIR BASIN		U/A
SOUTH COAST AIR BASIN		U/A
SOUTHEAST DESERT AIR BASIN		U/A

* Definitions and references for all areas can be found in 40 CFR, Chapter I, Part 81.305.

Figure 15

Area Designations for National Ambient Air Quality Standards NITROGEN DIOXIDE
N
0 50 100 150 200 Miles
Del Norte
Siskiyou
Modoc
NORTHEAST PLATEAU
NORTH COAST
Shasta
Lassen
Trinity
Humboldt
Tehema
Plumas
SACRAMENTO VALLEY
Mendocino
Glenn
Butte
Sierra
Nevada
MOUNTAIN COUNTIES
Colusa
Yuba
Placer
LAKE TAHOE
LAKE COUNTY
Lake
Sutter
Yolo
El Dorado
Alpine
Sonoma
Napa
Sac
Amador
SAN FRANCISCO BAY AREA
Marin
Solano
San Joaquin
Calaveras
Contra Costa
Tuolumne
Mono
GREAT BASIN VALLEYS
San Francisco
Alameda
Stanislaus
Mariposa
San Mateo
Santa Clara
Merced
Santa Cruz
Madera
SAN JOAQUIN VALLEY
San Benito
Fresno
NORTH CENTRAL COAST
Tulare
Inyo
Monterey
Kings
San Luis Obispo
Kern
SOUTH CENTRAL COAST
Santa Barbara
SOUTHEAST DESERT
Los Angeles
San Bernardino
Ventura
Riverside
Orange
SOUTH COAST
San Diego
Imperial
SAN DIEGO COUNTY
Unclassified/Attainment
Air Basin
County
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Air Quality Planning and Science Division

Table 15
National Ambient Air Quality Standards Area Designations for Nitrogen Dioxide*

Area	N	U/A
GREAT BASIN VALLEYS AIR BASIN		U/A
LAKE COUNTY AIR BASIN		U/A
LAKE TAHOE AIR BASIN		U/A
MOUNTAIN COUNTIES AIR BASIN		U/A
NORTH CENTRAL COAST AIR BASIN		U/A
NORTH COAST AIR BASIN		U/A
NORTHEAST PLATEAU AIR BASIN		U/A

Area	N	U/A
SACRAMENTO VALLEY AIR BASIN		U/A
SAN DIEGO COUNTY		U/A
SAN FRANCISCO BAY AREA AIR BASIN		U/A
SAN JOAQUIN VALLEY AIR BASIN		U/A
SOUTH CENTRAL COAST AIR BASIN		U/A
SOUTH COAST AIR BASIN		U/A
SOUTHEAST DESERT AIR BASIN		U/A

* Definitions and references for all areas can be found in 40 CFR, Chapter I, Part 81.305.

Figure 16

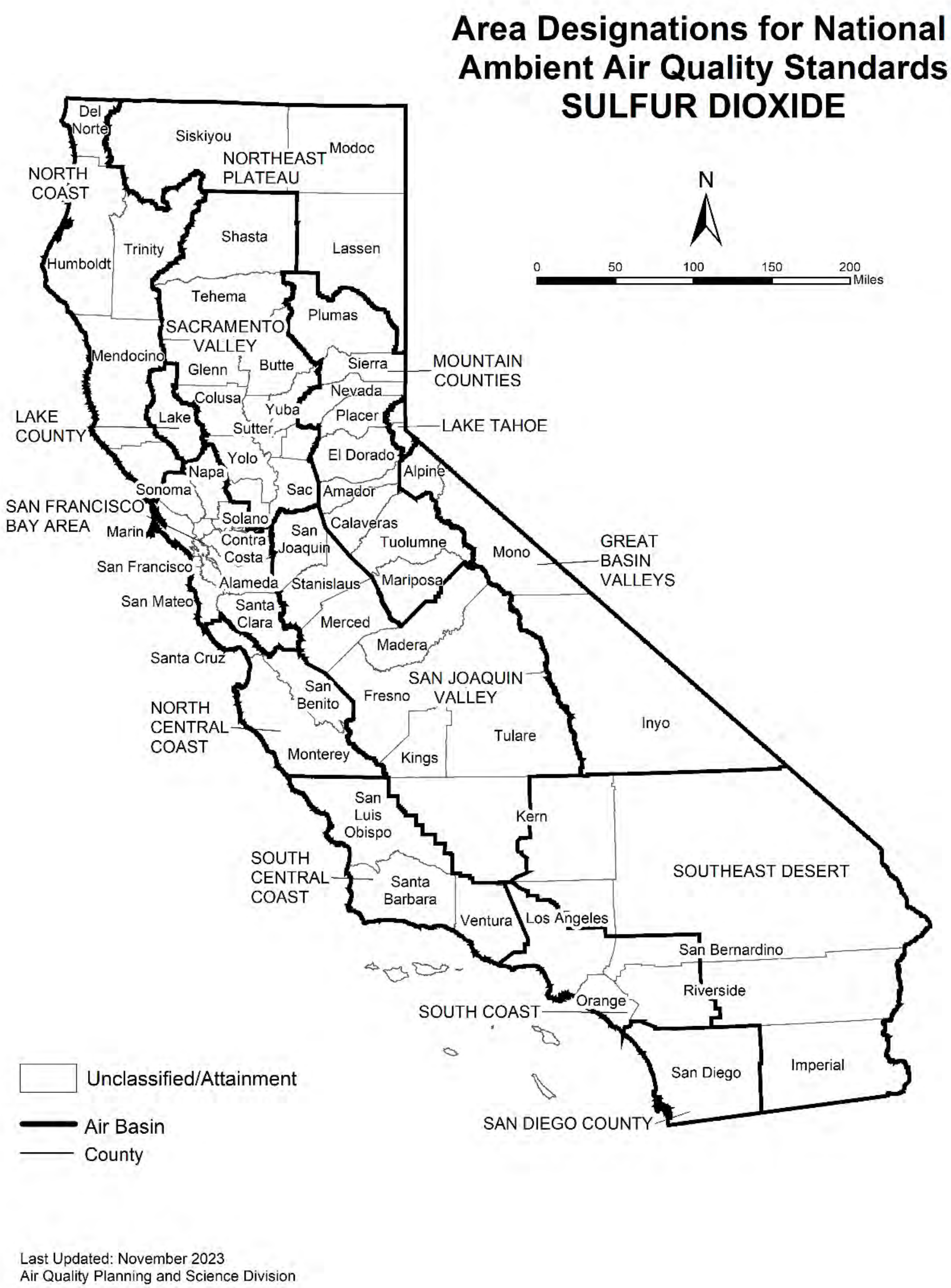
Area Designations for National Ambient Air Quality Standards
SULFUR DIOXIDE
N
0 50 100 150 200 Miles
Del Norte
Siskiyou
Modoc
NORTHEAST PLATEAU
NORTH COAST
Trinity
Shasta
Lassen
Humboldt
Tehema
Plumas
SACRAMENTO VALLEY
Mendocino
Glenn
Butte
Sierra
MOUNTAIN COUNTIES
Nevada
Colusa
Yuba
Placer
LAKE COUNTY
Lake
Sutter
LAKE TAHOE
Yolo
El Dorado
Napa
Alpine
Sonoma
Sac
Amador
SAN FRANCISCO BAY AREA
Solano
Marin
Contra Costa
San Joaquin
Calaveras
Tuolumne
Mono
GREAT BASIN VALLEYS
San Francisco
Alameda
Stanislaus
Mariposa
San Mateo
Santa Clara
Merced
Madera
Santa Cruz
SAN JOAQUIN VALLEY
San Benito
Fresno
NORTH CENTRAL COAST
Inyo
Tulare
Monterey
Kings
San Luis Obispo
Kern
SOUTH CENTRAL COAST
SOUTHEAST DESERT
Santa Barbara
Ventura
Los Angeles
San Bernardino
Riverside
SOUTH COAST
Orange
San Diego
Imperial
SAN DIEGO COUNTY
Unclassified/Attainment
Air Basin
County
Last Updated: November 2023
Air Quality Planning and Science Division

Table 16
National Ambient Air Quality Standards Area Designations for Sulfur Dioxide*

Area	N	U/A
GREAT BASIN VALLEYS AIR BASIN		U/A
LAKE COUNTY AIR BASIN		U/A
LAKE TAHOE AIR BASIN		U/A
MOUNTAIN COUNTIES AIR BASIN		U/A
NORTH CENTRAL COAST AIR BASIN		U/A
NORTH COAST AIR BASIN		U/A
NORTHEAST PLATEAU AIR BASIN		U/A
SACRAMENTO VALLEY AIR BASIN		U/A
SAN DIEGO COUNTY		U/A
SAN FRANCISCO BAY AREA AIR BASIN		U/A
SAN JOAQUIN VALLEY AIR BASIN		U/A
SOUTH CENTRAL COAST AIR BASIN[1]		U/A
SOUTH COAST AIR BASIN		U/A
SOUTHEAST DESERT AIR BASIN		U/A

* Definitions and references for all areas can be found in 40 CFR, Chapter I, Part 81.305.
NOTE: This map and table reflect the 2010 1-hour SO_2 standard of 75 ppb.

[1] South Central Coast Air Basin Channel Islands:
Santa Barbara County includes Santa Cruz, San Miguel, Santa Rosa, and Santa Barbara Islands.
Ventura County includes Anacapa and San Nicolas Islands.
Note that the San Clemente and Santa Catalina Islands are considered part of Los Angeles County, and therefore, are included as part of the South Coast Air Basin.

Figure 17

Area Designations for National Ambient Air Quality Standards LEAD
N
0
50
100
150
200
Miles
Del Norte
Siskiyou
Modoc
NORTHEAST PLATEAU
NORTH COAST
Shasta
Lassen
Trinity
Humboldt
Tehama
SACRAMENTO VALLEY
Plumas
Mendocino
Glenn
Butte
Sierra
Nevada
MOUNTAIN COUNTIES
Colusa
Yuba
Lake
Sutter
Placer
LAKE TAHOE
LAKE COUNTY
Yolo
El Dorado
Alpine
Napa
Sonoma
Sac
Amador
SAN FRANCISCO BAY AREA
Solano
Calaveras
Marin
Contra Costa
San Joaquin
Tuolumne
Mono
GREAT BASIN VALLEYS
San Francisco
Alameda
Stanislaus
Mariposa
San Mateo
Santa Clara
Merced
Santa Cruz
Madera
SAN JOAQUIN VALLEY
San Benito
Fresno
NORTH CENTRAL COAST
Inyo
Tulare
Monterey
Kings
San Luis Obispo
Kern
SOUTH CENTRAL COAST
SOUTHEAST DESERT
Santa Barbara
Ventura
Los Angeles
San Bernardino
Riverside
Orange
SOUTH COAST
San Diego
Imperial
SAN DIEGO COUNTY
Unclassified/Attainment
Nonattainment
Air Basin
County
Last Updated: November 2023
Air Quality Planning and Science Division

Table 17
National Ambient Air Quality Standards Area Designations for Lead (particulate)

Area	N	U/A
GREAT BASIN VALLEYS AIR BASIN		U/A
LAKE COUNTY AIR BASIN		U/A
LAKE TAHOE AIR BASIN		U/A
MOUNTAIN COUNTIES AIR BASIN		U/A
NORTH CENTRAL COAST AIR BASIN		U/A
NORTH COAST AIR BASIN		U/A
NORTHEAST PLATEAU AIR BASIN		U/A
SACRAMENTO VALLEY AIR BASIN		U/A

Area	N	U/A
SAN DIEGO COUNTY		U/A
SAN FRANCISCO BAY AREA AIR BASIN		U/A
SAN JOAQUIN VALLEY AIR BASIN		U/A
SOUTH CENTRAL COAST AIR BASIN		U/A
SOUTH COAST AIR BASIN		
Los Angeles County (portion)[1]	N	
Remainder of Air Basin		U/A
SOUTHEAST DESERT AIR BASIN		U/A

[1] Portion of County in Air Basin, not including Channel Islands

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APPENDIX 3.1:

CALEEMOD PROJECT EMISSIONS MODEL OUTPUTS

15959 - Loma Linda Medical Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	15959 - Loma Linda Medical
Construction Start Date	4/1/2025
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.50
Precipitation (days)	24.0
Location	34.047868636127845, -117.26043436582097
County	San Bernardino-South Coast
City	Loma Linda
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5385
EDFZ	10
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.29

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
Medical Office Building	105	1000sqft	0.48	105,000	18,365	—	—	—

Parking Lot	223	Space	0.83	0.00	0.00	—	—	—
Other Asphalt Surfaces	2.31	Acre	2.31	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.	29.4	29.0	37.5	33.8	0.07	1.93	5.89	7.82	1.78	2.74	4.52	—	8,784	8,784	0.69	0.88	11.7	9,074
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	29.4	29.0	19.7	28.8	0.04	0.77	0.84	1.61	0.71	0.20	0.91	—	5,444	5,444	0.22	0.13	0.10	5,487
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.89	1.81	8.56	9.99	0.02	0.36	0.69	1.05	0.33	0.22	0.55	—	2,228	2,228	0.12	0.09	0.83	2,259
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.34	0.33	1.56	1.82	< 0.005	0.07	0.13	0.19	0.06	0.04	0.10	—	369	369	0.02	0.02	0.14	374

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	4.91	4.13	37.5	33.8	0.07	1.93	5.89	7.82	1.78	2.74	4.52	—	8,784	8,784	0.69	0.88	11.7	9,074
2026	29.4	29.0	19.6	29.7	0.04	0.77	0.84	1.61	0.71	0.20	0.91	—	5,507	5,507	0.24	0.13	3.73	5,554
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.65	1.37	12.0	16.4	0.03	0.47	0.56	1.03	0.44	0.14	0.57	—	3,497	3,497	0.16	0.10	0.08	3,531
2026	29.4	29.0	19.7	28.8	0.04	0.77	0.84	1.61	0.71	0.20	0.91	—	5,444	5,444	0.22	0.13	0.10	5,487
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.15	0.93	8.56	9.99	0.02	0.36	0.69	1.05	0.33	0.22	0.55	—	2,228	2,228	0.12	0.09	0.83	2,259
2026	1.89	1.81	3.05	4.41	0.01	0.11	0.14	0.26	0.11	0.03	0.14	—	906	906	0.04	0.03	0.29	915
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.21	0.17	1.56	1.82	< 0.005	0.07	0.13	0.19	0.06	0.04	0.10	—	369	369	0.02	0.02	0.14	374
2026	0.34	0.33	0.56	0.81	< 0.005	0.02	0.03	0.05	0.02	0.01	0.03	—	150	150	0.01	< 0.005	0.05	151

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.	11.9	11.1	9.49	59.4	0.13	0.32	10.6	10.9	0.31	2.69	3.00	636	15,938	16,575	64.6	0.68	42.9	18,435
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.6	9.86	9.86	47.2	0.12	0.31	10.6	10.9	0.31	2.69	2.99	636	15,141	15,777	64.6	0.70	1.44	17,602
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	8.38	7.81	5.74	38.3	0.09	0.15	7.87	8.03	0.15	2.00	2.15	636	11,857	12,493	64.4	0.55	14.2	14,282
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.53	1.43	1.05	6.99	0.02	0.03	1.44	1.46	0.03	0.37	0.39	105	1,963	2,068	10.7	0.09	2.35	2,365

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	7.36	6.75	5.47	51.3	0.12	0.08	10.6	10.7	0.08	2.69	2.77	—	12,554	12,554	0.62	0.59	42.6	12,788
Area	3.21	3.15	0.04	4.57	< 0.005	0.01	—	0.01	0.01	—	0.01	—	18.8	18.8	< 0.005	< 0.005	—	18.8
Energy	0.09	0.04	0.77	0.65	< 0.005	0.06	—	0.06	0.06	—	0.06	—	2,691	2,691	0.25	0.02	—	2,704
Water	—	—	—	—	—	—	—	—	—	—	—	25.2	86.6	112	2.60	0.06	—	195
Waste	—	—	—	—	—	—	—	—	—	—	—	611	0.00	611	61.1	0.00	—	2,138
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Stationary	1.26	1.15	3.21	2.93	0.01	0.17	0.00	0.17	0.17	0.00	0.17	0.00	588	588	0.02	< 0.005	0.00	590
Total	11.9	11.1	9.49	59.4	0.13	0.32	10.6	10.9	0.31	2.69	3.00	636	15,938	16,575	64.6	0.68	42.9	18,435
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.88	6.27	5.87	43.7	0.11	0.08	10.6	10.7	0.08	2.69	2.77	—	11,775	11,775	0.65	0.61	1.10	11,974
Area	2.40	2.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.09	0.04	0.77	0.65	< 0.005	0.06	—	0.06	0.06	—	0.06	—	2,691	2,691	0.25	0.02	—	2,704
Water	—	—	—	—	—	—	—	—	—	—	—	25.2	86.6	112	2.60	0.06	—	195
Waste	—	—	—	—	—	—	—	—	—	—	—	611	0.00	611	61.1	0.00	—	2,138
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Stationary	1.26	1.15	3.21	2.93	0.01	0.17	0.00	0.17	0.17	0.00	0.17	0.00	588	588	0.02	< 0.005	0.00	590

Total	10.6	9.86	9.86	47.2	0.12	0.31	10.6	10.9	0.31	2.69	2.99	636	15,141	15,777	64.6	0.70	1.44	17,602
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.16	4.70	4.50	34.1	0.09	0.06	7.87	7.94	0.06	2.00	2.06	—	8,986	8,986	0.49	0.46	13.9	9,150
Area	2.96	2.91	0.03	3.13	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	12.9	12.9	< 0.005	< 0.005	—	12.9
Energy	0.09	0.04	0.77	0.65	< 0.005	0.06	—	0.06	0.06	—	0.06	—	2,691	2,691	0.25	0.02	—	2,704
Water	—	—	—	—	—	—	—	—	—	—	—	25.2	86.6	112	2.60	0.06	—	195
Waste	—	—	—	—	—	—	—	—	—	—	—	611	0.00	611	61.1	0.00	—	2,138
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Stationary	0.17	0.16	0.44	0.40	< 0.005	0.02	0.00	0.02	0.02	0.00	0.02	0.00	80.5	80.5	< 0.005	< 0.005	0.00	80.8
Total	8.38	7.81	5.74	38.3	0.09	0.15	7.87	8.03	0.15	2.00	2.15	636	11,857	12,493	64.4	0.55	14.2	14,282
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.94	0.86	0.82	6.23	0.02	0.01	1.44	1.45	0.01	0.37	0.38	—	1,488	1,488	0.08	0.08	2.30	1,515
Area	0.54	0.53	< 0.005	0.57	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.13	2.13	< 0.005	< 0.005	—	2.14
Energy	0.02	0.01	0.14	0.12	< 0.005	0.01	—	0.01	0.01	—	0.01	—	446	446	0.04	< 0.005	—	448
Water	—	—	—	—	—	—	—	—	—	—	—	4.18	14.3	18.5	0.43	0.01	—	32.3
Waste	—	—	—	—	—	—	—	—	—	—	—	101	0.00	101	10.1	0.00	—	354
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Stationary	0.03	0.03	0.08	0.07	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	13.3	13.3	< 0.005	< 0.005	0.00	13.4
Total	1.53	1.43	1.05	6.99	0.02	0.03	1.44	1.46	0.03	0.37	0.39	105	1,963	2,068	10.7	0.09	2.35	2,365

3. Construction Emissions Details

3.1. Demolition (2025) - 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	2.86	2.40	22.2	19.9	0.03	0.92	—	0.92	0.84	—	0.84	—	3,425	3,425	0.14	0.03	—	3,437
Demolition	—	—	—	—	—	—	1.66	1.66	—	0.25	0.25	—	—	—	—	—	—	—
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	1.22	1.09	< 0.005	0.05	—	0.05	0.05	—	0.05	—	188	188	0.01	< 0.005	—	188
Demolition	—	—	—	—	—	—	0.09	0.09	—	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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.22	0.20	< 0.005	0.01	—	0.01	0.01	—	0.01	—	31.1	31.1	< 0.005	< 0.005	—	31.2
Demolition	—	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005	—	—	—	—	—	—	—
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	0.08	0.07	0.07	1.17	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	211	211	0.01	0.01	0.78	215
Vendor	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	30.8	30.8	< 0.005	< 0.005	0.09	32.4
Hauling	0.65	0.11	6.13	3.44	0.03	0.07	1.37	1.44	0.07	0.38	0.44	—	5,117	5,117	0.54	0.84	10.9	5,391
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.8	10.8	< 0.005	< 0.005	0.02	10.9
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	0.04	0.01	0.35	0.19	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	—	280	280	0.03	0.05	0.26	295
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.78	1.78	< 0.005	< 0.005	< 0.005	1.81
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	0.01	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	46.4	46.4	< 0.005	0.01	0.04	48.9

3.3. Site Preparation (2025) - 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	4.82	4.05	37.5	32.4	0.05	1.93	—	1.93	1.78	—	1.78	—	5,528	5,528	0.22	0.04	—	5,547
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	0.13	0.11	1.03	0.89	< 0.005	0.05	—	0.05	0.05	—	0.05	—	151	151	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	0.02	0.02	0.19	0.16	< 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	0.09	0.08	0.08	1.36	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	247	247	0.01	0.01	0.91	250
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	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.28	6.28	< 0.005	< 0.005	0.01	6.37
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	< 0.005	< 0.005	—	1.04	1.04	< 0.005	< 0.005	< 0.005	1.05
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

3.5. Grading (2025) - 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	2.73	2.30	20.6	19.6	0.03	1.15	—	1.15	1.05	—	1.05	—	3,134	3,134	0.13	0.03	—	3,145
Dust From Material Movement	—	—	—	—	—	—	2.26	2.26	—	0.94	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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.13	1.07	< 0.005	0.06	—	0.06	0.06	—	0.06	—	172	172	0.01	< 0.005	—	172
Dust From Material Movement	—	—	—	—	—	—	0.12	0.12	—	0.05	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	0.03	0.02	0.21	0.20	< 0.005	0.01	—	0.01	0.01	—	0.01	—	28.4	28.4	< 0.005	< 0.005	—	28.5
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	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	0.08	0.07	0.07	1.17	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	211	211	0.01	0.01	0.78	215
Vendor	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	30.8	30.8	< 0.005	< 0.005	0.09	32.4
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	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.8	10.8	< 0.005	< 0.005	0.02	10.9

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	< 0.005	< 0.005	—	1.78	1.78	< 0.005	< 0.005	< 0.005	1.81
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

3.7. Building Construction (2025) - 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	1.45	1.21	11.3	14.1	0.03	0.47	—	0.47	0.43	—	0.43	—	2,630	2,630	0.11	0.02	—	2,639
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	1.45	1.21	11.3	14.1	0.03	0.47	—	0.47	0.43	—	0.43	—	2,630	2,630	0.11	0.02	—	2,639
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	0.58	0.49	4.54	5.67	0.01	0.19	—	0.19	0.17	—	0.17	—	1,055	1,055	0.04	0.01	—	1,059
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	0.11	0.09	0.83	1.04	< 0.005	0.03	—	0.03	0.03	—	0.03	—	175	175	0.01	< 0.005	—	175
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	0.17	0.15	0.15	2.62	0.00	0.00	0.44	0.44	0.00	0.10	0.10	—	473	473	0.02	0.02	1.76	481
Vendor	0.04	0.01	0.48	0.26	< 0.005	0.01	0.12	0.13	0.01	0.03	0.04	—	432	432	0.03	0.07	1.22	453
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	0.16	0.14	0.16	1.97	0.00	0.00	0.44	0.44	0.00	0.10	0.10	—	434	434	0.02	0.02	0.05	440
Vendor	0.04	0.01	0.50	0.26	< 0.005	0.01	0.12	0.13	0.01	0.03	0.04	—	432	432	0.03	0.07	0.03	452
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	0.06	0.06	0.07	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	177	177	0.01	0.01	0.30	179
Vendor	0.02	< 0.005	0.20	0.10	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	173	173	0.01	0.03	0.21	182
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	0.01	0.01	0.01	0.15	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	29.2	29.2	< 0.005	< 0.005	0.05	29.7

Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	28.7	28.7	< 0.005	< 0.005	0.03	30.1
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. 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	1.38	1.16	10.7	14.1	0.03	0.41	—	0.41	0.38	—	0.38	—	2,630	2,630	0.11	0.02	—	2,639
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	1.38	1.16	10.7	14.1	0.03	0.41	—	0.41	0.38	—	0.38	—	2,630	2,630	0.11	0.02	—	2,639
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	0.32	0.26	2.44	3.22	0.01	0.09	—	0.09	0.09	—	0.09	—	602	602	0.02	< 0.005	—	604
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	0.06	0.05	0.45	0.59	< 0.005	0.02	—	0.02	0.02	—	0.02	—	99.7	99.7	< 0.005	< 0.005	—	100
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	0.16	0.15	0.13	2.42	0.00	0.00	0.44	0.44	0.00	0.10	0.10	—	464	464	0.02	0.02	1.59	471
Vendor	0.04	0.01	0.46	0.25	< 0.005	0.01	0.12	0.13	0.01	0.03	0.04	—	425	425	0.03	0.07	1.12	446
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	0.15	0.14	0.15	1.83	0.00	0.00	0.44	0.44	0.00	0.10	0.10	—	425	425	0.01	0.02	0.04	430
Vendor	0.04	0.01	0.48	0.25	< 0.005	0.01	0.12	0.13	0.01	0.03	0.04	—	425	425	0.03	0.07	0.03	445
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	0.03	0.03	0.04	0.44	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	98.7	98.7	< 0.005	< 0.005	0.16	100
Vendor	0.01	< 0.005	0.11	0.06	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	97.3	97.3	0.01	0.01	0.11	102
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	0.01	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	16.3	16.3	< 0.005	< 0.005	0.03	16.6
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	16.1	16.1	< 0.005	< 0.005	0.02	16.9
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. 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	0.91	0.76	7.12	9.94	0.01	0.32	—	0.32	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.91	0.76	7.12	9.94	0.01	0.32	—	0.32	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.05	0.04	0.39	0.54	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Paving	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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	0.07	0.06	0.06	1.08	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	207	207	0.01	0.01	0.71	210
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.07	0.82	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	190	190	< 0.005	0.01	0.02	192
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.6	10.6	< 0.005	< 0.005	0.02	10.7
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	< 0.005	< 0.005	—	1.75	1.75	< 0.005	< 0.005	< 0.005	1.77
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

3.13. Architectural Coating (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	0.19	0.16	1.14	1.51	< 0.005	0.03	—	0.03	0.03	—	0.03	—	178	178	0.01	< 0.005	—	179
Architectural Coatings	26.2	26.2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.19	0.16	1.14	1.51	< 0.005	0.03	—	0.03	0.03	—	0.03	—	178	178	0.01	< 0.005	—	179
Architectural Coatings	26.2	26.2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.75	9.75	< 0.005	< 0.005	—	9.79
Architectural Coatings	1.44	1.44	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.61	1.61	< 0.005	< 0.005	—	1.62
Architectural Coatings	0.26	0.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.03	0.03	0.03	0.48	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	92.8	92.8	< 0.005	< 0.005	0.32	94.1
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.37	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	85.1	85.1	< 0.005	< 0.005	0.01	86.1
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.73	4.73	< 0.005	< 0.005	0.01	4.79
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	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.78	0.78	< 0.005	< 0.005	< 0.005	0.79
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

4.1. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	7.36	6.75	5.47	51.3	0.12	0.08	10.6	10.7	0.08	2.69	2.77	—	12,554	12,554	0.62	0.59	42.6	12,788
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	7.36	6.75	5.47	51.3	0.12	0.08	10.6	10.7	0.08	2.69	2.77	—	12,554	12,554	0.62	0.59	42.6	12,788
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	6.88	6.27	5.87	43.7	0.11	0.08	10.6	10.7	0.08	2.69	2.77	—	11,775	11,775	0.65	0.61	1.10	11,974
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	6.88	6.27	5.87	43.7	0.11	0.08	10.6	10.7	0.08	2.69	2.77	—	11,775	11,775	0.65	0.61	1.10	11,974
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Medical Office Building	0.94	0.86	0.82	6.23	0.02	0.01	1.44	1.45	0.01	0.37	0.38	—	1,488	1,488	0.08	0.08	2.30	1,515
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	0.94	0.86	0.82	6.23	0.02	0.01	1.44	1.45	0.01	0.37	0.38	—	1,488	1,488	0.08	0.08	2.30	1,515

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	1,738	1,738	0.17	0.02	—	1,748
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	30.0	30.0	< 0.005	< 0.005	—	30.2
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,768	1,768	0.17	0.02	—	1,778
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	1,738	1,738	0.17	0.02	—	1,748

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	30.0	30.0	< 0.005	< 0.005	—	30.2
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,768	1,768	0.17	0.02	—	1,778
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	288	288	0.03	< 0.005	—	289
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	4.97	4.97	< 0.005	< 0.005	—	5.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	293	293	0.03	< 0.005	—	294

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.09	0.04	0.77	0.65	< 0.005	0.06	—	0.06	0.06	—	0.06	—	923	923	0.08	< 0.005	—	926
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	0.09	0.04	0.77	0.65	< 0.005	0.06	—	0.06	0.06	—	0.06	—	923	923	0.08	< 0.005	—	926

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.09	0.04	0.77	0.65	< 0.005	0.06	—	0.06	0.06	—	0.06	—	923	923	0.08	< 0.005	—	926
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	0.09	0.04	0.77	0.65	< 0.005	0.06	—	0.06	0.06	—	0.06	—	923	923	0.08	< 0.005	—	926
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.02	0.01	0.14	0.12	< 0.005	0.01	—	0.01	0.01	—	0.01	—	153	153	0.01	< 0.005	—	153
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	0.02	0.01	0.14	0.12	< 0.005	0.01	—	0.01	0.01	—	0.01	—	153	153	0.01	< 0.005	—	153

4.3. Area Emissions by Source

4.3.1. 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	2.26	2.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architect Coatings	0.14	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.81	0.75	0.04	4.57	< 0.005	0.01	—	0.01	0.01	—	0.01	—	18.8	18.8	< 0.005	< 0.005	—	18.8
Total	3.21	3.15	0.04	4.57	< 0.005	0.01	—	0.01	0.01	—	0.01	—	18.8	18.8	< 0.005	< 0.005	—	18.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	2.26	2.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.14	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	2.40	2.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.10	0.09	< 0.005	0.57	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.13	2.13	< 0.005	< 0.005	—	2.14
Total	0.54	0.53	< 0.005	0.57	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.13	2.13	< 0.005	< 0.005	—	2.14

4.4. Water Emissions by Land Use

4.4.1. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	25.2	86.6	112	2.60	0.06	—	195
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	—	—	—	—	—	—	—	—	—	—	—	25.2	86.6	112	2.60	0.06	—	195
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	25.2	86.6	112	2.60	0.06	—	195
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	—	—	—	—	—	—	—	—	—	—	—	25.2	86.6	112	2.60	0.06	—	195
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	4.18	14.3	18.5	0.43	0.01	—	32.3
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	—	—	—	—	—	—	—	—	—	—	—	4.18	14.3	18.5	0.43	0.01	—	32.3

4.5. Waste Emissions by Land Use

4.5.1. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	611	0.00	611	61.1	0.00	—	2,138
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	—	—	—	—	—	—	—	—	—	—	—	611	0.00	611	61.1	0.00	—	2,138
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	611	0.00	611	61.1	0.00	—	2,138
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	—	—	—	—	—	—	—	—	—	—	—	611	0.00	611	61.1	0.00	—	2,138

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	101	0.00	101	10.1	0.00	—	354
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	—	—	—	—	—	—	—	—	—	—	—	101	0.00	101	10.1	0.00	—	354

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Emergency Generator	0.72	0.66	1.83	1.67	< 0.005	0.10	0.00	0.10	0.10	0.00	0.10	0.00	336	336	0.01	< 0.005	0.00	337
Fire Pump	0.54	0.49	1.38	1.26	< 0.005	0.07	0.00	0.07	0.07	0.00	0.07	0.00	252	252	0.01	< 0.005	0.00	253
Total	1.26	1.15	3.21	2.93	0.01	0.17	0.00	0.17	0.17	0.00	0.17	0.00	588	588	0.02	< 0.005	0.00	590
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Emergency Generator	0.72	0.66	1.83	1.67	< 0.005	0.10	0.00	0.10	0.10	0.00	0.10	0.00	336	336	0.01	< 0.005	0.00	337
Fire Pump	0.54	0.49	1.38	1.26	< 0.005	0.07	0.00	0.07	0.07	0.00	0.07	0.00	252	252	0.01	< 0.005	0.00	253
Total	1.26	1.15	3.21	2.93	0.01	0.17	0.00	0.17	0.17	0.00	0.17	0.00	588	588	0.02	< 0.005	0.00	590
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Emergency Generator	0.02	0.02	0.05	0.04	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	7.62	7.62	< 0.005	< 0.005	0.00	7.64
Fire Pump	0.01	0.01	0.03	0.03	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	5.71	5.71	< 0.005	< 0.005	0.00	5.73
Total	0.03	0.03	0.08	0.07	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	13.3	13.3	< 0.005	< 0.005	0.00	13.4

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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Demolition	Demolition	4/1/2025	4/28/2025	5.00	20.0	—
Site Preparation	Site Preparation	4/29/2025	5/12/2025	5.00	10.0	—
Grading	Grading	5/13/2025	6/9/2025	5.00	20.0	—
Building Construction	Building Construction	6/10/2025	4/27/2026	5.00	230	—
Paving	Paving	3/31/2026	4/27/2026	5.00	20.0	—
Architectural Coating	Architectural Coating	3/31/2026	4/27/2026	5.00	20.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Crawler Tractors	Diesel	Average	4.00	8.00	87.0	0.43
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Crawler Tractors	Diesel	Average	3.00	8.00	87.0	0.43
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	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
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

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	18.5	LDA,LDT1,LDT2
Demolition	Vendor	1.00	10.2	HHDT,MHDT

Demolition	Hauling	74.0	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	0.00	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	1.00	10.2	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	33.6	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	14.0	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	6.72	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	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	0.00	0.00	157,500	52,500	8,207

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	5,917	—
Site Preparation	—	—	35.0	0.00	—
Grading	—	—	50.0	0.00	—
Paving	0.00	0.00	0.00	0.00	3.14

5.6.2. Construction Earthmoving Control Strategies

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

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Medical Office Building	0.00	0%

Parking Lot	0.83	100%
Other Asphalt Surfaces	2.31	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	349	0.03	< 0.005
2026	0.00	346	0.03	< 0.005

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
Medical Office Building	1,827	450	74.6	503,700	14,927	3,680	609	4,115,229
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

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)
0	0.00	157,500	52,500	8,207

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

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)
Medical Office Building	1,832,448	346	0.0330	0.0040	2,881,202
Parking Lot	31,672	346	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	346	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)
Medical Office Building	13,175,456	294,926
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)
Medical Office Building	1,134	—

Parking Lot	0.00	—
Other Asphalt Surfaces	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
Medical Office Building	Household refrigerators and/or freezers	User Defined	150	0.45	0.60	0.00	1.00
Medical Office Building	Other commercial A/C and heat pumps	User Defined	750	< 0.005	4.00	4.00	18.0

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
Emergency Generator	Diesel	1.00	1.00	50.0	400	0.73
Fire Pump	Diesel	1.00	1.00	50.0	300	0.73

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	27.0	annual days of extreme heat
Extreme Precipitation	2.45	annual days with precipitation above 20 mm

Sea Level Rise	—	meters of inundation depth
Wildfire	4.79	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 (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
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	3	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 Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	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	3	1	1	3

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 Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	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	99.1
AQ-PM	58.7
AQ-DPM	24.0
Drinking Water	93.3
Lead Risk Housing	5.03
Pesticides	72.7
Toxic Releases	50.8
Traffic	27.0
Effect Indicators	—

CleanUp Sites	53.4
Groundwater	49.8
Haz Waste Facilities/Generators	68.1
Impaired Water Bodies	12.5
Solid Waste	95.3
Sensitive Population	—
Asthma	40.0
Cardio-vascular	45.6
Low Birth Weights	60.1
Socioeconomic Factor Indicators	—
Education	25.5
Housing	23.8
Linguistic	39.8
Poverty	29.7
Unemployment	62.4

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	79.36609778
Employed	40.65186706
Median HI	72.88592326
Education	—
Bachelor's or higher	85.74361607
High school enrollment	100
Preschool enrollment	43.82137816
Transportation	—

Auto Access	67.17567047
Active commuting	29.83446683
Social	—
2-parent households	81.63736687
Voting	58.30873861
Neighborhood	—
Alcohol availability	93.27601694
Park access	34.62081355
Retail density	10.72757603
Supermarket access	44.48864365
Tree canopy	28.83356859
Housing	—
Homeownership	55.357372
Housing habitability	63.03092519
Low-inc homeowner severe housing cost burden	65.50750674
Low-inc renter severe housing cost burden	33.96638008
Uncrowded housing	88.2586937
Health Outcomes	—
Insured adults	86.30822533
Arthritis	83.7
Asthma ER Admissions	46.6
High Blood Pressure	89.1
Cancer (excluding skin)	49.7
Asthma	58.2
Coronary Heart Disease	83.6
Chronic Obstructive Pulmonary Disease	81.8
Diagnosed Diabetes	92.6
Life Expectancy at Birth	56.4

Cognitively Disabled	19.2
Physically Disabled	13.2
Heart Attack ER Admissions	43.1
Mental Health Not Good	72.2
Chronic Kidney Disease	93.4
Obesity	70.2
Pedestrian Injuries	49.9
Physical Health Not Good	84.3
Stroke	91.3
Health Risk Behaviors	—
Binge Drinking	5.9
Current Smoker	77.7
No Leisure Time for Physical Activity	91.6
Climate Change Exposures	—
Wildfire Risk	26.4
SLR Inundation Area	0.0
Children	78.7
Elderly	8.1
English Speaking	43.5
Foreign-born	61.1
Outdoor Workers	82.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	79.8
Traffic Density	22.6
Traffic Access	23.0
Other Indices	—
Hardship	23.4
Other Decision Support	—

2016 Voting	70.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	57.0
Healthy Places Index Score for Project Location (b)	69.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
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	Based on site plan Total Project site is 3.62 acres.
Construction: Construction Phases	Building Construction, Paving, and Architectural Coating overlap to present a conservative analysis
Construction: Off-Road Equipment	T/L/B replaced with Crawler Tractor to accurately calculate disturbance for Site Preparation and Grading phases. Standard 8 hours work days.
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Demolition, Site Preparation, Grading, and Building Construction

Construction: Architectural Coatings	SCAQMD Rule 1113
Operations: Vehicle Data	Per client data, since 50% of trips will not be new, trip rate will be reduced by 50%. Trip length taken from VMT analysis.
Operations: Architectural Coatings	SCAQMD Rule 1113
Operations: Refrigerants	As of 1 January 2022, new commercial refrigeration equipment may not use refrigerants with a GWP of 150 or greater. Further, R-404A (the CalEEMod default) is unacceptable for new supermarket and cold storage systems as of 1 January 2019 and 2023, respectively. Beginning 1 January 2025, all new air conditioning equipment may not use refrigerants with a GWP of 750 or greater.

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APPENDIX 3.2:

SCAQMD AMICUS BRIEF

S219783

IN THE SUPREME COURT OF C ALIFORNIA

SIERRA CLUB, REVIVE THE SAN JOAQUIN, and
LEAGUE OF WOMEN VOTERS OF FRESNO,

Plaintiffs and Appellants,

v.

COUNTY OF FRESNO,

Defendant and Respondent,

and,

FRIANT RANCH, L.P.,

Real Party in Interest and Respondent.

After a Published Decision by the Court of Appeal, filed May 27, 2014
Fifth Appellate District Case No. F066798

Appeal from the Superior Court of California, County of Fresno
Case No. 11CECG00726
Honorable Rosendo A. Pena, Jr.

APPLICATION OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT FOR LEAVE TO FILE BRIEF OF *AMICUS CURIAE* IN SUPPORT OF NEITHER PARTY AND *[PROPOSED]* BRIEF OF *AMICUS CURIAE*

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TO THE HONORABLE CHIEF JUSTICE AND JUSTICES OF THE SUPREME COURT:

APPLICATION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF

Pursuant to Rule 8.520(f) of the California Rules of Court, the South Coast Air Quality Management District (SCAQMD) respectfully requests leave to file the attached *amicus curiae* brief. Because SCAQMD's position differs from that of either party, we request leave to submit this amicus brief in support of neither party.

HOW THIS BRIEF WILL ASSIST THE COURT

SCAQMD's proposed amicus brief takes a position on two of the issues in this case. In both instances, its position differs from that of either party. The issues are:

1) Does the California Environmental Quality Act (CEQA) require an environmental impact report (EIR) to correlate a project's air pollution emissions with specific levels of health impacts?
2) What is the proper standard of review for determining whether an EIR provides sufficient information on the health impacts caused by a project's emission of air pollutants?

This brief will assist the Court by discussing the practical realities of correlating identified air quality impacts with specific health outcomes. In short, CEQA requires agencies to provide detailed information about a project's air quality impacts that is sufficient for the public and decisionmakers to adequately evaluate the project and meaningfully understand its impacts. However, the level of analysis is governed by a rule of reason; CEQA only requires agencies to conduct analysis if it is reasonably feasible to do so.

With regard to health-related air quality impacts, an analysis that correlates a project's air pollution emissions with specific levels of health impacts will be feasible in some cases but not others. Whether it is feasible depends on a variety of factors, including the nature of the project and the nature of the analysis under consideration. The feasibility of analysis may also change over time as air districts and others develop new tools for measuring projects' air quality related health impacts. Because SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, it is uniquely situated to express an opinion on the extent to which the Court should hold that CEQA requires lead agencies to correlate air quality impacts with specific health outcomes.

SCAQMD can also offer a unique perspective on the question of the appropriate standard of review. SCAQMD submits that the proper standard of review for determining whether an EIR is sufficient as an informational document is more nuanced than argued by either party. In our view, this is a mixed question of fact and law. It includes determining whether additional analysis is feasible, which is primarily a factual question that should be reviewed under the substantial evidence standard. However, it also involves determining whether the omission of a particular analysis renders an EIR insufficient to serve CEQA's purpose as a meaningful, informational document. If a lead agency has not determined that a requested analysis is infeasible, it is the court's role to determine whether the EIR nevertheless meets CEQA's purposes, and courts should not defer to the lead agency's conclusions regarding the legal sufficiency of an EIR's analysis. The ultimate question of whether an EIR's analysis is "sufficient" to serve CEQA's informational purposes is predominately a question of law that courts should review de novo.

This brief will explain the rationale for these arguments and may assist the Court in reaching a conclusion that accords proper respect to a lead agency's factual conclusions while maintaining judicial authority over the ultimate question of what level of analysis CEQA requires.

STATEMENT OF INTEREST OF *AMICUS CURIAE*

The SCAQMD is the regional agency primarily responsible for air pollution control in the South Coast Air Basin, which consists of all of Orange County and the non-desert portions of the Los Angeles, Riverside, and San Bernardino Counties. (Health & Saf. Code § 40410; Cal. Code Regs., tit. 17, § 60104.) The SCAQMD participates in the CEQA process in several ways. Sometimes it acts as a lead agency that prepares CEQA documents for projects. Other times it acts as a responsible agency when it has permit authority over some part of a project that is undergoing CEQA review by a different lead agency. Finally, SCAQMD also acts as a commenting agency for CEQA documents that it receives because it is a public agency with jurisdiction by law over natural resources affected by the project.

In all of these capacities, SCAQMD will be affected by the decision in this case. SCAQMD sometimes submits comments requesting that a lead agency perform an additional type of air quality or health impacts analysis. On the other hand, SCAQMD sometimes determines that a particular type of health impact analysis is not feasible or would not produce reliable and informative results. Thus, SCAQMD will be affected by the Court's resolution of the extent to which CEQA requires EIRs to correlate emissions and health impacts, and its resolution of the proper standard of review.

CERTIFICATION REGARDING AUTHORSHIP AND FUNDING

No party or counsel in the pending case authored the proposed amicus curiae brief in whole or in part, or made any monetary contribution intended to fund the preparation or submission of the brief. No person or entity other than the proposed *Amicus Curiae* made any monetary contribution intended to fund the preparation or submission of the brief.

Respectfully submitted,

DATED: April 3, 2015

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BRIEF OF AMICUS CURIAE

SUMMARY OF ARGUMENT

The South Coast Air Quality Management District (SCAQMD) submits that this Court should not try to establish a hard-and-fast rule concerning whether lead agencies are required to correlate emissions of air pollutants with specific health consequences in their environmental impact reports (EIR). The level of detail required in EIRs is governed by a few, core CEQA (California Environmental Quality Act) principles. As this Court has stated, "[a]n EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." (*Laurel Heights Improvement Assn. v. Regents of the Univ of Cal.* (1988) 47 Cal.3d 376, 405 ["*Laurel Heights I*"]) Accordingly, "an agency must use its best efforts to find out and disclose all that it reasonably can." (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 428 (quoting CEQA Guidelines § 15144)[1].). However, "[a]nalysis of environmental effects need not be exhaustive, but will be judged in light of what is reasonably feasible." (*Association of Irritated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1390; CEQA Guidelines §§ 15151, 15204(a).)

With regard to analysis of air quality related health impacts, EIRs must generally quantify a project's pollutant emissions, but in some cases it is not feasible to correlate these emissions to specific, quantifiable health impacts (e.g., premature mortality; hospital admissions). In such cases, a general description of the adverse health impacts resulting from the pollutants at issue may be sufficient. In other cases, due to the magnitude

[1] The CEQA Guidelines are found at Cal. Code Regs., tit. 14 §§ 15000, *et seq*.

or nature of the pollution emissions, as well as the specificity of the project involved, it may be feasible to quantify health impacts. Or there may be a less exacting, but still meaningful analysis of health impacts that can feasibly be performed. In these instances, agencies should disclose those impacts.

SCAQMD also submits that whether or not an EIR complies with CEQA's informational mandates by providing sufficient, feasible analysis is a mixed question of fact and law. Pertinent here, the question of whether an EIR's discussion of health impacts from air pollution is sufficient to allow the public to understand and consider meaningfully the issues involves two inquiries: (1) Is it feasible to provide the information or analysis that a commenter is requesting or a petitioner is arguing should be required?; and (2) Even if it is feasible, is the agency relying on other policy or legal considerations to justify not preparing the requested analysis? The first question of whether an analysis is feasible is primarily a question of fact that should be judged by the substantial evidence standard. The second inquiry involves evaluating CEQA's information disclosure purposes against the asserted reasons to not perform the requested analysis. For example, an agency might believe that its EIR meets CEQA's informational disclosure standards even without a particular analysis, and therefore choose not to conduct that analysis. SCAQMD submits that this is more of a legal question, which should be reviewed de novo as a question of law.

ARGUMENT

I. RELEVANT FACTUAL AND LEGAL FRAMEWORK.

A. Air Quality Regulatory Background

The South Coast Air Quality Management District (SCAQMD) is one of the local and regional air pollution control districts and air quality management districts in California. The SCAQMD is the regional air pollution agency for the South Coast Air Basin, which consists of all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. (Health & Saf. Code § 40410, 17 Cal. Code Reg. § 60104.) The SCAQMD also includes the Coachella Valley in Riverside County (Palm Springs area to the Salton Sea). (SCAQMD, *Final 2012 AQMP (Feb. 2013)*, http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan; then follow "chapter 7" hyperlink; pp 7-1, 7-3 (last visited Apr. 1, 2015).) The SCAQMD's jurisdiction includes over 16 million residents and has the worst or nearly the worst air pollution levels in the country for ozone and fine particulate matter. (SCAQMD, *Final 2012 AQMP (Feb. 2013)*, http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan; then follow "Executive Summary" hyperlink p. ES-1 (last visited Apr. 1, 2015).)

Under California law, the local and regional districts are primarily responsible for controlling air pollution from all sources except motor vehicles. (Health & Saf. Code § 40000.) The California Air Resources Board (CARB), part of the California Environmental Protection Agency, is primarily responsible for controlling pollution from motor vehicles. (*Id.*) The air districts must adopt rules to achieve and maintain the state and federal ambient air quality standards within their jurisdictions. (Health & Saf. Code § 40001.)

The federal Clean Air Act (CAA) requires the United States Environmental Protection Agency (EPA) to identify pollutants that are widely distributed and pose a threat to human health, developing a so-called "criteria" document. (42 U.S.C. § 7408; CAA § 108.) These pollutants are frequently called "criteria pollutants." EPA must then establish "national ambient air quality standards" at levels "requisite to protect public health", allowing "an adequate margin of safety." (42 U.S.C. § 7409; CAA § 109.) EPA has set standards for six identified pollutants: ozone, nitrogen dioxide, sulfur dioxide, carbon monoxide, particulate matter (PM), and lead. (U.S. EPA, National Ambient Air Quality Standards (NAAQS), http://www.epa.gov/air/criteria.html (last updated Oct. 21, 2014).)[2]

Under the Clean Air Act, EPA sets emission standards for motor vehicles and "nonroad engines" (mobile farm and construction equipment, marine vessels, locomotives, aircraft, etc.). (42 U.S.C. §§ 7521, 7547; CAA §§ 202, 213.) California is the only state allowed to establish emission standards for motor vehicles and most nonroad sources; however, it may only do so with EPA's approval. (42 U.S.C. §§ 7543(b), 7543(e); CAA §§ 209(b), 209(c).) Sources such as manufacturing facilities, power plants and refineries that are not mobile are often referred to as "stationary sources." The Clean Air Act charges state and local agencies with the primary responsibility to attain the national ambient air quality standards. (42 U.S.C. § 7401(a)(3); CAA § 101(a)(3).) Each state must adopt and implement a plan including enforceable measures to achieve and maintain the national ambient air quality standards. (42 U.S.C. § 7410; CAA § 110.) The SCAQMD and CARB jointly prepare portion of the plan for the South Coast Air Basin and submit it for approval by EPA. (Health & Saf. Code §§ 40460, et seq.)

The Clean Air Act also requires state and local agencies to adopt a permit program requiring, among other things, that new or modified "major" stationary sources use technology to achieve the "lowest achievable emission rate," and to control minor stationary sources as

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[2] Particulate matter (PM) is further divided into two categories: fine particulate or $PM_{2.5}$ (particles with a diameter of less than or equal to 2.5 microns) and coarse particulate (PM_{10}) (particles with a diameter of 10 microns or less). (U.S. EPA, Particulate Matter (PM), http://www.epa.gov/airquality/particlepollution/ (last visited Apr. 1, 2015).)

needed to help attain the standards. (42 U.S.C. §§ 7502(c)(5), 7503(a)(2), 7410(a)(2)(C); CAA §§ 172(c)(5), 173(a)(2), 110(a)(2)(C).) The air districts implement these permit programs in California. (Health & Saf. Code §§ 42300, et seq.)

The Clean Air Act also sets out a regulatory structure for over 100 so-called "hazardous air pollutants" calling for EPA to establish "maximum achievable control technology" (MACT) for sources of these pollutants. (42 U.S.C. § 7412(d)(2); CAA § 112(d)(2).) California refers to these pollutants as "toxic air contaminants" (TACs) which are subject to two state-required programs. The first program requires "air toxics control measures" for specific categories of sources. (Health & Saf. Code § 39666.) The other program requires larger stationary sources and sources identified by air districts to prepare "health risk assessments" for impacts of toxic air contaminants. (Health & Saf. Code §§ 44320(b), 44322, 44360.) If the health risk exceeds levels identified by the district as "significant," the facility must implement a "risk reduction plan" to bring its risk levels below "significant" levels. Air districts may adopt additional more stringent requirements than those required by state law, including requirements for toxic air contaminants. (Health & Saf. Code § 41508; *Western Oil & Gas Assn. v. Monterey Bay Unified APCD* (1989) 49 Cal.3d 408, 414.) For example, SCAQMD has adopted a rule requiring new or modified sources to keep their risks below specified levels and use best available control technology (BACT) for toxics. (SCAQMD, *Rule 1401-New Source Review of Toxic Air Contaminants*, http://www.aqmd.gov/home/regulations/rules/scaqmd-rule-book/regulation-xiv; then follow "Rule 1401" hyperlink (last visited Apr. 1, 2015).)

B. The SCAQMD's Role Under CEQA

The California Environmental Quality Act (CEQA) requires public agencies to perform an environmental review and appropriate analysis for projects that they implement or approve. (Pub. Resources Code § 21080(a).) The agency with primary approval authority for a particular project is generally the "lead agency" that prepares the appropriate CEQA document. (CEQA Guidelines §§ 15050, 15051.) Other agencies having a subsequent approval authority over all or part of a project are called "responsible" agencies that must determine whether the CEQA document is adequate for their use. (CEQA Guidelines §§ 15096(c), 15381.) Lead agencies must also consult with and circulate their environmental impact reports to "trustee agencies" and agencies "with jurisdiction by law" including "authority over resources which may be affected by the project." (Pub. Resources Code §§ 21104(a), 21153; CEQA Guidelines §§ 15086(a)(3), 15073(c).) The SCAQMD has a role in all these aspects of CEQA.

Fulfilling its responsibilities to implement its air quality plan and adopt rules to attain the national ambient air quality standards, SCAQMD adopts a dozen or more rules each year to require pollution reductions from a wide variety of sources. The SCAQMD staff evaluates each rule for any adverse environmental impact and prepares the appropriate CEQA document. Although most rules reduce air emissions, they may have secondary environmental impacts such as use of water or energy or disposal of waste—e.g., spent catalyst from control equipment.[3]

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[3] The SCAQMD's CEQA program for its rules is a "Certified Regulatory Program" under which it prepares a "functionally equivalent" document in lieu of a negative declaration or EIR. (Pub. Resources Code § 21080.5, CEQA Guidelines § 15251(l).)

The SCAQMD also approves a large number of permits every year to construct new, modified, or replacement facilities that emit regulated air pollutants. The majority of these air pollutant sources have already been included in an earlier CEQA evaluation for a larger project, are currently being evaluated by a local government as lead agency, or qualify for an exemption. However, the SCAQMD sometimes acts as lead agency for major projects where the local government does not have a discretionary approval. In such cases, SCAQMD prepares and certifies a negative declaration or environmental impact report (EIR) as appropriate.[4] SCAQMD evaluates perhaps a dozen such permit projects under CEQA each year. SCAQMD is often also a "responsible agency" for many projects since it must issue a permit for part of the projects (e.g., a boiler used to provide heat in a commercial building). For permit projects evaluated by another lead agency under CEQA, SCAQMD has the right to determine that the CEQA document is inadequate for its purposes as a responsible agency, but it may not do so because its permit program already requires all permitted sources to use the best available air pollution control technology. (SCAQMD, *Rule 1303(a)(1) – Requirements*, http://www.aqmd.gov/home/regulations/rules/scaqmd-rule-book/regulation-xiii; then follow "Rule 1303" hyperlink (last visited Apr. 1, 2015).)

Finally, SCAQMD receives as many as 60 or more CEQA documents each month (around 500 per year) in its role as commenting agency or an agency with "jurisdiction by law" over air quality—a natural resource affected by the project. (Pub. Resources Code §§ 21104(a), 21153; CEQA Guidelines § 15366(a)(3).) The SCAQMD staff provides comments on as many as 25 or 30 such documents each month.

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[4] The SCAQMD's permit projects are not included in its Certified Regulatory Program, and are evaluated under the traditional local government CEQA analysis. (Pub. Resources Code §§ 21150-21154.)

(SCAQMD Governing Board Agenda, Apr. 3, 2015, Agenda Item 16, Attachment A, http://www.aqmd.gov/home/library/meeting-agendas-minutes/agenda?title=governing-board-meeting-agenda-april-3-2015; then follow "16. Lead Agency Projects and Environmental Documents Received by SCAQMD" hyperlink (last visited Apr. 1, 2015).) Of course, SCAQMD focuses its commenting efforts on the more significant projects.

Typically, SCAQMD comments on the adequacy of air quality analysis, appropriateness of assumptions and methodology, and completeness of the recommended air quality mitigation measures. Staff may comment on the need to prepare a health risk assessment detailing the projected cancer and noncancer risks from toxic air contaminants resulting from the project, particularly the impacts of diesel particulate matter, which CARB has identified as a toxic air contaminant based on its carcinogenic effects. (California Air Resources Board, Resolution 98-35, Aug. 27, 1998, http://www.arb.ca.gov/regact/diesltac/diesltac.htm; then follow Resolution 98-35 hyperlink (last visited Apr. 1, 2015).) Because SCAQMD already requires new or modified stationary sources of toxic air contaminants to use the best available control technology for toxics and to keep their risks below specified levels, (SCAQMD Rule 1401, supra, note 15), the greatest opportunity to further mitigate toxic impacts through the CEQA process is by reducing emissions—particularly diesel emissions—from vehicles.

II. THIS COURT SHOULD NOT SET A HARD-AND-FAST RULE CONCERNING THE EXTENT TO WHICH AN EIR MUST CORRELATE A PROJECT'S EMISSION OF POLLUTANTS WITH RESULTING HEALTH IMPACTS.

Numerous cases hold that courts do not review the correctness of an EIR's conclusions but rather its sufficiency as an informative document. (*Laurel Heights 1*, *supra*, 47 Cal.3d at p. 392; *Citizens of Goleta Valley v.*

Bd. of Supervisors (1990) 52 Cal.3d 553, 569; *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1197.)

As stated by the Court of Appeal in this case, where an EIR has addressed a topic, but the petitioner claims that the information provided about that topic is insufficient, courts must "draw[] a line that divides *sufficient* discussions from those that are *insufficient*." (*Sierra Club v. County of Fresno* (2014) 226 Cal.App.4th 704 (superseded by grant of review) 172 Cal.Rptr.3d 271, 290.) The Court of Appeal readily admitted that "[t]he terms themselves – sufficient and insufficient – provide little, if any, guidance as to where the line should be drawn. They are simply labels applied once the court has completed its analysis." (*Id.*)

The CEQA Guidelines, however, provide guidance regarding what constitutes a sufficient discussion of impacts. Section 15151 states that "the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible." Case law reflects this: "Analysis of environmental effects need not be exhaustive, but will be judged in light of what was reasonably feasible." (*Association of Irritated Residents v. County of Madera, supra,* 107 Cal.App.4th at p. 1390; see also CEQA Guidelines § 15204(a).)

Applying this test, this Court cannot realistically establish a hard-and-fast rule that an analysis correlating air pollution impacts of a project to quantified resulting health impacts is always required, or indeed that it is never required. Simply put, in some cases such an analysis will be "feasible"; in some cases it will not.

For example, air pollution control districts often require a proposed new source of toxic air contaminants to prepare a "health risk assessment" before issuing a permit to construct. District rules often limit the allowable cancer risk the new source may cause to the "maximally exposed individual" (worker and residence exposures). (*See, e.g.*, SCAQMD Rule 1401(c)(8); 1401(d)(1), *supra* note 15.) In order to perform this analysis, it is necessary to have data regarding the sources and types of air toxic contaminants, location of emission points, velocity of emissions, the meteorology and topography of the area, and the location of receptors (worker and residence). (SCAQMD, *Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics "Hot Spots" Information and Assessment Act (AB2588), pp. 11-16*; (last visited Apr. 1, 2015) http://www.aqmd.gov/home/library/documents-support-material; "Guidelines" hyperlink; AB2588; then follow AB2588 Risk Assessment Guidelines hyperlink.)

Thus, it is feasible to determine the health risk posed by a new gas station locating at an intersection in a mixed use area, where receptor locations are known. On the other hand, it may not be feasible to perform a health risk assessment for airborne toxics that will be emitted by a generic industrial building that was built on "speculation" (i.e., without knowing the future tenant(s)). Even where a health risk assessment can be prepared, however, the resulting maximum health risk value is only a calculation of risk—it does not necessarily mean anyone will contract cancer as a result of the project.

In order to find the "cancer burden" or expected additional cases of cancer resulting from the project, it is also necessary to know the numbers and location of individuals living within the "zone of impact" of the project: i.e., those living in areas where the projected cancer risk from the project exceeds one in a million. (SCAQMD, Health Risk Assessment Summary form, http://www.aqmd.gov/home/forms ; filter by "AB2588" category; then "Health Risk Assessment" hyperlink (last visited Apr. 1, 2015).) The affected population is divided into bands of those exposed to at least 1 in a million risk, those exposed to at least 10 in a million risk, etc. up to those exposed at the highest levels. (*Id.*) This data allows agencies to calculate an approximate number of additional cancer cases expected from the project. However, it is not possible to predict which particular individuals will be affected.

For the so-called criteria pollutants[5], such as ozone, it may be more difficult to quantify health impacts. Ozone is formed in the atmosphere from the chemical reaction of the nitrogen oxides (NO_x) and volatile organic compounds (VOC) in the presence of sunlight. (U.S. EPA, Ground Level Ozone, http://www.epa.gov/airquality/ozonepollution/ (last updated Mar. 25, 2015).) It takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources. (U.S. EPA, *Guideline on Ozone Monitoring Site Selection* (Aug. 1998) EPA-454/R-98-002 § 5.1.2, http://www.epa.gov/ttnamti1/archive/cpreldoc.html (last visited Apr. 1, 2015).) NO_x and VOC are known as "precursors" of ozone.

Scientifically, health effects from ozone are correlated with increases in the ambient level of ozone in the air a person breathes. (U.S. EPA, *Health Effects of Ozone in the General Population,* Figure 9, http://www.epa.gov/apti/ozonehealth/population.html#levels (last visited Apr. 1, 2015).) However, it takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels over an entire region. For example, the SCAQMD's 2012 AQMP showed that reducing NO_x by 432 tons per day (157,680 tons/year) and reducing VOC by 187 tons per day (68,255 tons/year) would reduce ozone levels at the SCAQMD's monitor site with the highest levels by only 9 parts per billion. (South Coast Air Quality Management District, *Final 2012 AQMP (February 2013)*, http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan; then follow "Appendix V: Modeling & Attainment Demonstrations" hyperlink,

[5] See discussion of types of pollutants, supra, Part I.A.

pp. v-4-2, v-7-4, v-7-24.) SCAQMD staff does not currently know of a way to accurately quantify ozone-related health impacts caused by NO_x or VOC emissions from relatively small projects.

On the other hand, this type of analysis may be feasible for projects on a regional scale with very high emissions of NO_x and VOCs, where impacts are regional. For example, in 2011 the SCAQMD performed a health impact analysis in its CEQA document for proposed Rule 1315, which authorized various newly-permitted sources to use offsets from the districts "internal bank" of emission reductions. This CEQA analysis accounted for essentially *all* the increases in emissions due to new or modified sources in the District between 2010 and 2030.[6] The SCAQMD was able to correlate this very large emissions increase (e.g., 6,620 pounds per day NO_x (1,208 tons per year), 89,180 pounds per day VOC (16,275 tons per year)) to expected health outcomes from ozone and particulate matter (e.g., 20 premature deaths per year and 89,947 school absences in the year 2030 due to ozone).[7] (SCAQMD Governing Board Agenda, February 4, 2011, Agenda Item 26, *Assessment for: Re-adoption of Proposed Rule 1315 – Federal New Source Review Tracking System* (see hyperlink in fn 6*)* at p. 4.1-35, Table 4.1-29.)

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[6] (SCAQMD Governing Board Agenda, February 4, 2011, Agenda Item 26, Attachment G, *Assessment for: Re-adoption of Proposed Rule 1315 – Federal New Source Review Tracking System, Vol. 1, p.4.0-6,* http://www.aqmd.gov/home/library/meeting-agendas-minutes/agenda?title=governing-board-meeting-agenda-february-4-2011; the follow "26. Adopt Proposed Rule 1315 – Federal New Source Review Tracking System" (last visited April 1, 2015).)

[7] The SCAQMD was able to establish the location of future NO_x and VOC emissions by assuming that new projects would be built in the same locations and proportions as existing stationary sources. This CEQA document was upheld by the Los Angeles County Superior Court in *Natural Res. Def. Council v SCAQMD*, Los Angeles Superior Court No. BS110792).

However, a project emitting only 10 tons per year of NO_x or VOC is small enough that its regional impact on ambient ozone levels may not be detected in the regional air quality models that are currently used to determine ozone levels. Thus, in this case it would not be feasible to directly correlate project emissions of VOC or NO_x with specific health impacts from ozone. This is in part because ozone formation is not linearly related to emissions. Ozone impacts vary depending on the location of the emissions, the location of other precursor emissions, meteorology and seasonal impacts, and because ozone is formed some time later and downwind from the actual emission. (EPA Guideline on Ozone Monitoring Site Selection (Aug. 1998) EPA-454/R-98-002, § 5.1.2; https://www.epa.gov/ttnamti1/archive/cpreldoc.html; then search "Guideline on Ozone Monitoring Site Selection" click on pdf) (last viewed Apr. 1, 2015).)

SCAQMD has set its CEQA "significance" threshold for NO_x and VOC at 10 tons per year (expressed as 55 lb/day). (SCAQMD, *Air Quality Analysis Handbook*, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook; then follow "SCAQMD Air Quality Significance Thresholds" hyperlink (last visited Apr. 1, 2015).) This is because the federal Clean Air Act defines a "major" stationary source for "extreme" ozone nonattainment areas such as SCAQMD as one emitting 10 tons/year. (42 U.S.C. §§ 7511a(e), 7511a(f); CAA §§ 182(e), 182(f).) Under the Clean Air Act, such sources are subject to enhanced control requirements (42 U.S.C. §§ 7502(c)(5), 7503; CAA §§ 172(c)(5), 173), so SCAQMD decided this was an appropriate threshold for making a CEQA "significance" finding and requiring feasible mitigation. Essentially, SCAQMD takes the position that a source that emits 10 tons/year of NO_x or VOC would contribute cumulatively to ozone formation. Therefore, lead agencies that use SCAQMD's thresholds of significance may determine that many projects have "significant" air quality impacts and must apply all feasible mitigation measures, yet will not be able to precisely correlate the project to quantifiable health impacts, unless the emissions are sufficiently high to use a regional modeling program.

In the case of particulate matter ($PM_{2.5}$)[8], another "criteria" pollutant, SCAQMD staff is aware of two possible methods of analysis. SCAQMD used regional modeling to predict expected health impacts from its proposed Rule 1315, as mentioned above. Also, the California Air Resources Board (CARB) has developed a methodology that can predict expected mortality (premature deaths) from large amounts of $PM_{2.5}$. (California Air Resources Board, *Health Impacts Analysis: PM Premature Death Relationship*, http://www.arb.ca.gov/research/health/pm-mort/pm-mort_arch.htm (last reviewed Jan. 19, 2012).) SCAQMD used the CARB methodology to predict impacts from three very large power plants (e.g., 731-1837 lbs/day). (Final Environmental Assessment for Rule 1315, *supra*, pp 4.0-12, 4.1-13, 4.1-37 (e.g., 125 premature deaths in the entire SCAQMD in 2030), 4.1-39 (0.05 to 1.77 annual premature deaths from power plants.) Again, this project involved large amounts of additional $PM_{2.5}$ in the District, up to 2.82 tons/day (5,650 lbs/day of $PM_{2.5}$, or, or 1029 tons/year. (*Id.* at table 4.1-4, p. 4.1-10.)

However, the primary author of the CARB methodology has reported that this $PM_{2.5}$ health impact methodology is not suited for small projects and may yield unreliable results due to various uncertainties.[9] (SCAQMD, *Final Subsequent Mitigated Negative Declaration for: Warren*

[8] SCAQMD has not attained the latest annual or 24-hour national ambient air quality standards for "$PM_{2.5}$" or particulate matter less than 2.5 microns in diameter.

[9] Among these uncertainties are the representativeness of the population used in the methodology, and the specific source of PM and the corresponding health impacts. (*Id.* at p. 2-24.)

E&P, Inc. WTU Central Facility, New Equipment Project (certified July 19, 2011), http://www.aqmd.gov/home/library/documents-support-material/lead-agency-permit-projects/permit-project-documents---year-2011; then follow "Final Subsequent Mitigated Negative Declaration for Warren E&P Inc. WTU Central Facility, New Equipment Project" hyperlink, pp. 2-22, 2-23 (last visited Apr. 1, 2015).) Therefore, when SCAQMD prepared a CEQA document for the expansion of an existing oil production facility, with very small $PM_{2.5}$ increases (3.8 lb/day) and a very small affected population, staff elected not to use the CARB methodology for using estimated $PM_{2.5}$ emissions to derive a projected premature mortality number and explained why it would be inappropriate to do so. (*Id.* at pp 2-22 to 2-24.) SCAQMD staff concluded that use of this methodology for such a small source could result in unreliable findings and would not provide meaningful information. (*Id.* at pp. 2-23, 2-25.) This CEQA document was not challenged in court.

In the above case, while it may have been technically possible to plug the data into the methodology, the results would not have been reliable or meaningful. SCAQMD believes that an agency should not be required to perform analyses that do not produce reliable or meaningful results. This Court has already held that an agency may decline to use even the "normal" "existing conditions" CEQA baseline where to do so would be misleading or without informational value. (*Neighbors for Smart Rail v. Exposition Metro Line* (2013) 57 Cal.4th 439, 448, 457.) The same should be true for a decision that a particular study or analysis would not provide reliable or meaningful results.[10]

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[10] Whether a particular study would result in "informational value" is a part of deciding whether it is "feasible." CEQA defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and

Therefore, it is not possible to set a hard-and-fast rule on whether a correlation of air quality impacts with specific quantifiable health impacts is required in all cases. Instead, the result turns on whether such an analysis is reasonably feasible in the particular case.[11] Moreover, what is reasonably feasible may change over time as scientists and regulatory agencies continually seek to improve their ability to predict health impacts. For example, CARB staff has been directed by its Governing Board to reassess and improve the methodology for estimating premature deaths. (California Air Resources Board, *Health Impacts Analysis: PM Mortality Relationship*, http://www.arb.ca.gov/research/health/pm-mort/pm-mort.htm (last reviewed Dec. 29, 2010).) This factor also counsels against setting any hard-and-fast rule in this case.

III. THE QUESTION OF WHETHER AN EIR CONTAINS SUFFICIENT ANALYSIS TO MEET CEQA'S REQUIREMENTS IS A MIXED QUESTION OF FACT AND LAW GOVERNED BY TWO DIFFERENT STANDARDS OF REVIEW.

A. Standard of Review for Feasibility Determination and Sufficiency as an Informative Document

A second issue in this case is whether courts should review an EIR's informational sufficiency under the "substantial evidence" test as argued by Friant Ranch or the "independent judgment" test as argued by Sierra Club.

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technological factors." (Pub. Resources Code § 21061.1.) A study cannot be "accomplished in a *successful* manner" if it produces unreliable or misleading results.

[11] In this case, the lead agency did not have an opportunity to determine whether the requested analysis was feasible because the comment was non-specific. Therefore, SCAQMD suggests that this Court, after resolving the legal issues in the case, direct the Court of Appeal to remand the case to the lead agency for a determination of whether the requested analysis is feasible. Because Fresno County, the lead agency, did not seek review in this Court, it seems likely that the County has concluded that at least some level of correlation of air pollution with health impacts is feasible.

As this Court has explained, "a reviewing court must adjust its scrutiny to the nature of the alleged defect, depending on whether the claim is predominantly one of improper procedure or a dispute over the facts." (*Vineyard Area Citizens v. City of Rancho Cordova, supra,* 40 Cal.4th at 435.) For questions regarding compliance with proper procedure or other legal questions, courts review an agency's action de novo under the "independent judgment" test. (*Id.*) On the other hand, courts review factual disputes only for substantial evidence, thereby "accord[ing] greater deference to the agency's substantive factual conclusions." (*Id.*)

Here, Friant Ranch and Sierra Club agree that the case involves the question of whether an EIR includes sufficient information regarding a project's impacts. However, they disagree on the proper standard of review for answering this question: Sierra Club contends that courts use the independent judgment standard to determine whether an EIR's analysis is sufficient to meet CEQA's informational purposes,[12] while Friant Ranch contends that the substantial evidence standard applies to this question.

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[12] Sierra Club acknowledges that courts use the substantial evidence standard when reviewing predicate factual issues, but argues that courts ultimately decide as a matter of law what CEQA requires. (Answering Brief, pp. 14, 23.)

SCAQMD submits that the issue is more nuanced than either party contends. We submit that, whether a CEQA document includes sufficient analysis to satisfy CEQA's informational mandates is a mixed question of fact and law,[13] containing two levels of inquiry that should be judged by different standards.[14]

The state CEQA Guidelines set forth standards for the adequacy of environmental analysis. Guidelines Section 15151 states:

> An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good-faith effort at full disclosure.

In this case, the basic question is whether the underlying analysis of air quality impacts made the EIR "sufficient" as an informative document. However, whether the EIR's analysis was sufficient is judged in light of what was reasonably feasible. This represents a mixed question of fact and law that is governed by two different standards of review.

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[13] Friant Ranch actually states that the claim that an EIR lacks sufficient relevant information is, "most properly thought of as raising mixed questions of fact and law." (Opening Brief, p. 27.) However, the remainder of its argument claims that the court should apply the substantial evidence standard of review to all aspects of the issue.

[14] Mixed questions of fact and law issues may implicate predominantly factual subordinate questions that are reviewed under the substantial evidence test even though the ultimate question may be reviewed by the independent judgment test. *Crocker National Bank v. City and County of San Francisco* (1989) 49 Cal.3d 881, 888-889.

SCAQMD submits that an EIR's sufficiency as an informational document is ultimately a legal question that courts should determine using their independent judgment. This Court's language in *Laurel Heights I* supports this position. As this Court explained: "The court does not pass upon the correctness of the EIR's environmental conclusions, but only upon its *sufficiency as an informative document*." (*Laurel Heights I, supra,* 47 Cal.3d at 392-393) (emphasis added.) As described above, the Court in *Vineyard Area Citizens v. City of Rancho Cordova, supra,* 40 Cal.4th at 431, also used its independent judgment to determine what level of analysis CEQA requires for water supply impacts. The Court did not defer to the lead agency's opinion regarding the law's requirements; rather, it determined for itself what level of analysis was necessary to meet "[t]he law's informational demands." (*Id.* at p. 432.) Further, existing case law also holds that where an agency fails to comply with CEQA's information disclosure requirements, the agency has "failed to proceed in the manner required by law." (*Save Our Peninsula Comm. v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 118.)

However, whether an EIR satisfies CEQA's requirements depends in part on whether it was reasonably feasible for an agency to conduct additional or more thorough analysis. EIRs must contain "a detailed statement" of a project's impacts (Pub. Res. Code § 21061), and an agency must "use its best efforts to find out and disclose all that it reasonably can." (CEQA Guidelines § 15144.) Nevertheless, "the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible." (CEQA Guidelines § 15151.)

SCAQMD submits that the question of whether additional analysis or a particular study suggested by a commenter is "feasible" is generally a question of fact. Courts have already held that whether a particular alternative is "feasible" is reviewed by the substantial evidence test.

(*Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 598-99; *Center for Biological Diversity v. County of San Bernardino* (2010) 185 Cal.App.4th 866, 883.) Thus, if a lead agency determines that a particular study or analysis is infeasible, that decision should generally be judged by the substantial evidence standard. However, SCAQMD urges this Court to hold that lead agencies must explain the basis of any determination that a particular analysis is infeasible in the EIR itself. An EIR must discuss information, including issues related to the feasibility of particular analyses "in sufficient detail to enable meaningful participation and criticism by the public. '[W]hatever is required to be considered in an EIR must be in that formal report; what any official might have known from other writings or oral presentations cannot supply what is lacking in the report.'" (*Laurel Heights I*, *supra*, 47 Cal.3d at p. 405 (quoting *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3d 818, 831) (discussing analysis of alternatives).) The evidence on which the determination is based should also be summarized in the EIR itself, with appropriate citations to reference materials if necessary. Otherwise commenting agencies such as SCAQMD would be forced to guess where the lead agency's evidence might be located, thus thwarting effective public participation.

Moreover, if a lead agency determines that a particular study or analysis would not result in reliable or useful information and for that reason is not feasible, that determination should be judged by the substantial evidence test. (See *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority*, *supra*, 57 Cal.4th 439, 448, 457:

whether "existing conditions" baseline would be misleading or uninformative judged by substantial evidence standard.[15])

If the lead agency's determination that a particular analysis or study is not feasible is supported by substantial evidence, then the agency has not violated CEQA's information disclosure provisions, since it would be infeasible to provide additional information. This Court's decisions provide precedent for such a result. For example, this Court determined that the issue of whether the EIR should have included a more detailed discussion of future herbicide use was resolved because substantial evidence supported the agency's finding that "the precise parameters of future herbicide use could not be predicted." *Ebbetts Pass Forest Watch v. California Dept. of Forestry & Fire Protection* (2008) 43 Cal.4th 936, 955.

Of course, SCAQMD expects that courts will continue to hold lead agencies to their obligations to consult with, and not to ignore or misrepresent, the views of sister agencies having special expertise in the area of air quality. (*Berkeley Keep Jets Over the Bay v. Board of Port Commissioners* (2007) 91 Cal.App.4th 1344, 1364 n.11.) In some cases, information provided by such expert agencies may establish that the purported evidence relied on by the lead agency is not in fact "substantial". (*Id.* at pp. 1369-1371.)

In sum, courts retain ultimate responsibility to determine what CEQA requires. However, the law does not require exhaustive analysis, but only what is reasonably feasible. Agencies deserve deference for their factual determinations regarding what type of analysis is reasonably feasible. On the other hand, if a commenter requests more information, and the lead agency declines to provide it but does *not* determine that the

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[15] The substantial evidence standard recognizes that the courts "have neither the resources nor the scientific expertise" to weigh conflicting evidence on technical issues. (*Laurel Heights I, supra,* 47 Cal.3d 376, 393.)

requested study or analysis would be infeasible, misleading or uninformative, the question becomes whether the omission of that analysis renders the EIR inadequate to satisfy CEQA's informational purposes. (*Id.* at pp. 1370-71.) Again, this is predominantly a question of law and should be judged by the de novo or independent judgment standard of review. Of course, this Court has recognized that a "project opponent or reviewing court can always imagine some additional study or analysis that might provide helpful information. It is not for them to design the EIR. That further study...might be helpful does not make it necessary." (*Laurel Heights I, supra,* 47 Cal.3d 376, 415 – see also CEQA Guidelines § 15204(a) [CEQA "does not require a lead agency to conduct every test. . . recommended or demanded by commenters."].) Courts, then, must adjudicate whether an omission of particular information renders an EIR inadequate to serve CEQA's informational purposes.[16]

[16] We recognize that there is case law stating that the substantial evidence standard applies to "challenges to the scope of an EIR's analysis of a topic" as well as the methodology used and the accuracy of the data relied on in the document "because these types of challenges involve factual questions." (*Bakersfield Citizens for Local Control v. City of Bakersfield, supra,* 124 Cal.App.4th 1184, 1198, and cases relied on therein.) However, we interpret this language to refer to situations where the question of the scope of the analysis really is factual—that is, where it involves whether further analysis is feasible, as discussed above. This interpretation is supported by the fact that the *Bakersfield* court expressly rejected an argument that a claimed "omission of information from the EIR should be treated as inquiries whether there is substantial evidence supporting the decision approving the project. " *Bakersfield, supra,* 124 Cal.App.4th at p. 1208. And the *Bakersfield* court ultimately decided that the lead agency must analyze the connection between the identified air pollution impacts and resulting health impacts, even though the EIR already included some discussion of air-pollution-related respiratory illnesses. *Bakersfield, supra,* 124 Cal.App.4th at p. 1220. Therefore, the court must not have interpreted this question as one of the "scope of the analysis" to be judged by the substantial evidence standard.

B. Friant Ranch's Rationale for Rejecting the Independent Judgment Standard of Review is Unsupported by Case Law.

In its brief, Friant Ranch makes a distinction between cases where a required CEQA topic is not discussed at all (to be reviewed by independent judgment as a failure to proceed in the manner required by law) and cases where a topic is discussed, but the commenter claims the information provided is insufficient (to be judged by the substantial evidence test). (Opening Brief, pp. 13-17.) The Court of Appeal recognized these two types of cases, but concluded that both raised questions of law. (*Sierra Club v. County of Fresno* (2014) 226 Cal.App.4th 704 (superseded by grant of review) 172 Cal.Rptr.3d 271, 290.) We believe the distinction drawn by Friant Ranch is unduly narrow, and inconsistent with cases which have concluded that CEQA documents are insufficient. In many instances, CEQA's requirements are stated broadly, and the courts must interpret the law to determine what level of analysis satisfies CEQA's mandate for providing meaningful information, even though the EIR discusses the issue to some extent.

For example, the CEQA Guidelines require discussion of the existing environmental baseline. In *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 954-955, the lead agency had discussed the environmental baseline by describing historic month-end water levels in the affected lakes. However, the court held that this was not an adequate baseline discussion because it failed to discuss the timing and amounts of past actual water releases, to allow comparison with the proposed project. The court evidently applied the independent judgment test to its decision, even though the agency discussed the issue to some extent.

Likewise, in *Vineyard Area Citizens* (2007) 40 Cal.4th 412, this Court addressed the question of whether an EIR's analysis of water supply impacts complied with CEQA. The parties agreed that the EIR was required to analyze the effects of providing water to the development project, "and that in order to do so the EIR had, in some manner, to identify the planned sources of that water." (*Vineyard Area Citizens, supra,* at p. 428.) However, the parties disagreed as to the level of detail required for this analysis and "what level of uncertainty regarding the availability of water supplies can be tolerated in an EIR . . . ." (*Id.*) In other words, the EIR had analyzed water supply impacts for the project, but the petitioner claimed that the analysis was insufficient.

This Court noted that neither CEQA's statutory language or the CEQA Guidelines specifically addressed the question of how precisely an EIR must discuss water supply impacts. (*Id.*) However, it explained that CEQA "states that '[w]hile foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can.'" (*Id.*, [Guidelines § 15144].) The Court used this general principle, along with prior precedent, to elucidate four "principles for analytical adequacy" that are necessary in order to satisfy "CEQA's informational purposes." (*Vineyard Area Citizens, supra,* at p. 430.) The Court did not defer to the agency's determination that the EIR's analysis of water supply impacts was sufficient. Rather, this Court used its independent judgment to determine for itself the level of analysis required to satisfy CEQA's fundamental purposes. (*Vineyard Area Citizens, supra*, at p. 441: an EIR does not serve its purposes where it neglects to explain likely sources of water and "... leaves long term water supply considerations to later stages of the project.")

Similarly, the CEQA Guidelines require an analysis of noise impacts of the project. (Appendix G, "Environmental Checklist Form."[17]) In *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1123, the court held that the lead agency's noise impact analysis was inadequate even though it had addressed the issue and concluded that the increase would not be noticeable. If the court had been using the substantial evidence standard, it likely would have upheld this discussion.

Therefore, we do not agree that the issue can be resolved on the basis suggested by Friant Ranch, which would apply the substantial evidence standard to *every* challenge to an analysis that addresses a required CEQA topic. This interpretation would subvert the courts' proper role in interpreting CEQA and determining what the law requires.

Nor do we agree that the Court of Appeal in this case violated CEQA's prohibition on courts interpreting its provisions "in a manner which imposes procedural or substantive requirements beyond those explicitly stated in this division or in the state guidelines." (Pub. Resources Code § 21083.1.) CEQA requires an EIR to describe *all* significant impacts of the project on the environment. (Pub. Resources Code § 21100(b)(2); *Vineyard Area Citizens, supra,* at p. 428.) Human beings are part of the environment, so CEQA requires EIRs to discuss a project's significant impacts on human health. However, except in certain particular circumstances,[18] neither the CEQA statute nor Guidelines specify the precise level of analysis that agencies must undertake to satisfy the law's requirements. (see, e.g., CEQA Guidelines § 15126.2(a) [EIRs must describe "health and safety problems caused by {a project's} physical changes"].) Accordingly, courts must interpret CEQA as a whole to

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[17] Association of Environmental Professionals, 2015 CEQA Statute and Guidelines (2015) p.287.
[18] E.g., Pub. Resources Code § 21151.8(C)(3)(B)(iii) (requiring specific type of health risk analysis for siting schools).

determine whether a particular EIR is sufficient as an informational document. A court determining whether an EIR's discussion of human health impacts is legally sufficient does not constitute imposing a new substantive requirement.[19] Under Friant Ranch's theory, the above-referenced cases holding a CEQA analysis inadequate would have violated the law. This is not a reasonable interpretation.

IV. COURTS MUST SCRUPULOUSLY ENFORCE THE REQUIREMENTS THAT LEAD AGENCIES CONSULT WITH AND OBTAIN COMMENTS FROM AIR DISTRICTS

Courts must "scrupulously enforce" CEQA's legislatively mandated requirements. (*Vineyard Area Citizens, supra*, 40 Cal.4th 412, 435.) Case law has firmly established that lead agencies must consult with the relevant air pollution control district before conducting an initial study, and must provide the districts with notice of the intention to adopt a negative declaration (or EIR). (*Schenck v. County of Sonoma* (2011) 198 Cal.App.4th 949, 958.) As *Schenck* held, neither publishing the notice nor providing it to the State Clearinghouse was a sufficient substitute for sending notice directly to the air district. (*Id.*) Rather, courts "must be satisfied that [administrative] agencies have fully complied with the procedural requirements of CEQA, since only in this way can the important public purposes of CEQA be protected from subversion." *Schenck,* 198 Cal.App.4th at p. 959 (citations omitted).[20]

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[19] We submit that Public Resources Code Section 21083.1 was intended to prevent courts from, for example, holding that an agency must analyze economic impacts of a project where there are no resulting environmental impacts (see CEQA Guidelines § 15131) , or imposing new procedural requirements, such as imposing additional public notice requirements not set forth in CEQA or the Guidelines.

[20] Lead agencies must consult air districts, as public agencies with jurisdiction by law over resources affected by the project, *before* releasing an EIR. (Pub. Resources Code §§ 21104(a); 21153.) Moreover, air

Lead agencies should be aware, therefore, that failure to properly seek and consider input from the relevant air district constitutes legal error which may jeopardize their project approvals. For example, the court in *Fall River Wild Trout Foundation v. County of Shasta,* (1999) 70 Cal.App.4th 482, 492 held that the failure to give notice to a trustee agency (Department of Fish and Game) was prejudicial error requiring reversal. The court explained that the lack of notice prevented the Department from providing any response to the CEQA document. (*Id.* at p. 492.) It therefore prevented relevant information from being presented to the lead agency, which was prejudicial error because it precluded informed decision-making. (*Id.*)[21]

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districts should be considered "state agencies" for purposes of the requirement to consult with "trustee agencies" as set forth in Public Resources Code § 20180.3(a). This Court has long ago held that the districts are not mere "local agencies" whose regulations are superseded by those of a state agency regarding matters of statewide concern, but rather have concurrent jurisdiction over such issues. (*Orange County Air Pollution Control District v. Public Util. Com.* (1971) 4 Cal.3d 945, 951, 954.) Since air pollution is a matter of statewide concern, *Id* at 952, air districts should be entitled to trustee agency status in order to ensure that this vital concern is adequately protected during the CEQA process.

[21] In *Schenck,* the court concluded that failure to give notice to the air district was not prejudicial, but this was partly because the trial court had already corrected the error before the case arrived at the Court of Appeal. The trial court issued a writ of mandate requiring the lead agency to give notice to the air district. The air district responded by concurring with the lead agency that air impacts were not significant. (*Schenck,* 198 Cal.App.4th 949, 960.) We disagree with the *Schenck* court that the failure to give notice to the air district would not have been prejudicial (even in the absence of the trial court writ) merely because the lead agency purported to follow the air district's published CEQA guidelines for significance. (*Id.*, 198 Cal.App.4th at p. 960.) In the first place, absent notice to the air district, it is uncertain whether the lead agency properly followed those guidelines. Moreover, it is not realistic to expect that an air district's published guidelines would necessarily fully address all possible air-quality related issues that can arise with a CEQA project, or that those

Similarly, lead agencies must obtain additional information requested by expert agencies, including those with jurisdiction by law, if that information is necessary to determine a project's impacts. (*Sierra Club v. State Bd. Of Forestry* (1994) 7 Cal.4th 1215, 1236-37.) Approving a project without obtaining that information constitutes a failure to proceed in the manner prescribed by CEQA. (*Id.* at p. 1236.)

Moreover, a lead agency can save significant time and money by consulting with the air district early in the process. For example, the lead agency can learn what the air district recommends as an appropriate analysis on the facts of its case, including what kinds of health impacts analysis may be available, and what models are appropriate for use. This saves the lead agency from the need to do its analysis all over again and possibly needing to recirculate the document after errors are corrected, if new significant impacts are identified. (CEQA Guidelines § 15088.5(a).) At the same time, the air district's expert input can help the lead agency properly determine whether another commenter's request for additional analysis or studies is reasonable or feasible. Finally, the air district can provide input on what mitigation measures would be feasible and effective.

Therefore, we suggest that this Court provide guidance to lead agencies reminding them of the importance of consulting with the relevant air districts regarding these issues. Otherwise, their feasibility decisions may be vulnerable to air district evidence that establishes that there is no substantial evidence to support the lead agency decision not to provide specific analysis. (*See Berkeley Keep Jets Over the Bay, supra,* 91 Cal.App.4th 1344, 1369-1371.)

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guidelines would necessarily be continually modified to reflect new developments. Therefore we believe that, had the trial court not already ordered the lead agency to obtain the air district's views, the failure to give notice would have been prejudicial, as in *Fall River, supra,* 70 Cal.App.4th 482, 492.

CONCLUSION

The SCAQMD respectfully requests this Court *not* to establish a hard-and-fast rule concerning whether CEQA requires a lead agency to correlate identified air quality impacts of a project with resulting health outcomes. Moreover, the question of whether an EIR is "sufficient as an informational document" is a mixed question of fact and law containing two levels of inquiry. Whether a particular proposed analysis is feasible is predominantly a question of fact to be judged by the substantial evidence standard of review. Where the requested analysis is feasible, but the lead agency relies on legal or policy reasons not to provide it, the question of whether the EIR is nevertheless sufficient as an informational document is predominantly a question of law to be judged by the independent judgment standard of review.

Respectfully submitted,

DATED: April 3, 2015

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
KURT R. WIESE, GENERAL COUNSEL
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SOUTH COAST AIR QUALITY MANAGEMENT DISTICT

CERTIFICATE OF WORD COUNT

Pursuant to Rule 8.520(c)(1) of the California Rules of Court, I hereby certify that this brief contains 8,476 words, including footnotes, but excluding the Application, Table of Contents, Table of Authorities, Certificate of Service, this Certificate of Word Count, and signature blocks. I have relied on the word count of the Microsoft Word Vista program used to prepare this Certificate.

DATED: April 3, 2015 Respectfully submitted,

Barbara Baird

Barbara Baird

PROOF OF SERVICE

I am employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the within action. My business address is 21865 Copley Drive, Diamond Bar, California 91765.

On April 3, 2015 I served true copies of the following document(s) described as **APPLICATION OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT FOR LEAVE TO FILE BRIEF OF *AMICUS CURIAE* IN SUPPORT OF NEITHER PARTY AND *[PROPOSED]* BRIEF OF *AMICUS CURIAE*** by placing a true copy of the foregoing document(s) in a sealed envelope addressed as set forth on the attached service list as follows:

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing following our ordinary business practices. I am readily familiar with this District's practice for collection and processing of correspondence for mailing. Under that practice, the correspondence would be deposited with the United States Postal Service, with postage thereon fully prepaid at Diamond Bar, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 3, 2015 at Diamond Bar, California.

Patricia Anderson

Patricia Anderson

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APPENDIX B

CULTURAL RESOURCES REPORT

September 26, 2024

Travis J. McGill
Director/ Biologist
ELMT Consulting
2201 N. Grand Avenue #10098
Santa Ana, California 92711

Subject: Cultural Resources Report for the Loma Linda University Children's Hospital Pediatric Medical Office Building Project, Loma Linda, San Bernardino County, California (BCR Consulting Project No. EMT2407)

Dear Travis:

BCR Consulting LLC (BCR Consulting) was retained by ELMT Consulting to complete a cultural resources records search, Native American Heritage Commission (NAHC) Sacred Lands File Search, and vertebrate paleontological resources overview for the proposed Loma Linda University Children's Hospital Pediatric Medical Office Building Project (project) located in the City of Loma Linda (City), San Bernardino County, California. This effort is taking place in partial fulfillment of California Environmental Quality Act (CEQA) requirements. The proposed project involves the construction of a new 105,000 square-foot, 5-story medical office/clinic building, a new parking lot, patient drop-off/loading areas, landscaping, and lighting. It is in an area currently occupied by a modern parking lot. The project site is located in Section 36 of Township 1 South, Range 4 West, San Bernardino Baseline and Meridian. It is depicted on the United States Geological Survey (USGS) *San Bernardino South, California* (1980) 7.5-minute topographic quadrangle (Attachment B).

Cultural Setting

Prehistoric Context

The local prehistoric cultural setting has been organized into many chronological frameworks (see Warren and Crabtree 1986; Bettinger and Taylor 1974; Lanning 1963; Hunt 1960; Wallace 1958, 1962, 1978; Campbell and Campbell 1935), although there is no definitive sequence for the region. The difficulties in establishing cultural chronologies for western San Bernardino County are a function of its enormous size and the small amount of archaeological excavations conducted there. Moreover, throughout prehistory many groups have occupied the area and their territories often overlap spatially and chronologically resulting in mixed artifact deposits. Due to dry climate and capricious geological processes, these artifacts rarely become integrated in-situ. Lacking a milieu hospitable to the preservation of cultural midden, local chronologies have relied upon temporally diagnostic artifacts, such as projectile points, or upon the presence/absence of other temporal indicators, such as groundstone. Such methods are instructive, but can be limited by prehistoric occupants' concurrent use of different artifact styles, or by artifact re-use or re-sharpening, as well as researchers' mistaken diagnosis, and other factors (see Flenniken 1985; Flenniken and Raymond 1986; Flenniken and Wilke 1989). Recognizing the shortcomings of comparative temporal indicators, this study recommends review of Warren and Crabree (1986), who have drawn upon this method to produce a commonly cited and relatively comprehensive chronology.

Methods

Research

BCR Consulting Project Manager/Archaeologist Joseph Orozco M.A., RPA., completed an archaeological records search using South Central Coastal Information Center (SCCIC) records of California State University, Fullerton for project on August 28, 2024. This research reviewed the status of all recorded historic and prehistoric cultural resources, and survey and excavation reports completed within the project site boundaries and within a one-mile radius of the project site. Additional resources reviewed included the National Register of Historic Places (National Register), the California Register of Historical Resources, the Built Environmental Resource Directory (BERD), and documents and inventories published by the California Office of Historic Preservation.

Results

Cultural Resources Records Search

The records search from the SCCIC included a review of all recorded historic-period and prehistoric archaeological sites and built environment resources within one mile of the project site. The research also reviewed cultural resource reports completed in the vicinity. Results revealed that 39 cultural resource studies have taken place resulting in 22 cultural resources recorded within one mile of the project site. One of the previous studies has assessed the project site for cultural resources and no cultural resources have been previously identified within its boundaries. The records search is summarized in Table A, and a bibliography is included in Attachment C. Aerial photographs show that the parking lot that occupies the project site was constructed between 1980 and 1984 (United States Department of Agriculture 1980, 1984).

Table A. Records Search Results (One-Mile Radius)

USGS Quad	Cultural Resources	Reports
San Bernardino South, California (1980)	P-36-647: Historic-Period Trash Scatter (0.6 Mile NW) P-36-6352: Craftsman Citrus Ranch (0.9 Mile SE) P-36-7168: Gage Canal (0.8 Mile NW) P-36-10330: Union Pacific Railroad (0.9 Mile NE) P-36-11282: Montecito Cemetery (0.8 Mile W) P-36-12492: 25092 Barton (0.9 Mile E) P-36-12871: 10753 Poplar St (0.7 Mile NE) P-36-12872: 10763 Poplar St (0.7 Mile NE) P-36-12873: 10845 Poplar St (0.7 Mile NE) P-36-12874: 10861 Poplar St (0.7 Mile NE) P-36-13878: Teel Residence (0.8 Mile NW) P-36-15505: 11170 Ritchie Circle (0.3 Mile NE) P-36-17533: Shryock Hall, Loma Linda Univ. (0.5 Mile NW) P-36-20252: 24955 Redlands Blvd (One Mile N) P-36-20253: 10650 Anderson St (0.9 Mile N) P-36-20801: 24785 Stewart St (0.5 Mile N) P-36-20802: 24745 Stewart St (Adjacent NW) P-36-26049: Historic Water Conveyance System (0.6 Mile S) P-36-26051: Devers Transmission Lines (0.7 Mile S) P-36-29454: Elizabeth Crawford Residence (0.5 Mile S) P-36-29455: Robert and Elsie Smith Residence (0.1 Mile W) P-36-29994: Historic-Period Well (0.1 Mile NW)	SB-468, 1074, 1499, 1700, 1764*, 1795, 1806, 1840, 1874, 2065, 2414, 2503, 2715, 2784, 3196, 3732, 3740, 3925, 4331, 4338, 5249, 5605, 5927, 6291, 6438, 6446, 6447, 6740, 6743, 6756, 7368, 7407, 7526, 7527, 7701, 7834, 8148, 8200, 8202

*Previously assessed the project site for cultural resources.

Summary and Recommendations

No cultural resources were identified within the project during the records search. No significant historical resources have been identified within one mile of the project during the BERD search. Furthermore, the project site has been subject to previous cultural resources assessment with negative findings, and it was subsequently developed as a parking lot. The parking lot was developed less than 45 years ago, and as such it is not historic in age and does not merit consideration as a potential historical resource. Based on this information, the project site is recommended not sensitive for buried cultural resources. No significant impact related to historical resources is anticipated and no further investigations are recommended pursuant to CEQA unless:

- The proposed project is changed to include areas that have not been subject to this cultural resource assessment;
- Cultural materials are encountered during project activities.

If human remains are encountered during activities associated with the proposed project, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.

Please contact me by phone at 909/525-7078 or e-mail at david.brunzell@yahoo.com with any questions or comments.

Sincerely,

David Brunzell, M.A./RPA
Principal Investigator/Archaeologist

Attachment A: References
Attachment B: Project Map
Attachment C: SCCIC Bibliography
Attachment D: Native American Heritage Commission Sacred Lands File Search
Attachment E: Paleontological Overview

Attachment A: References

Bettinger, Robert L., and R.E. Taylor
1974 Suggested Revisions in Archaeological Sequences of the Great Basin and Interior Southern California. *Nevada Archaeological Survey Research Papers* 3:1-26.

Flenniken, J.J.
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Flenniken, J.J. and A.W. Raymond
1986 Morphological Projectile Point Typology: Replication, Experimentation, and Technological Analysis. *American Antiquity* 51:603-614.

Flenniken, J.J. and Philip J. Wilke
1989 Typology, Technology, and Chronology of Great Basin Dart Points. *American Anthropologist* 91:149-158.

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1963 The Archaeology of the Rose Spring Site (Iny-372). *University of California Publications in American Archaeology and Ethnology* 49(3):237-336.

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1980 Historic Aerial Photographs. Historicaerials.com. Accessed Multiple Dates.

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United States Geological Survey
1980 *San Bernardino South, California* 7.5 Minute Topographic Quadrangle Map.

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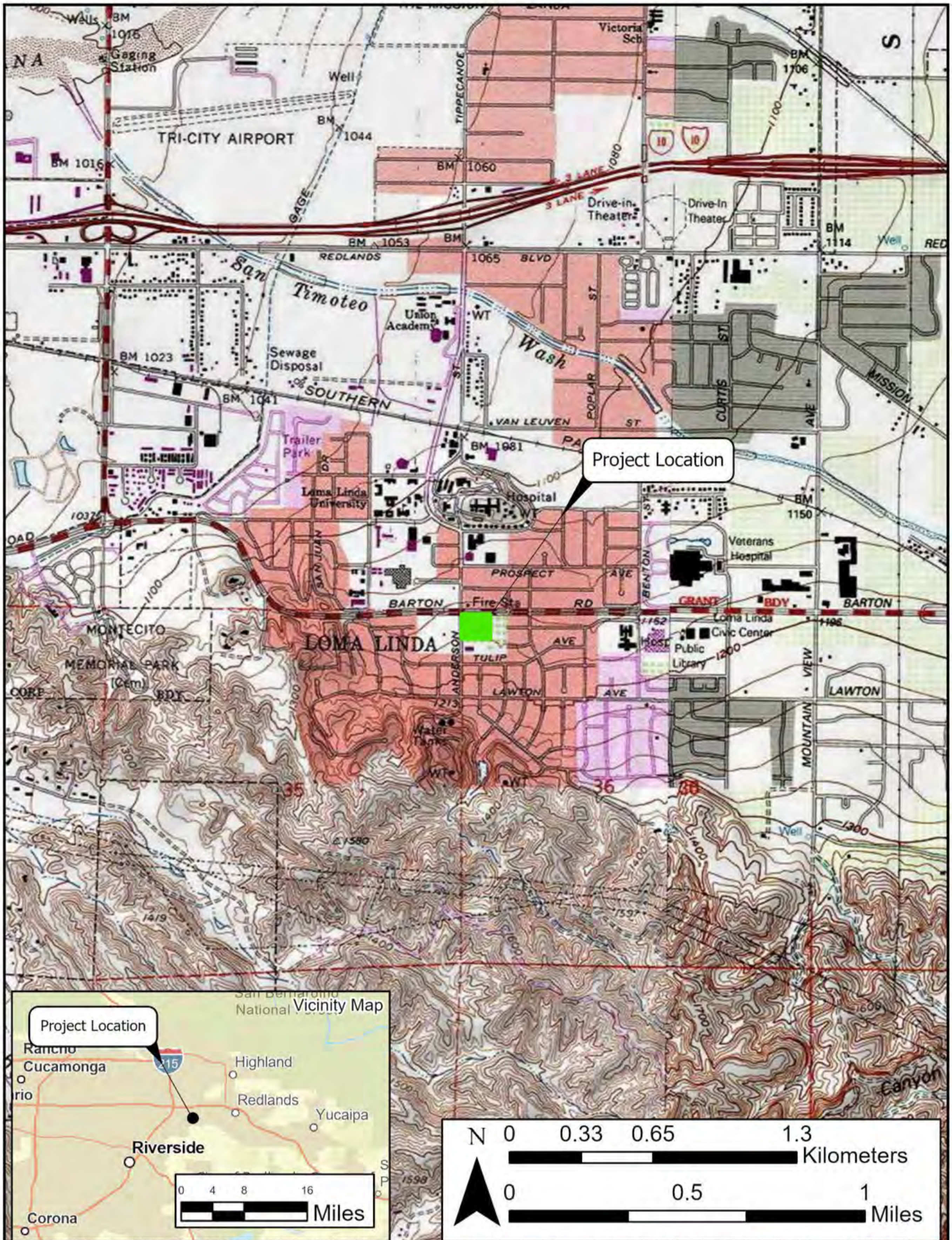
1978 The Southern Valley Yokuts, and The Northern Valley Yokuts. In *Handbook of the North American Indians, Vol. 8, California,* edited by W.L. d'Azevedo, pp. 448-470. W.C. Sturtevant, General Editor. Smithsonian Institution, Washington D.C.

Warren, Claude N. and R.H. Crabtree
1986 The Prehistory of the Southwestern Great Basin. In *Handbook of the North American Indians, Vol. 11, Great Basin,* edited by W.L. d'Azevedo, pp.183-193. W.C. Sturtevant, General Editor. Smithsonian Institution, Washington D.C.



BCRCONSULTING LLC	Project Location Site Figure 1 Loma Linda University Children's Hospital Pediatric Medical Office Reference: ESRI; USGS Quad: San Bernardino South, California (1980)	ELMT Consulting, Inc.

Report List

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SB-00468	NADB-R - 1060468; Voided - 77-1.3	1977	MONE, SHEILA, JIM CROWELL, and N. NELSON LEONARD III	ARCHAEOLOGICAL IMPACT OF PROPOSED CIVIC CENTER CONSTRUCTION, LOMA LINDA	ARCHAEOLOGICAL RESEARCH UNIT, UCR	
SB-01074	NADB-R - 1061074; Voided - 81-0.11	1981	LERCH, MICHAEL K. and ARDA M. HAENSZEL	LIFE ON COTTONWOOD ROW	HERITAGE TALES - 1981, CITY OF SAN BERNARDINO HISTORICAL SOCIETY, SAN BERNARDINO	
SB-01499	NADB-R - 1061499; Voided - 85-7.4A-B	1985	FOSTER, JOHN M. and ROBERTA S. GREENWOOD	CULTURAL RESOURCES OVERVIEW: CALIFORNIA PORTION, PROPOSED PACIFIC TEXAS PIPELINE PROJECT	GREENWOOD AND ASSOCIATES	
SB-01700	NADB-R - 1061700; Voided - 87-7.9	1987	DE MUNCK, VICTOR C. and STEPHEN J. BOUSCAREN	ENVIRONMENTAL IMPACT EVALUATION: AN ARCHAEOLOGICAL ASSESSMENT OF THE BARTON ROAD RESIDENTIAL DEVELOPMENT PROJECT IN THE CITY OF LOMA LINDA, SAN BERNARDINO	ARCHAEOLOGICAL AND ETHNOGRAPHIC FIELD ASSOCIATES	
SB-01764	NADB-R - 1061764; Voided - 88-1.7	1988	HATHEWAY, ROGER G.	A WINDSHIELD SURVEY AND PRELIMINARY ARCHITECTURAL/HISTORICAL INVENTORY OF LOMA LINDA, CALIFORNIA	HATHEWAY & MCKENNA	36-020252
SB-01795	NADB-R - 1061795; Voided - 88-4.7	1988	SWANSON, MARK T.	LETTER REPORT: LOMA LINDA AREA, T2S R4W, N 1/2 SECTION 1		
SB-01806	NADB-R - 1061806; Voided - 88-6.3	1988	SWANSON, MARK T.	CRESTA LINDA TRACT, JUDGEMENTAL SURVEY	RESEARCH ASSOCIATES	
SB-01840	NADB-R - 1061840; Voided - 88-11.8A-B	1988	APPLE, REBECCA MCCORKLE and JAN E. WOOLEY	MCI RIALTO TO EL PASO FIBER OPTICS PROJECT, INTENSIVE CULTURAL RESOURCE SURVEY, SAN BERNARDINO AND RIVERSIDE COUNTIES, CALIFORNIA	DAMES & MOORE	36-000573, 36-000574, 36-000647
SB-01874	NADB-R - 1061874; Voided - 89-4.3	1989	BISSELL, RONALD M.	CULTURAL RESOURCES RECONNAISSANCE OF THE OASIS TOWNHOUSE APARTMENTS PROPERTY, 30 ACRES IN LOMA LINDA, SAN BERNARDINO COUNTY, CALIFORNIA	RMW PALEO	
SB-02065	NADB-R - 1062065; Voided - 90-1.12	1990	MANLEY, WILLIAM R. and DAYLE M.	CULTURAL RESOURCE SURVEY OF THE 110-ACRE PACIFIC HILLS PROJECT AREA, LOMA LINDA, CALIFORNIA	RECON	36-006352
SB-02414	NADB-R - 1062414; Voided - 91-5.3	1991	RITZ, FRANK	CULTURAL RESOURCES SURVEY OF LOMA LINDA 11 ACRE PROPERTY, SAN BERNARDINO	RECON	

Report List

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SB-02503	NADB-R - 1062503; Voided - 92-2.4	1992	BOUSCAREN, STEPHEN J.	CULTURAL RESOURCES SURVEY OF TENTATIVE TRACT NO. 15180, 5.3 ACRES IN THE SOUTHWESTERN PORTION OF THE CITY OF LOMA LINDA, SAN BERNARDINO COUNTY, CALIFORNIA	RESEARCH ASSOCIATES	
SB-02715	NADB-R - 1062715	1992	ROMANI, JOHN F. AND ROGER G. HATHEWAY	CULTURAL RESOURCE SURVEY AND MECHANICAL SUBSURFACE TESTING FOR THE PROPOSED DEVELOPEMENT OF A WELLNESS AND RECREATION CENTER, LOMA LINDA UNIVERSITY, LOMA LINDA, SAN BERNARDINO COUNTY, CA	HATHEWAY AND ASSOCIATES	
SB-02784	NADB-R - 1062784	1991	HALLARAN, KEVIN B. and CHRISTOPHER FOORD	THE GAGE CANAL (DRAFT COPY OF 2 CHAPTERS OF UNKNOWN PUBLICATION)		36-007168
SB-03196	NADB-R - 1063196	1996	HATHEWAY, ROGER	HISTORIC ARCHITECTURAL AND ARCHAEOLOGICAL SURVEY REPORT FOR THE RITCHIE CIRCLE CANCER PATIENT LODGING FACILITY. 64PP	HATHEWAY & ASSOCIATES	
SB-03732	NADB-R - 1063732	1990	PERRY, RICHARD	CULTURAL RESOURCES SURVEY REPORT OF DEBRIS ALTERNATIVE, SAN TIMOTEO WASH FLOOD CONTROL PROJECT. 6PP	US ARMY CORPS OF ENGINEERS	36-002314, 36-016417
SB-03740	NADB-R - 1063740	2001	DUKE, CURT	CINGULAR WIRELESS FACILITY SB147-01, SAN BERNARDINO COUNTY, CA. 5PP	LSA	
SB-03925	NADB-R - 1063925	2003	IRISH, LESLIE NAY	FINAL ARCHAEOLOGICAL AND PALEONTOLOGICAL RECORDS SEARCH, SURVEY & RECORDATION REPORT FOR MONTECITO MEMORIAL PARK, CITY OF COLTON, COUNTY OF SAN BERNARDINO, CA. 45PP	L & L ENVIRONMENTAL	36-011282
SB-04331	NADB-R - 1064331	2000	WHITE, LAURIE S.	CULTURAL RESOURCES ASSESSMENT FOR AT&T WIRELESS SITE #C962 (BARTON & WATERMAN), CITY OF SAN BERNARDINO, SAN BERNARDINO COUNTY, CA. 5PP	ARCHAEOLOGICAL ASSOCIATES	
SB-04338	NADB-R - 1064338	1999	MCLEAN, DEBORAH	CULTURAL RESOURCES ASSESSMENT FOR PBMS TELECOMMUNICATIONS FACILITY CM 489-01, 11245 ANDERSON ST, CITY OF LOMA LINDA, COUNTY OF SAN BERNARDINO, CA. 3PP	LSA	

Report List

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SB-05249	NADB-R - 1065249	2006	Smallwood, Josh	Historical/Archaeological Resources Survey Report: Loma Linda/Poplar Street Project, City of Loma Linda, San Bernardino County, California.	CRM Tech	36-012871, 36-012872, 36-012873, 36-012874
SB-05605	NADB-R - 1065605	2005	Budinger, Fred	Proposed Wireless Device Monopalm and Associated Equipment; Rosarita Site, 494 E. Commercial Road, San Bernardino, California 92408.		
SB-05927	NADB-R - 1065927	2007	McKenna, Jeanette A.	An Architectural Evaluation of Structures Within the Loma Linda University Medical Center Ambulatory Pavilion in the City of Loma Linda, San Bernardino County, California.	McKenna et al	36-014126, 36-014127, 36-014128, 36-014129, 36-014130, 36-014131, 36-014132, 36-014133, 36-014134, 36-014135, 36-014136, 36-014137, 36-014138, 36-014139, 36-014140
SB-06291	NADB-R - 1066291	2008	Smith, Francesca, Caprice D. Harper, Lillian Makeda, John Dietler, and Carrie Chasteen	Cultural Resource Technical Report: sbX E Street Corridor BRT Project, Cities of San Bernardino and Loma Linda, San Bernardino County, California	SWCA Environmental Consultants	36-004288, 36-006101, 36-006793, 36-006847, 36-007168, 36-010316, 36-010330, 36-010820, 36-013886, 36-017818, 36-020255, 36-020805, 36-020806, 36-020807, 36-020808, 36-020809, 36-020810, 36-020811, 36-020812, 36-020813, 36-020814, 36-020815, 36-020816, 36-020817, 36-020818, 36-020819, 36-020820, 36-020821, 36-020822, 36-020823, 36-020824
SB-06291		2008	Chasteen, Carrie	Determination of Effects Report sbX E Street Corridor Bus Rapid Transit (BRT) Project, Cities of Loma Linda and San Bernardino San Bernardino County	Parsons	
SB-06438	NADB-R - 1066438	2008	McKenna, Jeanette A.	Historic Property Survey Report: A Cultural Resources Investigation for the Proposed Stewart Street Improvements Project, Located Between Anderson Street and Campus Street in the City of Loma Linda, San Bernardino County, California.	McKenna et al	36-020801, 36-020802
SB-06446	NADB-R - 1066446	2008	Chasteen, Carrie	Determinations of Effect Report: sbX E Street Corridor Bus Rapid Transit (BRT) Project, Cities of Loma Linda and San Bernardino, San Bernardino County, California.	Parsons	
SB-06447	NADB-R - 1066447	2009	Chasteen, Carrie	Addendum Cultural Resources Technical Report: sbX E Street Corridor BRT Project, Cities of San Bernardino and Loma Linda, San Bernardino County, California	Parsons	36-020825, 36-020826

Report List

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SB-06740	NADB-R - 1066740	2009	Wlodarski, Robert J.	Record Search Results for the Proposed AT&T Wireless Telecommunications Site LA8115 (City Hall), 25541 Barton Road, Loma Linda, California 92354	CARE	
SB-06743	NADB-R - 1066743	2010	Sander, Jay K.	Archaeological Survey Report for Southern California Edison's Pole Replacement Project: Loma Linda and San Bernardino, San Bernardino County, California.		
SB-06756	NADB-R - 1066756	2009	Andrews, Sherri	Records Search and Survey Results for the Yucaipa Valley Water District Brineline Project.		
SB-07368	NADB-R - 1067368	2012	Tang, Bai "Tom" and Harry Quinn	Archaeological and Paleontological Monitoring of Earth-Moving Activities, Yucaipa Valley Water District Regional Brineline Extension Project, Phase III, Cities of Loma Linda and San Bernardino, San Bernardino County, California.		
SB-07407	NADB-R - 1067407	2013	McKenna, Jeanette A.	Loma Linda University Health Master Plan--Campus Renovation in the City of Loma Linda, San Bernardino County, California.	McKenna et al	36-025614
SB-07526	NADB-R - 1067526	2013	Tang, Bai Tom and Terri Jacquemain	Historic Building Evaluation: Franz Hall at Loma Linda Academy, 11656 Anderston Street, City of Loma Linda, San Bernardino County, California.	CRM Tech	
SB-07527	NADB-R - 1067527	2013	Tang, Bai "Tom:", Terri Jacquemain, and Daniel Ballester	Mitigative Architectural/Historical Recordation: Franz Hall at Loma Linda Academy, 10656 Anderson Street, City of Loma Linda, San Bernardino County, California.	CRM Tech	
SB-07701	NADB-R - 1067701	2014	McKenna, Jeanette A.	Proposed Alterations to an Existing Structure at 11130 Anderson Street, Loma Linda, San Bernardino County, California.		
SB-07834	NADB-R - 1067834	2014	Tang, Bai "Tom" and Terri Jacquemain	Historic Buidling Evaluation: 24873 and 24885-24889 Prospect Avenue, City of Loma Linda, San Bernardino County, California.	CRM Tech	36-014140
SB-08148		2013	Greenberg, Gregory P.	Cultural Resources Survey CLV2822 1909 Business Center Drive, San Bernardino, San Bernardino County, California 92408, Unsectioned Area	EBI Consulting	

Report List

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
SB-08200		2016	Perez, Don C. and Andrea K. Fink	Cultural Resources Survey, Hulda Crooks Dog Park / CLV2813	EBI Consulting	36-029458
SB-08202	Paleo -	2015	McKenna, Jeanette A.	A PHASE I CULTURAL RESOURCES INVESTIGATION FOR THE PROPOSED LOMA LINDA UNIVERSITY MEDICAL CENTER (LLUMC) PARKING STRUCTURE AND PEDESTRIAN BRIDGE PROJECT SITE IN THE CITY OF LOMA LINDA, SAN BERNARDINO COUNTY, CALIFORNIA	McKENNA et al.	36-029454, 36-029455

Resource List

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Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-36-000647	CA-SBR-000647H	Resource Name - MCI Site #16	Site	Historic	AH04	1988 (Apple et al., Dames & Moore)	SB-01840
P-36-006352	CA-SBR-006352H	Resource Name - Craftsman Citrus Ranch	Building, Site	Historic	AH03; AH04; AH06; AH15; HP02; HP33	1987 (Roger Hatheway, Hatheway & McKenna); 1989 (Manley / Ritz); 1989 (Manley / Ritz, RECON); 2014 (Audry Williams, SCE)	SB-02065, SB-07946, SB-07955
P-36-007168	CA-SBR-007168H	Resource Name - Gage Canal; Other - MFA-1H; Other - ADOE-36-95-001-00	Structure, Site	Historic	AH06; HP20	1992 (Wlodarski); 1995; 2003; 2008; 2017 (Roberta Thomas, Applied EarthWorks, Inc)	SB-02784, SB-02889, SB-03228, SB-03605, SB-06291, SB-07955, SB-07963
P-36-010330	CA-SBR-010330H	Resource Name - Union Pacific Railroad; Other - Southern Pacific Railroad; Other - West Line Basin Alignment; Other - Union Pacific Railroad Crossing at Anderson Street; Other - 19-186112	Structure, Object	Historic	AH07; HP39	1999 (S. Ashkar, Jones & Stokes Associates, Inc.); 2002 (Goodwin, R., LSA Associates, Inc.); 2008 (Harper, C.D., SWCA); 2010 (Tibbet, C., LSA Associates, Inc.); 2012 (Paul, Daniel D., ICF International)	SB-04335, SB-05495, SB-05614, SB-06291, SB-06441, SB-06720, SB-07451, SB-07666, SB-07955
P-36-011282	CA-SBR-011282H	24145 Barton Rd, Colton; Resource Name - Montecito Cemetary; Resource Name - Montecito Memorial Park	Building, Structure	Historic	HP29; HP40	2003 (VAN WORMER+WALTER, Walter Enterprises)	SB-03925
P-36-012492		25676 Lawton moved to 25092 Barton, Loma Linda			AH15	1987 (HATHEWAY)	
P-36-012871		Resource Name - CRM Tech 1762-1; 10753 Poplar St, Loma Linda	Building	Historic	HP02	2005 (J. Smallwood, CRM Tech)	SB-05249
P-36-012872		Resource Name - CRM Tech 1762-2; 10763 Poplar St, Loma Linda	Building	Historic	HP02	2005 (Josh Smallwood, CRM TECH)	SB-05249
P-36-012873		Resource Name - CRM Tech 1762-3; 10845 Poplar St, Loma Linda	Building	Historic	HP02	2005 (Josh Smallwood, CRm Tech)	SB-05249
P-36-012874		Resource Name - CRM Tech 1762-4; 10861 Poplar St, Loma Linda	Building	Historic	HP02	2005 (Josh Smallwood, CRM TECH)	SB-05249

Resource List

EMT2407

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-36-013878		Resource Name - CRM Tech 2142-1H; Teel Residence, 24404 Univ, LL	Building	Historic	HP02	2007 (Terri Jacquemain, CRM TECH)	SB-05854
P-36-015505		11170/76 Ritchie Circle, Loma Linda; Resource Name - Captain Davis House	Building	Historic	AH15	1987 (R. Hatheway, Hatheway & McKenna)	
P-36-017533		Mound City, Loma Linda; Resource Name - Shryock Hall, Loma Linda University	Building	Historic	HP15	2008 (Jeaneffe A. McKenna, McKenna et al.)	
P-36-020252		Resource Name - 24955 Rdls Blvd, Loma Linda; Arrowhead Motel/Kool Kactus Kafe	Building	Historic	AH15; HP05	1987 (R. Hatheway, Hatheway & McKenna); 2006 (D. Painter, Painter Preservation & Planning)	SB-01764, SB-07667
P-36-020253		10650 Anderson St, Loma Linda; Resource Name - Loma Linda Academy	Building	Historic	AH15	1987 (Roger Hatheway, Hatheway & McKenna)	
P-36-020801		24785 Stewart St, Loma Linda; Resource Name - Evans Hall/Cutler Hall, Loma Linda University	Building	Historic	HP15	2008 (Jeanette A. McKenna, McKenna et al.)	SB-06438
P-36-020802		24745 Stewart St, Loma Linda; Resource Name - Shryock Hall/ Loma Linda University	Building	Historic	HP15	2008 (Jeanette A. McKenna, McKenna et al.)	SB-06438
P-36-026049		Resource Name - LSA-SCE1110-PF-S-4	Site	Historic	AH06	2012 (Phil Fulton, LSA)	SB-07955
P-36-026051		Resource Name - Devers-San Bernardino 220kV; Other - P-33-015035; Resource Name - SCE Hayfield-Chino 220kV Transmission Line; Other - Julian Hinds-Mirage 220kV, Devers-Mirage 220 kV, Devers-San Bernardino No. 1 220kV; Other - Mira Loma-Vista 220 kV, and Chino Mira Loma No. 3 220 kV Transmission Lines; Voided - 36-027693	Structure	Historic	HP11	2012 (Davidson, et al., LSA Associates, Inc.); 2013 (Wendy Tinsley/Steven Treffers, Urbana Preservation/SWCA); 2014 (Daniel Ballester, CRM Tech); 2018 (Robert Cunningham, ECORP); 2019 (Riordan Goodwin, LSA)	SB-07946, SB-07955, SB-08426
P-36-029454		Resource Name - Elizabeth Crawford Residence	Building	Historic	HP02	2015 (Jeanette A. McKenna, McKenna et al.)	SB-08202

Resource List

EMT2407

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-36-029455		Resource Name - Robert and Elsie Smith Residence	Building	Historic	HP02	2015 (Jeanette A. McKenna, Mckenna et al)	SB-08202
P-36-029994	CA-SBR-029994H	Resource Name - CRM TECH 3006-1H	Site	Historic	AH05	2015 (Jesse Yorck, CRM Tech)	

NATIVE AMERICAN HERITAGE COMMISSION

August 23, 2024

David Brunzell
BCR Consulting, LLC

Via Email to: *bcrllc2008@gmail.com*

Re: **Loma Linda University Children's Hospital Pediatric Medical Office Building Project**, San Bernardino County

Dear Mr. Brunzell:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information submitted for the above referenced project. The results were positive. Please contact the San Manuel Band of Mission Indians on the attached list for information. Please note that tribes do not always record their sacred sites in the SLF, nor are they required to do so. A SLF search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with a project's geographic area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites, such as the appropriate regional California Historical Research Information System (CHRIS) archaeological Information Center for the presence of recorded archaeological sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. Please contact all of those listed; if they cannot supply information, they may recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Cameron.vela@nahc.ca.gov.

Sincerely,

Cameron Vela

Cameron Vela
Cultural Resources Analyst

Attachment

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

Native American Heritage Commission
Native American Contact List
San Bernardino County
8/23/2024

County	Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Email Address	Cultural Affiliation
San Bernardino	Agua Caliente Band of Cahuilla Indians	F	Lacy Padilla, Director of Historic Preservation/THPO	5401 Dinah Shore Drive Palm Springs, CA, 92264	(760) 333-5222	ACBCI-THPO@aguacaliente.net	Cahuilla
	Augustine Band of Cahuilla Indians	F	Tribal Operations,	84-001 Avenue 54 Coachella, CA, 92236	(760) 398-4722	info@augustinetribe-nsn.gov	Cahuilla
	Cabazon Band of Cahuilla Indians	F	Doug Welmas, Chairperson	84-245 Indio Springs Parkway Indio, CA, 92203	(760) 342-2593	jstapp@cabazonindians-nsn.gov	Cahuilla
	Cahuilla Band of Indians	F	Anthony Madrigal, Tribal Historic Preservation Officer	52701 CA Highway 371 Anza, CA, 92539	(951) 763-5549	anthonymad2002@gmail.com	Cahuilla
	Cahuilla Band of Indians	F	Erica Schenk, Chairperson	52701 CA Highway 371 Anza, CA, 92539	(951) 590-0942	chair@cahuilla-nsn.gov	Cahuilla
	Cahuilla Band of Indians	F	BobbyRay Esparza, Cultural Director	52701 CA Highway 371 Anza, CA, 92539	(951) 763-5549	besparza@cahuilla-nsn.gov	Cahuilla
	Gabrieleno Band of Mission Indians - Kizh Nation	N	Christina Swindall Martinez, Secretary	P.O. Box 393 Covina, CA, 91723	(844) 390-0787	admin@gabrielenoindians.org	Gabrieleno

Native American Heritage Commission
Native American Contact List
San Bernardino County
8/23/2024

Gabrieleno Band of Mission Indians - Kizh Nation	N	Andrew Salas, Chairperson	P.O. Box 393 Covina, CA, 91723	(844) 390-0787	admin@gabrielenoindians.org	Gabrieleno
Gabrieleno/Tongva San Gabriel Band of Mission Indians	N	Anthony Morales, Chairperson	P.O. Box 693 San Gabriel, CA, 91778	(626) 483-3564	GTTribalcouncil@aol.com	Gabrieleno
Gabrielino Tongva Indians of California Tribal Council	N	Christina Conley, Cultural Resource Administrator	P.O. Box 941078 Simi Valley, CA, 93094	(626) 407-8761	christina.marsden@alumni.usc.edu	Gabrielino
Gabrielino Tongva Indians of California Tribal Council	N	Robert Dorame, Chairperson	P.O. Box 490 Bellflower, CA, 90707	(562) 761-6417	gtongva@gmail.com	Gabrielino
Gabrielino/Tongva Nation	N	Sandonne Goad, Chairperson	106 1/2 Judge John Aiso St., #231 Los Angeles, CA, 90012	(951) 807-0479	sgoad@gabrielino-tongva.com	Gabrielino
Gabrielino-Tongva Tribe	N	Sam Dunlap, Cultural Resource Director	P.O. Box 3919 Seal Beach, CA, 90740	(909) 262-9351	tongvatcr@gmail.com	Gabrielino
Gabrielino-Tongva Tribe	N	Charles Alvarez, Chairperson	23454 Vanowen Street West Hills, CA, 91307	(310) 403-6048	Chavez1956metro@gmail.com	Gabrielino
Los Coyotes Band of Cahuilla and Cupeño Indians	F	Ray Chapparosa, Chairperson	P.O. Box 189 Warner Springs, CA, 92086-0189	(760) 782-0711		Cahuilla
Morongo Band of Mission Indians	F	Ann Brierty, THPO	12700 Pumarra Road Banning, CA, 92220	(951) 755-5259	abrierty@morongo-nsn.gov	Cahuilla Serrano

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Morongo Band of Mission Indians	F	Robert Martin, Chairperson	12700 Pumarra Road Banning, CA, 92220	(951) 755-5110	abrierty@morongo-nsn.gov	Cahuilla Serrano
Pala Band of Mission Indians	F	Alexis Wallick, Assistant THPO	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3537	awallick@palatribe.com	Cupeno Luiseno
Pala Band of Mission Indians	F	Christopher Nejo, Legal Analyst/Researcher	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3564	cnejo@palatribe.com	Cupeno Luiseno
Pala Band of Mission Indians	F	Shasta Gaughen, Tribal Historic Preservation Officer	PMB 50, 35008 Pala Temecula Road Pala, CA, 92059	(760) 891-3515	sgaughen@palatribe.com	Cupeno Luiseno
Pechanga Band of Indians	F	Tuba Ebru Ozdil, Pechanga Cultural Analyst	P.O. Box 2183 Temecula, CA, 92593	(951) 770-6313	eozdil@pechanga-nsn.gov	Luiseno
Pechanga Band of Indians	F	Steve Bodmer, General Counsel for Pechanga Band of Indians	P.O. Box 1477 Temecula, CA, 92593	(951) 770-6171	sbodmer@pechanga-nsn.gov	Luiseno
Quechan Tribe of the Fort Yuma Reservation	F	Manfred Scott, Acting Chairman - Kw'ts'an Cultural Committee	P.O. Box 1899 Yuma, AZ, 85366	(928) 210-8739	culturalcommittee@quechantribe.com	Quechan
Quechan Tribe of the Fort Yuma Reservation	F	Jill McCormick, Historic Preservation Officer	P.O. Box 1899 Yuma, AZ, 85366	(928) 261-0254	historicpreservation@quechantribe.com	Quechan
Quechan Tribe of the Fort Yuma Reservation	F	Jordan Joaquin, President, Quechan Tribal Council	P.O.Box 1899 Yuma, AZ, 85366	(760) 919-3600	executivesecretary@quechantribe.com	Quechan

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Ramona Band of Cahuilla	F	Joseph Hamilton, Chairperson	P.O. Box 391670 Anza, CA, 92539	(951) 763-4105	admin@ramona-nsn.gov	Cahuilla
Ramona Band of Cahuilla	F	John Gomez, Environmental Coordinator	P. O. Box 391670 Anza, CA, 92539	(951) 763-4105	jgomez@ramona-nsn.gov	Cahuilla
Rincon Band of Luiseno Indians	F	Joseph Linton, Tribal Council/Culture Committee Member	One Government Center Lane Valley Center, CA, 92082	(760) 803-3548	jlinton@rincon-nsn.gov	Luiseno
Rincon Band of Luiseno Indians	F	Cheryl Madrigal, Cultural Resources Manager/Tribal Historic Preservation Officer	One Government Center Lane Valley Center, CA, 92082	(760) 648-3000	cmadrigal@rincon-nsn.gov	Luiseno
Rincon Band of Luiseno Indians	F	Denise Turner Walsh, Attorney General	One Government Center Lane Valley Center, CA, 92082	(760) 689-5727	dwalsh@rincon-nsn.gov	Luiseno
Rincon Band of Luiseno Indians	F	Laurie Gonzalez, Tribal Council/Culture Committee Member	One Government Center Lane Valley Center, CA, 92082	(760) 484-4835	lgonzalez@rincon-nsn.gov	Luiseno
San Manuel Band of Mission Indians	F	Alexandra McCleary, Senior Manager of Cultural Resources Management	26569 Community Center Drive Highland, CA, 92346	(909) 633-0054	alexandra.mccleary@sanmanuel-nsn.gov	Serrano
Santa Rosa Band of Cahuilla Indians	F	Vanessa Minott, Tribal Administrator	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	vminott@santarosa-nsn.gov	Cahuilla

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Santa Rosa Band of Cahuilla Indians	F	Steven Estrada, Tribal Chairman	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	sestrada@santarosa-nsn.gov	Cahuilla
Serrano Nation of Mission Indians	N	Wayne Walker, Co-Chairperson	P. O. Box 343 Patton, CA, 92369	(253) 370-0167	serranonation1@gmail.com	Serrano
Serrano Nation of Mission Indians	N	Mark Cochrane, Co-Chairperson	P. O. Box 343 Patton, CA, 92369	(909) 578-2598	serranonation1@gmail.com	Serrano
Soboba Band of Luiseno Indians	F	Joseph Ontiveros, Tribal Historic Preservation Officer	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-5279	jontiveros@soboba-nsn.gov	Cahuilla Luiseno
Soboba Band of Luiseno Indians	F	Jessica Valdez, Cultural Resource Specialist	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-6261	jvaldez@soboba-nsn.gov	Cahuilla Luiseno
Torres-Martinez Desert Cahuilla Indians	F	Mary Belardo, Cultural Committee Vice Chair	P.O. Box 1160 Thermal, CA, 92274	(760) 397-0300	belardom@gmail.com	Cahuilla
Torres-Martinez Desert Cahuilla Indians	F	Abraham Becerra, Cultural Coordinator	P.O. Box 1160 Thermal, CA, 92274	(760) 397-0300	abecerra@tmdci.org	Cahuilla
Torres-Martinez Desert Cahuilla Indians	F	Thomas Tortez, Chairperson	P.O. Box 1160 Thermal, CA, 92274	(760) 397-0300	thomas.tortez@tmdci.org	Cahuilla
Torres-Martinez Desert Cahuilla Indians	F	Gary Resvaloso, TM MLD	P.O. Box 1160 Thermal, CA, 92274	(760) 777-0365	grestmtm@gmail.com	Cahuilla
Torres-Martinez Desert Cahuilla Indians	F	Alesia Reed, Cultural Committee Chairwoman	P.O. Box 1160 Thermal, CA, 92274	(760) 397-0300	lisareed990@gmail.com	Cahuilla

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This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Loma Linda University Children's Hospital Pediatric Medical Office Building Project, San Bernardino County.

WESTERN SCIENCE CENTER

October 6th, 2024

BCR Consulting, LLC
Timothy Blood
505 W. 8th St.
Claremont, CA 91711

Dear Mr. Blood,

This letter presents the results of a record search conducted for Loma Linda University Children's Hospital Pediatric Medical Office Building Project located in the city of Loma Linda, San Bernardino County, CA. The project site is located south of Barton Road and east of Anderson Street on Township 1 South, Range 4 West, Section 36 of the *San Bernardino South, CA* USGS 7.5 minute quadrangle.

The geologic units underlying this project are mapped as alluvial sand, gravel, and clay from the Holocene epoch, with nearby units from the San Timoteo Formation (Dibblee and Minch 2003). Holocene alluvial units are considered to be of high preservation value, but material found is unlikely to be fossil material due to the relatively modern associated dates of the deposits. However, if development requires any substantial depth of disturbance, the likelihood of reaching Pleistocene alluvial sediments would increase. The Western Science Center does not have localities within the project area or within a 1 mile radius.

While the presence of any fossil material is unlikely, if excavation activity disturbs deeper sediment dating to the earliest parts of the Holocene or Late Pleistocene periods, or extends towards the San Timoteo Formation, the material would be scientifically significant. Excavation activity associated with the development of the project area is unlikely to be paleontologically sensitive, but caution during development should be observed.

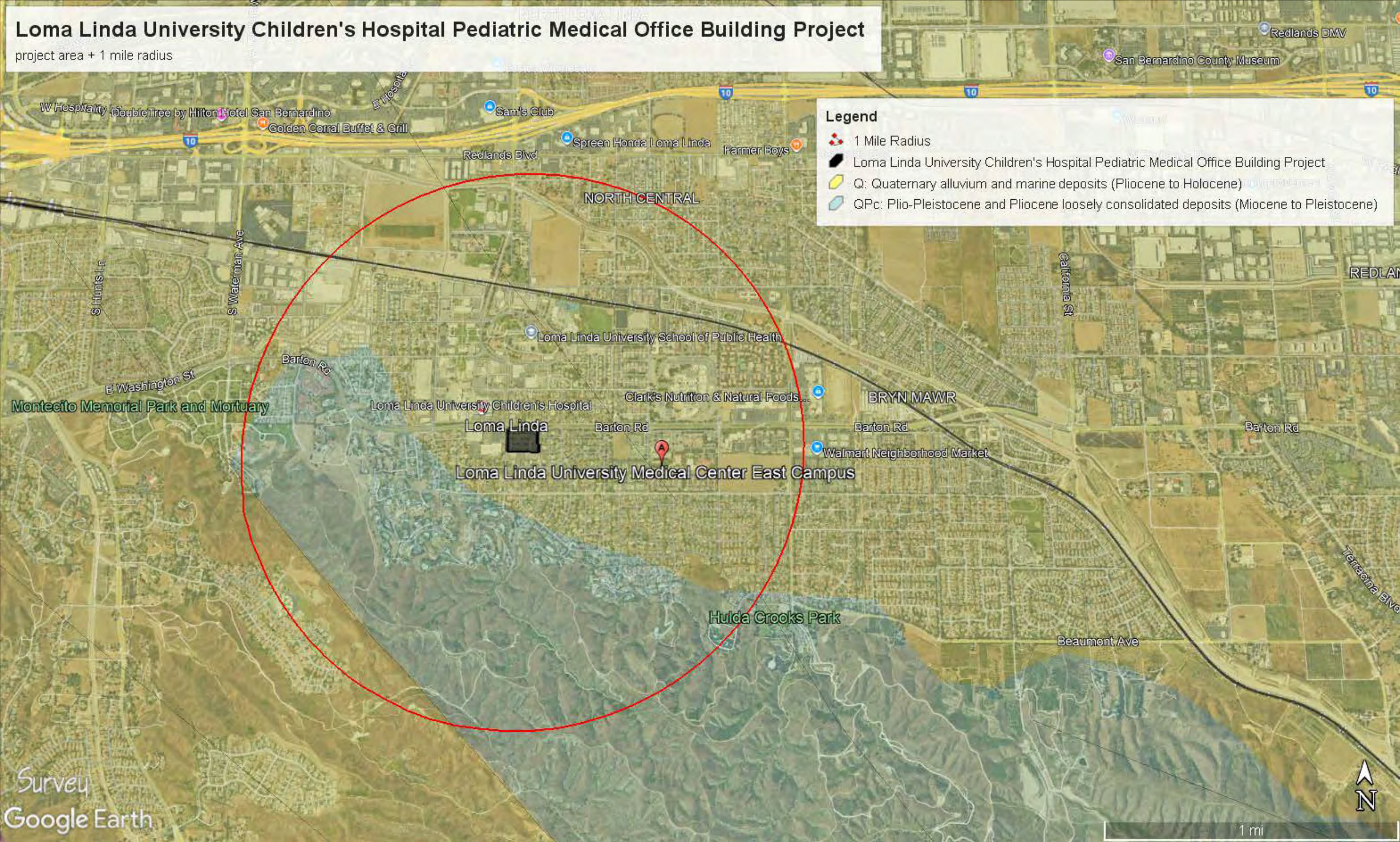
If you have any questions, or would like further information, please feel free to contact me at bstoneburg@westerncentermuseum.org.

Sincerely,

Brittney Elizabeth Stoneburg, MSc
Collections Manager

Loma Linda University Children's Hospital Pediatric Medical Office Building Project

project area + 1 mile radius



APPENDIX C

GEOTECHNICAL ENGINEERING REPORT

Geotechnical Engineering Report

Proposed Children's Clinics Outpatient Pavilion
Loma Linda, San Bernardino County, California
December 21, 2022
Terracon Project No. CB225133

Prepared for:
Loma Linda University Shared Services
Loma Linda, California

Prepared by:
Terracon Consultants, Inc.
Colton, California

Terracon

December 21, 2022

Loma Linda University Shared Services
1115 Mountain View Avenue, Suite 101
Loma Linda, California 92354

Attn: Ms. Leticia Gasca-Guerrero
P: (909) 558 5699
E: LGascaguerrero@llu.edu

Re: Geotechnical Engineering Report
Proposed Children's Clinics Outpatient Pavilion
SEC of Barton Road and Anderson Street
Loma Linda, San Bernardino County, California
Terracon Project No. CB225133

Dear Ms. Gasca-Guerrero:

We have completed the Geotechnical Engineering services for the above referenced project. This study was performed in general accordance with Terracon Proposal No. PCB225133 dated August 25, 2022. This report presents the findings of the subsurface exploration and provides geotechnical recommendations concerning earthwork and the design and construction of foundations, floor slabs and pavements for the proposed project.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning this report or if we may be of further service, please contact us.

Sincerely,
Terracon Consultants, Inc.

Ali Tabatabaei, Ph.D., G.E.
Geotechnical Project Engineer

REGISTERED PROFESSIONAL ENGINEER
SEYEDALI TABATABAEI
No. 3159
GEOTECHNICAL
STATE OF CALIFORNIA

Keith P. Askew, P.E., G.E.
Geotechnical Department Manager

Terracon Consultants, Inc. 1355 E. Cooley Dr. Colton, California 92324
P (909) 824 7311 F (909) 301 6016 terracon.com

REPORT TOPICS

Note: This report was originally delivered in a web-based format. Orange Bold text in the report indicates a referenced section heading. The PDF version also includes hyperlinks which direct the reader to that section and clicking on the *GeoReport* logo will bring you back to this page. For more interactive features, please view your project online at client.terracon.com.

ATTACHMENTS

Note: Refer to each individual Attachment for a listing of contents.

Geotechnical Engineering Report

Proposed Children's Clinics Outpatient Pavilion
SEC of Barton Road and Anderson Street
Loma Linda, San Bernardino County, California
Terracon Project No. CB225133
December 21, 2022

INTRODUCTION

This report presents the results of our subsurface exploration and geotechnical engineering services performed for the proposed Children Hospital Outpatient Pavilion to be located at SEC of Barton Road and Anderson Street in Loma Linda, San Bernardino County, California. The purpose of these services is to provide information and geotechnical engineering recommendations relative to:

- Subsurface soil conditions
- Groundwater conditions and historic high groundwater
- 2019 California Building Code (CBC) seismic design parameters
- Liquefaction analysis
- Subgrade preparation/earthwork recommendations
- Foundation design and concrete slabs-on-grade
- Preliminary pavement section design
- Infiltration and drainage

The geotechnical engineering Scope of Services for this project included the advancement of eleven test borings to depths ranging from approximately 5 to 51½ feet below existing site grades. Our scope also included advancing four Cone Penetration Test (CPT) soundings to depths ranging from approximately 43 to 76 feet below existing grades, percolation testing, laboratory testing, and preparation of this report.

Maps showing the site and boring locations are shown in the **Site Location** and **Exploration Plan** sections, respectively. The results of the laboratory testing performed on soil samples obtained from the site during the field exploration are included on the boring logs and/or as separate graphs in the **Exploration Results** section.

SITE CONDITIONS

The following description of site conditions is derived from our site visit in association with the field exploration and our review of publicly available geologic and topographic maps.

Item	Description
Parcel Information	The project is located at the SEC of Barton Road and Anderson Street in Loma Linda, San Bernardino County, California, within the campus of Loma Linda University. The footprint (per plans provided to us) for the new structure is approximately 21,300 square feet or approximately 0.49 acres. The project site is approximately 5.84 acres. Center of the proposed structure is Latitude 34.0478° N / Longitude 117.2606° W (approximate) See **Site Location**
Existing Improvements	The proposed footprint for development is currently an existing parking lot with associated drive lanes and landscaping. Planters, curbs and lighting are present.
Current Ground Cover	Asphalt concrete parking, trees and shrubs and concrete flatwork.
Existing Topography	The site is relatively flat with a slope to the north. Elevations vary from approximately 1,175 feet to 1,165 feet.

PROJECT DESCRIPTION

Our initial understanding of the project was provided in our proposal and was discussed during project planning. A period of collaboration has transpired since the project was initiated, and our final understanding of the project conditions is as follows:

Item	Description
Proposed Development	The project includes constructing a 4- or 5-story medical office building for outpatient services for children. The facility is not expected to fall under review criteria by HCAI (formerly OSHPD).
Building Construction	Not provided. A likely construction would be steel moment frame with a slab on grade, using spread footings or a mat foundation.
Finished Floor Elevation	Unknown, assume close to existing grade.
Structural Loads (assumed)	■ Columns: 600 kips ■ Walls: 1 to 3 kips per linear foot (klf) ■ Slabs: 200 pounds per square foot (psf)
Grading Requirements	Up to 5 feet of cut and fill may be required to develop final grade, excluding remedial grading. Permanent slopes are not anticipated.
Below Grade Structures	Not specified; inclusion of a basement for the structure is possible.
Infiltration Systems	An on-site stormwater retention/infiltration system is planned; therefore, we have included infiltration testing in this current scope of work and report.
Free-Standing Retaining Wall	Retaining walls up to 12 feet high may be constructed as part of site development if a basement is included.

Item	Description
Pavements	Paved driveway and parking will be constructed on site. We assume both rigid (concrete) and flexible (asphalt) pavement sections should be considered. Please confirm this assumption. Anticipated traffic indices (TIs) are as follows for asphalt pavement: ■ Auto Parking Areas: TI=4.5 ■ Drive Lanes TI=5.5 ■ Truck Delivery Areas: TI=6.0 ■ The pavement design period is 20 years. Anticipated average daily truck traffic (ADTT) is as follows for concrete pavement: ■ Light Duty: ADTT=1 (Category A) ■ Medium Duty: ADTT=25 (Category B) ■ Heavy Duty: ADTT=700 (Category C)

GEOTECHNICAL CHARACTERIZATION

Site Geology

The site is located in the San Bernardino Valley, a structural basin of the northern Peninsular Ranges geomorphic province. The San Bernardino Valley is formed by a structurally down-dropped block of crystalline bedrock overlain by a thick accumulation of alluvium composed of floodplain and alluvial-fan deposits derived from highlands located to the south, east, north and northwest. The valley is bordered to the north and east by the northwest-to-southeast-trending San Andreas fault and San Bernardino Mountains. The San Jacinto fault zone, located southwest of the site, forms the boundary between two low-relief regions: The Perris Block and the San Jacinto Mountains Block (Morton and Miller, 2006). The San Timoteo Badlands is south of the site and forms the northern limit of the San Jacinto Mountains Block.

Subsurface Profile

We have developed a general characterization of the subsurface soil and groundwater conditions based upon our review of the data and our understanding of the geologic setting and planned construction. The table below summarizes our geotechnical characterization.

The geotechnical characterization forms the basis of our geotechnical calculations and evaluation of site preparation, foundation options and pavement options. As noted in **General Comments**, the characterization is based upon widely spaced exploration points across the site, and variations are likely.

Conditions encountered at each boring location are indicated on the individual boring logs shown in the **Exploration Results** section and are attached to this report. Stratification boundaries on the boring logs represent the approximate location of changes in native soil types; in situ, the transition between materials may be gradual.

Stratum	Approximate Depth to Bottom of Stratum (feet)	Material Description [1]	Consistency/Density
Surface Cover	---	Asphalt Concrete (AC), approximately 3" to 5" thick	---
	----	Aggregate Base (AB), approximately 2" to 5" thick	---
Stratum I	76 (maximum depth of the explorations)	Interbedded layers of silty clayey sand, clayey sand, well graded sand with varying amounts of silt and gavel, silty clay, and silty sand, brown	---

Groundwater Conditions

The borings were advanced using continuous flight auger drilling techniques that allow short-term groundwater observations to be made while drilling. Groundwater seepage was not observed within the maximum depths of exploration during or at the completion of drilling. According to data collected from the Water Data Library of California Department of Water Resources (DWR) historic groundwater levels are deeper than 50 feet.

Groundwater level fluctuations occur due to seasonal variations in the amount of rainfall, runoff and other factors not evident at the time the borings were performed. We do not anticipate groundwater to impact construction.

SEISMIC CONSIDERATIONS

Based on the soil properties encountered at the site and as described on the exploration logs and results, it is our opinion that the Seismic Site Classification is D. The 2019 California Building Code (CBC) Seismic Design Parameters have been generated using the SEAOC/OSHPD Seismic Design Maps Tool. This web-based software application calculates seismic design parameters in accordance with ASCE 7-16 and 2019 CBC. The 2019 CBC requires that a site-specific ground motion study be performed in accordance with Section 11.4.8 of ASCE 7-16 for Site Class D sites with a mapped S_1 value greater than or equal 0.2.

However, Section 11.4.8 of ASCE 7-16 includes an exception from such analysis for specific structures on Site Class D sites. The commentary for Section 11 of ASCE 7-16 (Page 534 of Section C11 of ASCE 7-16) states that "In general, this exception effectively limits the requirements for site-specific hazard analysis to very tall and or flexible structures at Site Class D sites." Based on our understanding of the proposed structures, it is our assumption that the exception in Section 11.4.8 applies to the proposed structure(s). However, the structural engineer should verify the applicability of this exception.

Based on this exception, the spectral response accelerations presented below were calculated using the site coefficients (F_a and F_v) from Tables 1613.2.3(1) and 1613.2.3(2) presented in Section 16.4.4 of the 2019 CBC.

Description	Value
Site Classification (CBC) [1]	D [2]
Site Latitude (°N)	34.0478
Site Longitude (°W)	117.2606
S_s Spectral Acceleration for a 0.2-Second Period	2.428
S_1 Spectral Acceleration for a 1-Second Period	0.973
F_a Site Coefficient for a 0.2-Second Period	1.0
F_v Site Coefficient for a 1-Second Period	1.7
Site Modified Peak Ground Acceleration	1.124g
De-aggregated Modal Magnitude [3]	8.1

1. Seismic site classification in general accordance with the *2019 California Building Code*.
2. The 2019 California Building Code (CBC) requires a site soil profile determination extending to a depth of 100 feet for seismic site classification. The current scope does not include the required 100-foot soil profile determination. Our borings were extended to a maximum depth of 51½ feet. This seismic site class definition considers that similar or denser soils continue below the maximum depth of the subsurface exploration. Additional exploration to deeper depths would be required to confirm the conditions below the current depth of exploration.
3. These values were obtained using on-line Unified Hazard Tool by the USGS (https://earthquake.usgs.gov/hazards/interactive/) for return period of 2% in 50 years accessed

A site-specific ground motion study may reduce design values and consequently construction costs. We recommend consulting with a structural engineer to evaluate the need for such study and its potential impact on construction costs. Terracon should be contacted if a site-specific ground motion study is desired.

Faulting and Estimated Ground Motions

The site is located in the seismically active southern California area. The type and magnitude of seismic hazards affecting the site are dependent on the distance to causative faults, the intensity, and the magnitude of the seismic event. As calculated using the USGS Unified Hazard Tool, the San Jacinto (San Bernardino segment) Fault, which is considered to have the most significant effect at the site from a design standpoint, has a maximum earthquake magnitude of 8.01 and is located approximately 0.83 kilometers from the site.

Based on the USGS Design Maps Summary Report, using the American Society of Civil Engineers (ASCE 7-16) standard, the peak ground acceleration (PGA_M) at the project site is expected to be 1.124 g. Based on the USGS Unified Hazard Tool, the project site has a de-aggregated modal magnitude of 8.1. The site is not located within an Alquist-Priolo Earthquake Fault Zone based on our review of the State Fault Hazard Maps.

LIQUEFACTION AND SEISMIC SETTLEMENT

Liquefaction is a mode of ground failure that results from the generation of high pore-water pressures during earthquake ground shaking, causing loss of shear strength, and is typically a hazard where loose sandy soils exist below groundwater. San Bernardino County has designated certain areas as potential liquefaction hazard zones. These are areas considered at a risk of liquefaction-related ground failure during a seismic event, based upon mapped surficial deposits and the presence of a relatively shallow water table.

The subsurface materials generally consist of Interbedded layers of silty clayey sand, clayey sand, well graded sand with varying amounts of silt and gavel, silty clay, and silty sand extending to the maximum depth of the explorations approximately 76 feet bgs. Groundwater seepage was not observed within the maximum depths of exploration during or at the completion of drilling and has historically been greater than 50 feet bgs.

According to the County of San Bernardino geologic hazard maps, the site is not within an area identified as having liquefaction potential. Historic groundwater levels are not within 50 feet of the ground surface; therefore, liquefaction is not anticipated.

Seismic Settlement

To determine the amount of seismic settlement (dry sand), we utilized the software "LiquefyPro" by CivilTech Software, seismic settlement was estimated using the soil profile from exploratory borings and CPT soundings. A Peak Ground Acceleration (PGA) of 1.124g and the de-aggregated mode magnitude of 8.1 were utilized as input into the liquefaction analysis program. Settlement analysis used the Ishihara / Yoshimine method and the fines percentage were corrected for liquefaction using the Modify Stark/Olson method.

We performed a seismic settlement analysis to determine the dry seismic settlement using data from boring B-1 and B-2., and CPTs 1, 2, 3, and 4. Based on the calculation results, seismically induced settlement (dry sand) is estimated to be on the order of 6½ to 9½ inches. Differential seismic settlement is estimated to be on the order of 2 to 3 inches total over a distance of 50 feet.

GEOTECHNICAL OVERVIEW

The site appears suitable for the proposed construction based upon geotechnical conditions encountered in the test borings, provided that the recommendations provided in this report are implemented in the design and construction phases of this project.

Geotechnical engineering recommendations for foundation systems and other earth connected phases of the project are outlined below. The recommendations contained in this report are based upon the results of field and laboratory testing, engineering analyses, and our current understanding of the proposed project.

On-site soils generally consisted of Interbedded layers of silty clayey sand, clayey sand, well graded sand with varying amounts of silt and gavel, silty clay, and silty sand extending to the maximum depth of the explorations approximately 76 feet bgs.

Based on the conditions encountered and the potential for relatively large total and differential seismic settlement, we recommend the proposed building be supported on drilled shaft foundations extending into undisturbed native soils. Other elements of the structure that are able to tolerate the estimated amount of settlement may be founded on mat foundationsbearing on compacted engineered fill.

No groundwater was encountered in any of the borings within the drilling depths at the time of drilling. Groundwater is not expected to affect shallow foundation construction on this site.

The **General Comments** section provides an understanding of the report limitations.

EARTHWORK

The following recommendations include site preparation, excavation, subgrade preparation and placement of engineered fills on the project. The recommendations presented for design and construction of earth supported elements including foundations, slabs, and pavements are contingent upon following the recommendations outlined in this section.

Earthwork on the project should be observed and evaluated by Terracon. The evaluation of earthwork should include observation and testing of engineered fill, subgrade preparation, foundation bearing soils, and other geotechnical conditions exposed during the construction of the project.

Site Preparation

Strip and remove existing vegetation, debris, pavements and other deleterious materials from proposed building and pavement areas. Exposed surfaces should be free of mounds and depressions which could prevent uniform compaction. The site should be initially graded to create a relatively level surface to receive fill and provide for a relatively uniform thickness of fill beneath proposed building structures.

All materials derived from the demolition of existing structures and pavements should be removed from the site and not be allowed for use as on-site fill, unless processed in accordance with the fill requirements included in this report.

Existing utility lines were noted across the site. However, although no evidence of other underground facilities such as septic tanks, cesspools, and basements, was observed during the site reconnaissance, such features could be encountered during construction. If unexpected fills, utilities, or underground facilities are encountered, such features should be removed and the excavation thoroughly cleaned prior to backfill placement and/or construction.

Subgrade Preparation

Due to the low bearing capacity of near surface soils and anticipated seismic settlements, mat foundations should be supported on minimum of 3 feet of engineered fill below the bottom of mat foundations or 5 feet below existing site grades, whichever is greater. Grading for proposed mat foundations should incorporate the limits of the foundations plus a lateral distance of 5 feet beyond the outside edge of footings, where space is available. On-site soils are considered suitable to be used as engineered fill materials.

Subgrade soils beneath exterior slabs and pavements should be removed to a depth of 1 foot beneath proposed slab or pavement section, or existing grade, whichever is greater. The bottom of the excavation should then be scarified, moisture conditioned, and compacted to a minimum depth of 10 inches.

Exposed areas which will receive fill, once properly cleared and benched where necessary, should be scarified to a minimum depth of 10 inches, moisture conditioned, and compacted per the compaction requirements in this report. Compacted fill soils should then be placed to the design grades, and the moisture content and compaction of soils should be maintained until slab, pavement, or proposed improvements are constructed.

Based upon the subsurface conditions determined from the geotechnical exploration, subgrade soils exposed during construction are anticipated to be relatively workable. However, the workability of the subgrade may be affected by precipitation, repetitive construction traffic or other factors. If unworkable conditions develop, workability may be improved by scarifying and drying.

Excavation

We anticipate that excavations for the proposed construction can be accomplished with conventional earthmoving equipment. The bottom of excavations should be thoroughly cleaned of loose soils and disturbed materials prior to backfill placement and/or construction.

Individual contractors are responsible for designing and constructing stable, temporary excavations. Excavations should be sloped or shored in the interest of safety following local, and federal regulations, including current OSHA excavation and trench safety standards.

Fill Material Types

All fill materials should be inorganic soils free of vegetation, debris, and fragments larger than three inches in size. Pea gravel or other similar non-cementitious, poorly-graded materials should not be used as fill or backfill without the prior approval of the geotechnical engineer.

Clean on-site soils or approved imported materials may be used as fill material for the following:

■ general site grading	■ foundation backfill
■ foundation areas	■ pavement areas
■ interior floor slab areas	■ exterior slab areas

If imported soils are used as fill materials to raise grades, these soils should conform to low volume change materials and should conform to the following requirements:

Gradation	**Percent Finer by Weight (ASTM C 136)**
3"	100
No. 4 Sieve	50 - 100
No. 200 Sieve	20 - 50

- Liquid Limit .... 30 (max)
- Plasticity Index .... 15 (max)
- Maximum Expansive Index* .... 20 (max)

*ASTM D 4829

The contractor shall notify the Geotechnical Engineer of import sources sufficiently ahead of their use so that the sources can be observed and approved as to the physical characteristic of the import material. For all import material, the contractor shall also submit current verified reports from a recognized analytical laboratory indicating that the import has a "not applicable" (Class S0) potential for sulfate attack based upon current ACI criteria. The reports shall be accompanied by a written statement from the contractor that the laboratory test results are representative of all import material that will be brought to the job.

Engineered fill should be placed and compacted in horizontal lifts, using equipment and procedures that will produce recommended moisture contents and densities throughout the lift. Fill lifts should not exceed 10 inches loose thickness.

Compaction Requirements

Material Type and Location	Per the Modified Proctor Test (ASTM D 1557)		
	Minimum Compaction Requirement (%)	Range of Moisture Contents for Compaction Above Optimum	
		Minimum	Maximum
On-site soils and/or low volume change imported fill:			
Beneath foundations:	90	0%	+3%
Beneath interior slabs:	90	0%	+3%
Miscellaneous backfill:	90	0%	+3%
Beneath pavements:	95	0%	+3%
Utility Trenches*:	90	0%	+3%
Bottom of excavation receiving fill:	90	0%	+3%
Aggregate base (beneath pavements):	95	0%	+3%

* Upper 12 inches should be compacted to 95% within pavement and structural areas. Low-volume change imported soils should be used in structural areas.

Utility Trenches

We anticipate that the on-site soils will provide suitable support for underground utilities and piping that may be installed. Any soft and/or unsuitable material encountered at the bottom of excavations should be removed and be replaced with an adequate bedding material. A non-expansive granular material with a sand equivalent greater than 30 is recommended for bedding and shading of utilities, unless otherwise allowed by the utility manufacturer.

On-site materials are considered suitable for backfill of utility and pipe trenches from one foot above the top of the pipe to the final ground surface, provided the material is free of organic matter and deleterious substances.

Trench backfill should be mechanically placed and compacted as discussed earlier in this report. Compaction of initial lifts should be accomplished with hand-operated tampers or other lightweight compactors. Where trenches are placed beneath slabs or footings, the backfill should satisfy the gradation and expansion index requirements of engineered fill discussed in this report. Flooding or jetting for placement and compaction of backfill is not recommended.

Grading and Drainage

Positive drainage should be provided during construction and maintained throughout the life of the development. Infiltration of water into utility trenches or foundation excavations should be prevented during construction. Planters and other surface features which could retain water in areas adjacent to the building or pavements should be sealed or eliminated. In areas where sidewalks or paving do not immediately adjoin the structure, we recommend that protective slopes be provided with a minimum grade of approximately 5 percent for at least 10 feet from perimeter walls. Backfill against footings, exterior walls, and in utility and sprinkler line trenches should be well compacted and free of all construction debris to reduce the possibility of moisture infiltration.

We recommend a minimum horizontal setback distance of 10 feet from the perimeter of any building and the high-water elevation of the nearest storm-water retention basin.

Roof drainage should discharge into splash blocks or extensions when the ground surface beneath such features is not protected by exterior slabs or paving. Sprinkler systems and landscaped irrigation should not be installed within 5 feet of foundation walls.

Exterior Slab Design and Construction

Exterior slabs-on-grade, exterior architectural features, and utilities founded on, or in backfill may experience some movement due to the volume change of the backfill. To reduce the potential for damage caused by movement, we recommend:

- minimizing moisture increases in the backfill;
- controlling moisture-density during placement of backfill;
- using designs which allow vertical movement between the exterior features and adjoining structural elements;
- placing effective control joints on relatively close centers.

Construction Considerations

Upon completion of filling and grading, care should be taken to maintain the subgrade moisture content prior to construction of floor slabs and pavements. Construction traffic over the completed subgrade should be avoided to the extent practical. The site should also be graded to prevent ponding of surface water on the prepared subgrades or in excavations. If the subgrade should become desiccated, saturated, or disturbed, the affected material should be removed or these materials should be scarified, moisture conditioned, and recompacted prior to floor slab and pavement construction.

Onsite soils consist of cohesionless sandy soils. Such soils have the tendency to cave and slough during excavations. Therefore, formwork may be needed for foundation excavations.

We recommend that the earthwork portion of this project be completed during extended periods of dry weather if possible. If earthwork is completed during the wet season (typically November through April) it may be necessary to take extra precautionary measures to protect subgrade soils. Wet season earthwork operations may require additional mitigative measures beyond that which would be expected during the drier summer and fall months. This could include diversion of surface runoff around exposed soils and draining of ponded water on the site. Once subgrades are established, it may be necessary to protect the exposed subgrade soils from construction traffic.

Construction Observation and Testing

The geotechnical engineer should be retained during the construction phase of the project to observe earthwork and to perform necessary tests and observations during subgrade preparation, proof-rolling, placement and compaction of controlled compacted fills, backfilling of excavations to the completed subgrade.

The exposed subgrade and each lift of compacted fill should be tested, evaluated, and reworked as necessary until approved by the Geotechnical Engineer prior to placement of additional lifts. Each lift of fill should be tested for density and water content at a frequency of at least one test for every 2,500 square feet of compacted fill in the building areas and 5,000 square feet in pavement areas. One density and water content test for every 50 linear feet of compacted utility trench backfill.

In areas of foundation excavations, the bearing subgrade should be evaluated under the direction of the Geotechnical Engineer. In the event that unanticipated conditions are encountered, the Geotechnical Engineer should prescribe mitigation options.

In addition to the documentation of the essential parameters necessary for construction, the continuation of the Geotechnical Engineer into the construction phase of the project provides the continuity to maintain the Geotechnical Engineer's evaluation of subsurface conditions, including assessing variations and associated design changes.

SHALLOW FOUNDATIONS

Mat Foundation Design Recommendations

Mat foundation design recommendations are provided for those elements of the structure that are non-critical and can tolerate the estimated seismic settlement. Recommendations for foundations for the proposed structures and related structural elements are presented in the following paragraphs.

Provided the site has been prepared in accordance with the requirements noted in Earthwork, the following design parameters are applicable for mat foundations.

DESCRIPTION	RECOMENDATION
Foundation Type	Mat Foundation

DESCRIPTION	RECOMENDATION
Bearing Material	Engineered fill extending 3 feet below the bottom of foundations, or 5 feet below existing grades, whichever is greater.
Maximum Net Allowable Bearing Pressure[1]	2,500 psf
Modulus of Subgrade Reaction, kb	150 psi/in
Minimum Embedment Depth Below Finished Grade	18 inches

1. The maximum net allowable bearing pressure is the pressure in excess of the minimum surrounding overburden pressure at the foundation base elevation. An appropriate factor of safety has been applied. These bearing pressures can be increased by 1/3 for transient loads unless those loads have been factored to account for transient conditions.

The subgrade modulus (K_b) for the mat is affected by the size of the mat foundation and would vary according the following equation:

$$K_b = K_{v1} \times (B+1)^2/4B^2$$

Where: K_{v1} is the modulus of vertical subgrade reaction
B is the width of the mat foundation.

Thus, for a footing width of B = 10 ft bearing on the onsite soils, the subgrade modulus would be:

$$K_b = 150 \times (10+1)^2/(4\times 10^2) = 45 \text{ pci}$$

Foundation Construction Considerations

As noted in **Earthwork**, the footing excavations should be evaluated under the direction of the Geotechnical Engineer. The base of all foundation excavations should be free of water and loose soil, prior to placing concrete. Concrete should be placed soon after excavating to reduce bearing soil disturbance. Care should be taken to prevent wetting or drying of the bearing materials during construction. Excessively wet or dry material or any loose/disturbed material in the bottom of the footing excavations should be removed/reconditioned before foundation concrete is placed.

To ensure foundations have adequate support, special care should be taken when footings are located adjacent to trenches. The bottom of such footings should be at least 1 foot below an imaginary plane with an inclination of 1.5 horizontal to 1.0 vertical extending upward from the nearest edge of adjacent trenches.

DEEP FOUNDATIONS

Drilled pier recommendations are provided for the proposed structure. We recommend drilled piers be designed and constructed as presented below.

Drilled Pier Foundation – Design Parameters

Axial Loading: Axial compressive loads may be supported on straight-sided drilled piers. Compressive axial loads on pier foundations should be resisted by side friction along the pier, while uplift loads are resisted by side friction along the pier and by the weight of the pier.

It may be beneficial to install a monitoring well to determine the actual depth to groundwater for both design and construction purposes. Drilled piers extending below groundwater should not be designed for end bearing since it is very difficult if not impossible to adequately clean the bottom of the excavation in sandy soils to ensure end bearing can be relied upon.

Allowable compressive side friction axial capacity of drilled piers are provided for pile diameters of 2.0 to 5 feet in the attachments of this report. The allowable uplift capacities should only be based on two-thirds of the allowable side friction of the shaft; however, the weight of the foundation should be added to these values to obtain the actual allowable uplift capacities for drilled shafts. The allowable skin friction values are based on factors of safety of 2. We recommend that end bearing be neglected.

Based on the seismic settlement profiles, a majority of the seismic settlement will accumulate within the upper 30 feet of soils which will consequently induce downdrag loads (negative friction) on the piers. We recommend that an average negative side shear of 200 psf/ft be applied to each pier as a downdrag force to a depth of 30 feet bgs. Downdrag loads should be included with total loads and piers will start accumulating skin friction capacity beyond depths greater than 30 feet bgs.

Lateral Loading: The proposed structure may be subjected to lateral loading. The lateral resistance of a drilled pier can be estimated using L-PILE Analysis. The lateral load design L-Pile input parameters are provided in the tables below.

L-Pile Design Input Parameters					
Layer	Bottom Depth of Layer (feet)	L-PILE Soil Types*	Effective Unit Weight (pcf)	Friction Angle (degrees)	Undrained Shear Strength (psf)
1	5	4	110	30	---
2	10	4	110	31	---
3	15	4	110	31	---
4	20	4	115	31	---
5	25	4	115	33	---
6	30	4	120	33	---

L-Pile Design Input Parameters					
Layer	Bottom Depth of Layer (feet)	L-PILE Soil Types*	Effective Unit Weight (pcf)	Friction Angle (degrees)	Undrained Shear Strength (psf)
7	35	4	120	34	---
8	40	4	120	34	---
9	45	4	125	34	---
10	50	4	125	35	---

1. Design depth to subsurface water is deeper than 100 feet.

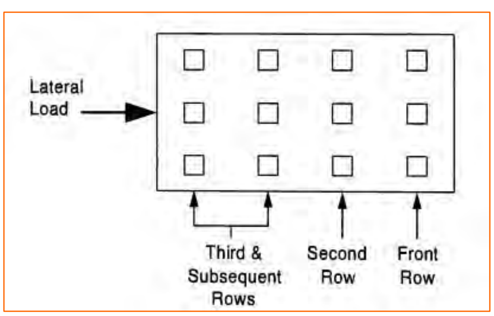
* L-PILE Soil Type: 4 – sand (Reese)

Tensile reinforcement should extend to the bottom of piers subjected to uplift loading, while maintaining appropriate concrete coverage.

Drilled piers should have a minimum (center-to-center) spacing of three diameters. Closer spacing may require a reduction in axial load capacity. Axial capacity reduction can be determined by comparing the allowable axial capacity determined from the sum of individual piers in a group versus the capacity calculated using the perimeter and base of the pier group acting as a unit. The lesser of the two capacities should be used in design.

Post-construction settlements of drilled piers designed and constructed as described in this report are estimated to range from about ¾ to 1 inch. Differential settlement between individual piers is expected to be ½ to ⅔ of the total settlement.

When piers are used in groups, the lateral capacities of the piers in the second, third, and subsequent rows of the group should be reduced as compared to the capacity of a single, independent pier. Guidance for applying p-multiplier factors to the p values in the p-y curves for each row of pier foundations within a pier group are as follows:



1. Front row: $P_m = 0.8$;
2. Second row: $P_m = 0.4$
3. Third and subsequent row: $P_m = 0.3$.

For the case of a single row of piers supporting a laterally loaded grade beam, group action for lateral resistance of piers would need to be considered when spacing is less than three pier diameters (measured center-to-center). However, spacing closer than 3D (where D is the diameter of the pier) is not recommended due to the potential for the installation of a new pier disturbing an adjacent installed pier, likely resulting in axial capacity reduction.

A structural engineer licensed in the State of California should be retained to design the drilled pier foundation. Deep foundation construction should be monitored by the Geotechnical Engineer to observe that recommendations are correctly interpreted and implemented.

Drilled Pier Construction Recommendations

The Geotechnical Engineer should observe the installation of drilled piers to verify the soil conditions and the diameter and depth of piers. Drilled piers should be constructed true and plumb.

Because of the granular nature of the soils encountered, the possible presence of shallow groundwater, and the anticipated diameter of the drilled holes, it is anticipated that caving could occur during the drilling and construction of piers within the on-site soils. Appropriate precautions should therefore be taken during the construction of piers to reduce caving and raveling.

Temporary steel casing may be required to properly drill and clean drilled piers prior to concrete placement. A water and polymer displacement method may also be considered as a means of maintaining pier integrity during construction. Foundation concrete should be placed immediately after completion of drilling and cleaning. If foundation concrete cannot be placed in dry conditions, a tremie should be used for concrete placement. Due to potential sloughing and raveling, foundation concrete quantities may exceed calculated geometric volumes.

If casing is used for foundation construction, it should be withdrawn in a slow continuous manner, maintaining a sufficient head of concrete to prevent caving or the creation of voids in pier concrete. Foundation concrete should have a relatively high fluidity when placed in cased pier holes or through a tremie. Foundation concrete with slump in the range of 6 to 8 inches is recommended when temporary casing is utilized.

Free-fall concrete placement in drilled piers will only be acceptable if provisions are taken to avoid striking the concrete on the sides of the hole or reinforcing steel. The use of a bottom-dump hopper, or an "elephant's trunk" discharging near the bottom of the hole where concrete segregation will be minimized, is recommended.

Drilled pier end bearing surfaces must be thoroughly cleaned prior to concrete placement. A representative of the Geotechnical Engineer should inspect the bearing surface and foundation pier configuration. If the subsurface soil conditions encountered differ significantly from those presented in this report, supplemental recommendations will be required.

The contractor should check for gas and/or oxygen deficiency before any workers enter the excavation for observation and manual cleanup. All necessary monitoring and safety precautions as required by OSHA, State or local codes should be strictly enforced.

The drilling speed should be reduced as necessary to minimize vibration and caving of the silty sand materials. Based on the data developed during our investigation, drilling for the piers may need casing. as caving soils may be encountered; the contractor should be prepared to use casing or other approved means to prevent caving. The contractor should review the boring logs to make sure he is familiar with the anticipated subsurface conditions prior to beginning construction of the deep foundations.

The installation of drilled straight-shafts may likely require the use of the slurry displacement method and/or temporary steel casing with water pumps, if groundwater encountered. If drilled straight-shaft installation is attempted without utilizing slurry displacement method or temporary casing, zones of sloughing soils and/or groundwater inflow may occur during construction. Therefore, we recommend that provisions be incorporated into the plans and specifications to utilize slurry or casing to control sloughing and/or groundwater seepage during shaft construction.

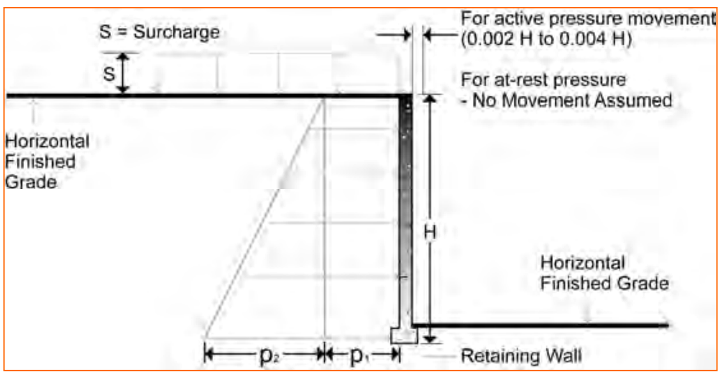
The need for casing or slurry will depend on the depth of the drilled shaft and the groundwater conditions at the time of construction. If casing is used and seepage persists, the water accumulating in the foundation excavation should be pumped out. The condition of the bearing surface should be evaluated immediately prior to placing concrete, if casing is used in lieu of slurry. If groundwater inflow is too severe to be controlled by the use of casing and pumping or significant sloughing of the sidewalls occurs, the slurry method of construction should be utilized to complete the foundation installation.

Closely spaced piers should be drilled and filled alternately, allowing the concrete to set at least eight hours before drilling the adjacent pier. All excavations should be filled with concrete as soon after drilling as possible. In no event should pier holes be left open overnight. To prevent concrete from striking the walls of the pier and causing caving, the concrete should be placed with appropriate equipment so that the concrete is not allowed to fall freely more than 5 feet. All loose materials should be thoroughly cleaned from the bottom of the pier excavation. This is especially important because end bearing has been considered in determining the provided pier capacities. If casing is necessary and is utilized, then the casing should be withdrawn concurrently with the concrete placement.

LATERAL EARTH PRESSURES

Design Parameters

Structures with unbalanced backfill levels on opposite sides should be designed for earth pressures at least equal to values indicated in the following table. Earth pressures will be influenced by structural design of the walls, conditions of wall restraint, methods of construction and/or compaction and the strength of the materials being restrained. Two wall restraint conditions are shown in the diagram below. Active earth pressure is commonly used for design of free-standing cantilever retaining walls and assumes wall movement. The "at-rest" condition assumes no wall movement and is commonly used for basement walls, loading dock walls, or other walls restrained at the top. The recommended design lateral earth pressures do not include a factor of safety and do not provide for possible hydrostatic pressure on the walls (unless stated).



For on-site or import materials that are compacted as recommended in this report, we recommend the following preliminary lateral earth pressure parameters

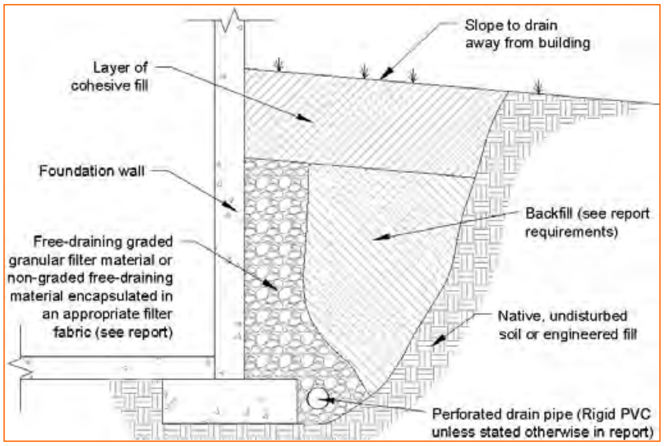
ITEM [1,2]	EFFECTIVE FLUID PRESSURE [5] (UNSATURATED) [6]
Active (K_a)	42 psf/ft
Passive (K_p)	375 psf/ft
At-Rest (K_0)	63 psf/ft
Surcharge Loads [3,4]	0.33 x (S) psf
Coefficient of Friction**	0.36
Wall Foundation Support	Engineered fill extending 2-foot below the bottom of wall foundation
Net Allowable Bearing Pressure [7]	2,000 psf

1. For active earth pressure, wall must rotate about base, with top lateral movements 0.002 H to 0.004 H, where H is wall height. For passive earth pressure conditions, wall movement in a range of 0.005H to 0.01H (H is the height of the wall) is required to fully mobilize passive earth pressures. If this scale of wall movement is not expected, a reduction factor of 50% may be used for passive earth pressure condition design.
2. Uniform, horizontal backfill, compacted to at least 90 percent of the ASTM D1557 maximum dry density, rendering a maximum unit weight of 125 pcf.
3. Uniform surcharge, where S is surcharge pressure. The project structural engineer should provide any surcharge loading.
4. Loading from heavy compaction equipment is not included.
5. No safety factor is included in these values.
6. To achieve "Unsaturated" conditions, follow guidelines in Retaining Wall Drainage below. Terracon should be contacted if drainage systems will not be installed behind retaining walls or if the walls will be located below groundwater.
7. The maximum net allowable bearing pressure is the pressure in excess of the minimum surrounding overburden pressure at the footing base elevation. An appropriate factor of safety has been applied.

Backfill placed against structures should consist of granular soils. For the granular values to be valid, the granular backfill must extend out and up from the base of the wall at an angle of at least 45 and 60 degrees from vertical for the active and passive cases, respectively.

Subsurface Drainage for Below-Grade Walls

A perforated rigid plastic drain line installed behind the base of walls and extends below adjacent grade is recommended to prevent hydrostatic loading on the walls. The invert of a drain line around a below-grade building area or exterior retaining wall should be placed near foundation bearing level. The drain line should be sloped to provide positive gravity drainage to daylight or to a sump pit and pump. The drain line should be surrounded by clean, free-draining granular material having less than 5% passing the No. 200 sieve. The free-draining aggregate should be encapsulated in a filter fabric. The granular fill should extend to within 2 feet of final grade, where it should be capped with compacted cohesive fill to reduce infiltration of surface water into the drain system.



As an alternative to free-draining granular fill, a pre-fabricated drainage structure may be used. A pre-fabricated drainage structure is a plastic drainage core or mesh which is covered with filter fabric to prevent soil intrusion, and is fastened to the wall prior to placing backfill.

Subsurface Drainage for Below Grade Walls

Backfill behind retaining walls should consist of a soil of granularity sufficient that the backfill will properly drain. The granular soil should be classified per the USCS as GW, GP, SW, SP, SW-SM or SP-SM. Surface drainage should be provided to prevent ponding of water behind walls. A drainage system consisting of either or both of the following should be installed behind all retaining walls:

1. A 4-inch-diameter perforated PVC (Schedule 40) pipe or equivalent at the base of the stem encased in 2 cubic feet of granular drain material per linear foot of pipe or
2. Synthetic drains such as Enkadrain, Miradrain, Hydraway 300 or equivalent.

Perforations in the PVC pipe should be 3/8 inch in diameter and should be placed facing down. Granular drain material should be wrapped with filter cloth such as Mirafi 140 or equivalent to prevent clogging of the drains with fines. Walls should be waterproofed to prevent nuisance seepage and damage. Water should outlet to an approved drain.

FLOOR SLABS

DESCRIPTION	RECOMMENDATION
Interior floor system	Slab-on-grade concrete
Floor slab support	Engineered fill extending 3 feet below the bottom of foundations, or 5 feet below existing grades, whichever is greater.
Subbase	Minimum 4-inches of Aggregate Base

DESCRIPTION	RECOMMENDATION
Modulus of subgrade reaction	150 pounds per square inch per inch (psi/in) (The modulus was obtained based on estimates obtained from NAVFAC 7.1 design charts). This value is for a small loaded area (1 Sq. ft or less) such as for forklift wheel loads or point loads and should be adjusted for larger loaded areas.

The use of a vapor retarder should be considered beneath concrete slabs on grade covered with wood, tile, carpet, or other moisture sensitive or impervious coverings, or when the slab will support equipment sensitive to moisture. When conditions warrant the use of a vapor retarder, the slab designer should refer to ACI 302 and/or ACI 360 for procedures and cautions regarding the use and placement of a vapor retarder.

Saw-cut control joints should be placed in the slab to help control the location and extent of cracking. For additional recommendations refer to the ACI Design Manual. Joints or cracks should be sealed with a water-proof, non-extruding compressible compound specifically recommended for heavy duty concrete pavement and wet environments.

Where floor slabs are tied to perimeter walls or turn-down slabs to meet structural or other construction objectives, our experience indicates differential movement between the walls and slabs will likely be observed in adjacent slab expansion joints or floor slab cracks beyond the length of the structural dowels. The Structural Engineer should account for potential differential settlement through use of sufficient control joints, appropriate reinforcing or other means.

PAVEMENTS

General Pavement Comments

Pavement designs are provided for the traffic conditions and pavement life conditions as noted in **Project Description** and in the following sections of this report. A critical aspect of pavement performance is site preparation. Pavement designs noted in this section must be applied to the site which has been prepared as recommended in the **Earthwork** section.

Pavement Design Parameters

Design of asphalt concrete (AC) pavements is based on the procedures outlined in the Caltrans "Highway Design Manual for Safety Roadside Rest Areas" (Caltrans, 2016). Design of Portland cement concrete (PCC) pavements are based upon American Concrete Institute (ACI) 330R-08; "Guide for Design and Construction of Concrete Parking Lots."

An R-value of 25 was assumed for the AC pavement design. A modulus of rupture of 600 psi was used for pavement concrete. The structural sections are predicated upon proper compaction of the utility trench backfills and the subgrade soils as prescribed by in **Earthwork**, with the upper

12 inches of subgrade soils and all aggregate base material brought to a minimum relative compaction of 95 percent in accordance with ASTM D 1557 prior to paving. The aggregate base should meet Caltrans requirements for Class 2 base.

The pavement designs were based upon the results of preliminary sampling and testing and should be verified by additional sampling and testing during construction when the actual subgrade soils are exposed. Additionally, the preliminary sections provided are minimums based on procedures previously referenced. The project civil engineer should confirm minimum Traffic Indices and sections required by local agencies or jurisdictions if applicable.

Pavement Section Thicknesses

The following table provides options for AC and PCC Sections:

Asphalt Concrete Design		
Usage	**Assumed Traffic Index**	**Recommended Structural Section**
Auto Parking Areas	4.5	3" HMA[1]/5" Class 2 AB[2]
Drive lanes	5.5	3" HMA[1]/8" Class 2 AB[2]
Truck Delivery Areas	6.0	3" HMA[1]/10" Class 2 AB[2]

1. HMA = hot mix asphalt
2. AB = aggregate base

Portland Cement Concrete Design			
Layer	**Thickness (inches)**		
	Light Duty[1]	**Medium Duty**[2]	**Heavy Duty**[3]
PCC	5.0	6.0	7.5
Aggregate Base [4]	--	--	--

1. Car Parking and Access Lanes, Average Daily Truck Traffic (ADTT) = 1 (Category A).
2. Truck Parking Areas, Multiple Units, ADTT = 25 (Category B)
3. In areas of anticipated heavy traffic, fire trucks, delivery trucks, or concentrated loads (e.g., dumpster pads), and areas with repeated turning or maneuvering of heavy vehicles, ADTT = 700 (Category C).
4. Aggregate base is not required. Compacted on-site material is considered competent.

Recommended structural sections were calculated based on assumed TIs and our preliminary sampling and testing.

Terracon does not practice traffic engineering. We recommend that the project civil engineer or traffic engineer verify that the TIs and ADTT traffic indices used are appropriate for this project.

Areas for parking of heavy vehicles, concentrated turn areas, and start/stop maneuvers could require thicker pavement sections. Edge restraints (i.e. concrete curbs or aggregate shoulders) should be planned along curves and areas of maneuvering vehicles. A maintenance program including surface sealing, joint cleaning and sealing, and timely repair of cracks and deteriorated areas will increase the pavement's service life. As an option, thicker sections could be constructed to decrease future maintenance.

Concrete for rigid pavements should have a minimum 28-day compressive strength of 4,000 psi, and be placed with a maximum slump of 4 inches. Although not required for structural support, a minimum 4-inchthick base course layer is recommended to help reduce potential for slab curl, shrinkage cracking, and subgrade pumping through joints. Proper joint spacing will also be required to prevent excessive slab curling and shrinkage cracking. Joints should be sealed to prevent entry of foreign material and doweled where necessary for load transfer.

Where practical, we recommend early-entry cutting of crack-control joints in PCC pavements. Cutting of the concrete in its "green" state typically reduces the potential for micro-cracking of the pavements prior to the crack control joints being formed, compared to cutting the joints after the concrete has fully set. Micro-cracking of pavements may lead to crack formation in locations other than the sawed joints, and/or reduction of fatigue life of the pavement.

Openings in pavements, such as decorative landscaped areas, are sources for water infiltration into surrounding pavement systems. Water can collect in the islands and migrate into the surrounding subgrade soils thereby degrading support of the pavement. This is especially applicable for islands with raised concrete curbs, irrigated foliage, and low permeability near-surface soils. The civil design for the pavements with these conditions should include features to restrict or collect and discharge excess water from the islands. Examples of features are edge drains connected to the storm water collection system, longitudinal subdrains, or other suitable outlets and impermeable barriers preventing lateral migration of water such as a cutoff wall installed to a depth below the pavement structure.

Dishing in parking lots surfaced with ACC is usually observed in frequently-used parking stalls (such as near the front of buildings), and occurs under the wheel footprint in these stalls. The use of higher-grade asphalt cement, or surfacing these areas with PCC, should be considered. The dishing is exacerbated by factors such as irrigated islands or planter areas, sheet surface drainage to the front of structures, and placing the ACC directly on a compacted clay subgrade.

PCC pavement details for joint spacing, joint reinforcement, and joint sealing should be prepared in accordance with ACI 330 and ACI 325. PCC pavements should be provided with mechanically reinforced joints (doweled or keyed) in accordance with ACI 330.

Pavement Drainage

Pavements should be sloped to provide rapid drainage of surface water. Water allowed to pond on or adjacent to the pavements could saturate the subgrade and contribute to premature pavement deterioration. In addition, the pavement subgrade should be graded to provide positive drainage within the granular base section. Appropriate sub-drainage or connection to a suitable daylight outlet should be provided to remove water from the granular subbase.

Pavement Maintenance

The pavement sections represent minimum recommended thicknesses and, as such, periodic maintenance should be anticipated. Therefore, preventive maintenance should be planned and provided for through an on-going pavement management program. Maintenance activities are intended to slow the rate of pavement deterioration and to preserve the pavement investment. Maintenance consists of both localized maintenance (e.g., crack and joint sealing and patching) and global maintenance (e.g., surface sealing). Preventive maintenance is usually the priority when implementing a pavement maintenance program. Additional engineering observation is recommended to determine the type and extent of a cost-effective program. Even with periodic maintenance, some movements and related cracking may still occur and repairs may be required.

Pavement performance is affected by its surroundings. In addition to providing preventive maintenance, the civil engineer should consider the following recommendations in the design and layout of pavements:

- Final grade adjacent to paved areas should slope down from the edges at a minimum 2 percent.
- Subgrade and pavement surfaces should have a minimum 2 percent slope to promote proper surface drainage.
- Install below pavement drainage systems surrounding areas anticipated for frequent wetting.
- Install joint sealant and seal cracks immediately.
- Seal all landscaped areas in or adjacent to pavements to reduce moisture migration to subgrade soils.
- Place compacted, low permeability backfill against the exterior side of curb and gutter.
- Place curb, gutter and/or sidewalk directly on clay subgrade soils rather than on unbound granular base course materials.

STORM WATER MANAGEMENT

Three in-situ infiltration tests (falling head borehole permeability) were performed at approximate depth of 10 feet bgs. The objective of the infiltration testing is to provide infiltration rates for designing the proposed infiltration system. A 2-inch thick, 3/8-inch gravel layer was placed in the bottom of each boring after the borings were drilled to investigate the soil profile.

Three-inch diameter perforated pipes were installed on top of the gravel layer. Gravel was used to backfill between the perforated pipes and the boring sidewall. The borings were then filled with water for a pre-soak period.

At the beginning of each test, the pipes were refilled with water and readings were taken at periodic time intervals as the water level dropped. The soil at the percolation test locations was classified in the field using a visual/manual procedure. The infiltration velocity is presented as the infiltration rate and is summarized in the following table. The infiltration rates provided do not include safety factors.

Test Location	Boring Depth (ft.) [1]	Test Depth Range (ft.) [1]	Soil Type	Percolation Rate Average (in./hr.)	Correlated Infiltration Rate Average (in./hr.) [2]
P-1	10	5 to 10	SC-SM	93.8	3.45
P-2	10	5 to 10	SC-SM	60.24	2.04
P-3	10	5 to 10	SC-SM	108.0	3.94

The above infiltration rates determined by the shallow percolation test method are based on field test results utilizing clear water. Infiltration rates can be affected by silt buildup, debris, degree of soil saturation, site variability and other factors. The rate obtained at specific location and depth is representative of the location and depth tested and may not be representative of the entire site. Application of an appropriate safety factor is prudent to account for subsoil inconsistencies, possible compaction related to site grading, and potential silting of the percolating soils, depending on the application.

The design engineer should also check with the local agency for the limitation of the infiltration rate allowed in the design. If the maximum allowable design infiltration rate is lower than the above recommended rate, the maximum allowable design infiltration rate should be used. The designer of the basins should also consider other possible site variability in the design.

The percolation test was performed with clear water, whereas the storm water will likely not be clear, but may contain organics, fines, and grease/oil. The presence of these deleterious materials will tend to decrease the rate that water percolates from the infiltration systems. Design of the storm water infiltration systems should account for the presence of these materials and should incorporate structures/devices to remove these deleterious materials.

Based on the soils encountered in our borings, we expect the percolation rates of the soils could be different than measured in the field due to variations in fines and gravel content. The design elevation and size of the proposed infiltration system should account for this expected variability in infiltration rates.

Infiltration testing should be performed after construction of the infiltration system to verify the design infiltration rates. It should be noted that siltation and vegetation growth along with other factors may affect the infiltration rates of the infiltration areas. The actual infiltration rate may vary from the values reported here. Infiltration systems should be located at least 10 feet from any existing or proposed foundation system.

CORROSIVITY

The following table lists the laboratory electrical resistivity (standard and as-received), chlorides, soluble sulfates, and pH testing results. These values may be used to estimate potential corrosive characteristics of the on-site soils with respect to contact with the various underground materials which will be used for project construction.

Boring	Depth (feet)	Soluble Sulfate (mg/kg)	Soluble Chloride (mg/kg)	Total Salts (mg/kg)	pH	Resistivity (as-received) (Ohm-cm)	Resistivity (saturated) (Ohm-cm)
B-7	0 to 5	70	45	213	8.30	24,250	6,208

Results of soluble sulfate testing indicate samples of the on-site soils tested possess negligible sulfate concentrations when classified in accordance with Table 4.3.1 of the ACI Design Manual. Concrete should be designed in accordance with the provisions of the ACI Design Manual, Section 318, Chapter 4.

For protection against corrosion to buried metals, Terracon recommends that an experienced corrosion engineer be retained to design a suitable corrosion protection system for underground metal structures or components.

If corrosion of buried metal is critical, it should be protected using a non-corrosive backfill, wrapping, coating, sacrificial anodes, or a combination of these methods, as designed by a qualified corrosion engineer.

GENERAL COMMENTS

Our analysis and opinions are based upon our understanding of the project, the geotechnical conditions in the area, and the data obtained from our site exploration. Natural variations will occur between exploration point locations or due to the modifying effects of construction or weather. The nature and extent of such variations may not become evident until during or after construction. Terracon should be retained as the Geotechnical Engineer, where noted in this report, to provide observation and testing services during pertinent construction phases. If variations appear, we can provide further evaluation and supplemental recommendations. If variations are noted in the absence of our observation and testing services on-site, we should be immediately notified so that we can provide evaluation and supplemental recommendations.

Our Scope of Services does not include either specifically or by implication any environmental or biological (e.g., mold, fungi, bacteria) assessment of the site or identification or prevention of pollutants, hazardous materials or conditions. If the owner is concerned about the potential for such contamination or pollution, other studies should be undertaken.

Our services and any correspondence or collaboration through this system are intended for the sole benefit and exclusive use of our client for specific application to the project discussed and are accomplished in accordance with generally accepted geotechnical engineering practices with no third-party beneficiaries intended. Any third-party access to services or correspondence is solely for information purposes to support the services provided by Terracon to our client. Reliance upon the services and any work product is limited to our client, and is not intended for third parties. Any use or reliance of the provided information by third parties is done solely at their own risk. No warranties, either express or implied, are intended or made.

Site characteristics as provided are for design purposes and not to estimate excavation cost. Any use of our report in that regard is done at the sole risk of the excavating cost estimator as there may be variations on the site that are not apparent in the data that could significantly impact excavation cost. Any parties charged with estimating excavation costs should seek their own site characterization for specific purposes to obtain the specific level of detail necessary for costing. Site safety, and cost estimating including, excavation support, and dewatering requirements/design are the responsibility of others. If changes in the nature, design, or location of the project are planned, our conclusions and recommendations shall not be considered valid unless we review the changes and either verify or modify our conclusions in writing.

ATTACHMENTS

EXPLORATION AND TESTING PROCEDURES

Field Exploration

Terracon conducted eleven (11) soil-testing borings. Our scope also included advancing four Cone Penetration Test (CPT) soundings. These borings and CPT soundings were planned to the following extended depths below existing grades.

Number of Borings	Boring Depth (feet) [1]	Location
2 (B-1 and B-2)	51 ½	Planned building footprint
2 (B-3 and B-4)	31 ½	Planned building footprint
4 (B-5 to B-8)	5	Parking lots
3(P-1 to P-3)	10	Infiltration areas
CPT-1	49	Planned building footprint
CPT-2	45	Planned building footprint
CPT-3	43	Planned building footprint
CPT-4	76	Planned building footprint

1. Below ground surface.

Boring/Sounding Layout and Elevations: Unless otherwise noted, Terracon personnel provided the boring layout. Coordinates were obtained with a handheld GPS unit (estimated horizontal accuracy of about ±10 feet) and approximate elevations were obtained by interpolation from the Google Earth. If elevations and a more precise boring layout are desired, we recommend borings be surveyed following completion of fieldwork.

Subsurface Exploration Procedures: We advance the borings with a truck-mounted drill rig using hollow-stem augers. Both a standard penetration test (SPT) sampler (2-inch outer diameter and 1-3/8-inch inner diameter) and a modified California ring-lined sampler (3-inch outer diameter and 2-3/8-inch inner diameter) are utilized in our investigation. The penetration resistance is recorded on the boring logs as the number of hammer blows used to advance the sampler in 6-inch increments (or less if noted). The samplers are driven with an automatic hammer that drops a 140-pound weight 30 inches for each blow. After the required seating, samplers are advanced up to 18 inches, providing up to three sets of blowcounts at each sampling interval. The sampling depths, penetration distances, and other sampling information are recorded on the field boring logs. The recorded blows are raw numbers without any corrections for hammer type (automatic vs. manual cathead) or sampler size (ring sampler vs. SPT sampler). Relatively undisturbed and bulk samples of the soils encountered are placed in sealed containers and returned to the laboratory for testing and evaluation.

We observe and record groundwater levels during drilling and sampling. For safety purposes, all borings are backfilled with auger cuttings after their completion.

Our exploration team prepares field boring logs as part of the drilling operations. These field logs include visual classifications of the materials encountered during drilling and our interpretation of the subsurface conditions between samples. Final boring logs are prepared from the field logs. The final boring logs represent the Geotechnical Engineer's interpretation of the field logs and include modifications based on observations and tests of the samples in our laboratory.

Laboratory Testing

The project engineer reviewed the field data and assigned laboratory tests to understand the engineering properties of the various soil strata, as necessary, for this project. Procedural standards noted below are for reference to methodology in general. In some cases, variations to methods were applied because of local practice or professional judgment. Standards noted below include reference to other, related standards. Such references are not necessarily applicable to describe the specific test performed.

- Water (Moisture) Content of Soil by Mass
- Laboratory Determination of Density (Unit Weight) of Soil Specimens
- Particle-Size Distribution (Gradation) of Soils Using Sieve Analysis
- Modified Proctor test
- Plasticity Index test
- Corrosivity suite test

The laboratory testing program often included examination of soil samples by an engineer. Based on the material's texture and plasticity, we described and classified the soil samples in accordance with the Unified Soil Classification System.

SITE LOCATION

Proposed Children's Clinics Outpatient Pavilion ■ Loma Linda, San Bernardino County, California
December 21, 2022 ■ Terracon Project No. CB225133

DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

MAP PROVIDED BY MICROSOFT BING MAPS

EXPLORATION PLAN

Proposed Children's Clinics Outpatient Pavilion ■ Loma Linda, San Bernardino County, California

December 21, 2022 ■ Terracon Project No. CB225133

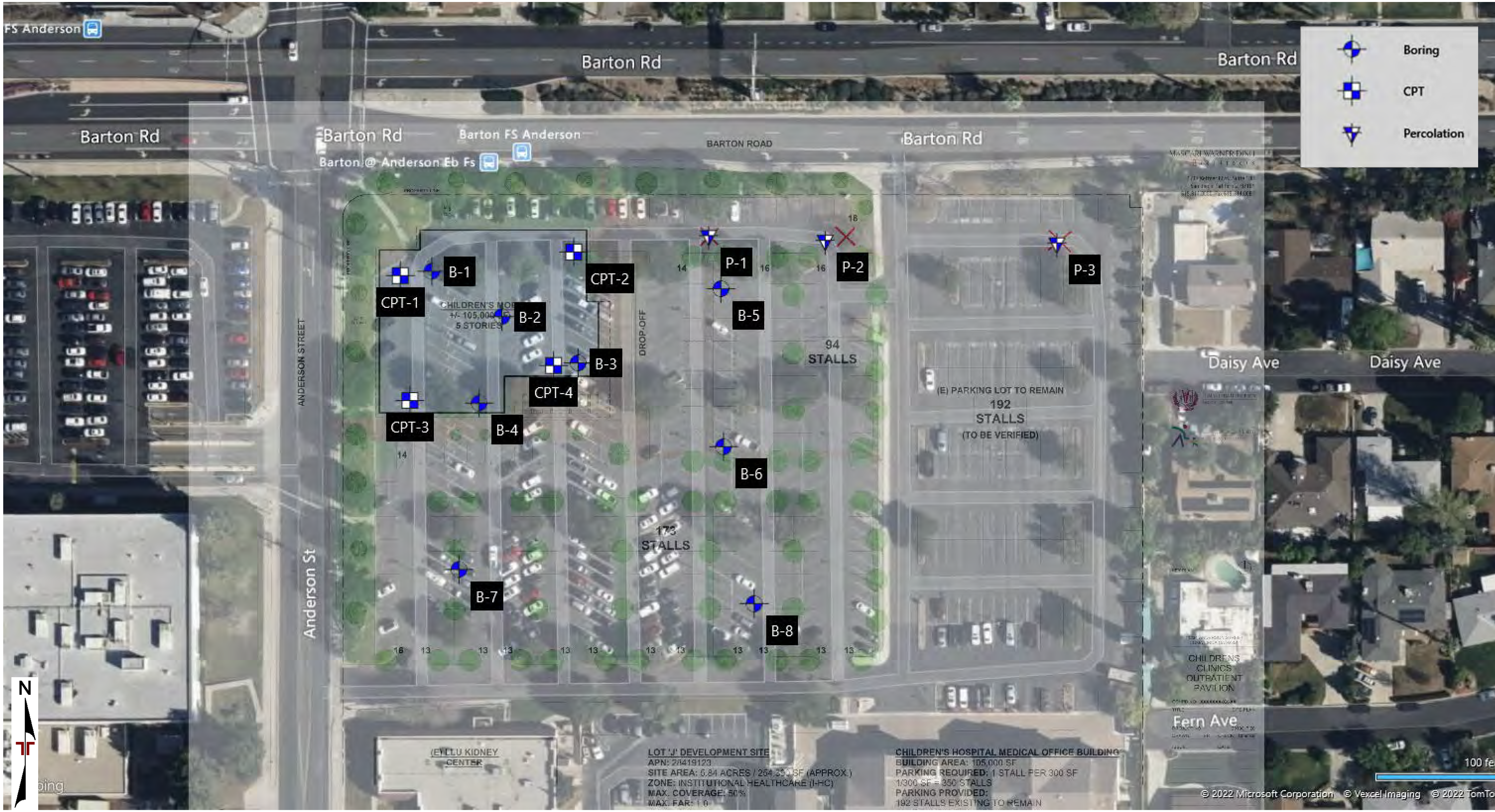


DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

MAP PROVIDED BY MICROSOFT BING MAPS

BORING LOG NO. B-1

PROJECT: Children's Hospital Outpatient Pavilion

**CLIENT: Loma Linda University Medical Center
Loma Linda, CA**

**SITE: Barton Road and Anderson Street
Loma Linda, CA**

LOCATION See Exploration Plan

Latitude: 34.048° Longitude: -117.2608°

DEPTH	Description	DEPTH (Ft.)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	FIELD TEST RESULTS	STRENGTH TEST: TEST TYPE	COMPRESSIVE STRENGTH (tsf)	STRAIN (%)	WATER CONTENT (%)	DRY UNIT WEIGHT (pcf)	ATTERBERG LIMITS LL-PL-PI	PERCENT FINES
0.3	**ASPHALT**, approximately 4" thick											
0.5	**AGGREGATE BASE COURSE**, approximately 2" Thick											
	SILTY SAND (SM), trace gravel, brown											
	loose				4-7-10				3	116		17
5.0		5										
	WELL GRADED SAND (SW), with gravel, light brown, medium dense				9-10-15				1	115		
7.5	**SILTY SAND (SM)**, with gravel, light brown, loose				5-6-11				4	116		
	trace gravel, medium dense	10			8-10-11				3	113	NP	28
15.0	**SILTY CLAY (CL-ML)**, brown, stiff	15			3-4-5 N=9							51
20.0	**SILTY SAND (SM)**, brown, medium dense	20			5-5-5 N=10						NP	45
25.0	**SILTY SAND (SM)**, light brown, medium dense	25			5-8-11 N=19							

Stratification lines are approximate. In-situ, the transition may be gradual.

Hammer Type: Automatic

Advancement Method:
Hollow Stem Auger

Abandonment Method:
Boring backfilled with Auger Cuttings and/or Bentonite
Surface Capped with Asphalt

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes:

WATER LEVEL OBSERVATIONS

Terracon
1355 E Cooley Dr, Ste C
Colton, CA

Boring Started: 10-27-2022 | Boring Completed: 10-27-2022
Drill Rig: CME 75 | Driller: 2R
Project No.: CB225133

BORING LOG NO. B-1

PROJECT: Children's Hospital Outpatient Pavilion

CLIENT: Loma Linda University Medical Center
Loma Linda, CA

SITE: Barton Road and Anderson Street
Loma Linda, CA

LOCATION See Exploration Plan

Latitude: 34.048° Longitude: -117.2608°

GRAPHIC LOG	DEPTH	DEPTH (Ft.)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	FIELD TEST RESULTS	STRENGTH TEST: TEST TYPE	STRENGTH TEST: COMPRESSIVE STRENGTH (tsf)	STRENGTH TEST: STRAIN (%)	WATER CONTENT (%)	DRY UNIT WEIGHT (pcf)	ATTERBERG LIMITS LL-PL-PI	PERCENT FINES
	SILTY SAND (SM), light brown, medium dense *(continued)*											
	30.0	30										
	SILTY CLAYEY SAND (SC-SM), trace gravel, light brown, medium dense			X	10-7-9 N=16							35
	35.0	35										
	SILTY SAND (SM), light brown, medium dense			X	5-9-13 N=22							
	trace gravel	40		X	7-11-9 N=20							
		45		X	9-9-10 N=19							30
	50.0	50										
	SILTY CLAYEY SAND (SC-SM), trace gravel, light brown, medium dense			X	7-9-11 N=20							
	51.5											
	Boring Terminated at 51.5 Feet											

Stratification lines are approximate. In-situ, the transition may be gradual.

Hammer Type: Automatic

Advancement Method:
Hollow Stem Auger

Abandonment Method:
Boring backfilled with Auger Cuttings and/or Bentonite
Surface Capped with Asphalt

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes:

WATER LEVEL OBSERVATIONS

Terracon
1355 E Cooley Dr, Ste C
Colton, CA

Boring Started: 10-27-2022	Boring Completed: 10-27-2022
Drill Rig: CME 75	Driller: 2R
Project No.: CB225133	

BORING LOG NO. B-2

PROJECT: Children's Hospital Outpatient Pavilion

CLIENT: Loma Linda University Medical Center
Loma Linda, CA

SITE: Barton Road and Anderson Street
Loma Linda, CA

LOCATION See Exploration Plan

Latitude: 34.0479° Longitude: -117.2606°

DEPTH	Description	DEPTH (Ft.)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	FIELD TEST RESULTS	STRENGTH TEST: TEST TYPE	STRENGTH TEST: COMPRESSIVE STRENGTH (tsf)	STRENGTH TEST: STRAIN (%)	WATER CONTENT (%)	DRY UNIT WEIGHT (pcf)	ATTERBERG LIMITS LL-PL-PI	PERCENT FINES
0.4	**ASPHALT**, approximately 5" thick											
0.7	**AGGREGATE BASE COURSE**, approximately 3" thick											
	SILTY SAND (SM), trace gravel, light brown											
	medium dense				6-6-9				4	113		
	loose	5			7-8-11				3	112	18-17-1	40
	medium dense				4-7-10				4	110		
		10			8-9-12				3	117		
		15			3-5-5 N=10							
		20			4-5-6 N=11						NP	40
		25			6-8-10 N=18							

Stratification lines are approximate. In-situ, the transition may be gradual.

Hammer Type: Automatic

Advancement Method:
Hollow Stem Auger

Abandonment Method:
Boring backfilled with Auger Cuttings and/or Bentonite
Surface Capped with Asphalt

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes:

WATER LEVEL OBSERVATIONS

Terracon
1355 E Cooley Dr, Ste C
Colton, CA

Boring Started: 10-27-2022	Boring Completed: 10-27-2022
Drill Rig: CME 75	Driller: 2R
Project No.: CB225133	

BORING LOG NO. B-2

PROJECT: Children's Hospital Outpatient Pavilion

CLIENT: Loma Linda University Medical Center
Loma Linda, CA

SITE: Barton Road and Anderson Street
Loma Linda, CA

LOCATION See Exploration Plan

Latitude: 34.0479° Longitude: -117.2606°

DEPTH	Description	DEPTH (Ft.)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	FIELD TEST RESULTS	STRENGTH TEST: TEST TYPE	STRENGTH TEST: COMPRESSIVE STRENGTH (tsf)	STRENGTH TEST: STRAIN (%)	WATER CONTENT (%)	DRY UNIT WEIGHT (pcf)	ATTERBERG LIMITS LL-PL-PI	PERCENT FINES
	SILTY SAND (SM), trace gravel, light brown *(continued)*											
		30		X	6-5-7 N=12							
		35		X	6-8-7 N=15							38
40.0	**WELL GRADED SAND WITH SILT AND GRAVEL (SW-SM)**, light brown, very dense	40		X	24-40-40 N=80							
45.0	**SILTY SAND (SM)**, light brown, medium dense	45		X	7-9-11 N=20							21
50.0	**SILTY CLAYEY SAND (SC-SM)**, trace gravel, brown, medium dense	50		X	5-8-11 N=19							
51.5	***Boring Terminated at 51.5 Feet***											

Stratification lines are approximate. In-situ, the transition may be gradual.

Hammer Type: Automatic

Advancement Method:
Hollow Stem Auger

Abandonment Method:
Boring backfilled with Auger Cuttings and/or Bentonite
Surface Capped with Asphalt

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes:

WATER LEVEL OBSERVATIONS

Terracon
1355 E Cooley Dr, Ste C
Colton, CA

Boring Started: 10-27-2022 | Boring Completed: 10-27-2022
Drill Rig: CME 75 | Driller: 2R
Project No.: CB225133

BORING LOG NO. B-3

PROJECT: Children's Hospital Outpatient Pavilion

**CLIENT: Loma Linda University Medical Center
Loma Linda, CA**

**SITE: Barton Road and Anderson Street
Loma Linda, CA**

LOCATION See Exploration Plan

Latitude: 34.0478° Longitude: -117.2604°

DEPTH	Description	DEPTH (Ft.)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	FIELD TEST RESULTS	STRENGTH TEST: TEST TYPE	STRENGTH TEST: COMPRESSIVE STRENGTH (tsf)	STRENGTH TEST: STRAIN (%)	WATER CONTENT (%)	DRY UNIT WEIGHT (pcf)	ATTERBERG LIMITS LL-PL-PI	PERCENT FINES
0.3	**ASPHALT**, approximately 4" thick											
0.6	**AGGREGATE BASE COURSE**, approximately 3" thick											
	SILTY SAND (SM), trace gravel, brown											
	very loose				2-2-4				10	106		
	loose	5			4-4-5				6	113		
					3-4-5				6	115		
		10			5-4-6							28
		15			2-2-2 N=4							
		20			2-2-3 N=5							
	medium dense	25			3-4-9 N=13							28

Stratification lines are approximate. In-situ, the transition may be gradual.

Hammer Type: Automatic

Advancement Method:
Hollow Stem Auger

Abandonment Method:
Boring backfilled with Auger Cuttings and/or Bentonite
Surface Capped with Asphalt

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes:

WATER LEVEL OBSERVATIONS

Terracon
1355 E Cooley Dr, Ste C
Colton, CA

Boring Started: 10-28-2022	Boring Completed: 10-28-2022
Drill Rig: CME 75	Driller: 2R
Project No.: CB225133	

BORING LOG NO. B-3

PROJECT: Children's Hospital Outpatient Pavilion

CLIENT: Loma Linda University Medical Center
Loma Linda, CA

SITE: Barton Road and Anderson Street
Loma Linda, CA

GRAPHIC LOG	LOCATION See Exploration Plan Latitude: 34.0478° Longitude: -117.2604° DEPTH	DEPTH (Ft.)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	FIELD TEST RESULTS	STRENGTH TEST: TEST TYPE	STRENGTH TEST: COMPRESSIVE STRENGTH (tsf)	STRENGTH TEST: STRAIN (%)	WATER CONTENT (%)	DRY UNIT WEIGHT (pcf)	ATTERBERG LIMITS LL-PL-PI	PERCENT FINES
	SILTY SAND (SM), trace gravel, brown *(continued)*											
		30			4-5-6 N=11							
	31.5											
	Boring Terminated at 31.5 Feet											

Stratification lines are approximate. In-situ, the transition may be gradual.

Hammer Type: Automatic

Advancement Method:
Hollow Stem Auger

Abandonment Method:
Boring backfilled with Auger Cuttings and/or Bentonite
Surface Capped with Asphalt

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes:

WATER LEVEL OBSERVATIONS

Terracon
1355 E Cooley Dr, Ste C
Colton, CA

Boring Started: 10-28-2022	Boring Completed: 10-28-2022
Drill Rig: CME 75	Driller: 2R
Project No.: CB225133	

BORING LOG NO. B-4

PROJECT: Children's Hospital Outpatient Pavilion

CLIENT: Loma Linda University Medical Center
Loma Linda, CA

SITE: Barton Road and Anderson Street
Loma Linda, CA

LOCATION See Exploration Plan

Latitude: 34.0477° Longitude: -117.2607°

DEPTH	Description	DEPTH (Ft.)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	FIELD TEST RESULTS	STRENGTH TEST: TEST TYPE	STRENGTH TEST: COMPRESSIVE STRENGTH (tsf)	STRENGTH TEST: STRAIN (%)	WATER CONTENT (%)	DRY UNIT WEIGHT (pcf)	ATTERBERG LIMITS LL-PL-PI	PERCENT FINES
0.3	**ASPHALT**, approximately 3" thick											
0.7	**AGGREGATE BASE COURSE**, approximately 5" thick											
	CLAYEY SAND (SC), light brown											
	medium dense				7-7-9							39
		5			7-7-9							
7.5	**SILTY SAND (SM)**, light brown, medium dense				8-11-14							
		10			11-11-13							
15.0	**CLAYEY SAND (SC)**, light brown, medium dense	15			4-5-7 N=12							
		20			3-5-11 N=16							
25.0	**SILTY CLAYEY SAND (SC-SM)**, trace gravel, light brown, medium dense	25			12-13-16 N=29							

Stratification lines are approximate. In-situ, the transition may be gradual.

Hammer Type: Automatic

Advancement Method:
Hollow Stem Auger

Abandonment Method:
Boring backfilled with Auger Cuttings and/or Bentonite
Surface Capped with Asphalt

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes:

WATER LEVEL OBSERVATIONS

Terracon
1355 E Cooley Dr, Ste C
Colton, CA

Boring Started: 10-27-2022	Boring Completed: 10-27-2022
Drill Rig: CME 75	Driller: 2R
Project No.: CB225133	

BORING LOG NO. B-4

PROJECT: Children's Hospital Outpatient Pavilion

CLIENT: Loma Linda University Medical Center Loma Linda, CA

SITE: Barton Road and Anderson Street Loma Linda, CA

LOCATION See Exploration Plan

Latitude: 34.0477° Longitude: -117.2607°

GRAPHIC LOG	DEPTH	DEPTH (Ft.)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	FIELD TEST RESULTS	STRENGTH TEST: TEST TYPE	STRENGTH TEST: COMPRESSIVE STRENGTH (tsf)	STRENGTH TEST: STRAIN (%)	WATER CONTENT (%)	DRY UNIT WEIGHT (pcf)	ATTERBERG LIMITS LL-PL-PI	PERCENT FINES
	SILTY CLAYEY SAND (SC-SM), trace gravel, light brown, medium dense *(continued)*											
		30			6-7-8 N=15							
	31.5											
	Boring Terminated at 31.5 Feet											

Stratification lines are approximate. In-situ, the transition may be gradual.

Hammer Type: Automatic

Advancement Method:
Hollow Stem Auger

Abandonment Method:
Boring backfilled with Auger Cuttings and/or Bentonite
Surface Capped with Asphalt

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes:

WATER LEVEL OBSERVATIONS

Terracon
1355 E Cooley Dr, Ste C
Colton, CA

Boring Started: 10-27-2022

Boring Completed: 10-27-2022

Drill Rig: CME 75

Driller: 2R

Project No.: CB225133

BORING LOG NO. B-5

PROJECT: Children's Hospital Outpatient Pavilion

CLIENT: Loma Linda University Medical Center
Loma Linda, CA

SITE: Barton Road and Anderson Street
Loma Linda, CA

LOCATION See Exploration Plan

Latitude: 34.0479° Longitude: -117.26°

GRAPHIC LOG	DEPTH	DEPTH (Ft.)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	FIELD TEST RESULTS	STRENGTH TEST: TEST TYPE	STRENGTH TEST: COMPRESSIVE STRENGTH (tsf)	STRENGTH TEST: STRAIN (%)	WATER CONTENT (%)	DRY UNIT WEIGHT (pcf)	ATTERBERG LIMITS LL-PL-PI	PERCENT FINES
	0.3 **ASPHALT**, approximately 4" thick											
	0.6 **AGGREGATE BASE COURSE**, approximately 3" thick											
	SILTY SAND (SM), trace gravel, light brown to brown											30
	5.0	5										
	Boring Terminated at 5 Feet											

Stratification lines are approximate. In-situ, the transition may be gradual.

Hammer Type: Automatic

Advancement Method:
Hollow Stem Auger

Abandonment Method:
Boring backfilled with Auger Cuttings and/or Bentonite
Surface Capped with Asphalt

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes:

WATER LEVEL OBSERVATIONS

Terracon
1355 E Cooley Dr, Ste C
Colton, CA

Boring Started: 10-28-2022	Boring Completed: 10-28-2022
Drill Rig: CME 75	Driller: 2R
Project No.: CB225133	

BORING LOG NO. B-6

PROJECT: Children's Hospital Outpatient Pavilion

CLIENT: Loma Linda University Medical Center
Loma Linda, CA

SITE: Barton Road and Anderson Street
Loma Linda, CA

GRAPHIC LOG	LOCATION See Exploration Plan Latitude: 34.0476° Longitude: -117.26° DEPTH	DEPTH (Ft.)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	FIELD TEST RESULTS	STRENGTH TEST: TEST TYPE	STRENGTH TEST: COMPRESSIVE STRENGTH (tsf)	STRENGTH TEST: STRAIN (%)	WATER CONTENT (%)	DRY UNIT WEIGHT (pcf)	ATTERBERG LIMITS LL-PL-PI	PERCENT FINES
	0.3 **ASPHALT**, approximately 4" thick											
	0.5 **AGGREGATE BASE COURSE**, approximately 2" thick											
	SILTY SAND (SM), trace gravel, light brown to brown											
	5.0	5										
	Boring Terminated at 5 Feet											

Stratification lines are approximate. In-situ, the transition may be gradual.

Hammer Type: Automatic

Advancement Method:
Hollow Stem Auger

Abandonment Method:
Boring backfilled with Auger Cuttings and/or Bentonite
Surface Capped with Asphalt

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes:

WATER LEVEL OBSERVATIONS

Terracon
1355 E Cooley Dr, Ste C
Colton, CA

Boring Started: 10-28-2022

Boring Completed: 10-28-2022

Drill Rig: CME 75

Driller: 2R

Project No.: CB225133

BORING LOG NO. B-7

PROJECT: **Children's Hospital Outpatient Pavilion**

CLIENT: **Loma Linda University Medical Center**
Loma Linda, CA

SITE: **Barton Road and Anderson Street**
Loma Linda, CA

GRAPHIC LOG	LOCATION See Exploration Plan Latitude: 34.0473° Longitude: -117.2607° DEPTH	DEPTH (Ft.)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	FIELD TEST RESULTS	STRENGTH TEST: TEST TYPE	STRENGTH TEST: COMPRESSIVE STRENGTH (tsf)	STRENGTH TEST: STRAIN (%)	WATER CONTENT (%)	DRY UNIT WEIGHT (pcf)	ATTERBERG LIMITS LL-PL-PI	PERCENT FINES
	0.3 **ASPHALT**, approximately 4" thick											
	0.6 **AGGREGATE BASE COURSE**, approximately 3" thick											
	SILTY SAND (SM), light brown											
	5.0	5										
	Boring Terminated at 5 Feet											

Stratification lines are approximate. In-situ, the transition may be gradual.

Hammer Type: Automatic

Advancement Method:
Hollow Stem Auger

Abandonment Method:
Boring backfilled with Auger Cuttings and/or Bentonite
Surface Capped with Asphalt

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes:

WATER LEVEL OBSERVATIONS

Terracon
1355 E Cooley Dr, Ste C
Colton, CA

Boring Started: 10-27-2022	Boring Completed: 10-27-2022
Drill Rig: CME 75	Driller: 2R
Project No.: CB225133	

BORING LOG NO. B-8

PROJECT: Children's Hospital Outpatient Pavilion

CLIENT: Loma Linda University Medical Center
Loma Linda, CA

SITE: Barton Road and Anderson Street
Loma Linda, CA

LOCATION See Exploration Plan

Latitude: 34.0473° Longitude: -117.26°

GRAPHIC LOG	DEPTH	DESCRIPTION	DEPTH (Ft.)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	FIELD TEST RESULTS	STRENGTH TEST: TEST TYPE	STRENGTH TEST: COMPRESSIVE STRENGTH (tsf)	STRENGTH TEST: STRAIN (%)	WATER CONTENT (%)	DRY UNIT WEIGHT (pcf)	ATTERBERG LIMITS LL-PL-PI	PERCENT FINES
	0.4	**ASPHALT**, approximately 5" thick											
	0.7	**AGGREGATE BASE COURSE**, approximately 3" thick											
	5.0	**SILTY SAND (SM)**, trace gravel, light brown to brown	5										24
		Boring Terminated at 5 Feet											

Stratification lines are approximate. In-situ, the transition may be gradual.

Hammer Type: Automatic

Advancement Method:
Hollow Stem Auger

Abandonment Method:
Boring backfilled with Auger Cuttings and/or Bentonite
Surface Capped with Asphalt

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes:

WATER LEVEL OBSERVATIONS

Terracon
1355 E Cooley Dr, Ste C
Colton, CA

Boring Started: 10-28-2022	Boring Completed: 10-28-2022
Drill Rig: CME 75	Driller: 2R
Project No.: CB225133	

BORING LOG NO. P-1

PROJECT: Children's Hospital Outpatient Pavilion

CLIENT: Loma Linda University Medical Center
Loma Linda, CA

SITE: Barton Road and Anderson Street
Loma Linda, CA

LOCATION See Exploration Plan

Latitude: 34.048° Longitude: -117.2601°

DEPTH	Description	DEPTH (Ft.)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	FIELD TEST RESULTS	STRENGTH TEST: TEST TYPE	STRENGTH TEST: COMPRESSIVE STRENGTH (tsf)	STRENGTH TEST: STRAIN (%)	WATER CONTENT (%)	DRY UNIT WEIGHT (pcf)	ATTERBERG LIMITS LL-PL-PI	PERCENT FINES
0.3	**ASPHALT**, approximately 4" thick											
0.6	**AGGREGATE BASE COURSE**, approximately 3" thick											
5.0	**SILTY SAND (SM)**, trace gravel, brown	5										
10.0	**CLAYEY SAND (SC)**, light brown	10										33
	Boring Terminated at 10 Feet											

Stratification lines are approximate. In-situ, the transition may be gradual.

Hammer Type: Automatic

Advancement Method:
Hollow Stem Auger

Abandonment Method:
Boring backfilled with Auger Cuttings and/or Bentonite
Surface Capped with Asphalt

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes:

WATER LEVEL OBSERVATIONS

Terracon
1355 E Cooley Dr, Ste C
Colton, CA

Boring Started: 10-27-2022	Boring Completed: 10-27-2022
Drill Rig: CME 75	Driller: 2R
Project No.: CB225133	

BORING LOG NO. P-2

PROJECT: Children's Hospital Outpatient Pavilion

CLIENT: Loma Linda University Medical Center
Loma Linda, CA

SITE: Barton Road and Anderson Street
Loma Linda, CA

GRAPHIC LOG	LOCATION See Exploration Plan Latitude: 34.048° Longitude: -117.2598° DEPTH	DEPTH (Ft.)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	FIELD TEST RESULTS	STRENGTH TEST: TEST TYPE	STRENGTH TEST: COMPRESSIVE STRENGTH (tsf)	STRENGTH TEST: STRAIN (%)	WATER CONTENT (%)	DRY UNIT WEIGHT (pcf)	ATTERBERG LIMITS LL-PL-PI	PERCENT FINES
	0.3 **ASPHALT**, approximately 4" thick											
	0.6 **AGGREGATE BASE COURSE**, approximately 3" thick											
	CLAYEY SAND (SC), trace gravel, brown											
	light brown	5										38
	10.0	10										
	Boring Terminated at 10 Feet											

Stratification lines are approximate. In-situ, the transition may be gradual.

Hammer Type: Automatic

Advancement Method:
Hollow Stem Auger

Abandonment Method:
Boring backfilled with Auger Cuttings and/or Bentonite
Surface Capped with Asphalt

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes:

WATER LEVEL OBSERVATIONS

Terracon
1355 E Cooley Dr, Ste C
Colton, CA

Boring Started: 10-27-2022	Boring Completed: 10-27-2022
Drill Rig: CME 75	Driller: 2R
Project No.: CB225133	

BORING LOG NO. P-3

PROJECT: Children's Hospital Outpatient Pavilion

CLIENT: Loma Linda University Medical Center
Loma Linda, CA

SITE: Barton Road and Anderson Street
Loma Linda, CA

GRAPHIC LOG	LOCATION See Exploration Plan Latitude: 34.048° Longitude: -117.2592° DEPTH	DEPTH (Ft.)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	FIELD TEST RESULTS	STRENGTH TEST: TEST TYPE	STRENGTH TEST: COMPRESSIVE STRENGTH (tsf)	STRENGTH TEST: STRAIN (%)	WATER CONTENT (%)	DRY UNIT WEIGHT (pcf)	ATTERBERG LIMITS LL-PL-PI	PERCENT FINES
	0.3 **ASPHALT**, approximately 3" thick											
	0.6 **AGGREGATE BASE COURSE**, approximately 4" thick											
	SILTY CLAYEY SAND (SC-SM), brown											
		5										36
	10.0	10										
	Boring Terminated at 10 Feet											

Stratification lines are approximate. In-situ, the transition may be gradual.

Hammer Type: Automatic

Advancement Method:
Hollow Stem Auger

Abandonment Method:
Boring backfilled with Auger Cuttings and/or Bentonite
Surface Capped with Asphalt

See Exploration and Testing Procedures for a description of field and laboratory procedures used and additional data (If any).

See Supporting Information for explanation of symbols and abbreviations.

Notes:

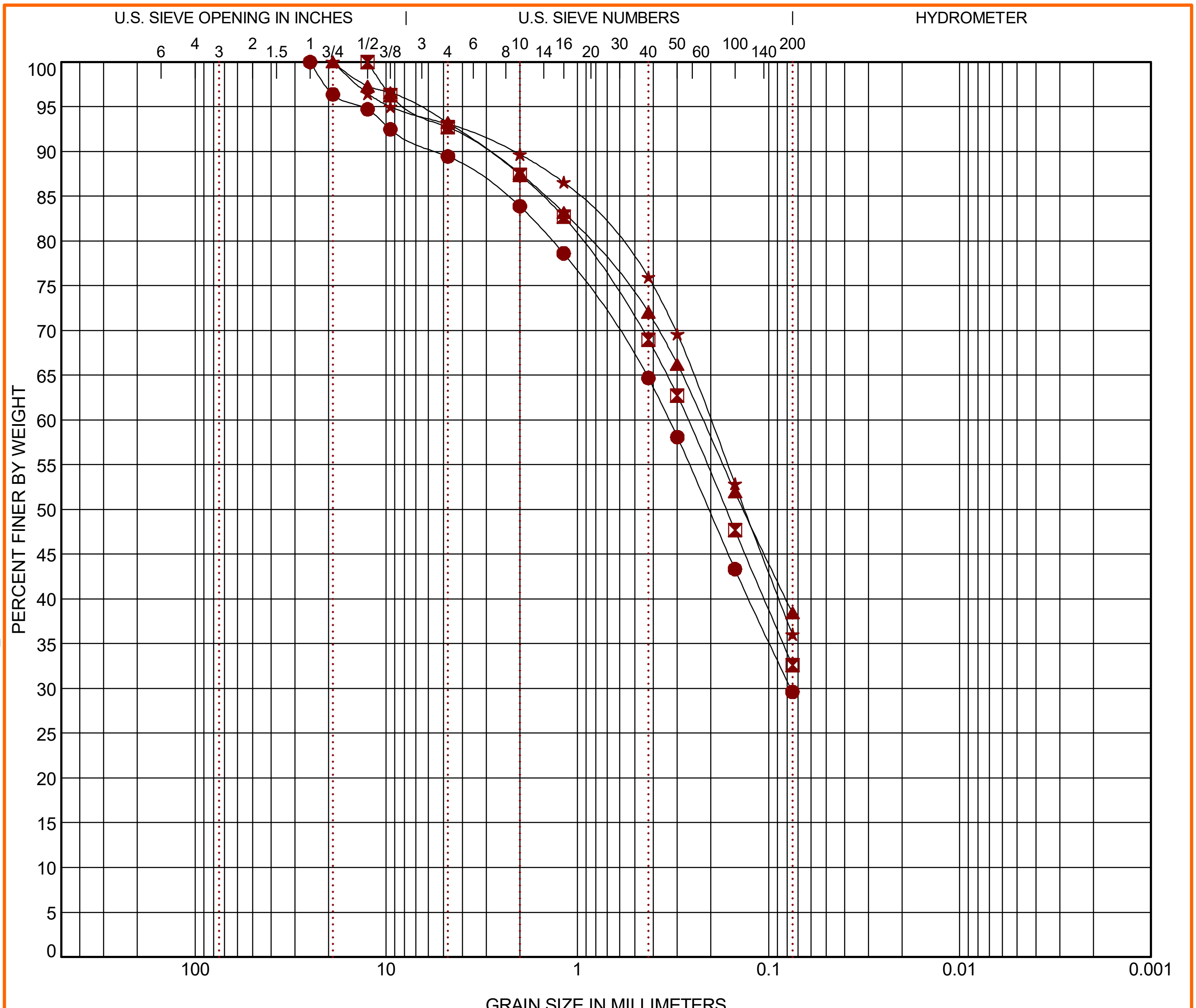
WATER LEVEL OBSERVATIONS

Terracon
1355 E Cooley Dr, Ste C
Colton, CA

Boring Started: 10-27-2022	Boring Completed: 10-27-2022
Drill Rig: CME 75	Driller: 2R
Project No.: CB225133	

GRAIN SIZE DISTRIBUTION

ASTM D422 / ASTM C136



COBBLES	GRAVEL		SAND			SILT OR CLAY
	coarse	fine	coarse	medium	fine	

Boring ID		Depth	USCS Classification	WC (%)	LL	PL	PI	Cc	Cu
●	B-5	0 - 5							
⊠	P-1	5 - 10							
▲	P-2	5 - 10							
★	P-3	5 - 10							

Boring ID		Depth	D_{100}	D_{60}	D_{30}	D_{10}	%Cobbles	%Gravel	%Sand	%Silt	%Fines	%Clay
●	B-5	0 - 5	25	0.332	0.076		0.0	10.6	59.8		29.6	
⊠	P-1	5 - 10	12.5	0.264			0.0	7.3	60.1		32.6	
▲	P-2	5 - 10	19	0.222			0.0	6.8	54.8		38.5	
★	P-3	5 - 10	19	0.202			0.0	6.9	57.0		36.0	

PROJECT: Children's Hospital Outpatient Pavilion

SITE: Barton Road and Anderson Street
Loma Linda, CA

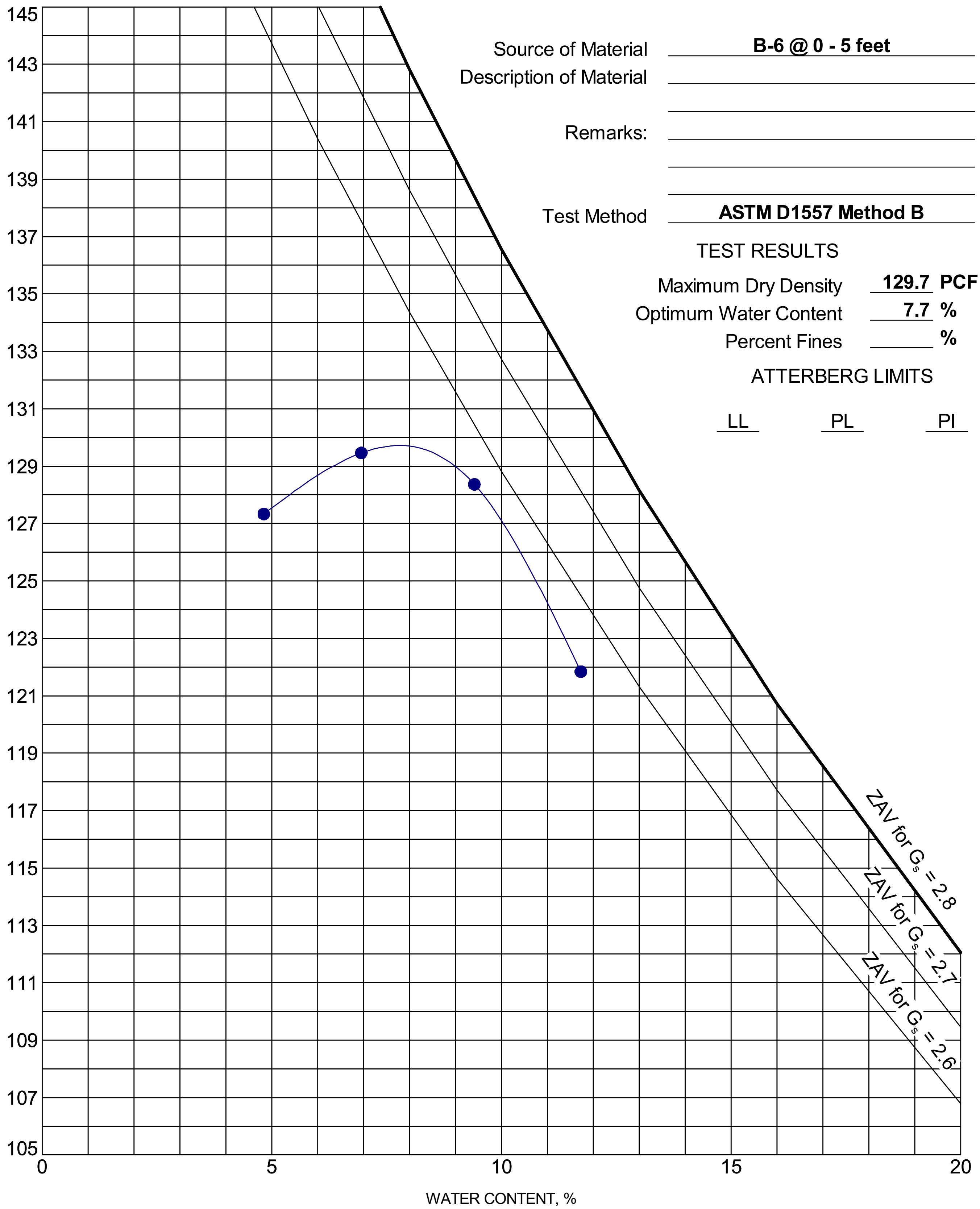
Terracon
1355 E Cooley Dr, Ste C
Colton, CA

PROJECT NUMBER: CB225133

CLIENT: Loma Linda University Medical Center
Loma Linda, CA

MOISTURE-DENSITY RELATIONSHIP

ASTM D698/D1557



Source of Material **B-6 @ 0 - 5 feet**

Description of Material

Remarks:

Test Method **ASTM D1557 Method B**

TEST RESULTS

Maximum Dry Density **129.7 PCF**

Optimum Water Content **7.7 %**

Percent Fines **%**

ATTERBERG LIMITS

LL	PL	PI

LABORATORY TESTS ARE NOT VALID IF SEPARATED FROM ORIGINAL REPORT. COMPACTION - V1 CB225133 CHILDREN'S HOSPIT.GPJ TERRACON_DATATEMPLATE.GDT 12/1/22

PROJECT: Children's Hospital Outpatient Pavilion	Terracon 1355 E Cooley Dr, Ste C Colton, CA	PROJECT NUMBER: CB225133
SITE: Barton Road and Anderson Street Loma Linda, CA		CLIENT: Loma Linda University Medical Center Loma Linda, CA

Job No.: CB225133

PERCOLATION TEST DATA

BORING NUMBER: P-1
LOT No: N/A
TRACT No: N/A

CLIENT: Loma Linda University Shared Services
PROJECT: Proposed Children's Hospital Outpatient Pavilion

DATE OF DRILLING: October 27, 2022
DATE OF PRESOAK: October 27, 2022
DATE OF TEST: October 27, 2022
TESTED BY: AT

DEPTH BEFORE (ft.): 10.2
DEPTH AFTER (ft.): 10.0
PVC PIPE DIA. (in.): 3.0
PERC HOLE DIA. (in.): 8.0

Time Interval (min.)	Total Elapsed Time (min.)	Initial Water Level (in.)	Final Water Level (in.)	Change in Water Level (in.)	Initial Hole Depth (in.)	Final Hole Depth (in.)	Percolation Rate (in/hr)	Infiltration rate (Porchet Method) (in/hr)
10	10	60.0	79.3	19.3	120.2	120.0	115.9	4.41
10	20	60.0	77.2	17.2	120.2	120.0	103.0	3.84
10	30	60.0	77.9	17.9	120.2	120.0	107.3	4.03
10	40	60.0	76.7	16.7	120.2	120.0	100.1	3.72
10	50	60.0	75.0	15.0	120.2	120.0	90.0	3.29
10	60	60.0	75.2	15.2	120.2	120.0	91.4	3.35
				Average of last 3 readings:			93.84	3.45

Job No.: CB225133

PERCOLATION TEST DATA

BORING NUMBER: P-2
LOT No: N/A
TRACT No: N/A

CLIENT: Loma Linda University Shared Services
PROJECT: Proposed Children's Hospital Outpatient Pavilion

DATE OF DRILLING:	October 27, 2022	DEPTH BEFORE (ft.):	10.2
DATE OF PRESOAK:	October 27, 2022	DEPTH AFTER (ft.):	10.0
DATE OF TEST:	October 27, 2022	PVC PIPE DIA. (in.):	3.0
TESTED BY:	AT	PERC HOLE DIA. (in.):	8.0

Time Interval (min.)	Total Elapsed Time (min.)	Initial Water Level (in.)	Final Water Level (in.)	Change in Water Level (in.)	Initial Hole Depth (in.)	Final Hole Depth (in.)	Percolation Rate (in/hr)	Infiltration rate (Porchet Method) (in/hr)
10	10	60.0	76.2	16.2	122.0	122.0	97.2	3.48
10	20	60.0	73.1	13.1	122.0	122.0	78.5	2.73
10	30	60.0	72.1	12.1	122.0	122.0	72.7	2.51
10	40	60.0	70.3	10.3	122.0	122.0	61.9	2.10
10	50	60.0	70.0	10.0	122.0	122.0	59.8	2.03
10	60	60.0	69.8	9.8	122.0	122.0	59.0	2.00
					Average of last 3 readings:		60.24	2.04

Job No.: CB225133

PERCOLATION TEST DATA

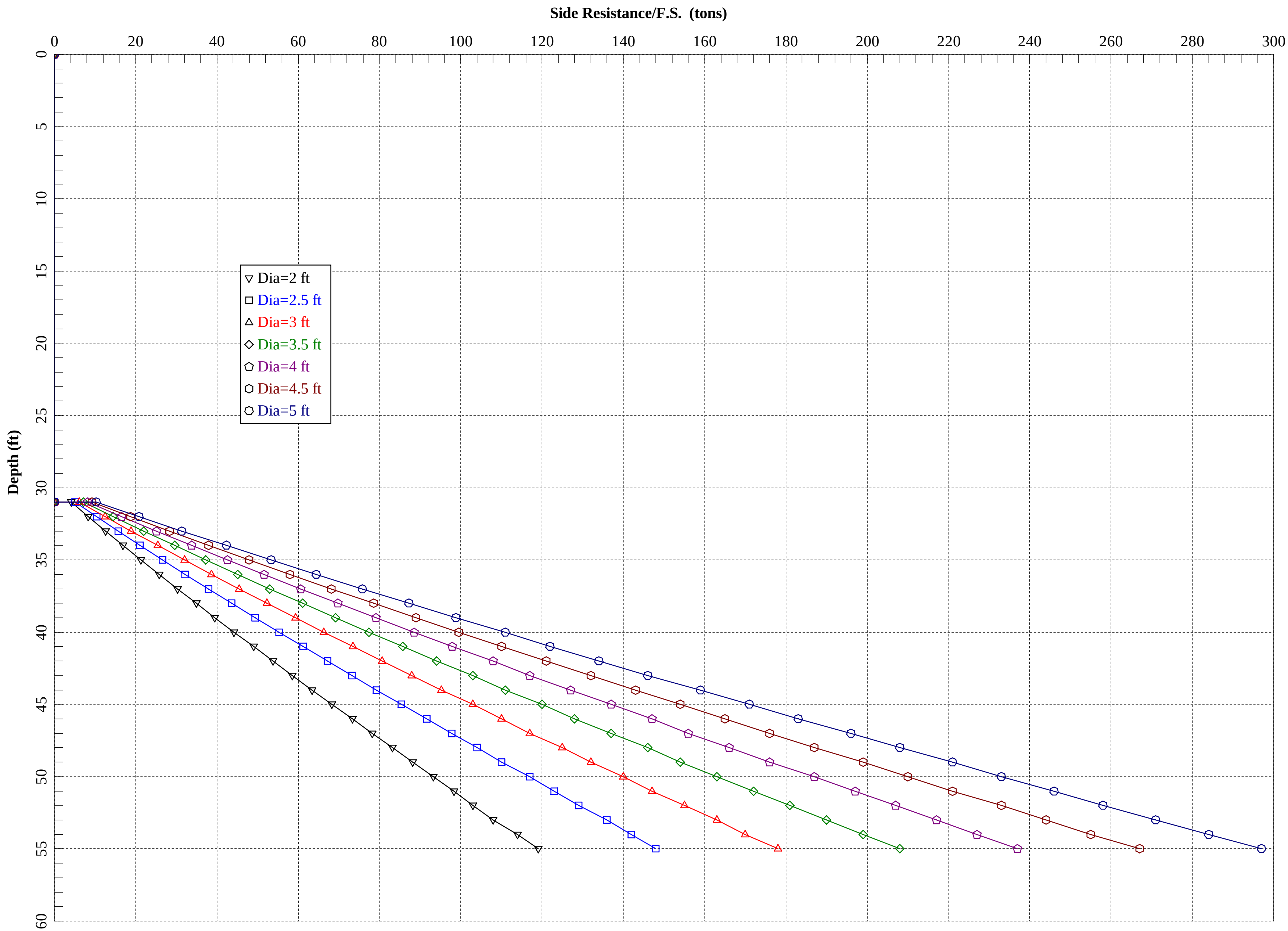
BORING NUMBER: P-3
LOT No: N/A
TRACT No: N/A

CLIENT: Loma Linda University Shared Services
PROJECT: Proposed Children's Hospital Outpatient Pavilion

DATE OF DRILLING: October 27, 2022
DATE OF PRESOAK: October 27, 2022
DATE OF TEST: October 27, 2022
TESTED BY: AT

DEPTH BEFORE (ft.): 10.2
DEPTH AFTER (ft.): 10.0
PVC PIPE DIA. (in.): 3.0
PERC HOLE DIA. (in.): 8.0

Time Interval (min.)	Total Elapsed Time (min.)	Initial Water Level (in.)	Final Water Level (in.)	Change in Water Level (in.)	Initial Hole Depth (in.)	Final Hole Depth (in.)	Percolation Rate (in/hr)	Infiltration rate (Porchet Method) (in/hr)
10	10	60.0	83.3	23.3	122.0	122.0	139.7	5.34
10	20	60.0	81.8	21.8	122.0	122.0	131.0	4.94
10	30	60.0	82.3	22.3	122.0	122.0	133.9	5.07
10	40	60.0	81.2	21.2	122.0	122.0	127.4	4.77
10	50	60.0	77.0	17.0	122.0	122.0	102.2	3.69
10	60	60.0	75.7	15.7	122.0	122.0	94.3	3.36
				Average of last 3 readings:			108.00	3.94



Side Resistance/F.S. (tons)
0
20
40
60
80
100
120
140
160
180
200
220
240
260
280
300
Depth (ft)
0
5
10
15
20
25
30
35
40
45
50
55
60
Dia=2 ft
Dia=2.5 ft
Dia=3 ft
Dia=3.5 ft
Dia=4 ft
Dia=4.5 ft
Dia=5 ft

GENERAL NOTES
DESCRIPTION OF SYMBOLS AND ABBREVIATIONS

Terracon GeoReport

SAMPLING	WATER LEVEL	FIELD TESTS
Auger Cuttings Modified California Ring Sampler Grab Sample Standard Penetration Test	**Water Initially Encountered** **Water Level After a Specified Period of Time** **Water Level After a Specified Period of Time** **Cave In Encountered** Water levels indicated on the soil boring logs are the levels measured in the borehole at the times indicated. Groundwater level variations will occur over time. In low permeability soils, accurate determination of groundwater levels is not possible with short term water level observations.	**N** Standard Penetration Test Resistance (Blows/Ft.) **(HP)** Hand Penetrometer **(T)** Torvane **(DCP)** Dynamic Cone Penetrometer **UC** Unconfined Compressive Strength **(PID)** Photo-Ionization Detector **(OVA)** Organic Vapor Analyzer

DESCRIPTIVE SOIL CLASSIFICATION

Soil classification as noted on the soil boring logs is based Unified Soil Classification System. Where sufficient laboratory data exist to classify the soils consistent with ASTM D2487 "Classification of Soils for Engineering Purposes" this procedure is used. ASTM D2488 "Description and Identification of Soils (Visual-Manual Procedure)" is also used to classify the soils, particularly where insufficient laboratory data exist to classify the soils in accordance with ASTM D2487. In addition to USCS classification, coarse grained soils are classified on the basis of their in-place relative density, and fine-grained soils are classified on the basis of their consistency. See "Strength Terms" table below for details. The ASTM standards noted above are for reference to methodology in general. In some cases, variations to methods are applied as a result of local practice or professional judgment.

LOCATION AND ELEVATION NOTES

Exploration point locations as shown on the Exploration Plan and as noted on the soil boring logs in the form of Latitude and Longitude are approximate. See Exploration and Testing Procedures in the report for the methods used to locate the exploration points for this project. Surface elevation data annotated with +/- indicates that no actual topographical survey was conducted to confirm the surface elevation. Instead, the surface elevation was approximately determined from topographic maps of the area.

STRENGTH TERMS

RELATIVE DENSITY OF COARSE-GRAINED SOILS (More than 50% retained on No. 200 sieve.) Density determined by Standard Penetration Resistance			CONSISTENCY OF FINE-GRAINED SOILS (50% or more passing the No. 200 sieve.) Consistency determined by laboratory shear strength testing, field visual-manual procedures or standard penetration resistance			
Descriptive Term (Density)	**Standard Penetration or N-Value Blows/Ft.**	**Ring Sampler Blows/Ft.**	**Descriptive Term (Consistency)**	**Unconfined Compressive Strength Qu, (tsf)**	**Standard Penetration or N-Value Blows/Ft.**	**Ring Sampler Blows/Ft.**
Very Loose	0 - 3	0 - 6	Very Soft	less than 0.25	0 - 1	< 3
Loose	4 - 9	7 - 18	Soft	0.25 to 0.50	2 - 4	3 - 4
Medium Dense	10 - 29	19 - 58	Medium Stiff	0.50 to 1.00	4 - 8	5 - 9
Dense	30 - 50	59 - 98	Stiff	1.00 to 2.00	8 - 15	10 - 18
Very Dense	> 50	> 99	Very Stiff	2.00 to 4.00	15 - 30	19 - 42
			Hard	> 4.00	> 30	> 42

RELEVANCE OF SOIL BORING LOG

The soil boring logs contained within this document are intended for application to the project as described in this document. Use of these soil boring logs for any other purpose may not be appropriate.

UNIFIED SOIL CLASSIFICATION SYSTEM

Terracon GeoReport

Criteria for Assigning Group Symbols and Group Names Using Laboratory Tests [A]				Soil Classification: Group Symbol	Soil Classification: Group Name [B]
Coarse-Grained Soils: More than 50% retained on No. 200 sieve	**Gravels:** More than 50% of coarse fraction retained on No. 4 sieve	**Clean Gravels:** Less than 5% fines [C]	$Cu \geq 4$ and $1 \leq Cc \leq 3$ [E]	GW	Well-graded gravel [F]
			$Cu < 4$ and/or [$Cc<1$ or $Cc>3.0$] [E]	GP	Poorly graded gravel [F]
		Gravels with Fines: More than 12% fines [C]	Fines classify as ML or MH	GM	Silty gravel [F, G, H]
			Fines classify as CL or CH	GC	Clayey gravel [F, G, H]
	Sands: 50% or more of coarse fraction passes No. 4 sieve	**Clean Sands:** Less than 5% fines [D]	$Cu \geq 6$ and $1 \leq Cc \leq 3$ [E]	SW	Well-graded sand [I]
			$Cu < 6$ and/or [$Cc<1$ or $Cc>3.0$] [E]	SP	Poorly graded sand [I]
		Sands with Fines: More than 12% fines [D]	Fines classify as ML or MH	SM	Silty sand [G, H, I]
			Fines classify as CL or CH	SC	Clayey sand [G, H, I]
Fine-Grained Soils: 50% or more passes the No. 200 sieve	**Silts and Clays:** Liquid limit less than 50	**Inorganic:**	$PI > 7$ and plots on or above "A" line [J]	CL	Lean clay [K, L, M]
			$PI < 4$ or plots below "A" line [J]	ML	Silt [K, L, M]
		Organic:	Liquid limit - oven dried / Liquid limit - not dried < 0.75	OL	Organic clay [K, L, M, N]
					Organic silt [K, L, M, O]
	Silts and Clays: Liquid limit 50 or more	**Inorganic:**	PI plots on or above "A" line	CH	Fat clay [K, L, M]
			PI plots below "A" line	MH	Elastic Silt [K, L, M]
		Organic:	Liquid limit - oven dried / Liquid limit - not dried < 0.75	OH	Organic clay [K, L, M, P]
					Organic silt [K, L, M, Q]
Highly organic soils:	Primarily organic matter, dark in color, and organic odor			PT	Peat

[A] Based on the material passing the 3-inch (75-mm) sieve.

[B] If field sample contained cobbles or boulders, or both, add "with cobbles or boulders, or both" to group name.

[C] Gravels with 5 to 12% fines require dual symbols: GW-GM well-graded gravel with silt, GW-GC well-graded gravel with clay, GP-GM poorly graded gravel with silt, GP-GC poorly graded gravel with clay.

[D] Sands with 5 to 12% fines require dual symbols: SW-SM well-graded sand with silt, SW-SC well-graded sand with clay, SP-SM poorly graded sand with silt, SP-SC poorly graded sand with clay.

[E] $Cu = D_{60}/D_{10}$ $\qquad Cc = \dfrac{(D_{30})^2}{D_{10} \times D_{60}}$

[F] If soil contains ≥ 15% sand, add "with sand" to group name.

[G] If fines classify as CL-ML, use dual symbol GC-GM, or SC-SM.

[H] If fines are organic, add "with organic fines" to group name.

[I] If soil contains ≥ 15% gravel, add "with gravel" to group name.

[J] If Atterberg limits plot in shaded area, soil is a CL-ML, silty clay.

[K] If soil contains 15 to 29% plus No. 200, add "with sand" or "with gravel," whichever is predominant.

[L] If soil contains ≥ 30% plus No. 200 predominantly sand, add "sandy" to group name.

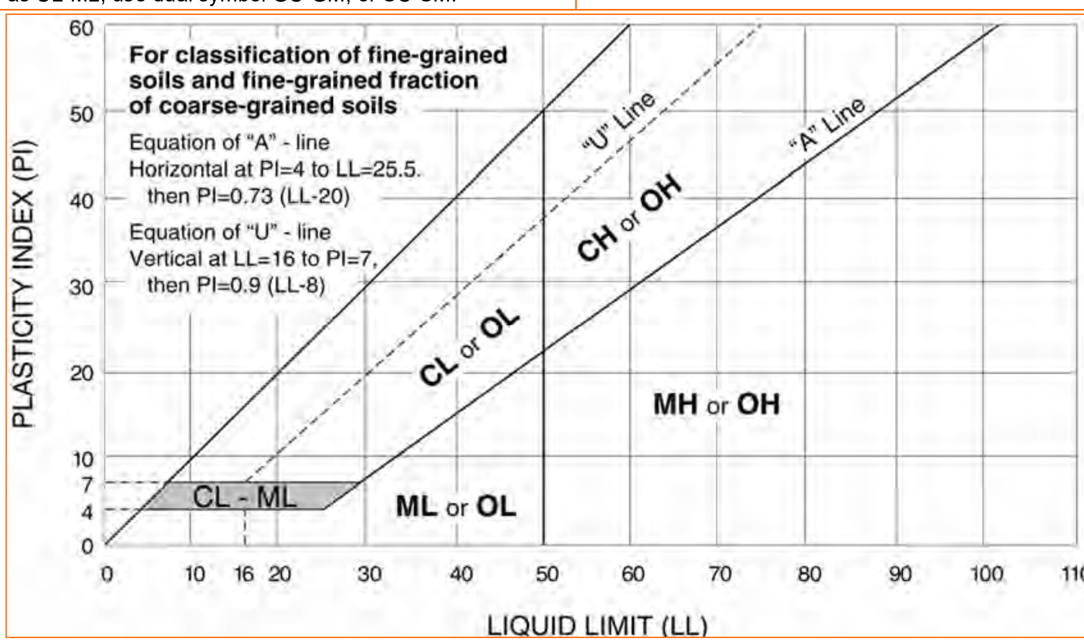
[M] If soil contains ≥ 30% plus No. 200, predominantly gravel, add "gravelly" to group name.

[N] $PI \geq 4$ and plots on or above "A" line.

[O] $PI < 4$ or plots below "A" line.

[P] PI plots on or above "A" line.

[Q] PI plots below "A" line.



APPENDIX D

GREENHOUSE GAS ANALYSIS

Loma Linda Medical Office Building

GREENHOUSE GAS ANALYSIS

CITY OF LOMA LINDA

PREPARED BY:

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DECEMBER 3, 2024

TABLE OF CONTENTS

APPENDICES

LIST OF EXHIBITS

LIST OF TABLES

LIST OF ABBREVIATED TERMS

%	Percent
°C	Degrees Celsius
°F	Degrees Fahrenheit
(1)	Reference
2017 Scoping Plan	Final 2017 Scoping Plan Update
AB	Assembly Bill
AB 32	Global Warming Solutions Act of 2006
AB 1493	Pavley Fuel Efficiency Standards
AB 1881	California Water Conservation Landscaping Act of 2006
Annex I	Industrialized Nations
APA	Administrative Procedure Act
AQIA	*Loma Linda Medical Office Building Air Quality Impact Analysis*
BAU	Business as Usual
C_2F_6	Hexafluoroethane
C_2H_6	Ethane
CAA	Federal Clean Air Act
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGAPS	California LBNL GHG Analysis of Policies Spreadsheet
CALGreen	California Green Building Standards Code
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resource Board
CEC	California Energy Commission
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CEQA Guidelines	*CEQA Statute and Guidelines*
CDFA	California Department of Food and Agriculture
CF_4	Tetrafluoromethane
CFC	Chlorofluorocarbons
CFC-113	Trichlorotrifluoroethane
CH_4	Methane
City	City of Loma Linda
CNRA	California Natural Resources Agency
CNRA 2009	*2009 California Climate Adaptation Strategy*
CO_2	Carbon Dioxide

CO_2e	Carbon Dioxide Equivalent
Convention	United Nation's Framework Convention on Climate Change
COP	Conference of the Parties
CPUC	California Public Utilities Commission
DWR	Department of Water Resources
EPA	Environmental Protection Agency
EV	Electric Vehicle
GCC	Global Climate Change
Gg	Gigagram
GHGA	Greenhouse Gas Analysis
gpd	Gallons Per Day
GWP	Global Warming Potential
H_2O	Water
HFC	Hydrofluorocarbons
HFC-23	Fluoroform
HFC-134a	1,1,1,2-tetrafluoroethane
HFC-152a	1,1-difluoroethane
hp	Horsepower
IPCC	Intergovernmental Panel on Climate Change
ISO	Independent System Operator
kWh	Kilowatt Hours
lbs	Pounds
LBNL	Lawrence Berkeley National Laboratory
LCA	Life-Cycle Analysis
LCD	Liquid Crystal Display
LCFS	Low Carbon Fuel Standard or Executive Order S-01-07
LEV III	Low-Emission Vehicle
LULUCF	Land-Use, Land-Use Change and Forestry
$MMTCO_2e$	Million Metric Ton of Carbon Dioxide Equivalent
mpg	Miles Per Gallon
MPOs	Metropolitan Planning Organizations
$MMTCO_2e$/yr	Million Metric Ton of Carbon Dioxide Equivalent Per Year
MT/yr	Metric Tons Per Year
$MTCO_2e$	Metric Ton of Carbon Dioxide Equivalent
$MTCO_2e$/yr	Metric Ton of Carbon Dioxide Equivalent Per Year
MW	Megawatts
MWh	Megawatts Per Hour
MWELO	California Department of Water Resources' Model Water

	Efficient
N_2O	Nitrous Oxide
NDC	Nationally Determined Contributions
NF_3	Nitrogen Trifluoride
NHTSA	National Highway Traffic Safety Administration
NIOSH	National Institute for Occupational Safety and Health
NO_X	Nitrogen Oxides
Non-Annex I	Developing Nations
OAL	Office of Administrative Law
OPR	Office of Planning and Research
PFC	Perfluorocarbons
ppb	Parts Per Billion
ppm	Parts Per Million
ppt	Parts Per Trillion
Project	Loma Linda Medical Office Building
RTP	Regional Transportation Plan
SAFE	Safer Affordable Fuel-Efficient Vehicles Rule
SB	Senate Bill
SB 32	California Global Warming Solutions Act of 2006
SB 375	Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies
SB 1078	Renewable Portfolio Standards
SB 1368	Statewide Retail Provider Emissions Performance Standards
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
Scoping Plan	California Air Resources Board Climate Change Scoping Plan
SCS	Sustainable Communities Strategy
sf	Square Feet
SF_6	Sulfur Hexaflouride
SLPS	Short-Lived Climate Pollutant Strategy
TA	*Loma Linda Medical Office Building Trip Generation Assessment*
TDM	Transportation Demand Measures
Title 20	Appliance Energy Efficiency Standards
Title 24	California Building Code
U.N.	United Nations

U.S.	United States
UNFCCC	United Nations' Framework Convention on Climate Change
VMT	Vehicle Miles Traveled
WCI	Western Climate Initiative
WRI	World Resources Institute
ZE/NZE	Zero and Near-Zero Emissions
ZEV	Zero-Emissions Vehicles

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EXECUTIVE SUMMARY

ES.1 SUMMARY OF FINDINGS

The results of this *Loma Linda Medical Office Building Greenhouse Gas Analysis* (GHGA) is 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* (*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: Would the Project generate GHG emissions either directly or indirectly, that may have a significant impact on the environment?	3.7	*Less than Significant*	*n/a*
GHG Impact #2: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	3.7	*Less than Significant*	*n/a*

ES.2 PROJECT REQUIREMENTS

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

- Global Warming Solutions Act of 2006 (Assembly Bill (AB) 32) (2).
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (Senate Bill (SB) 375) (3).
- Pavley Fuel Efficiency Standards (AB 1493). Establishes fuel efficiency ratings for new vehicles (4).
- California Building Code (Title 24 California Code of Regulations (CCR)) and CALGreen standards. Establishes energy efficiency requirements for new construction (5).
- Appliance Energy Efficiency Standards (Title 20 CCR). Establishes energy efficiency requirements for appliances (6).
- Low Carbon Fuel Standard (LCFS). Requires carbon content of fuel sold in California to be 10 percent (%) 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 – also referred to as RPS). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20% by 2010 and 33% by 2020 (10).
- California Global Warming Solutions Act of 2006 (SB 32). Requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15 (11).

Promulgated regulations that will affect the Project's emissions are accounted for in the Project's GHG calculations provided in this report. In particular, AB 1493, LCFS, and RPS, and therefore are accounted for in the Project's emission calculations.

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1 INTRODUCTION

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

1.1 SITE LOCATION

The proposed Loma Linda Medical Office Building Project is located on the southeast corner of Barton Road and Anderson Street in the City of Loma Linda, as shown on Exhibit 1-A.

1.2 PROJECT DESCRIPTION

The Project is to consist of the development of a 105,000-square-foot, five-story medical office building. The preliminary site plan for the proposed Project is shown in Exhibit 1-B.

EXHIBIT 1-A: LOCATION MAP

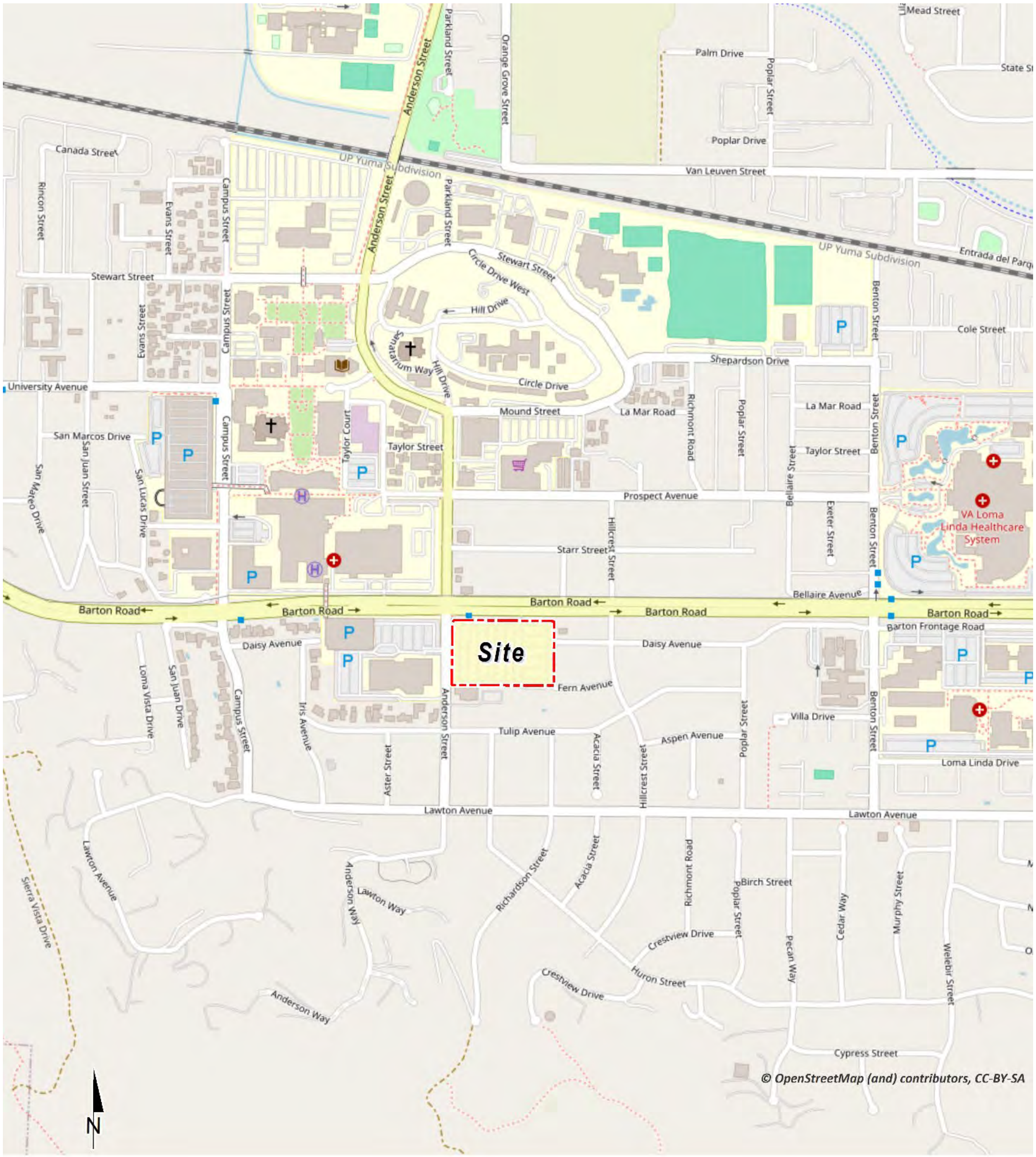
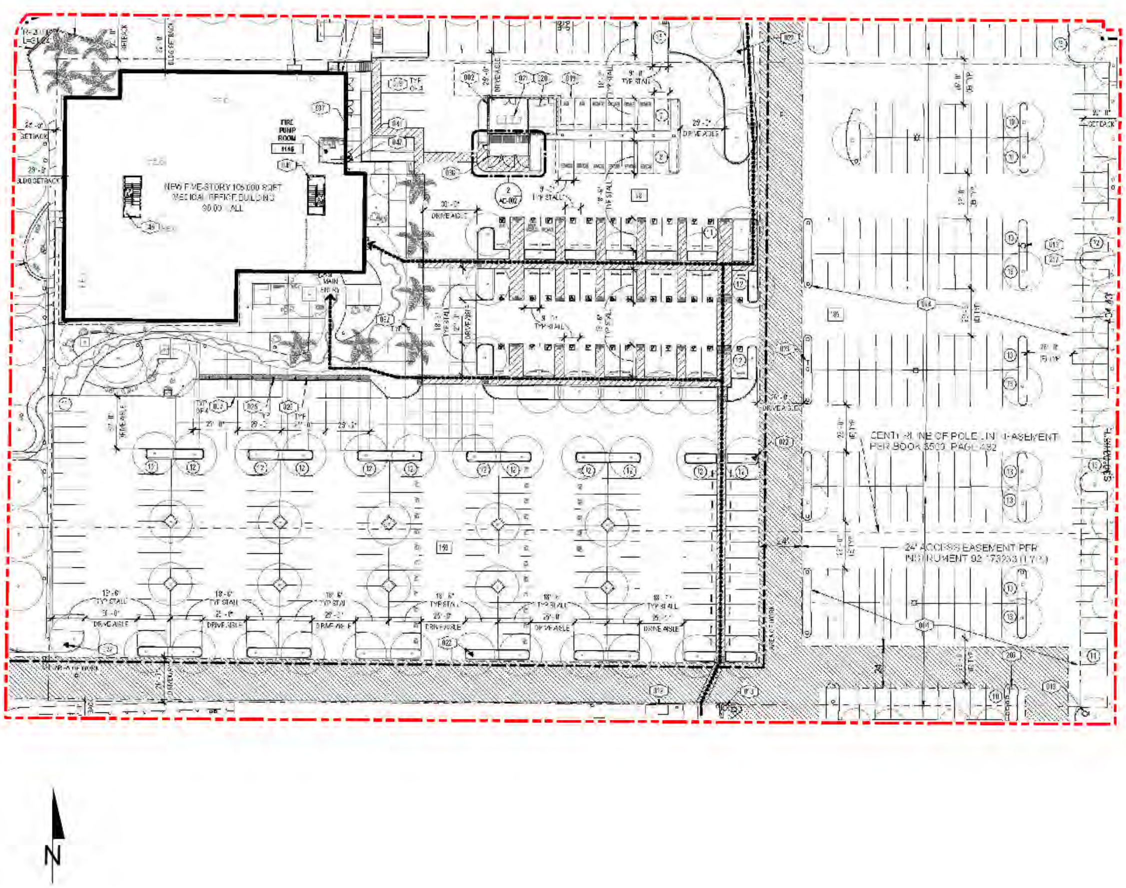


EXHIBIT 1-B: SITE PLAN



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2 CLIMATE CHANGE SETTING

2.1 INTRODUCTION TO GLOBAL CLIMATE CHANGE (GCC)

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

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

2.2 GLOBAL CLIMATE CHANGE DEFINED

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation, and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO_2, N_2O, CH_4, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radiative 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 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
Water	Water is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. Climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to 'hold' more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop would continue is	The main source of water vapor is evaporation from the oceans (approximately 85%). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves.	There are no known direct health effects related to water vapor at this time. It should be noted however that when some pollutants react with water vapor, the reaction forms a transport mechanism for some of these pollutants to enter the human body through water vapor.

GHGs	Description	Sources	Health Effects
	unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it would eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the earth's surface and heat it up) (12).		
CO_2	CO_2 is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO_2 concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30%. Left unchecked, the concentration of CO_2 in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources (13).	CO_2 is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil, natural gas, and wood. CO_2 is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks (14).	Outdoor levels of CO_2 are not high enough to result in negative health effects. 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 (15).

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

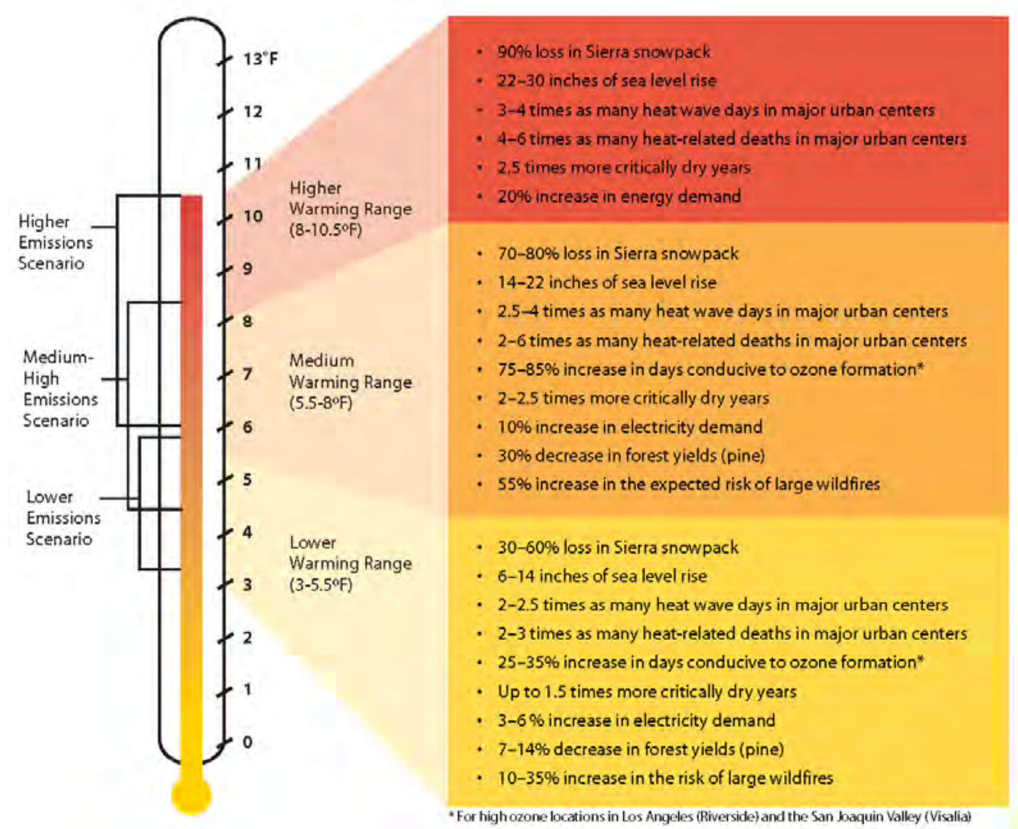
GHGs	Description	Sources	Health Effects
		bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. N_2O can be transported into the stratosphere, be deposited on the earth's surface, and be converted to other compounds by chemical reaction (17).	
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the earth's surface).	CFCs have no natural source but were first synthesized in 1928. They were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of the CFCs would remain in the atmosphere for over 100 years (18).	In confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.

GHGs	Description	Sources	Health Effects
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.
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 exceptionally long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). The EPA estimates that concentrations of CF_4 in the atmosphere are over 70 parts per trillion (ppt).	The two main sources of PFCs are primary aluminum production and semiconductor manufacture.	No health effects are known to result from exposure to PFCs.
SF_6	SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900) (19). The EPA indicates that concentrations in the 1990s were about 4 ppt.	SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and 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 (20).	NF_3 is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display (LCD) panels, types of solar panels, and chemical lasers.	Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis (21).

The potential health effects related directly to the emissions of CO_2, CH_4, and N_2O as they relate to development projects such as the proposed Project are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Climate change would likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas (22). Exhibit 2-A presents the potential impacts of global warming (23).

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



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

2.4 GLOBAL WARMING POTENTIAL

GHGs have varying GWP values. GWP of a GHG indicates the amount of warming a gas cause 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 Intergovernmental Panel on Climate Change (IPCC) is the international body for assessing the science related to climate change. IPCC Assessment Reports cover the full scientific, technical and socio-economic assessment of climate change. 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 range from 1 for CO_2 to 23,900 for SF_6 and GWP for the 6th Assessment Report range from 1 for CO_2 to 25,200 for SF_6 (24).

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

Gas	Atmospheric Lifetime (years)	GWP (100-year time horizon)	
		2nd Assessment Report	6th Assessment Report
CO_2	Multiple	1	1
CH_4	11.8	21	28
N_2O	109	310	273
HFC-23	228	11,700	14,600
HFC-134a	14	1,300	1,526
HFC-152a	1.6	140	164
SF_6	3,200	23,900	25,200

Source: IPCC Second Assessment Report, 1995 and IPCC Sixth Assessment Report, 2023

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 2021. Based on the latest available data, the sum of these emissions totaled approximately 28,272,940 gigagram (Gg) CO_2e[1] (25) (26) 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 2021 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 2016, 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 2021.

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

Emitting Countries	GHG Emissions (Gg CO_2e)
China	12,300,200
United States	6,340,228
European Union (27-member countries)	3,468,394
India	2,839,425
Russian Federation	2,156,599
Japan	1,168,094
Total	**28,272,940**

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 (17). The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2023 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2021 GHG emissions period, California emitted an average 381.3 million metric tons of CO_2e per year ($MMTCO_2e$/yr) or 381,300 Gg CO_2e (6.01% of the total United States GHG emissions) (27). Based on data published by the U.S. Energy Information Administration, California's per capita (9.12 metric tons) GHG emissions are much less than the nationwide per capita (15.8 metric ton) average (28).

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 (29).

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 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. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding.

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

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) (30).

Following President Biden's day one executive order, the United States officially rejoined the landmark Paris Agreement on February 19, 2021, positioning the country to once again be part of the global climate solution. Meanwhile, city, state, business, and civic leaders across the country and around the world have been ramping up efforts to drive the clean energy advances needed to meet the goals of the agreement and put the brakes on dangerous climate change.

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 (31).

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 (32). 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 existing 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 (33). On December 21, 2021, after reviewing all the public comments submitted on NHTSA's April 2021 Notice of Proposed Rulemaking, NHTSA finalizes the CAFE Preemption rulemaking to withdraw its portions of the so-called SAFE I Rule. The final rule concludes that the SAFE I Rule overstepped the agency's legal authority and established overly broad prohibitions that did not account for a variety of important state and local interests. The final rule ensures that the SAFE I Rule will no longer form an improper barrier to states exploring creative solutions to address their local communities' environmental and public health challenges (34).

On March 31, 2022, NHTSA finalized CAFE standards for MY 2024-2026. The standards for passenger cars and light trucks for MYs 2024-2025 were increased at a rate of 8% per year and then increased at a rate of 10% per year for MY 2026 vehicles. NHTSA currently projects that the revised standards would require an industry fleet-wide average of roughly 49 mpg in MY 2026 and would reduce average fuel outlays over the lifetimes of affected vehicles that provide consumers hundreds of dollars in net savings. These standards are directly responsive to the agency's statutory mandate to improve energy conservation and reduce the nation's energy dependence on foreign sources (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.

On January 19, 2021, the D.C. Circuit Court of Appeals ruled that the EPA's ACE Rule for GHG emissions from power plants rested on an erroneous interpretation of the CAA that barred EPA from considering measures beyond those that apply at and to an individual source. The court therefore vacated and remanded the ACE Rule and adopted a replacement rule which regulates

CO2 emissions from existing power plants, potentially again considering generation shifting and other measures to more aggressively target power sector emissions.

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 1881

The Water Conservation in Landscaping Act of 2006 requires local agencies to adopt the updated DWR model ordinance or equivalent. AB 1881 also requires the CEC to consult with the DWR to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.

SB 1368

California SB 1368 adds Sections 8340 and 8341 to the Public Utilities Code (effective January 1, 2007) with the intent "to prevent long-term investments in power plants with GHG emissions in excess of those produced by a combined-cycle natural gas power plant" with the aim of "reducing emissions of GHGs from the state's electricity consumption, not just the state's electricity production." SB 1368 provides a mechanism for reducing the GHG emissions of electricity providers, both in-state and out-of-state, thereby assisting CARB in meeting its mandate under AB 32, the Global Warming Solutions Act of 2006.

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[2]). 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, 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

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[2] Based upon the 2023 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2021 GHG emissions period, California emitted an average 381.3 $MMTCO_2e$ (56). This is less than the 2020 emissions target of 431 $MMTCO_2e$.

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 electric vehicles (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 45% 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).

2022 CARB SCOPING PLAN

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) (40). 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.

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 (41).

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."* (42)

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.

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.

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

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 became 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 building permit document 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).
- 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 electric vehicle 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).

2.7.4 REGIONAL

The project is within the SCAB, which is under the jurisdiction of the SCAQMD.

SCAQMD

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

In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim

CEQA GHG Significance Threshold, which could be applied by lead agencies. The working group has not provided additional guidance since release of the interim guidance in 2008. The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current interim thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
  - Residential and commercial land use: 3,000 $MTCO_2e$/yr
  - Industrial land use: 10,000 $MTCO_2e$/yr
  - Based on land use type: residential: 3,500 $MTCO_2e$/yr; commercial: 1,400 $MTCO_2e$/yr; or mixed use: 3,000 $MTCO_2e$/yr
- Tier 4 has the following options:
  - Option 1: Reduce Business-as-Usual (BAU) emissions by a certain percentage; this percentage is currently undefined.
  - Option 2: Early implementation of applicable AB 32 Scoping Plan measures
  - Option 3: 2020 target for service populations (SP), which includes residents and employees: 4.8 $MTCO_2e$ per SP per year for projects and 6.6 $MTCO_2e$ per SP per year for plans;
  - Option 3, 2035 target: 3.0 $MTCO_2e$ per SP per year for projects and 4.1 $MTCO_2e$ per SP per year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

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

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

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

- Rule 2700 defines terms and post global warming potentials.

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

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

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3 PROJECT GHG 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 sections.

3.2 STANDARDS OF SIGNIFICANCE

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

3.2.1 THRESHOLDS OF SIGNIFICANCE

The City of Loma Linda has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. A screening threshold of 3,000 $MTCO_2e$/yr to determine if additional analysis is required is an acceptable approach for small projects such as the proposed Project. This approach is a widely accepted screening threshold used by the City of Loma Linda and numerous cities in the South Coast Air Basin (SCAB) and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans ("SCAQMD Interim GHG Threshold"). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required (48). As noted by the SCAQMD:

> *"…the…screening level for stationary sources is based on an emission capture rate of 90% for all new or modified projects...the policy objective of [SCAQMD's] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90% of all new or modified stationary source projects. A GHG significance threshold based on a 90% emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90% emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than 1% of future 2050 statewide GHG emissions target (85 [MMTCO2e/yr]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology] (BACT) for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility."* (49)

Thus, and based on guidance from the SCAQMD, if a non-industrial project would emit GHGs less than 3,000 $MTCO_2e$/yr, the project is not considered a substantial GHG emitter and the GHG impact is less than significant, requiring no additional analysis and no mitigation. On the other hand, if a non-industrial project would emit GHGs in excess of 3,000 $MTCO_2e$/yr, then the project could be considered a substantial GHG emitter, requiring additional analysis and potential mitigation. As previously discussed, a screening threshold of 3,000 $MTCO_2e$/yr is an acceptable approach for small projects to determine if additional analysis is required and is therefore applied for this Project.

3.3 MODELS EMPLOYED TO ANALYZE GHGS

3.3.1 CALIFORNIA EMISSIONS ESTIMATOR MODEL (CALEEMOD)

The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, as such the latest version available at the time of this report has been utilized in this analysis. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures (50). Accordingly, the latest version of CalEEMod has been used for this Project to determine GHG emissions. Output from the model runs for construction and operational activity for the proposed Project is provided in Appendix 3.1. CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water, refrigerants, and stationary.

3.4 LIFE-CYCLE ANALYSIS NOT REQUIRED

A full life-cycle analysis (LCA) for construction and operational activity is not included in this analysis due to the lack of consensus guidance on LCA methodology at this time (51). Life-cycle analysis (i.e., assessing economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in the Project development, infrastructure, and on-going operations) depends on emission factors or econometric factors that are not well established for all processes. At this time, an LCA would be extremely speculative and thus has not been prepared.

Additionally, the SCAQMD recommends analyzing direct and indirect project GHG emissions generated within California and not life-cycle emissions because the life-cycle effects from a project could occur outside of California, might not be very well understood, or documented, and would be challenging to mitigate (52). Additionally, the science to calculate life cycle emissions is not yet established or well defined; therefore, SCAQMD has not recommended, and is not requiring, life-cycle emissions analysis.

3.5 CONSTRUCTION EMISSIONS

Project construction activities would generate CO_2 and CH_4 emissions. The report *Loma Linda Medical Office Building Air Quality Impact Analysis* (AQIA) contains detailed information regarding Project construction activities (53). As discussed in the AQIA, Construction related emissions are expected from the following construction activities:

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

3.5.1 CONSTRUCTION DURATION

For purposes of analysis, construction of Project is expected to commence in April 2025 and will last through April 2026 (53). The construction schedule utilized in the analysis, shown in Table 3-1, represents a "conservative" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent[3]. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per *CEQA Guidelines* (46).

TABLE 3-1: CONSTRUCTION DURATION

Construction Activity	Start Date	End Date	Days
Demolition	4/1/2025	4/28/2025	20
Site Preparation	4/29/2025	5/12/2025	10
Grading	5/13/2025	6/9/2025	20
Building Construction	6/10/2025	4/27/2026	230
Paving	3/31/2026	4/27/2026	20
Architectural Coating	3/31/2026	4/27/2026	20

3.5.2 CONSTRUCTION EQUIPMENT

A summary of construction equipment by phase is provided at Table 3-2. Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 3-2 will operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the code.

TABLE 3-2: CONSTRUCTION EQUIPMENT ASSUMPTIONS

Construction Activity	Equipment	Amount	Hours Per Day
Demolition	Concrete/Industrial Saws	1	8
	Excavators	3	8
	Rubber Tired Dozers	2	8
Site Preparation	Rubber Tired Dozers	3	8
	Crawler Tractors	4	8
Grading	Excavators	1	8
	Graders	1	8
	Rubber Tired Dozers	1	8

[3] As shown in the CalEEMod User's Guide Version 2022.1, Section 4.3 "OFFROAD Equipment" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

Construction Activity	Equipment	Amount	Hours Per Day
	Crawler Tractors	3	8
Building Construction	Cranes	1	8
	Forklifts	3	8
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	8
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

[1] In order to account for fugitive dust emissions, Crawler Tractors were used in lieu of Tractors/Loaders/Backhoes.

3.5.3 CONSTRUCTION EMISSIONS SUMMARY

For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions (54). As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 3-3.

TABLE 3-3: AMORTIZED ANNUAL CONSTRUCTION EMISSIONS

Year	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e[4]
2025	368.81	0.02	0.02	0.14	374.02
2026	149.99	0.01	0.00	0.05	151.43
Total GHG Emissions	518.80	0.03	0.02	0.19	525.45
Amortized Construction Emissions	**17.29**	**8.44E-04**	**6.52E-04**	**6.17E-03**	**17.51**

Source: CalEEMod annual construction-source emissions are presented in Appendix 3.1.

[A] CalEEMod reports the most common GHGs emitted which include CO_2, CH_4, N_2O and Refrigerants. These GHGs are then converted into CO_2e by multiplying the individual GHG by the GWP.

3.6 OPERATIONAL EMISSIONS

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

[4] CalEEMod reports the most common GHGs emitted which include CO_2, CH_4, N_2O and Refrigerants. These GHGs are then converted into the CO_2e by multiplying the individual GHG by the GWP.

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

3.6.1 AREA SOURCE EMISSIONS

LANDSCAPE MAINTENANCE EQUIPMENT

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that on October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by January 1, 2024, which is now effective. For purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod.

3.6.2 ENERGY SOURCE EMISSIONS

COMBUSTION EMISSIONS ASSOCIATED WITH NATURAL GAS AND ELECTRICITY

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building; the building energy use emissions do not include street lighting[5]. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Electricity and natural gas usage associated with the Project were calculated by CalEEMod using default parameters.

3.6.3 MOBILE SOURCE EMISSIONS

The Project related operational air quality emissions derive primarily from vehicle trips generated by the Project, including employee trips to and from the site associated with the proposed uses. It should be noted that the proposed Medical Office Building would serve as an addition to the existing Loma Linda University Medical Center, increasing capacity to accommodate current patients and employees. Based on information provided by the Project Applicant, 50% of the trips associated with the proposed Medical Office Building are anticipated to be new. Accordingly, the CalEEMod default trip rates used in this analysis were reduced by 50% to reflect only the new

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

traffic generated by the Project. Trip length characteristics available from the *Loma Linda Medical Office Building Vehicle Miles Traveled (VMT) Analysis* were utilized in this analysis (55).

3.6.4 STATIONARY SOURCE EMISSIONS

The proposed Project was conservatively assumed to include installation of one 300-horsepower diesel-powered fire pump and one 400-horsepower diesel-powered emergency generator at the medical office building. The fire pump and emergency generator were estimated to operate for up to 1 hour per day, 1 day per week for up to 50 hours per year for maintenance and testing purposes. Emissions associated with the stationary diesel-powered fire pump and emergency generator were calculated using CalEEMod.

3.6.5 WATER SUPPLY, TREATMENT AND DISTRIBUTION

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. Unless otherwise noted, CalEEMod default parameters were used.

3.6.6 SOLID WASTE

Industrial land uses will result in the generation and disposal of solid waste. A percentage of this waste will be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted will be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by CalEEMod using default parameters.

3.6.7 REFRIGERANTS

Air conditioning (A/C) and refrigeration equipment associated with the Project are anticipated to generate GHG emissions. CalEEMod automatically generates a default A/C and refrigeration equipment inventory for each project land use subtype based on industry data from the USEPA (2016b). CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. Note that CalEEMod does not quantify emissions from the disposal of refrigeration and A/C equipment at the end of its lifetime. Per 17 CCR 95371, new facilities with refrigeration equipment containing more than 50 pounds of refrigerant are prohibited from utilizing refrigerants with a GWP of 150 or greater as of January 1, 2022. Additionally, beginning January 1, 2025, all new air conditioning equipment may not use refrigerants with a GWP of 750 or greater. GHG emissions associated with refrigerants were calculated by CalEEMod using default parameters.

3.6.8 EMISSIONS SUMMARY

PROJECT GHG EMISSIONS

The annual GHG emissions associated with the Project are summarized in Table 3-4. As shown in Table 3-4, construction and operation of the Project would generate approximately 2,382.07 $MTCO_2e$/yr.

TABLE 3-4: PROJECT GHG EMISSIONS

Emission Source	Emissions (MT/yr)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Annual construction-related emissions amortized over 30 years	17.29	8.44E-04	6.52E-04	6.17E-03	17.51
Mobile Source	1487.67	0.08	0.08	2.30	1514.91
Area Source	2.13	0.00	0.00	0.00	2.14
Energy Source	445.60	0.04	0.00	0.00	447.73
Water Usage	18.51	0.43	0.01	0.00	32.34
Waste	101.18	10.11	0.00	0.00	354.01
Refrigerants	0.00	0.00	0.00	0.06	0.06
Stationary Source	13.33	0.00	0.00	0.00	13.37
Total CO_2e (All Sources)	**2,382.07**				

Source: CalEEMod output, See Appendix 3.1 for detailed proposed Project model outputs.

3.7 GHG EMISSIONS FINDINGS AND RECOMMENDATIONS

GHG Impact #1: The Project would have the potential to generate direct or indirect GHG emissions that would result in a significant impact on the environment.

The City of Loma Linda has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. A screening threshold of 3,000 $MTCO_2e$/yr to determine if additional analysis is required is an acceptable approach for small projects. This approach is a widely accepted screening threshold used by the City of Loma Linda and numerous cities in the SCAB and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* ("SCAQMD Interim GHG Threshold"). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required (49).

The Project would result in approximately 2,382.07 $MTCO_2e$/yr, as shown on Table 3-4. As such, the Project would not exceed the SCAQMD's recommended numeric threshold of 3,000 $MTCO_2e$/yr if it were applied. As such, project-related emissions would have a less than significant direct or indirect impact on GHG and climate change and no mitigation measures are required.

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

As previously stated, pursuant to 15604.4 of the *CEQA Guidelines*, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions (46). As such, the Project's consistency with the 2022 Scoping Plan, is discussed below. It should be noted that the Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 and 2017 Scoping Plan is not necessary, since both of these plans have been superseded by the 2022 Scoping Plan. For reasons outlined herein, the proposed Project would result in a less than significant impact with respect to GHG emissions for GHG Impact #2.

2022 SCOPING PLAN CONSISTENCY

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the Project will comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. As such, the Project would be consistent with the 2022 Scoping Plan.

The Project would not have the potential to conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

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5 CERTIFICATIONS

The contents of this GHG study report represent an accurate depiction of the GHG impacts associated with the proposed Loma Linda Medical Office Building Project. The information contained in this GHG report is based on the best available data at the time of preparation. If you have any questions, please contact me directly at hqureshi@urbanxroads.com.

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EDUCATION

Master of Science in Environmental Studies
California State University, Fullerton • May 2010

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AEP – Association of Environmental Planners
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ASTM – American Society for Testing and Materials

PROFESSIONAL CERTIFICATIONS

Planned Communities and Urban Infill – Urban Land Institute • June 2011
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APPENDIX 3.1:

CALEEMOD PROJECT EMISSIONS MODEL OUTPUTS

15959 - Loma Linda Medical Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	15959 - Loma Linda Medical
Construction Start Date	4/1/2025
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.50
Precipitation (days)	24.0
Location	34.047868636127845, -117.26043436582097
County	San Bernardino-South Coast
City	Loma Linda
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5385
EDFZ	10
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.29

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
Medical Office Building	105	1000sqft	0.48	105,000	18,365	—	—	—

Parking Lot	223	Space	0.83	0.00	0.00	—	—	—
Other Asphalt Surfaces	2.31	Acre	2.31	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.	29.4	29.0	37.5	33.8	0.07	1.93	5.89	7.82	1.78	2.74	4.52	—	8,784	8,784	0.69	0.88	11.7	9,074
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	29.4	29.0	19.7	28.8	0.04	0.77	0.84	1.61	0.71	0.20	0.91	—	5,444	5,444	0.22	0.13	0.10	5,487
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.89	1.81	8.56	9.99	0.02	0.36	0.69	1.05	0.33	0.22	0.55	—	2,228	2,228	0.12	0.09	0.83	2,259
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.34	0.33	1.56	1.82	< 0.005	0.07	0.13	0.19	0.06	0.04	0.10	—	369	369	0.02	0.02	0.14	374

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	4.91	4.13	37.5	33.8	0.07	1.93	5.89	7.82	1.78	2.74	4.52	—	8,784	8,784	0.69	0.88	11.7	9,074
2026	29.4	29.0	19.6	29.7	0.04	0.77	0.84	1.61	0.71	0.20	0.91	—	5,507	5,507	0.24	0.13	3.73	5,554
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.65	1.37	12.0	16.4	0.03	0.47	0.56	1.03	0.44	0.14	0.57	—	3,497	3,497	0.16	0.10	0.08	3,531
2026	29.4	29.0	19.7	28.8	0.04	0.77	0.84	1.61	0.71	0.20	0.91	—	5,444	5,444	0.22	0.13	0.10	5,487
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.15	0.93	8.56	9.99	0.02	0.36	0.69	1.05	0.33	0.22	0.55	—	2,228	2,228	0.12	0.09	0.83	2,259
2026	1.89	1.81	3.05	4.41	0.01	0.11	0.14	0.26	0.11	0.03	0.14	—	906	906	0.04	0.03	0.29	915
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.21	0.17	1.56	1.82	< 0.005	0.07	0.13	0.19	0.06	0.04	0.10	—	369	369	0.02	0.02	0.14	374
2026	0.34	0.33	0.56	0.81	< 0.005	0.02	0.03	0.05	0.02	0.01	0.03	—	150	150	0.01	< 0.005	0.05	151

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.	11.9	11.1	9.49	59.4	0.13	0.32	10.6	10.9	0.31	2.69	3.00	636	15,938	16,575	64.6	0.68	42.9	18,435
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.6	9.86	9.86	47.2	0.12	0.31	10.6	10.9	0.31	2.69	2.99	636	15,141	15,777	64.6	0.70	1.44	17,602
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	8.38	7.81	5.74	38.3	0.09	0.15	7.87	8.03	0.15	2.00	2.15	636	11,857	12,493	64.4	0.55	14.2	14,282
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.53	1.43	1.05	6.99	0.02	0.03	1.44	1.46	0.03	0.37	0.39	105	1,963	2,068	10.7	0.09	2.35	2,365

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	7.36	6.75	5.47	51.3	0.12	0.08	10.6	10.7	0.08	2.69	2.77	—	12,554	12,554	0.62	0.59	42.6	12,788
Area	3.21	3.15	0.04	4.57	< 0.005	0.01	—	0.01	0.01	—	0.01	—	18.8	18.8	< 0.005	< 0.005	—	18.8
Energy	0.09	0.04	0.77	0.65	< 0.005	0.06	—	0.06	0.06	—	0.06	—	2,691	2,691	0.25	0.02	—	2,704
Water	—	—	—	—	—	—	—	—	—	—	—	25.2	86.6	112	2.60	0.06	—	195
Waste	—	—	—	—	—	—	—	—	—	—	—	611	0.00	611	61.1	0.00	—	2,138
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Stationary	1.26	1.15	3.21	2.93	0.01	0.17	0.00	0.17	0.17	0.00	0.17	0.00	588	588	0.02	< 0.005	0.00	590
Total	11.9	11.1	9.49	59.4	0.13	0.32	10.6	10.9	0.31	2.69	3.00	636	15,938	16,575	64.6	0.68	42.9	18,435
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.88	6.27	5.87	43.7	0.11	0.08	10.6	10.7	0.08	2.69	2.77	—	11,775	11,775	0.65	0.61	1.10	11,974
Area	2.40	2.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.09	0.04	0.77	0.65	< 0.005	0.06	—	0.06	0.06	—	0.06	—	2,691	2,691	0.25	0.02	—	2,704
Water	—	—	—	—	—	—	—	—	—	—	—	25.2	86.6	112	2.60	0.06	—	195
Waste	—	—	—	—	—	—	—	—	—	—	—	611	0.00	611	61.1	0.00	—	2,138
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Stationary	1.26	1.15	3.21	2.93	0.01	0.17	0.00	0.17	0.17	0.00	0.17	0.00	588	588	0.02	< 0.005	0.00	590

Total	10.6	9.86	9.86	47.2	0.12	0.31	10.6	10.9	0.31	2.69	2.99	636	15,141	15,777	64.6	0.70	1.44	17,602
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.16	4.70	4.50	34.1	0.09	0.06	7.87	7.94	0.06	2.00	2.06	—	8,986	8,986	0.49	0.46	13.9	9,150
Area	2.96	2.91	0.03	3.13	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	12.9	12.9	< 0.005	< 0.005	—	12.9
Energy	0.09	0.04	0.77	0.65	< 0.005	0.06	—	0.06	0.06	—	0.06	—	2,691	2,691	0.25	0.02	—	2,704
Water	—	—	—	—	—	—	—	—	—	—	—	25.2	86.6	112	2.60	0.06	—	195
Waste	—	—	—	—	—	—	—	—	—	—	—	611	0.00	611	61.1	0.00	—	2,138
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Stationary	0.17	0.16	0.44	0.40	< 0.005	0.02	0.00	0.02	0.02	0.00	0.02	0.00	80.5	80.5	< 0.005	< 0.005	0.00	80.8
Total	8.38	7.81	5.74	38.3	0.09	0.15	7.87	8.03	0.15	2.00	2.15	636	11,857	12,493	64.4	0.55	14.2	14,282
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.94	0.86	0.82	6.23	0.02	0.01	1.44	1.45	0.01	0.37	0.38	—	1,488	1,488	0.08	0.08	2.30	1,515
Area	0.54	0.53	< 0.005	0.57	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.13	2.13	< 0.005	< 0.005	—	2.14
Energy	0.02	0.01	0.14	0.12	< 0.005	0.01	—	0.01	0.01	—	0.01	—	446	446	0.04	< 0.005	—	448
Water	—	—	—	—	—	—	—	—	—	—	—	4.18	14.3	18.5	0.43	0.01	—	32.3
Waste	—	—	—	—	—	—	—	—	—	—	—	101	0.00	101	10.1	0.00	—	354
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Stationary	0.03	0.03	0.08	0.07	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	13.3	13.3	< 0.005	< 0.005	0.00	13.4
Total	1.53	1.43	1.05	6.99	0.02	0.03	1.44	1.46	0.03	0.37	0.39	105	1,963	2,068	10.7	0.09	2.35	2,365

3. Construction Emissions Details

3.1. Demolition (2025) - 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	2.86	2.40	22.2	19.9	0.03	0.92	—	0.92	0.84	—	0.84	—	3,425	3,425	0.14	0.03	—	3,437
Demolition	—	—	—	—	—	—	1.66	1.66	—	0.25	0.25	—	—	—	—	—	—	—
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	1.22	1.09	< 0.005	0.05	—	0.05	0.05	—	0.05	—	188	188	0.01	< 0.005	—	188
Demolition	—	—	—	—	—	—	0.09	0.09	—	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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.22	0.20	< 0.005	0.01	—	0.01	0.01	—	0.01	—	31.1	31.1	< 0.005	< 0.005	—	31.2
Demolition	—	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005	—	—	—	—	—	—	—
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	0.08	0.07	0.07	1.17	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	211	211	0.01	0.01	0.78	215
Vendor	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	30.8	30.8	< 0.005	< 0.005	0.09	32.4
Hauling	0.65	0.11	6.13	3.44	0.03	0.07	1.37	1.44	0.07	0.38	0.44	—	5,117	5,117	0.54	0.84	10.9	5,391
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.8	10.8	< 0.005	< 0.005	0.02	10.9
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	0.04	0.01	0.35	0.19	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	—	280	280	0.03	0.05	0.26	295
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.78	1.78	< 0.005	< 0.005	< 0.005	1.81
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	0.01	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	46.4	46.4	< 0.005	0.01	0.04	48.9

3.3. Site Preparation (2025) - 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	4.82	4.05	37.5	32.4	0.05	1.93	—	1.93	1.78	—	1.78	—	5,528	5,528	0.22	0.04	—	5,547
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	0.13	0.11	1.03	0.89	< 0.005	0.05	—	0.05	0.05	—	0.05	—	151	151	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	0.02	0.02	0.19	0.16	< 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	0.09	0.08	0.08	1.36	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	247	247	0.01	0.01	0.91	250
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	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.28	6.28	< 0.005	< 0.005	0.01	6.37
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	< 0.005	< 0.005	—	1.04	1.04	< 0.005	< 0.005	< 0.005	1.05
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

3.5. Grading (2025) - 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	2.73	2.30	20.6	19.6	0.03	1.15	—	1.15	1.05	—	1.05	—	3,134	3,134	0.13	0.03	—	3,145
Dust From Material Movement	—	—	—	—	—	—	2.26	2.26	—	0.94	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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.13	1.07	< 0.005	0.06	—	0.06	0.06	—	0.06	—	172	172	0.01	< 0.005	—	172
Dust From Material Movement	—	—	—	—	—	—	0.12	0.12	—	0.05	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	0.03	0.02	0.21	0.20	< 0.005	0.01	—	0.01	0.01	—	0.01	—	28.4	28.4	< 0.005	< 0.005	—	28.5
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	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	0.08	0.07	0.07	1.17	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	211	211	0.01	0.01	0.78	215
Vendor	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	30.8	30.8	< 0.005	< 0.005	0.09	32.4
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	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.8	10.8	< 0.005	< 0.005	0.02	10.9

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	< 0.005	< 0.005	—	1.78	1.78	< 0.005	< 0.005	< 0.005	1.81
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

3.7. Building Construction (2025) - 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	1.45	1.21	11.3	14.1	0.03	0.47	—	0.47	0.43	—	0.43	—	2,630	2,630	0.11	0.02	—	2,639
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	1.45	1.21	11.3	14.1	0.03	0.47	—	0.47	0.43	—	0.43	—	2,630	2,630	0.11	0.02	—	2,639
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	0.58	0.49	4.54	5.67	0.01	0.19	—	0.19	0.17	—	0.17	—	1,055	1,055	0.04	0.01	—	1,059
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	0.11	0.09	0.83	1.04	< 0.005	0.03	—	0.03	0.03	—	0.03	—	175	175	0.01	< 0.005	—	175
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	0.17	0.15	0.15	2.62	0.00	0.00	0.44	0.44	0.00	0.10	0.10	—	473	473	0.02	0.02	1.76	481
Vendor	0.04	0.01	0.48	0.26	< 0.005	0.01	0.12	0.13	0.01	0.03	0.04	—	432	432	0.03	0.07	1.22	453
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	0.16	0.14	0.16	1.97	0.00	0.00	0.44	0.44	0.00	0.10	0.10	—	434	434	0.02	0.02	0.05	440
Vendor	0.04	0.01	0.50	0.26	< 0.005	0.01	0.12	0.13	0.01	0.03	0.04	—	432	432	0.03	0.07	0.03	452
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	0.06	0.06	0.07	0.84	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	177	177	0.01	0.01	0.30	179
Vendor	0.02	< 0.005	0.20	0.10	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	173	173	0.01	0.03	0.21	182
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	0.01	0.01	0.01	0.15	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	29.2	29.2	< 0.005	< 0.005	0.05	29.7

Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	28.7	28.7	< 0.005	< 0.005	0.03	30.1
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. 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	1.38	1.16	10.7	14.1	0.03	0.41	—	0.41	0.38	—	0.38	—	2,630	2,630	0.11	0.02	—	2,639
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	1.38	1.16	10.7	14.1	0.03	0.41	—	0.41	0.38	—	0.38	—	2,630	2,630	0.11	0.02	—	2,639
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	0.32	0.26	2.44	3.22	0.01	0.09	—	0.09	0.09	—	0.09	—	602	602	0.02	< 0.005	—	604
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	0.06	0.05	0.45	0.59	< 0.005	0.02	—	0.02	0.02	—	0.02	—	99.7	99.7	< 0.005	< 0.005	—	100
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	0.16	0.15	0.13	2.42	0.00	0.00	0.44	0.44	0.00	0.10	0.10	—	464	464	0.02	0.02	1.59	471
Vendor	0.04	0.01	0.46	0.25	< 0.005	0.01	0.12	0.13	0.01	0.03	0.04	—	425	425	0.03	0.07	1.12	446
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	0.15	0.14	0.15	1.83	0.00	0.00	0.44	0.44	0.00	0.10	0.10	—	425	425	0.01	0.02	0.04	430
Vendor	0.04	0.01	0.48	0.25	< 0.005	0.01	0.12	0.13	0.01	0.03	0.04	—	425	425	0.03	0.07	0.03	445
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	0.03	0.03	0.04	0.44	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	98.7	98.7	< 0.005	< 0.005	0.16	100
Vendor	0.01	< 0.005	0.11	0.06	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	97.3	97.3	0.01	0.01	0.11	102
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	0.01	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	16.3	16.3	< 0.005	< 0.005	0.03	16.6
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	16.1	16.1	< 0.005	< 0.005	0.02	16.9
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. 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	0.91	0.76	7.12	9.94	0.01	0.32	—	0.32	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.91	0.76	7.12	9.94	0.01	0.32	—	0.32	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.05	0.04	0.39	0.54	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Paving	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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	0.07	0.06	0.06	1.08	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	207	207	0.01	0.01	0.71	210
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.07	0.82	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	190	190	< 0.005	0.01	0.02	192
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.6	10.6	< 0.005	< 0.005	0.02	10.7
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	< 0.005	< 0.005	—	1.75	1.75	< 0.005	< 0.005	< 0.005	1.77
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

3.13. Architectural Coating (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	0.19	0.16	1.14	1.51	< 0.005	0.03	—	0.03	0.03	—	0.03	—	178	178	0.01	< 0.005	—	179
Architectural Coatings	26.2	26.2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.19	0.16	1.14	1.51	< 0.005	0.03	—	0.03	0.03	—	0.03	—	178	178	0.01	< 0.005	—	179
Architectural Coatings	26.2	26.2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.75	9.75	< 0.005	< 0.005	—	9.79
Architectural Coatings	1.44	1.44	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.61	1.61	< 0.005	< 0.005	—	1.62
Architectural Coatings	0.26	0.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.03	0.03	0.03	0.48	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	92.8	92.8	< 0.005	< 0.005	0.32	94.1
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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.37	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	85.1	85.1	< 0.005	< 0.005	0.01	86.1
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.73	4.73	< 0.005	< 0.005	0.01	4.79
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	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.78	0.78	< 0.005	< 0.005	< 0.005	0.79
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

4.1. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	7.36	6.75	5.47	51.3	0.12	0.08	10.6	10.7	0.08	2.69	2.77	—	12,554	12,554	0.62	0.59	42.6	12,788
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	7.36	6.75	5.47	51.3	0.12	0.08	10.6	10.7	0.08	2.69	2.77	—	12,554	12,554	0.62	0.59	42.6	12,788
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	6.88	6.27	5.87	43.7	0.11	0.08	10.6	10.7	0.08	2.69	2.77	—	11,775	11,775	0.65	0.61	1.10	11,974
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	6.88	6.27	5.87	43.7	0.11	0.08	10.6	10.7	0.08	2.69	2.77	—	11,775	11,775	0.65	0.61	1.10	11,974
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Medical Office Building	0.94	0.86	0.82	6.23	0.02	0.01	1.44	1.45	0.01	0.37	0.38	—	1,488	1,488	0.08	0.08	2.30	1,515
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	0.94	0.86	0.82	6.23	0.02	0.01	1.44	1.45	0.01	0.37	0.38	—	1,488	1,488	0.08	0.08	2.30	1,515

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	1,738	1,738	0.17	0.02	—	1,748
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	30.0	30.0	< 0.005	< 0.005	—	30.2
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,768	1,768	0.17	0.02	—	1,778
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	1,738	1,738	0.17	0.02	—	1,748

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	30.0	30.0	< 0.005	< 0.005	—	30.2
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,768	1,768	0.17	0.02	—	1,778
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	288	288	0.03	< 0.005	—	289
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	4.97	4.97	< 0.005	< 0.005	—	5.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	293	293	0.03	< 0.005	—	294

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.09	0.04	0.77	0.65	< 0.005	0.06	—	0.06	0.06	—	0.06	—	923	923	0.08	< 0.005	—	926
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	0.09	0.04	0.77	0.65	< 0.005	0.06	—	0.06	0.06	—	0.06	—	923	923	0.08	< 0.005	—	926

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.09	0.04	0.77	0.65	< 0.005	0.06	—	0.06	0.06	—	0.06	—	923	923	0.08	< 0.005	—	926
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	0.09	0.04	0.77	0.65	< 0.005	0.06	—	0.06	0.06	—	0.06	—	923	923	0.08	< 0.005	—	926
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.02	0.01	0.14	0.12	< 0.005	0.01	—	0.01	0.01	—	0.01	—	153	153	0.01	< 0.005	—	153
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	0.02	0.01	0.14	0.12	< 0.005	0.01	—	0.01	0.01	—	0.01	—	153	153	0.01	< 0.005	—	153

4.3. Area Emissions by Source

4.3.1. 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	2.26	2.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architect Coatings	0.14	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.81	0.75	0.04	4.57	< 0.005	0.01	—	0.01	0.01	—	0.01	—	18.8	18.8	< 0.005	< 0.005	—	18.8
Total	3.21	3.15	0.04	4.57	< 0.005	0.01	—	0.01	0.01	—	0.01	—	18.8	18.8	< 0.005	< 0.005	—	18.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	2.26	2.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.14	0.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	2.40	2.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.10	0.09	< 0.005	0.57	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.13	2.13	< 0.005	< 0.005	—	2.14
Total	0.54	0.53	< 0.005	0.57	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.13	2.13	< 0.005	< 0.005	—	2.14

4.4. Water Emissions by Land Use

4.4.1. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	25.2	86.6	112	2.60	0.06	—	195
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	—	—	—	—	—	—	—	—	—	—	—	25.2	86.6	112	2.60	0.06	—	195
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	25.2	86.6	112	2.60	0.06	—	195
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	—	—	—	—	—	—	—	—	—	—	—	25.2	86.6	112	2.60	0.06	—	195
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	4.18	14.3	18.5	0.43	0.01	—	32.3
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	—	—	—	—	—	—	—	—	—	—	—	4.18	14.3	18.5	0.43	0.01	—	32.3

4.5. Waste Emissions by Land Use

4.5.1. 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	611	0.00	611	61.1	0.00	—	2,138
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	—	—	—	—	—	—	—	—	—	—	—	611	0.00	611	61.1	0.00	—	2,138
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	611	0.00	611	61.1	0.00	—	2,138
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	—	—	—	—	—	—	—	—	—	—	—	611	0.00	611	61.1	0.00	—	2,138

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	101	0.00	101	10.1	0.00	—	354
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	—	—	—	—	—	—	—	—	—	—	—	101	0.00	101	10.1	0.00	—	354

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Emerge Generator	0.72	0.66	1.83	1.67	< 0.005	0.10	0.00	0.10	0.10	0.00	0.10	0.00	336	336	0.01	< 0.005	0.00	337
Fire Pump	0.54	0.49	1.38	1.26	< 0.005	0.07	0.00	0.07	0.07	0.00	0.07	0.00	252	252	0.01	< 0.005	0.00	253
Total	1.26	1.15	3.21	2.93	0.01	0.17	0.00	0.17	0.17	0.00	0.17	0.00	588	588	0.02	< 0.005	0.00	590
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Emergency Generator	0.72	0.66	1.83	1.67	< 0.005	0.10	0.00	0.10	0.10	0.00	0.10	0.00	336	336	0.01	< 0.005	0.00	337
Fire Pump	0.54	0.49	1.38	1.26	< 0.005	0.07	0.00	0.07	0.07	0.00	0.07	0.00	252	252	0.01	< 0.005	0.00	253
Total	1.26	1.15	3.21	2.93	0.01	0.17	0.00	0.17	0.17	0.00	0.17	0.00	588	588	0.02	< 0.005	0.00	590
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Emergency Generator	0.02	0.02	0.05	0.04	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	7.62	7.62	< 0.005	< 0.005	0.00	7.64
Fire Pump	0.01	0.01	0.03	0.03	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	5.71	5.71	< 0.005	< 0.005	0.00	5.73
Total	0.03	0.03	0.08	0.07	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	13.3	13.3	< 0.005	< 0.005	0.00	13.4

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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Demolition	Demolition	4/1/2025	4/28/2025	5.00	20.0	—
Site Preparation	Site Preparation	4/29/2025	5/12/2025	5.00	10.0	—
Grading	Grading	5/13/2025	6/9/2025	5.00	20.0	—
Building Construction	Building Construction	6/10/2025	4/27/2026	5.00	230	—
Paving	Paving	3/31/2026	4/27/2026	5.00	20.0	—
Architectural Coating	Architectural Coating	3/31/2026	4/27/2026	5.00	20.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Crawler Tractors	Diesel	Average	4.00	8.00	87.0	0.43
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Crawler Tractors	Diesel	Average	3.00	8.00	87.0	0.43
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	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
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

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	18.5	LDA,LDT1,LDT2
Demolition	Vendor	1.00	10.2	HHDT,MHDT

Demolition	Hauling	74.0	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	0.00	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	1.00	10.2	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	33.6	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	14.0	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	6.72	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	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	0.00	0.00	157,500	52,500	8,207

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	5,917	—
Site Preparation	—	—	35.0	0.00	—
Grading	—	—	50.0	0.00	—
Paving	0.00	0.00	0.00	0.00	3.14

5.6.2. Construction Earthmoving Control Strategies

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

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Medical Office Building	0.00	0%

Parking Lot	0.83	100%
Other Asphalt Surfaces	2.31	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	349	0.03	< 0.005
2026	0.00	346	0.03	< 0.005

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
Medical Office Building	1,827	450	74.6	503,700	14,927	3,680	609	4,115,229
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

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)
0	0.00	157,500	52,500	8,207

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

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)
Medical Office Building	1,832,448	346	0.0330	0.0040	2,881,202
Parking Lot	31,672	346	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	346	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)
Medical Office Building	13,175,456	294,926
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)
Medical Office Building	1,134	—

Parking Lot	0.00	—
Other Asphalt Surfaces	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
Medical Office Building	Household refrigerators and/or freezers	User Defined	150	0.45	0.60	0.00	1.00
Medical Office Building	Other commercial A/C and heat pumps	User Defined	750	< 0.005	4.00	4.00	18.0

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
Emergency Generator	Diesel	1.00	1.00	50.0	400	0.73
Fire Pump	Diesel	1.00	1.00	50.0	300	0.73

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	27.0	annual days of extreme heat
Extreme Precipitation	2.45	annual days with precipitation above 20 mm

Sea Level Rise	—	meters of inundation depth
Wildfire	4.79	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 (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
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	3	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 Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	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	3	1	1	3

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 Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	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	99.1
AQ-PM	58.7
AQ-DPM	24.0
Drinking Water	93.3
Lead Risk Housing	5.03
Pesticides	72.7
Toxic Releases	50.8
Traffic	27.0
Effect Indicators	—

CleanUp Sites	53.4
Groundwater	49.8
Haz Waste Facilities/Generators	68.1
Impaired Water Bodies	12.5
Solid Waste	95.3
Sensitive Population	—
Asthma	40.0
Cardio-vascular	45.6
Low Birth Weights	60.1
Socioeconomic Factor Indicators	—
Education	25.5
Housing	23.8
Linguistic	39.8
Poverty	29.7
Unemployment	62.4

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	79.36609778
Employed	40.65186706
Median HI	72.88592326
Education	—
Bachelor's or higher	85.74361607
High school enrollment	100
Preschool enrollment	43.82137816
Transportation	—

Auto Access	67.17567047
Active commuting	29.83446683
Social	—
2-parent households	81.63736687
Voting	58.30873861
Neighborhood	—
Alcohol availability	93.27601694
Park access	34.62081355
Retail density	10.72757603
Supermarket access	44.48864365
Tree canopy	28.83356859
Housing	—
Homeownership	55.357372
Housing habitability	63.03092519
Low-inc homeowner severe housing cost burden	65.50750674
Low-inc renter severe housing cost burden	33.96638008
Uncrowded housing	88.2586937
Health Outcomes	—
Insured adults	86.30822533
Arthritis	83.7
Asthma ER Admissions	46.6
High Blood Pressure	89.1
Cancer (excluding skin)	49.7
Asthma	58.2
Coronary Heart Disease	83.6
Chronic Obstructive Pulmonary Disease	81.8
Diagnosed Diabetes	92.6
Life Expectancy at Birth	56.4

Cognitively Disabled	19.2
Physically Disabled	13.2
Heart Attack ER Admissions	43.1
Mental Health Not Good	72.2
Chronic Kidney Disease	93.4
Obesity	70.2
Pedestrian Injuries	49.9
Physical Health Not Good	84.3
Stroke	91.3
Health Risk Behaviors	—
Binge Drinking	5.9
Current Smoker	77.7
No Leisure Time for Physical Activity	91.6
Climate Change Exposures	—
Wildfire Risk	26.4
SLR Inundation Area	0.0
Children	78.7
Elderly	8.1
English Speaking	43.5
Foreign-born	61.1
Outdoor Workers	82.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	79.8
Traffic Density	22.6
Traffic Access	23.0
Other Indices	—
Hardship	23.4
Other Decision Support	—

2016 Voting	70.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	57.0
Healthy Places Index Score for Project Location (b)	69.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
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	Based on site plan Total Project site is 3.62 acres.
Construction: Construction Phases	Building Construction, Paving, and Architectural Coating overlap to present a conservative analysis
Construction: Off-Road Equipment	T/L/B replaced with Crawler Tractor to accurately calculate disturbance for Site Preparation and Grading phases. Standard 8 hours work days.
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Demolition, Site Preparation, Grading, and Building Construction

Construction: Architectural Coatings	SCAQMD Rule 1113
Operations: Vehicle Data	Per client data, since 50% of trips will not be new, trip rate will be reduced by 50%. Trip length taken from VMT analysis.
Operations: Architectural Coatings	SCAQMD Rule 1113
Operations: Refrigerants	As of 1 January 2022, new commercial refrigeration equipment may not use refrigerants with a GWP of 150 or greater. Further, R-404A (the CalEEMod default) is unacceptable for new supermarket and cold storage systems as of 1 January 2019 and 2023, respectively. Beginning 1 January 2025, all new air conditioning equipment may not use refrigerants with a GWP of 750 or greater.

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APPENDIX E

NOISE IMPACT ANALYSIS

Loma Linda Medical Office Building

NOISE IMPACT ANALYSIS

CITY OF LOMA LINDA

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NOVEMBER 17, 2024

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LIST OF ABBREVIATED TERMS

(1)	Reference
ADT	Average Daily Traffic
ANSI	American National Standards Institute
Calveno	California Vehicle Noise
CEQA	California Environmental Quality Act
CNEL	Community Noise Equivalent Level
dBA	A-weighted decibels
FHWA	Federal Highway Administration
FTA	Federal Transit Administration

I-10	Interstate 10
INCE	Institute of Noise Control Engineering
L_{eq}	Equivalent continuous (average) sound level
L_{max}	Maximum level measured over the time interval
L_{min}	Minimum level measured over the time interval
mph	Miles per hour
PPV	Peak Particle Velocity
Project	Loma Linda Medical Office Building
REMEL	Reference Energy Mean Emission Level
RMS	Root-mean-square
VdB	Vibration Decibels

EXECUTIVE SUMMARY

Urban Crossroads, Inc. has prepared this noise study to determine the noise exposure and the necessary noise mitigation measures for the Loma Linda Medical Office Building ("Project"). The Project site is located on the southeast corner of Barton Road and Anderson Street in the City of Loma Linda. The Project is proposed to include the development of an 88-room, four-story hotel. This study has been prepared consistent with the applicable City of Loma Linda noise standards, and significance criteria based on guidance provided by Appendix G of the California Environmental Quality Act (CEQA) Guidelines. (1)

SUMMARY OF CEQA SIGNIFICANCE FINDINGS

The results of this Loma Linda Medical Office Building Noise Impact Analysis are summarized below based on the significance criteria in Section 4 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 each potential noise and/or vibration impact under CEQA before and after any required mitigation measures described below.

TABLE ES-1: SUMMARY OF CEQA SIGNIFICANCE FINDINGS

Analysis	Report Section	Significance Findings	
		Unmitigated	Mitigated
Off-Site Traffic Noise Levels	6	*Less Than Significant*	-
Operational Noise Levels	8	*Less Than Significant*	-
Construction Noise Levels	9	*Less Than Significant*	-
Construction Vibration Levels		*Less Than Significant*	-

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1 INTRODUCTION

This noise analysis has been completed to determine the noise impacts associated with the development of the Loma Linda Medical Office Building ("Project"). This noise study briefly describes the proposed Project, provides information regarding noise fundamentals, describes the local regulatory setting, provides the study methods and procedures for traffic noise analysis, and evaluates the future exterior noise environment. In addition, this study includes an analysis of the potential Project-related long-term operational and short-term construction noise impacts.

1.1 SITE LOCATION

The Project site is located on the southeast corner of Barton Road and Anderson Street in the City of Loma Linda, as shown in Exhibit 1-A.

1.2 PROJECT DESCRIPTION

The Project is to consist of the development of a 105,000-square-foot, five-story medical office building. The preliminary site plan for the proposed Project is shown in Exhibit 1-B. The on-site Project-related noise sources are expected to include: trash enclosures, rooftop air handling units, chiller units, roof exhaust units, and parking lot vehicle movements. This noise analysis is intended to describe noise level impacts associated with the expected typical operational activities at the Project site.

EXHIBIT 1-A: LOCATION MAP

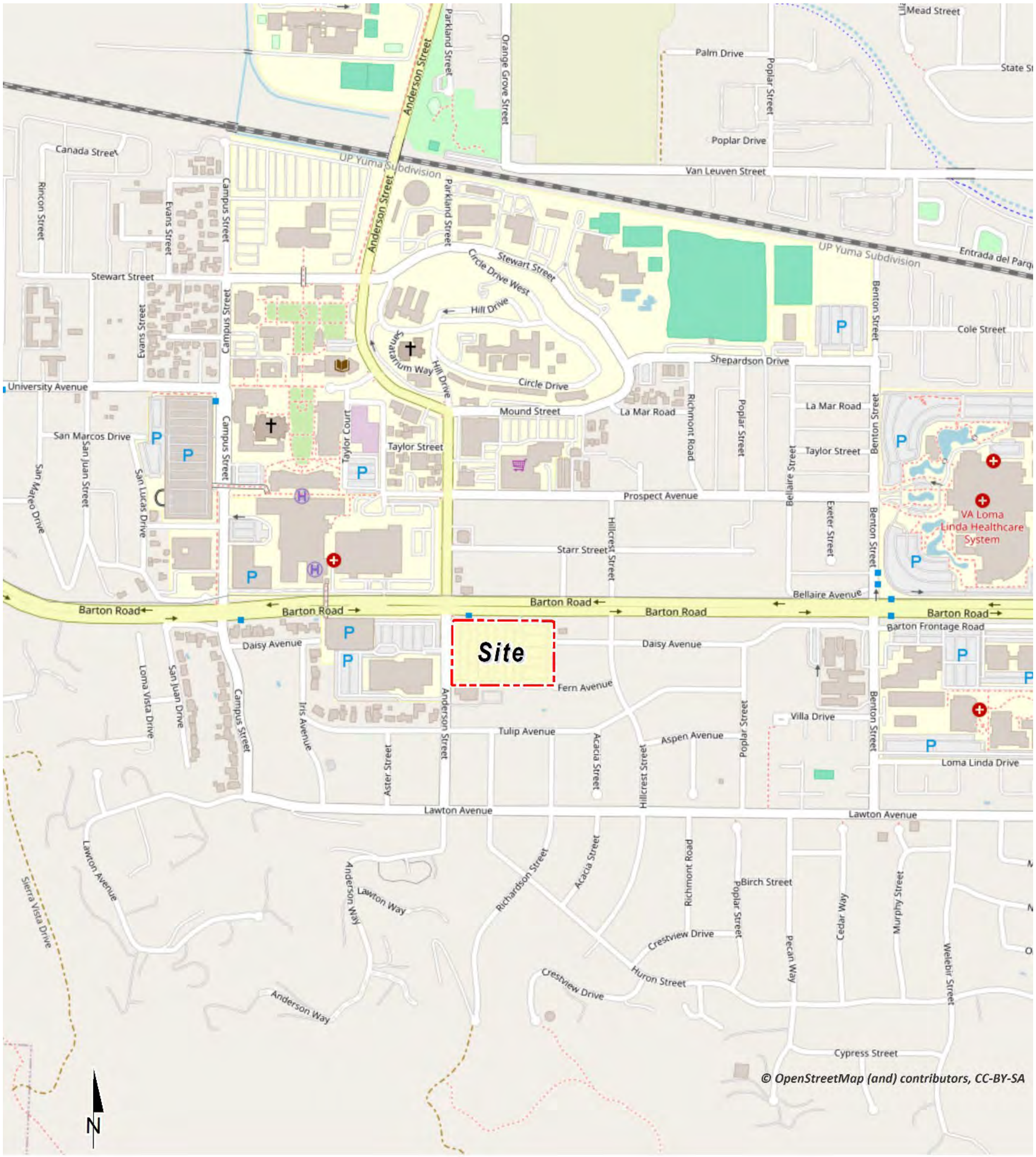
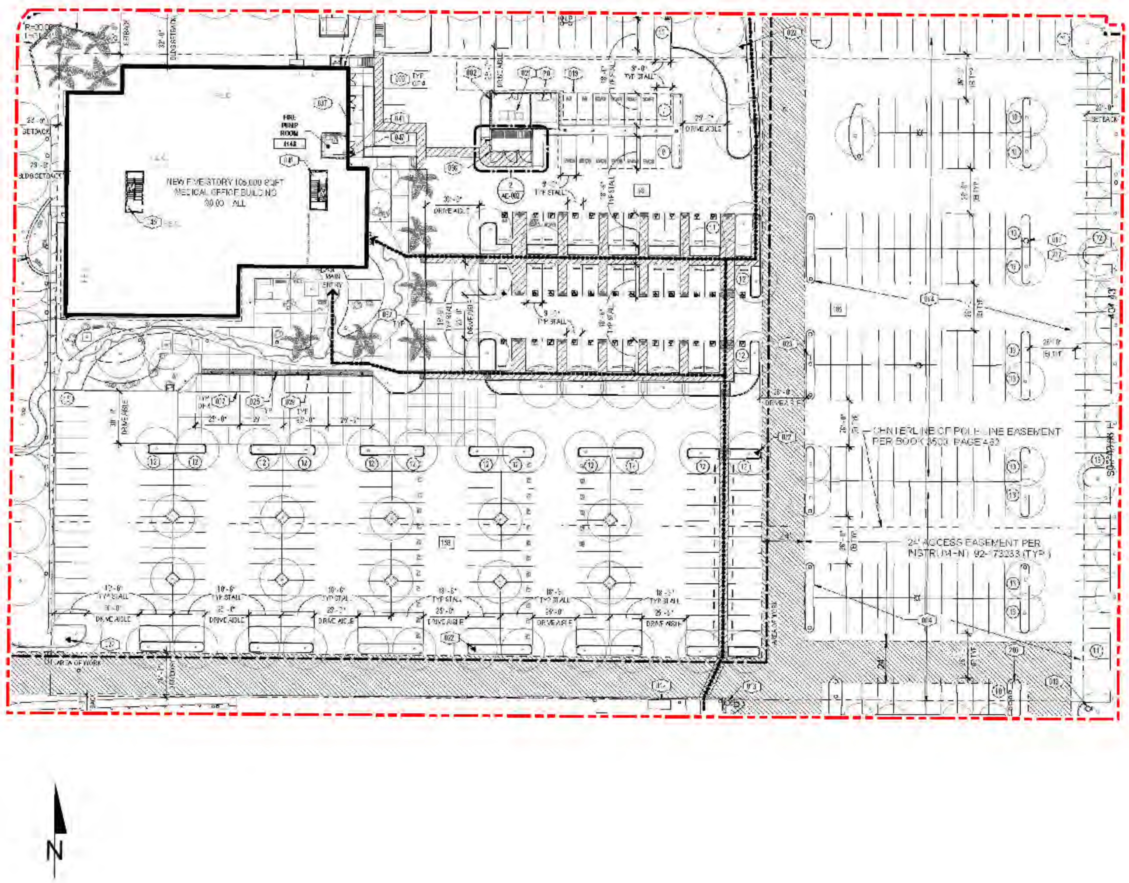


EXHIBIT 1-B: SITE PLAN



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2 FUNDAMENTALS

Noise has been simply defined as "unwanted sound." Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear. Exhibit 2-A presents a summary of the typical noise levels and their subjective loudness and effects that are described in more detail below.

EXHIBIT 2-A: TYPICAL NOISE LEVELS

COMMON OUTDOOR ACTIVITIES	COMMON INDOOR ACTIVITIES	A - WEIGHTED SOUND LEVEL dBA	SUBJECTIVE LOUDNESS	EFFECTS OF NOISE
THRESHOLD OF PAIN		140	INTOLERABLE OR DEAFENING	HEARING LOSS
NEAR JET ENGINE		130		
		120		
JET FLY-OVER AT 300m (1000 ft)	ROCK BAND	110		
LOUD AUTO HORN		100	VERY NOISY	
GAS LAWN MOWER AT 1m (3 ft)		90		
DIESEL TRUCK AT 15m (50 ft), at 80 km/hr (50 mph)	FOOD BLENDER AT 1m (3 ft)	80		SPEECH INTERFERENCE
NOISY URBAN AREA, DAYTIME	VACUUM CLEANER AT 3m (10 ft)	70	LOUD	
HEAVY TRAFFIC AT 90m (300 ft)	NORMAL SPEECH AT 1m (3 ft)	60		
QUIET URBAN DAYTIME	LARGE BUSINESS OFFICE	50	MODERATE	SLEEP DISTURBANCE
QUIET URBAN NIGHTTIME	THEATER, LARGE CONFERENCE ROOM (BACKGROUND)	40		
QUIET SUBURBAN NIGHTTIME	LIBRARY	30	FAINT	NO EFFECT
QUIET RURAL NIGHTTIME	BEDROOM AT NIGHT, CONCERT HALL (BACKGROUND)	20		
	BROADCAST/RECORDING STUDIO	10	VERY FAINT	
LOWEST THRESHOLD OF HUMAN HEARING	LOWEST THRESHOLD OF HUMAN HEARING	0		

Source: Environmental Protection Agency Office of Noise Abatement and Control, Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety (EPA/ONAC 550/9-74-004) March 1974.

2.1 RANGE OF NOISE

Since the range of intensities that the human ear can detect is so large, the scale frequently used to measure intensity is a scale based on multiples of 10, the logarithmic scale. The scale for measuring intensity is the decibel scale. Each interval of 10 decibels indicates a sound energy ten times greater than before, which is perceived by the human ear as being roughly twice as loud. (2) The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at three feet is roughly at 60 dBA, while loud jet engine noises equate to 110 dBA at approximately 100 feet, which can cause serious discomfort. (3) Another important aspect of noise is the duration of the sound and the way it is described and distributed in time.

2.2 NOISE DESCRIPTORS

Environmental noise descriptors are generally based on averages, rather than instantaneous, noise levels. The most commonly used figure is the equivalent level (L_{eq}). Equivalent sound levels are not measured directly but are calculated from sound pressure levels typically measured in A-weighted decibels (dBA). The equivalent sound level (L_{eq}) represents a steady state sound level containing the same total energy as a time varying signal over a given sample period and is commonly used to describe the "average" noise levels within the environment.

Peak hour or average noise levels, while useful, do not completely describe a given noise environment. Noise levels lower than peak hour may be disturbing if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL), representing a composite 24-hour noise level is utilized. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time of day corrections require the addition of 5 decibels to dBA L_{eq} sound levels in the evening from 7:00 p.m. to 10:00 p.m., and the addition of 10 decibels to dBA L_{eq} sound levels at night between 10:00 p.m. and 7:00 a.m. These additions are made to account for the noise sensitive time periods during the evening and night hours when sound appears louder. CNEL does not represent the actual sound level heard at any time, but rather represents the total sound exposure. The City of Loma Linda relies on the 24-hour CNEL level to assess land use compatibility with transportation related noise sources.

2.3 SOUND PROPAGATION

When sound propagates over a distance, it changes in level and frequency content. The way noise reduces with distance depends on the following factors.

2.3.1 GEOMETRIC SPREADING

Sound from a localized source (i.e., a stationary point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source. (2)

2.3.2 GROUND ABSORPTION

The propagation path of noise from a highway to a receptor is usually very close to the ground. Noise attenuation from ground absorption and reflective wave canceling adds to the attenuation associated with geometric spreading. Traditionally, the excess attenuation has also been expressed in terms of attenuation per doubling of distance. This approximation is usually sufficiently accurate for distances of less than 200 ft. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receptor, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., those sites with an absorptive ground surface between the source and the receptor such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the cylindrical spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance from a line source. (4)

2.3.3 ATMOSPHERIC EFFECTS

Receptors located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound levels can be increased at large distances (e.g., more than 500 feet) due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors such as air temperature, humidity, and turbulence can also have significant effects. (2)

2.3.4 SHIELDING

A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Shielding by trees and other such vegetation typically only has an "out of sight, out of mind" effect. That is, the perception of noise impact tends to decrease when vegetation blocks the line-of-sight to nearby resident. However, for vegetation to provide a substantial, or even noticeable, noise reduction, the vegetation area must be at least 15 feet in height, 100 feet wide and dense enough to completely obstruct the line-of sight between the source and the receiver. This size of vegetation may provide up to 5 dBA of noise reduction. The FHWA does not consider the planting of vegetation to be a noise abatement measure. (4)

2.4 NOISE CONTROL

Noise control is the process of obtaining an acceptable noise environment for an observation point or receptor by controlling the noise source, transmission path, receptor, or all three. This concept is known as the source-path-receptor concept. In general, noise control measures can be applied to these three elements.

2.5 NOISE BARRIER ATTENUATION

Effective noise barriers can reduce noise levels by 10 to 15 dBA, cutting the loudness of traffic noise in half. A noise barrier is most effective when placed close to the noise source or receptor. Noise barriers, however, do have limitations. For a noise barrier to work, it must be high enough and long enough to block the path of the noise source. (4)

2.6 LAND USE COMPATIBILITY WITH NOISE

Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches, and residences are more sensitive to noise intrusion than are commercial or industrial developments and related activities. As ambient noise levels affect the perceived amenity or livability of a development, so too can the mismanagement of noise impacts impair the economic health and growth potential of a community by reducing the area's desirability as a place to live, shop and work. For this reason, land use compatibility with the noise environment is an important consideration in the planning and design process. The FHWA encourages State and Local government to regulate land development in such a way that noise-sensitive land uses are either prohibited from being located adjacent to a highway, or that the developments are planned, designed, and constructed in such a way that noise impacts are minimized. (5)

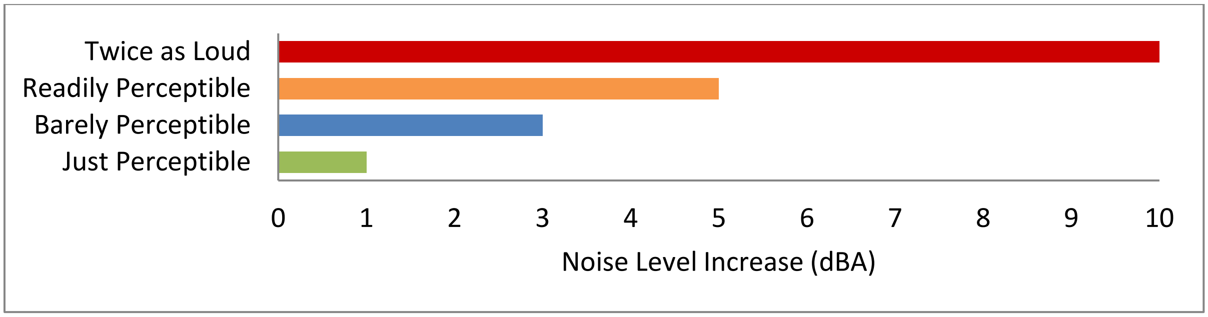
2.7 COMMUNITY RESPONSE TO NOISE

Community responses to noise may range from registering a complaint by telephone or letter, to initiating court action, depending upon everyone's susceptibility to noise and personal attitudes about noise. Several factors are related to the level of community annoyance including:

- Fear associated with noise producing activities;
- Socio-economic status and educational level;
- Perception that those affected are being unfairly treated;
- Attitudes regarding the usefulness of the noise-producing activity;
- Belief that the noise source can be controlled.

Approximately ten percent of the population has a very low tolerance for noise and will object to any noise not of their making. Consequently, even in the quietest environment, some complaints will occur. Another 25 percent of the population will not complain even in very severe noise environments. Thus, a variety of reactions can be expected from people exposed to any given noise environment. (6) Surveys have shown that about ten percent of the people exposed to traffic noise of 60 dBA will report being highly annoyed with the noise, and each increase of one dBA is associated with approximately two percent more people being highly annoyed. When traffic noise exceeds 60 dBA or aircraft noise exceeds 55 dBA, people may begin to complain. (6) Despite this variability in behavior on an individual level, the population can be expected to exhibit the following responses to changes in noise levels as shown on Exhibit 2-B. An increase or decrease of 1 dBA cannot be perceived except in carefully controlled laboratory experiments, a change of 3 dBA are considered *barely perceptible*, and changes of 5 dBA are considered *readily perceptible*. (4)

EXHIBIT 2-B: NOISE LEVEL INCREASE PERCEPTION



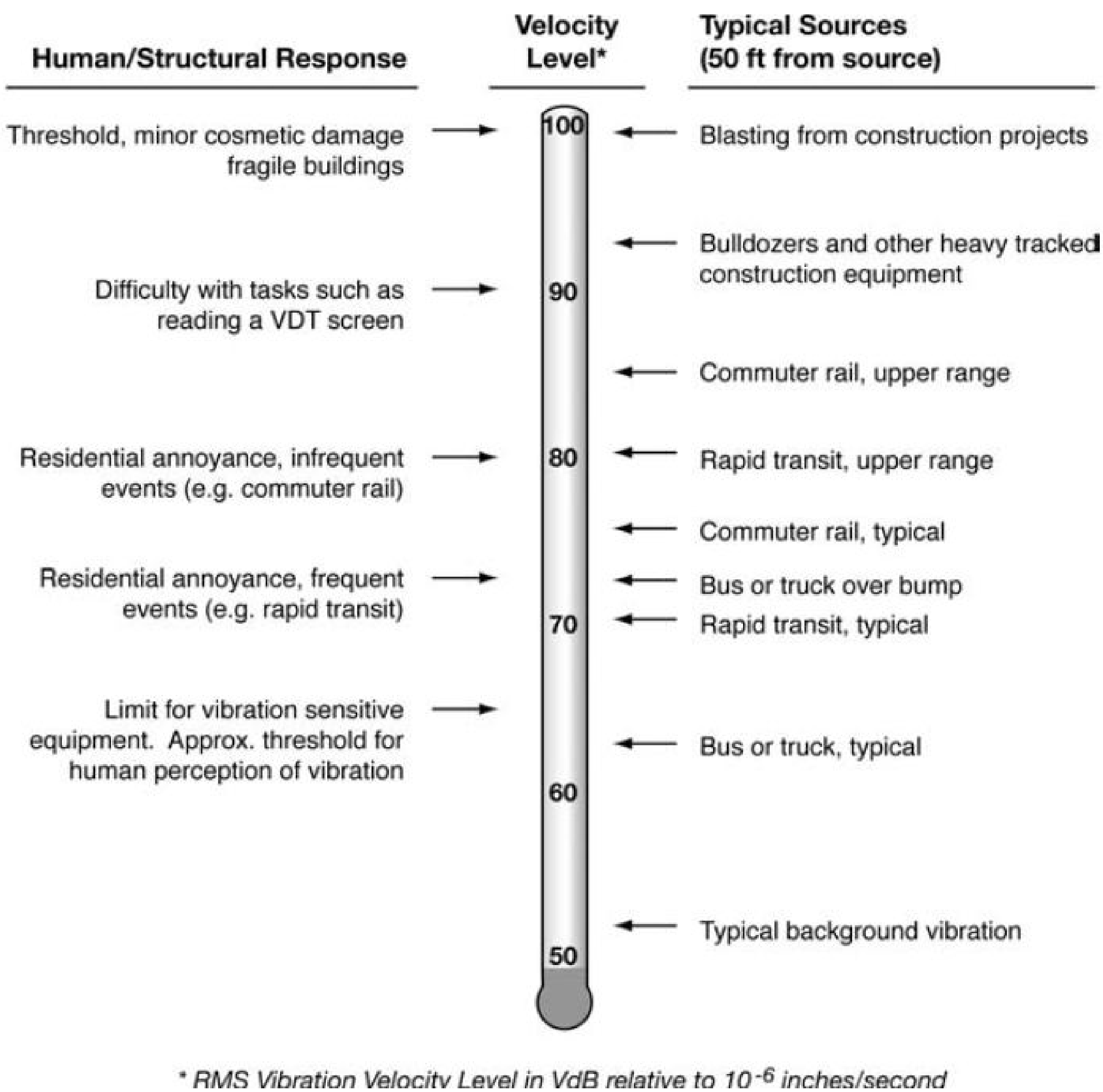
2.9 VIBRATION

Per the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual*, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency. Additionally, in contrast to airborne noise, ground-borne vibration outdoors is not a common environmental problem and annoyance from ground-borne vibration is almost exclusively an indoor phenomenon (7). Therefore, the effects of vibrations should only be evaluated at a structure and the effects of the building structure on the vibration should be considered. Wood-frame buildings, such as typical residential structures, are more easily excited by ground vibration than heavier buildings. In contrast, large masonry buildings with spread footings have a low response to ground vibration (7). In general, the heavier a building is, the lower the response will be to the incident vibration energy. However, all structurers reduce vibration levels due to the coupling of the building to the soil.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal (7). The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body (7). However, the RMS amplitude and PPV are related mathematically, and the RMS amplitude of equipment is typically calculated from the PPV reference level. The RMS amplitude is approximately 70% of the PPV (8). Thus, either can be used in the description of vibration impacts.

While not universally accepted, vibration decibel notation (VdB) is another vibration notation developed and used by the FTA in their guidance manual to describe vibration levels and provide a background of common vibration levels and set vibration limits. (7) Decibel notation (VdB) serves to reduce the range of numbers used to describe vibration levels and is used in this report to describe vibration levels. As stated in the FTA guidance manual, the background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings. Exhibit 2-C illustrates common vibration sources and the human and structural response to ground-borne vibration

EXHIBIT 2-C: TYPICAL LEVELS OF GROUND-BORNE VIBRATION



Source: Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual.

3 REGULATORY SETTING

To limit population exposure to physically and/or psychologically damaging as well as intrusive noise levels, the federal government, the State of California, various county governments, and most municipalities in the state have established standards and ordinances to control noise. In most areas, automobile and truck traffic is the major source of environmental noise. Traffic activity generally produces an average sound level that remains constant with time. Air and rail traffic, and commercial and industrial activities are also major sources of noise in some areas. Federal, state, and local agencies regulate different aspects of environmental noise. Federal and state agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies.

3.1 STATE OF CALIFORNIA NOISE REQUIREMENTS

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city adopt a General Plan that includes a Noise Element which is to be prepared per guidelines adopted by the Governor's Office of Planning and Research. (9) The purpose of the Noise Element is to *limit the exposure of the community to excessive noise levels*. In addition, the California Environmental Quality Act (CEQA) requires that all known environmental effects of a project be analyzed, including environmental noise impacts.

3.2 STATE OF CALIFORNIA BUILDING STANDARDS

The 2016 State of California's Green Building Standards Code contains mandatory measures for non-residential building construction in Section 5.507 on Environmental Comfort. (10) These noise standards are applied to new construction in California for controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when non-residential structures are developed in areas where the exterior noise levels exceed 65 dBA CNEL, such as within a noise contour of an airport, freeway, railroad, and other areas where noise contours are not readily available. If the development falls within an airport or freeway 65 dBA CNEL noise contour, the combined sound transmission class (STC) rating of the wall and roof-ceiling assemblies must be at least 50. For those developments in areas where noise contours are not readily available, and the noise level exceeds 65 dBA L_{eq} for any hour of operation, a wall and roof-ceiling combined STC rating of 45, and exterior windows with a minimum STC rating of 40 are required (Section 5.507.4.1).

3.3 CITY OF LOMA LINDA GENERAL PLAN NOISE ELEMENT

The City of Loma Linda has adopted a Noise Element of the General Plan which identifies noise sources and supporting noise level limiting policies in the City. (11) To address these noise sources found in the City of Loma Linda, the following Guiding Policy has been identified in the General Plan Noise Element:

7.8.1 Strive to achieve an acceptable noise environment for existing and future residents of the City of Loma Linda.

The noise criteria identified in the City of Loma Linda Noise Element (Table 7.C) are guidelines to evaluate the land use compatibility of transportation-related noise. The compatibility criteria, shown on Exhibit 3-A, provides the City of Loma Linda with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise levels.

The *City of Loma Linda Noise Level Standards* matrix describes categories of compatibility. The Loma Linda Medical Office Building land use is considered *normally acceptable* with unmitigated exterior noise levels of less than 65 dBA CNEL. For *normally unacceptable* exterior noise levels, approaching 75 dBA CNEL for hotel land uses, *noise levels exceeding the following ranges shall generally be discouraged. If new activities or actions proceed, a detailed analysis of the noise reduction requirements must be made and necessary noise insulation features included in the design*. (12)

EXHIBIT 3-A: CITY OF LOMA LINDA TRANSPORTATION NOISE STANDARDS

Land Use Categories	Energy Average CNEL			
	Normally Acceptable(1)	Conditionally Acceptable(2)	Normally Unacceptable(3)	Clearly Unacceptable(4)
Residential	55	70	75	76 or more
Residential (10:00 p.m. to 7:00 p.m.)	< 50	55 or more	----	----
Transient Lodging, Motels, Hotels	65	70	75	76 or more
Schools, Libraries, Churches, Hospitals, Nursing Homes	70	70	80	81 or more
Auditoriums, Concert Halls, Amphitheaters	----	80	----	90 or more
Sports Arenas, Outdoor Spectator Sports	----	80	----	90 or more
Playgrounds, Neighborhood Parks	70	----	75	76 or more
Golf Course, Riding stables, Water Recreation, Cemeteries	----	----	80	81 or more
Office Buildings, Business Commercial and Professional	70	75	76 or more	----
Industrial Manufacturing, Utilities, Agriculture	70	80	81 or more	----

Emergency type land uses, emergency response vehicles, and emergency notification measures shall be considered as Normally Acceptable measures and exempt from violations and or penalties.

Source: Chapter 9.20 Loma Linda Municipal Code

INTERPRETATION

(1) Specified land use activities that are satisfactory based upon the assumption that any land use or buildings involved are of ordinary performance standards.

(2) Activities or Actions shall be undertaken only after a detailed analysis of the noise reduction (muffling) requirements is made and noise reduction insulation features are included as a preventive measure.

(3) Noise levels exceeding the following ranges shall generally be discouraged. If new activities or actions proceed, a detailed analysis of the noise reduction requirements must be made and necessary noise insulation features included in the design.

(4) Activities shall not be undertaken or permitted.

3.4 OPERATIONAL NOISE STANDARDS

To analyze noise impacts originating from a designated fixed location or private property such as the Loma Linda Medical Office Building Project, stationary-source (operational) noise such as the expected trash enclosures, rooftop air handling units, chiller units, roof exhaust units, and parking lot vehicle movements are typically evaluated against standards established under a jurisdiction's Municipal Code. However, the City of Loma Linda Municipal Code does not identify stationary-source (operational) exterior noise level limits. Therefore, to accurately describe the potential Project-related operational noise level impacts, this analysis presents the next appropriate stationary-source noise level standards from County of San Bernardino Development Code. The City of Loma Linda Municipal Code is provided in Appendix 3.1, and the County of San Bernardino Development Code is provided in Appendix 3.2.

The San Bernardino County Code, Title 8 Development Code, Section 83.01.080(c) establishes the noise level standards for stationary noise sources. The Project's commercial land use will potentially impact adjacent noise-sensitive and commercial uses in the Project study area. For residential properties, the exterior noise level shall not exceed 55 dBA L_{eq} during the daytime hours (7:00 a.m. to 10:00 p.m.) and 45 dBA L_{eq} during the nighttime hours (10:00 p.m. to 7:00 a.m.) for both the whole hour, and for not more than 30 minutes in any hour. In addition, County Code identifies an anytime exterior noise level limit of 60 dBA L_{eq} for commercial uses. (13)

The exterior noise level standards shall apply for a cumulative period of 30 minutes in any hour, as well as plus 5 dBA cannot be exceeded for a cumulative period of more than 15 minutes in any hour, or the standard plus 10 dBA for a cumulative period of more than 5 minutes in any hour, or the standard plus 15 dBA for a cumulative period of more than 1 minute in any hour, or the standard plus 20 dBA for any period of time. The County Code operational noise level standards are shown on Table 3-1.

TABLE 3-1: OPERATIONAL NOISE STANDARDS

Jurisdiction	Land Use	Time Period	Exterior Noise Level Standards[1]					
			L_{eq} (Hourly)	L_{50} (30 mins)	L_{25} (15 mins)	L_{8} (5 mins)	L_{2} (1 min)	L_{max} (<1 min)
County of San Bernardino[2]	Residential	7:00 a.m. to 10:00 p.m.	55	55	60	65	70	75
		10:00 p.m. to 7:00 a.m.	45	45	50	55	60	65
	Commercial	Anytime	60	60	65	70	75	80

[1] L_{eq} represents a steady state sound level containing the same total energy as a time varying signal over a given sample period. The percent noise level is the level exceeded "n" percent of the time during the measurement period. L_{25} is the noise level exceeded 25% of the time.
[2] Source: County of San Bernardino Development Code, Title 8, Section 83.01.080 (Appendix 3.2). Since the City of Loma Linda does not identify stationary-source (operational) exterior noise level limits, this analysis uses the applicable County of San Bernardino Development Code standards.

3.5 CONSTRUCTION NOISE STANDARDS

To analyze noise impacts originating from the construction of the Loma Linda Medical Office Building Project, noise from construction activities are typically limited to the hours of operation established under a jurisdiction's Municipal Code. Section 9.20.070 of the City of Loma Linda Municipal Code, provided in Appendix 3.1, indicates that construction activity is considered exempt from the noise level standards between the hours of 7:00a.m. to 800 p.m. Monday through Friday, except on weekends and national holidays. (14) However, neither the City of Loma Linda or County of San Bernardino General Plan and Municipal Codes establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes a *substantial temporary or periodic noise increase*. Therefore, a numerical construction threshold based on Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual* is used for analysis of daytime construction impacts, as discussed below.

According to the FTA, local noise ordinances are typically not very useful in evaluating construction noise. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the impact of a construction project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessment. The FTA considers a daytime exterior construction noise level of 80 dBA L_{eq} as a reasonable threshold for noise sensitive residential land use with a nighttime exterior construction noise level of 70 dBA L_{eq} (15 p. 179).

3.6 CONSTRUCTION VIBRATION STANDARDS

To analyze vibration impacts originating from the operation and construction of the Loma Linda Medical Office Building, vibration-generating activities are typically evaluated against standards established under a jurisdiction's Municipal Code. However, since the City of Loma Linda does not identify specific vibration level standards, the County Development Code vibration level standards are used in this analysis to assess potential impacts at nearby sensitive receiver locations.

The County Development Code, Section 83.01.090(a) states that vibration shall be no *greater than or equal to two-tenths inches per second measured at or beyond the lot line*. (13) Therefore, to determine if the vibration levels due to the operation and construction of the Project, the peak particle velocity (PPV) vibration level standard of 0.2 inches per second is used.

4 SIGNIFICANCE CRITERIA

The following significance criteria are based on currently adopted guidance provided by Appendix G of the State CEQA Guidelines. (16) For the purposes of this report, impacts would be potentially significant if the Project results in or causes:

A. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

B. Generation of excessive ground-borne vibration or ground-borne noise levels?

C. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

4.1 NOISE LEVEL INCREASES (THRESHOLD A)

Noise level increases resulting from the Project are evaluated based on the Appendix G CEQA Guidelines. Under CEQA, consideration must be given to the magnitude of the increase, the existing baseline ambient noise levels, and the location of receivers to determine if a noise increase represents a significant adverse environmental impact. This approach recognizes *that there is no single noise increase that renders the noise impact significant.* (17) This is primarily because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will typically be judged. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted—the so-called *ambient* environment. The *ambient noise level* is the composite of noise from all sources, excluding the alleged offensive noise. In this context, it represents the normal or existing level of environmental noise at a given location for a specified time of day or night.

4.1.1 TRANSPORTATION NOISE (SUBSTANTIAL PERMANENT NOISE LEVEL INCREASE)

The Federal Interagency Committee on Noise (FICON) (18) developed guidance to be used for the assessment of project-generated increases in noise levels that consider the ambient noise level. The FICON recommendations are based on studies that relate aircraft noise levels to the percentage of persons highly annoyed by aircraft noise. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative noise exposure metrics, such as the average-daily noise level (CNEL) and equivalent continuous noise level (L_{eq}).

As previously stated, the approach used in this noise study recognizes *that there is no single noise increase that renders a noise impact significant*, based on a 2008 California Court of Appeal ruling on Gray v. County of Madera. (17) For example, if the ambient noise environment is quiet (<60 dBA) and the new noise source greatly increases the noise levels, an impact may occur if the noise criteria may be exceeded. Therefore, for this analysis, a *readily perceptible* 5 dBA or greater project-related noise level increase is considered a significant impact when the without project noise levels are below 60 dBA. Per the FICON, in areas where the without project noise levels range from 60 to 65 dBA, a 3 dBA *barely perceptible* noise level increase appears to be appropriate for most people. When the without project noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA or greater is considered a significant impact if the noise criteria for a given land use is exceeded, since it likely contributes to an existing noise exposure exceedance.

The FICON guidance provides an established source of criteria to assess the impacts of substantial permanent increase in baseline ambient noise levels. Based on the FICON criteria, the amount to which a given noise level increase is considered acceptable is reduced when the without Project (baseline) noise levels are already shown to exceed certain land-use specific exterior noise level criteria. The specific levels are based on typical responses to noise level increases of 5 dBA or *readily perceptible*, 3 dBA or *barely perceptible*, and 1.5 dBA depending on the underlying without Project noise levels for noise-sensitive uses. These levels of increases and their perceived acceptance at noise sensitive receiver locations are consistent with guidance provided by both the Federal Highway Administration (19 p. 9) and Caltrans (20 p. 2_48).

The City of Loma Linda General Plan Noise Element, *Noise Compatibility by Land Use Type* was used to establish the satisfactory noise levels of significance for non-noise-sensitive land uses in the Project study area. As previously shown on Exhibit 3-A, the *completely compatible* exterior noise level for non-noise-sensitive land uses is 70 dBA CNEL. To determine if Project-related traffic noise level increases are significant at off-site non-noise-sensitive land uses, a *barely perceptible* 3 dBA criteria is used. When the without Project noise levels are greater than the *completely compatible* 70 dBA CNEL land use compatibility criteria, a *barely perceptible* 3 dBA or greater noise level increase is considered a significant impact since the noise level criteria is already exceeded. The noise level increases used to determine significant impacts for non-noise-sensitive land uses is generally consistent with the FICON noise level increase thresholds for noise-sensitive land uses but instead rely on the City of Loma Linda General Plan Noise Element, *Noise Compatibility by Land Use Type completely compatible* 70 dBA CNEL exterior noise level criteria.

4.1.2 NON-TRANSPORTATION NOISE (SUBSTANTIAL PERMANENT NOISE LEVEL INCREASE)

The FICON criteria are also used to determine if Project-related stationary source (operational) noise level increases are significant at off-site receiver locations. For non-transportation noise source activities, a substantial permanent noise level increase consists of increases of 5 dBA or *readily perceptible*, 3 dBA or *barely perceptible*, and 1.5 dBA depending on the underlying ambient noise levels.

4.1.3 CONSTRUCTION NOISE (SUBSTANTIAL TEMPORARY NOISE LEVEL INCREASE)

In addition to absolute noise limits, the temporary noise level increases over the existing ambient conditions must be considered under CEQA Significance Threshold A. Recent court cases have also placed an emphasis on the increase as opposed to the noise level limit. However, limits and acceptable increases are not unrelated since, often, the noise level limits can subtly include the increase limit.

While specific noise ordinances can vary widely, many jurisdictions across California set construction noise level limits around 75 to 80 dBA L_{eq} and only allow construction during daytime hours (e.g., City and County of Los Angeles, City and County of San Diego, City and County of San Francisco, etc.) In contrast, everyday noise limits are stricter because they apply to continuous, long-term activities where excessive noise can greatly affect the quality of life over time. Thus, for everyday noise limits, many jurisdictions across California set residential daytime noise level limits around 55 dBA L_{eq} during daytime hours. This implies that during daytime hours, many California communities consider an increase of 20 dBA over the daytime limit an acceptable temporary increase for construction activities. This is also illustrated in the adoption of many CEQA documents statewide that use an 80 dBA L_{eq} limit for assessing construction impacts while using everyday noise level limits of local noise ordinances in assessing on-site operational impacts.

However, since an increase of 20 dBA could result in noise levels over 85 dBA L_{eq}, which the California Occupational Safety and Health Administration (CalOSHA) identifies as a potentially hazardous noise level, the increase should not be allowed to result in an absolute noise level greater than 80 dBA L_{eq} at any residence, which is consistent with the FTA recommendations.

Therefore, if the Project-related construction noise levels generate a temporary noise level increase above the existing daytime ambient noise levels of up to 20 dBA L_{eq}, not to exceed 80 dBA L_{eq}, or an increase of 5 dBA L_{eq} above the existing nighttime ambient noise levels, then the Project construction noise level increases will not be considered a potentially significant impact.

4.2 VIBRATION (THRESHOLD B)

As described in Section 3.6, the vibration impacts are appropriately evaluated using the The County Development Code, Section 83.01.090(a) threshold of 0.2 PPV (in/sec) to assess potential temporary construction-related impacts at adjacent building locations.

4.3 CEQA GUIDELINES NOT FURTHER ANALYZED (THRESHOLD C)

Since the Project is located more than two miles away from the nearest airport, the potential impacts are considered *less than significant,* and no further noise analysis is provided under Guideline C.

4.4 SIGNIFICANCE CRITERIA SUMMARY

Noise impacts shall be considered significant if any of the following occur as a direct result of the proposed development. Table 4-1 shows the significance criteria summary matrix.

TABLE 4-1: SIGNIFICANCE CRITERIA SUMMARY

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site Traffic	Noise-Sensitive[1]	If ambient is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase	
		If ambient is 60 - 65 dBA CNEL	≥ 3 dBA CNEL Project increase	
		If ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL Project increase	
	Non-Noise-Sensitive[2]	if ambient is < 70 dBA CNEL	≥ 5 dBA CNEL Project increase	
		if ambient is > 70 dBA CNEL	≥ 3 dBA CNEL Project increase	
On-Site	Residential[2]	Exterior Noise Level Criteria	See Exhibit 3-A.	
		Interior Noise Level Standard	45 dBA CNEL	
Operational	Residential	Exterior Noise Level Standards	See Table 3-1.	
	Commercial	Exterior Noise Level Standards		
	Noise-Sensitive[1]	if ambient is < 60 dBA L_{eq}	≥ 5 dBA L_{eq} Project increase	
		if ambient is 60 - 65 dBA L_{eq}	≥ 3 dBA L_{eq} Project increase	
		if ambient is > 65 dBA L_{eq}	≥ 1.5 dBA L_{eq} Project increase	
Construction	Noise-Sensitive	Permitted between 7:00 a.m. to 8:00 p.m. Monday through Friday; no activity on weekends or national holidays.[3]		
		Noise Level Threshold[4]	80 dBA L_{eq}	n/a
		Noise Level Increase	20 dBA L_{eq}	n/a
		Vibration Level Threshold[5]	0.2 in/sec PPV	n/a

[1] Source: FICON, 1992.
[2] Source: City of Loma Linda General Plan Noise Element, Table 7.C.
[3] Source: City of Loma Linda Municipal Code, Section 9.20.070 (Appendix 3.1).
[4] Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual.
[5] Source: Source: Section 83.01.090(a) of the County of San Bernardino County Code, Title 8 Development Code.
"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.; "n/a" = construction activities are not planned during the nighttime hours; "PPV" = peak particle velocity.

5 EXISTING NOISE LEVEL MEASUREMENTS

To assess the existing noise level environment, three 24-hour noise level measurements were taken at sensitive receiver locations in the Project study area. The receiver locations were selected to describe and document the existing noise environment within the Project study area. Exhibit 5-A provides the boundaries of the Project study area and the noise level measurement locations. To fully describe the existing noise conditions, noise level measurements were collected by Urban Crossroads, Inc. on Thursday, September 5th, 2024. Appendix 5.1 includes study area photos.

5.1 MEASUREMENT PROCEDURE AND CRITERIA

To describe the existing noise environment, the hourly noise levels were measured during typical weekday conditions over a 24-hour period. By collecting individual hourly noise level measurements, it is possible to describe the daytime and nighttime hourly noise levels and calculate the 24-hour CNEL. The long-term noise readings were recorded using Piccolo Type 2 integrating sound level meter and dataloggers. The Piccolo sound level meters were calibrated using a Larson-Davis calibrator, Model CAL 150. All noise meters were programmed in "slow" mode to record noise levels in "A" weighted form. The sound level meters and microphones were equipped with a windscreen during all measurements. All noise level measurement equipment satisfies the American National Standards Institute (ANSI) standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013. (21)

5.2 NOISE MEASUREMENT LOCATIONS

The long-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing ambient hourly noise levels surrounding the Project site. Both Caltrans and the FTA recognize that it is not reasonable to collect noise level measurements that can fully represent any part of a private yard, patio, deck, or balcony normally used for human activity when estimating impacts for new development projects. This is demonstrated in the Caltrans general site location guidelines which indicate that, *sites must be free of noise contamination by sources other than sources of interest. Avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the express intent of the analyst to measure these sources*. (2) Further, FTA guidance states, t*hat it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in the project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community*. (22)

Based on recommendations of Caltrans and the FTA, it is not necessary to collect measurements at each individual building or residence, because each receiver measurement represents a group of buildings that share acoustical equivalence. (22) In other words, the area represented by the receiver shares similar shielding, terrain, and geometric relationship to the reference noise source. Receivers represent a location of noise sensitive areas and are used to estimate the future noise level impacts. Collecting reference ambient noise level measurements at the nearby

EXHIBIT 5-A: NOISE MEASUREMENT LOCATIONS

sensitive receiver locations allows for a comparison of the before and after Project noise levels and is necessary to assess potential noise impacts due to the Project's contribution to the ambient noise levels.

5.3 NOISE MEASUREMENT RESULTS

The noise measurements presented below focus on the average or equivalent sound levels (L_{eq}). The equivalent sound level (L_{eq}) represents a steady state sound level containing the same total energy as a time varying signal over a given sample period. Table 5-1 identifies the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location. Appendix 5.2 provides a summary of the existing hourly ambient noise levels described below:

Table 5-1 provides the (energy average) noise levels used to describe the daytime and nighttime ambient conditions. These daytime and nighttime energy average noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number. Appendix 5.2 provides summary worksheets of the noise levels for each hour as well as the minimum, maximum, L_1, L_2, L_5, L_8, L_{25}, L_{50}, L_{90}, L_{95}, and L_{99} percentile noise levels observed during the daytime and nighttime periods.

The background ambient noise levels in the Project study area are dominated by the transportation-related noise associated with the arterial roadway network and nearby railroad lines. The 24-hour existing noise level measurements shown on Table 5-1 present the existing ambient noise conditions.

TABLE 5-1: 24-HOUR AMBIENT NOISE LEVEL MEASUREMENTS

Location[1]	Description	Energy Average Hourly Noise Level (dBA L_{eq})[2]	
		Daytime	Nighttime
L1	Located north of the site near the residence at 24946 Barton Rd.	61.3	57.9
L2	Located east of the site near the residence at 25010 Daisy Ave.	68.7	63.5
L3	Located east of the site near the residence at 25010 Fern Ave.	58.7	58.0
L4	Located south of the site near the Ronald McDonald House Charity	60.9	60.6
L5	Located south of the site near the residence at 24934 Tulip Ave.	57.2	57.4

[1] See Exhibit 5-A for the noise level measurement locations.
[2] Energy (logarithmic) average hourly levels. The long-term 24-hour measurement worksheets are included in Appendix 5.2.
"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.

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6 OFF-SITE TRANSPORTATION NOISE IMPACTS

The Project would result in a small increase in regional and local traffic volumes. The Project is anticipated to generate a maximum increase of 3,654 vehicle trips (23), which would represent an incremental increase to the existing roadway volumes over the existing volumes as compared to the 22,600 vehicles on Barton Road and over 10,000 vehicles on Anderson Street and is not expected to generate perceptible noise level increase (i.e., less than 3 dBA CNEL) at nearby sensitive land uses adjacent to study area roadways. Due to the low traffic volumes generated by the Project, the off-site traffic noise levels generated by the Project are considered less than significant and no further analysis is required.

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7 RECEIVER LOCATIONS

To assess the potential for long-term operational and short-term construction noise impacts, the following four receiver locations as shown on Exhibit 7-A were identified as representative locations for focused analysis. Sensitive receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include: schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Moderately noise-sensitive land uses typically include: multi-family dwellings, hotels, motels, dormitories, out-patient clinics, cemeteries, golf courses, country clubs, athletic/tennis clubs, and equestrian clubs. Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, natural open space, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals.

Sensitive receivers near the Project site include existing mobile homes, and non-noise sensitive receiver locations include existing hotels and commercial uses as described below. Other sensitive land uses in the Project study area that are located at greater distances than those identified in this noise study will experience lower noise levels than those presented in this report due to the additional attenuation from distance and the shielding of intervening structures.

R1: R1 represents the existing residence at 24946 Barton Road, located about 164 feet north of the Project site. A 24-hour noise level measurement was taken near this location, L1, to describe the existing ambient noise environment.

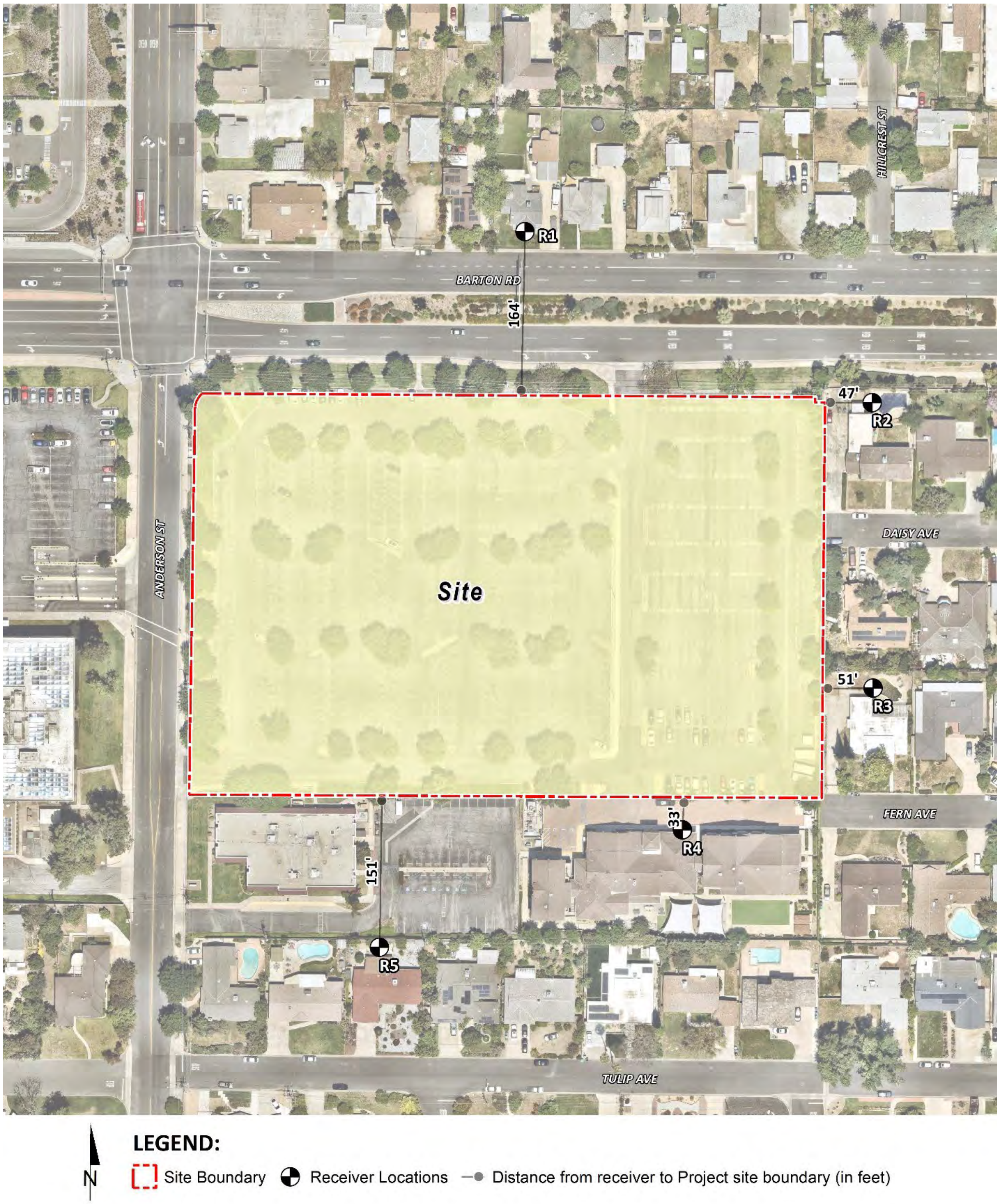
R2: Location R2 represents the existing residence at 25010 Daisy Avenue, located approximately 47 feet east of the Project site. A 24-hour noise level measurement was taken near this location, L2, to describe the existing ambient noise environment.

R3: Location R3 represents the existing residence at 25010 Fern Avenue, located about 51 feet east of the Project site. A 24-hour noise level measurement was taken near this location, L3, to describe the existing ambient noise environment.

R4: Location R4 represents the existing Ronald McDonald House Charity House, located 33 feet south of the Project site. A 24-hour noise level measurement was taken near this location, L4, to describe the existing ambient noise environment.

R5: Location R5 represents the existing residence at 24934 Tulip Avenue, located about 151 feet south of the Project site. A 24-hour noise level measurement was taken near this location, L5, to describe the existing ambient noise environment.

EXHIBIT 7-A: RECEIVER LOCATIONS



8 OPERATIONAL NOISE ANALYSIS

This section analyzes the potential stationary-source operational noise impacts at the nearest receiver locations, identified in Section 7, resulting from the operation of the proposed Project. Exhibit 8-A identifies the noise source locations used to assess the operational noise levels.

8.1 OPERATIONAL NOISE SOURCES

This operational noise analysis is intended to describe noise level impacts associated with the expected typical daytime and nighttime commercial activities at the Project site. To present the potential worst-case noise conditions, this analysis assumes the Project would be operational 24 hours per day, seven days per week. The on-site Project-related noise sources are expected to include: trash enclosures, rooftop air handling units, chiller units, roof exhaust units, and parking lot vehicle movements.

8.2 REFERENCE NOISE LEVELS

To estimate the Project operational noise impacts, reference noise level measurements were collected from similar types of activities to represent the noise levels expected with the development of the proposed Project. This section provides a detailed description of the reference noise level measurements shown in Table 8-1 used to estimate the Project operational noise impacts.

8.2.1 MEASUREMENT PROCEDURES

Unless noted in the following descriptions, the reference noise level measurements presented in this section were collected using a Larson Davis LxT Type 1 precisions sound level meter (serial number 01146). The LxT sound level meter was calibrated using a Larson-Davis calibrator, Model CAL 200, was programmed in "slow" mode to record noise levels in "A" weighted form and was located at approximately five feet above the ground elevation for each measurement. The sound level meters and microphones were equipped with a windscreen during all measurements. All noise level measurement equipment satisfies the American National Standards Institute (ANSI) standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013. (24)

8.2.2 TRASH ENCLOSURE/COLLECTION ACTIVITY

To describe the noise levels associated with a trash enclosure and collection activity, Urban Crossroads collected a reference noise level measurement at an existing trash enclosure containing two dumpster bins. The trash enclosure noise levels describe metal gates opening and closing, metal scraping against concrete floor sounds, dumpster movement on metal wheels, and trash dropping into the metal dumpster. The reference noise levels describe trash enclosure noise activities when trash is dropped into an empty metal dumpster, as would occur at the Project site. The measured reference noise level at the uniform 50-foot reference distance is 57.3 dBA Leq for the trash enclosure activity. The reference noise level describes the expected noise source activities associated with the trash enclosures for the Project's proposed building. Typical trash enclosure activities are estimated to occur for 10 minutes per hour.

EXHIBIT 8-A: OPERATIONAL NOISE SOURCE LOCATIONS

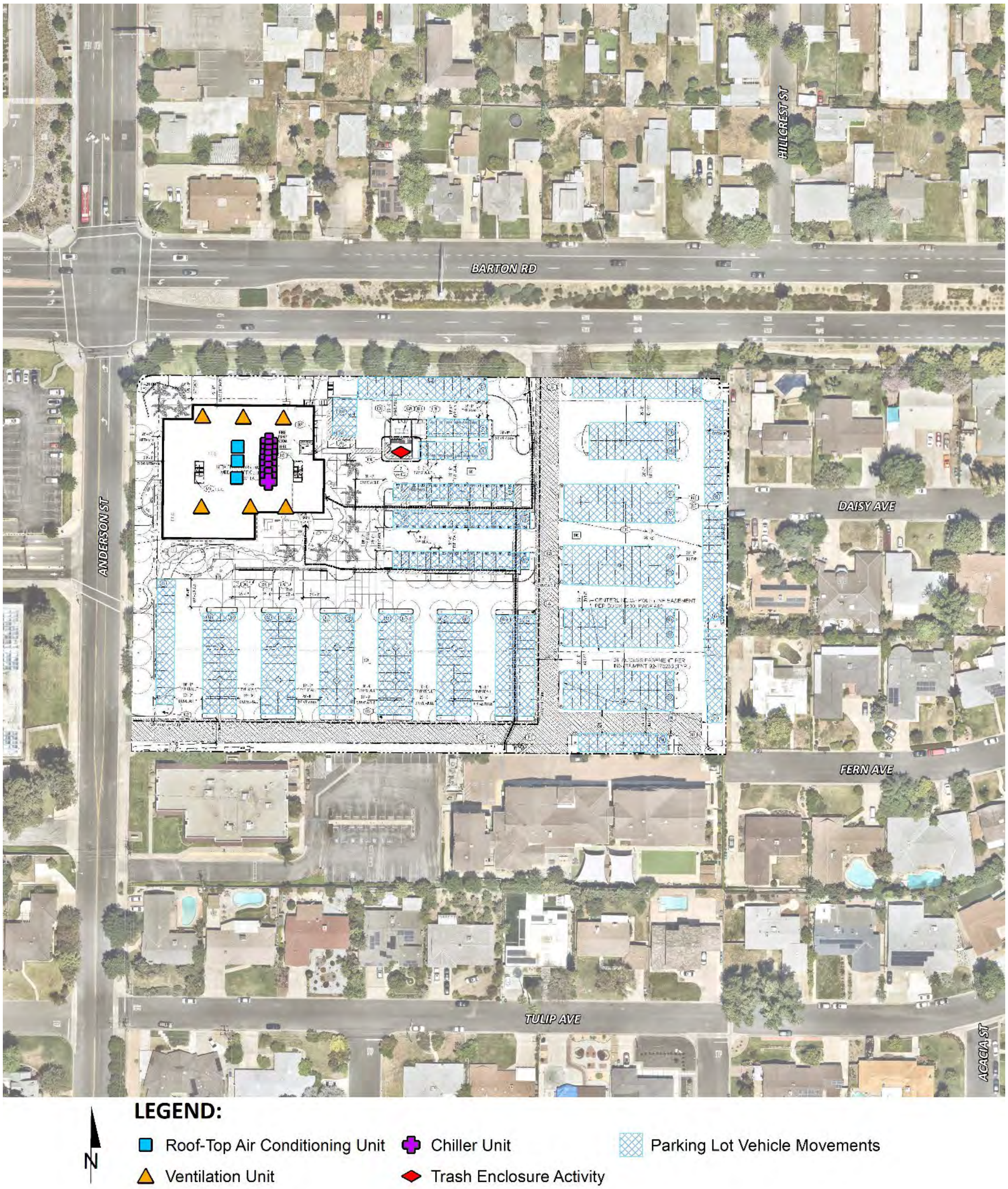


TABLE 8-1: REFERENCE NOISE LEVEL MEASUREMENTS

Noise Source	Noise Source Height (Feet)	Source Type	Min./Hour[4]		Reference Noise Level (dBA L_{eq}) @ 50 Feet	Sound Power Level (dBA)[5]
			Day	Night		
Trash Enclosure Activity[1]	5'	Point	10	10	57.4	89.0
Air Handling Unit[2]	5'	Point	45	30	69.4	101.0
Chiller Unit[2]	5'	Point	45	30	54.4	86.0
Roof Exhaust Unit[2]	2'	Point	45	30	41.4	73.0
Parking Lot Vehicle Movements[3]	0'	Area	60	0	31.4	63.0

[1] As measured by Urban Crossroads, Inc.
[2] See Appendix 7.1 for manufacturer data sheets.
[3] Each lot shown is calculated based on: Log10*(movements*(10$^{(63 \text{ dBA Lw}/10)}$)).
[4] Anticipated duration (minutes within the hour) of noise activity during typical hourly conditions expected at the Project site. "Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.
[5] Sound power level represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels calculated using the CadnaA noise model at the reference distance to the noise source. Numbers may vary due to size differences between point and area noise sources.

8.2.3 AIR HANDLING UNITS

To assess the noise levels created by the air handling units (AHU), reference noise levels were taken from equipment specifications for the Project; see Appendix 8.1 for AHU-1 and AHU-2 sound level data. Each air handling unit was modeled 8 feet above the roof elevation. Each air conditioning unit was modeled as operating 60 minutes per hour during the daytime and nighttime hours. At a uniform reference distance of 50 feet, AHU-1 would generate a reference noise level of 68.4 dBA $L_{eq,}$ and AHU-2 would generate a reference noise level of 69.4 dBA L_{eq}.

8.2.4 CHILLER UNITS

To assess the noise levels created by the chiller units, reference noise levels were taken from equipment specifications for the Project; see Appendix 8.1 for QTH1 - Modular Heat Pump sound level data. Each chiller unit was modeled 5 feet above the roof elevation. Each chiller unit was modeled as operating 60 minutes per hour during the daytime and nighttime hours. At a uniform reference distance of 50 feet, each chiller would generate a reference noise level of 54.4 dBA L_{eq}.

8.2.5 ROOF EXHAUST UNITS

To assess the noise levels created by the roof exhaust units, reference noise levels were taken from equipment specifications for the Project; see Appendix 7.1 for model CUE-100HP-VG, CUE-160XP-VG, CUE-160XP-VG, CUE-160XP-VG, and CUE-160XP-VG sound level data. Each air handling unit was modeled 3 feet above the roof elevation. Each roof exhaust unit was modeled as operating 60 minutes per hour during the daytime and nighttime hours. At a uniform reference distance of 50 feet, the loudest roof exhaust unit (CUE-160XP-VG) would generate a reference noise level of 41.4 dBA L_{eq}. To be conservative, this reference level was used for all roof exhaust units.

8.2.6 PARKING LOT VEHICLE MOVEMENTS

Parking activities are based on the area of the parking spaces. The Project includes approximately 413 spaces, which are assumed to have up to 4 movements per hour for a total of 44 events in an hour. Based on studies conducted in Europe and Australia, the average parking procedure, which included movement associated with either entering or exiting the parking area, parking the vehicles, and opening and closing doors resulted in a sound power level of approximately 63 dBA L_w/square meter per event (25) (26). Parking lot activities were modeled at full activity during the daytime and nighttime hours.

8.3 CADNAA NOISE PREDICTION MODEL

To fully describe the exterior operational noise levels from the Project, Urban Crossroads, Inc. developed a noise prediction model using the CadnaA (Computer Aided Noise Abatement) computer program. CadnaA can analyze multiple types of noise sources using the spatially accurate Project site plan, georeferenced Nearmap aerial imagery, topography, buildings, and barriers in its calculations to predict outdoor noise levels.

Using the ISO 9613 protocol, CadnaA will calculate the distance from each noise source to the noise receiver locations, using the ground absorption, distance, and barrier/building attenuation inputs to provide a summary of the noise level at each receiver and the partial noise level contributions by noise source. Consistent with the ISO 9613 protocol, the CadnaA noise prediction model relies on the reference sound power level (L_w) to describe individual noise sources. While sound pressure levels (i.e., L_{eq}) quantify in decibels the intensity of given sound sources at a reference distance, sound power levels (L_w) are connected to the sound source and are independent of distance. Sound pressure levels vary substantially with distance from the source and diminish from intervening obstacles and barriers, air absorption, wind, and other factors.

Sound power is the acoustical energy emitted by the sound source and is an absolute value that is not affected by the environment. The operational noise level calculations provided in this noise study account for the distance attenuation provided due to geometric spreading, when sound from a localized stationary source (i.e., a point source) propagates uniformly outward in a spherical pattern. A default ground attenuation factor of 0.5 was used in the CadnaA noise analysis to account for simi-hard site conditions. Appendix 8.2 includes the detailed noise model inputs.

8.4 PROJECT OPERATIONAL NOISE LEVELS

Using the reference noise levels to represent the proposed Project operations that include trash enclosures, rooftop air handling units, chiller units, roof exhaust units, and parking lot vehicle movements, Urban Crossroads, Inc. calculated the operational source noise levels that are expected to be generated at the Project site and the Project-related noise level increases that would be experienced at each of the sensitive receiver locations. Table 8-2 shows the Project operational noise levels during the daytime hours of 7:00 a.m. to 9:00 p.m. The daytime hourly noise levels at the off-site receiver locations are expected to range from 42.9 to 45.2 dBA Leq.

TABLE 8-2: DAYTIME PROJECT OPERATIONAL NOISE LEVELS

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)				
	R1	R2	R3	R4	R5
Roof-Top Air Conditioning	31.2	26.7	25.7	26.5	25.1
Trash Enclosure Activity	32.2	37.2	39.2	40.9	32.6
Car Wash Vacuum Heads	42.1	42.1	41.3	42.5	42.7
Car Wash Tunnel Blowers	26.8	29.6	32.3	34.0	35.2
Parking Lot Activity	20.4	17.3	18.4	19.3	19.9
Total (All Noise Sources)	**42.9**	**43.6**	**43.8**	**45.2**	**43.8**

[1] See Exhibit 8-A for the noise source locations. CadnaA noise model calculations are included in Appendix 8.2.

Table 8-3 shows the Project operational noise levels during the nighttime hours of 9:00 p.m. to 7:00 a.m. The nighttime hourly noise levels at the off-site receiver locations are expected to range from 40.3 to 42.1 dBA L_{eq}. The differences between the daytime and nighttime noise levels is largely related to the duration of noise activity (Table 8-1).

TABLE 8-3: NIGHTTIME PROJECT OPERATIONAL NOISE LEVELS

Noise Source[1]	Operational Noise Levels by Receiver Location (dBA Leq)				
	R1	R2	R3	R4	R5
Roof-Top Air Conditioning	30.2	25.7	24.7	25.6	24.1
Trash Enclosure Activity	28.2	33.2	35.2	36.9	28.6
Car Wash Vacuum Heads	39.4	39.3	38.5	39.8	40.0
Car Wash Tunnel Blowers	24.1	26.8	29.6	31.3	32.4
Parking Lot Activity	17.7	14.6	15.7	16.5	17.1
Total (All Noise Sources)	**40.3**	**40.6**	**40.6**	**42.1**	**41.0**

[1] See Exhibit 8-A for the noise source locations. CadnaA noise model calculations are included in Appendix 8.2.

8.5 PROJECT OPERATIONAL NOISE LEVEL COMPLIANCE

To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against exterior noise level thresholds based on the City of Loma Linda exterior noise level standards at the nearest noise-sensitive receiver locations. Table 8-4 shows the operational noise levels associated with the Project will satisfy the City of Loma Linda 65 dBA L_{eq} daytime and 55 dBA L_{eq} nighttime residential exterior noise level standards at all nearest receiver locations. Therefore, the operational noise impacts are considered *less than significant* at the nearest noise-sensitive receiver locations.

TABLE 8-4: OPERATIONAL NOISE LEVEL COMPLIANCE

Receiver Location[1]	Land Use	Project Operational Noise Levels (dBA Leq)[2]		Noise Level Standards (dBA Leq)[3]		Noise Level Standards Exceeded?[4]	
		Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	Residential	42.9	40.3	55	45	No	No
R2	Residential	43.6	40.6	55	45	No	No
R3	Residential	43.8	40.6	55	45	No	No
R4	Residential	45.2	42.1	55	45	No	No
R5	Residential	43.8	41.0	55	45	No	No

[1] See Exhibit 7-A for the receiver locations.
[2] Proposed Project operational noise levels as shown in Tables 8-2 and 8-3.
[3] Exterior noise level standards for residential land use, as shown in Table 3-1.
[4] Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 7:00 a.m. to 9:00 p.m.; "Nighttime" = 9:00 p.m. to 7:00 a.m.

8.6 PROJECT OPERATIONAL NOISE LEVEL INCREASES

To describe the Project operational noise level increases, the Project operational noise levels are combined with the existing ambient noise level measurements for the nearest receiver locations potentially impacted by Project operational noise sources. Since the units used to measure noise, decibels (dB), are logarithmic units, the Project-operational, and existing ambient noise levels cannot be combined using standard arithmetic equations. (2) Instead, they must be logarithmically added using the following base equation:

$$SPL_{Total} = 10\log_{10}[10^{SPL1/10} + 10^{SPL2/10} + \ldots 10^{SPLn/10}]$$

Where "SPL1," "SPL2," etc. are equal to the sound pressure levels being combined, or in this case, the Project-operational and existing ambient noise levels. The difference between the combined Project and ambient noise levels describes the Project noise level increases to the existing ambient noise environment. As indicated in Tables 8-5 and 8-6, the Project is expected to generate daytime and nighttime operational noise level increases ranging from less than 0.1 to 0.2 dBA L_{eq} at the nearest receiver locations. Project-related operational noise level increases will satisfy the operational noise level increase significance criteria presented in Table 4-1. Therefore, the incremental Project operational noise level increase is considered *less than significant* at all receiver locations.

TABLE 8-5: DAYTIME PROJECT OPERATIONAL NOISE LEVEL INCREASES

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?[7]
R1	42.9	L1	61.3	61.4	0.1	5	No
R2	43.6	L2	68.7	68.7	0.0	5	No
R3	43.8	L3	58.7	58.8	0.1	5	No
R4	45.2	L4	60.9	61.0	0.1	5	No
R5	43.8	L5	57.2	57.4	0.2	5	No

[1] See Exhibit 7-A for the receiver locations.
[2] Total Project nighttime operational noise levels as shown in Table 8-4.
[3] Reference noise level measurement locations as shown on Exhibit 5-A.
[4] Observed nighttime ambient noise levels as shown in Table 5-1.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
[7] Significance increase criteria as shown in Table 4-1.

TABLE 8-6: NIGHTTIME PROJECT OPERATIONAL NOISE LEVEL INCREASES

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?[7]
R1	40.3	L1	57.9	58.0	0.1	5	No
R2	40.6	L2	63.5	63.5	0.0	5	No
R3	40.6	L3	58.0	58.1	0.1	5	No
R4	42.1	L4	60.6	60.7	0.1	5	No
R5	41.0	L5	57.4	57.5	0.1	5	No

[1] See Exhibit 7-A for the receiver locations.
[2] Total Project nighttime operational noise levels as shown in Table 8-4.
[3] Reference noise level measurement locations as shown on Exhibit 5-A.
[4] Observed nighttime ambient noise levels as shown in Table 5-1.
[5] Represents the combined ambient conditions plus the Project activities.
[6] The noise level increase expected with the addition of the proposed Project activities.
[7] Significance increase criteria as shown in Table 4-1.

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9 CONSTRUCTION IMPACTS

This section analyzes potential impacts resulting from the short-term construction activities associated with the development of the Project. Exhibit 9-A shows the construction activity boundaries in relation to the nearby sensitive receiver locations.

9.1 CONSTRUCTION NOISE LEVELS

Noise generated by the Project construction equipment will include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. The number and mix of construction equipment is expected to occur in the following stages:

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

This construction noise analysis was prepared using reference noise level measurements taken by Urban Crossroads, Inc. to describe the typical construction activity noise levels for each stage of Project construction. The construction reference noise level measurements represent a list of typical construction activity noise levels. Noise levels generated by heavy construction equipment can range from approximately 68 dBA to in excess of 80 dBA when measured at 50 feet. Hard site conditions are used in the construction noise analysis which result in noise levels that attenuate (or decrease) at a rate of 6 dBA for each doubling of distance from a point source (i.e. construction equipment). For example, a noise level of 80 dBA measured at 50 feet from the noise source to the receiver would be reduced to 74 dBA at 100 feet from the source to the receiver and would be further reduced to 68 dBA at 200 feet from the source to the receiver. The construction stages used in this analysis are consistent with the data used to support the air Quality construction emissions in prepared by Lilburn Corporation.

9.2 CONSTRUCTION REFERENCE NOISE LEVELS

To describe the Project construction noise levels, measurements were collected for similar activities at several construction sites. Table 9-1 provides a summary of the construction reference noise level measurements. .

EXHIBIT 9-A: CONSTRUCTION ACTIVITY AND RECEIVER LOCATIONS

TABLE 9-1: CONSTRUCTION REFERENCE NOISE LEVELS

Construction Stage	Reference Construction Equipmnet[1]	Reference Noise Level @ 50 Feet (dBA L_{eq})	Composite Reference Noise Level (dBA L_{eq})	Reference Power Level (dBA L_w)
Site Preparation	Dozer	78.0	83.4	115.1
	Front End Loader	75.0		
	Grader	81.0		
Grading	Excavator	77.0	84.0	115.6
	Tractor	80.0		
	Scraper	80.0		
Building Construction	Crane	73.0	77.4	109.1
	Backhoe	74.0		
	Generator (<25kVA)	70.0		
Paving	Paver	74.0	77.8	109.5
	Dump Truck	72.0		
	Roller	73.0		
Architectural Coating	Man Lift	68.0	76.2	107.8
	Compressor (air)	74.0		
	Generator (<25kVA)	70.0		

[1] FHWA Road Construction Noise Model.

9.3 TYPICAL CONSTRUCTION NOISE ANALYSIS

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project construction noise level impacts with multiple pieces of equipment operating simultaneously at the nearest sensitive receiver locations were completed. This includes the additional noise attenuation provided by the existing intervening building structures and noise barriers located between the Project site and the nearest receiver locations.

To assess the worst-case construction noise levels, the Project construction noise analysis relies on the highest noise level impacts when the equipment with the highest reference noise level is operating at the closest point from the edge of primary construction activity (Project site boundary) to each receiver location. As shown in Table 9-2, the construction noise levels are expected to range from 59.0 to 72.1 dBA L_{eq}, and the highest construction levels are expected to range from 66.8 to 72.1 dBA L_{eq} at the nearest receiver locations. Appendix 9.1 includes the detailed CadnaA construction noise model inputs.

TABLE 9-2: CONSTRUCTION EQUIPMENT NOISE LEVEL SUMMARY

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	66.3	66.8	60.2	60.7	59.0	66.8
R2	68.6	69.1	62.5	63.0	61.3	69.1
R3	70.1	70.6	64.0	64.5	62.8	70.6
R4	71.6	72.1	65.5	66.0	64.3	72.1
R5	66.4	66.9	60.3	60.8	59.1	66.9

[1] Noise receiver locations are shown in Exhibit 9-A.
[2] Construction noise level calculations based on distance from the project site boundaries (construction activity area) to nearest receiver locations. CadnaA construction noise model inputs are included in Appendix 9.1.

9.4 TYPICAL CONSTRUCTION NOISE LEVEL COMPLIANCE

To evaluate whether the Project will generate potentially significant short-term noise levels at the nearest noise sensitive receiver locations, a construction-related daytime noise level threshold of 80 dBA L_{eq} is used as a reasonable threshold to assess the daytime construction noise level impacts. The construction noise analysis shows that the nearest receiver locations will satisfy the daytime 80 dBA L_{eq} significance threshold during Project construction activities as shown in Table 9-3. Therefore, the noise impacts due to Project construction noise is considered *less than significant* at all receiver locations.

TABLE 9-3: TYPICAL CONSTRUCTION NOISE LEVEL COMPLIANCE

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})		
	Highest Construction Noise Levels[2]	Threshold[3]	Threshold Exceeded?[4]
R1	66.8	80	No
R2	69.1	80	No
R3	70.6	80	No
R4	72.1	80	No
R5	66.9	80	No

[1] Noise receiver locations are shown in Exhibit 9-A.
[2] Highest construction noise level calculations based on distance from the construction noise source activity to nearby receiver locations as shown in Table 9-2.
[3] Federal Transit Administration, Transit Noise and Vibration Impact Assessment noise level threshold as shown in Table 4-1.
[4] Do the estimated Project construction noise levels exceed the construction noise level threshold?

9.5 TEMPORARY CONSTRUCTION NOISE LEVEL INCREASES

To describe the temporary Project construction noise level contributions to the existing ambient noise environment, the Project construction noise levels were combined with the existing ambient noise levels measurements at the nearest off-site receiver locations. The difference between the combined Project-construction and ambient noise levels is used to describe the construction noise level contributions. Temporary noise level increases that would be experienced at sensitive receiver locations when Project construction-source noise is added to the ambient daytime conditions are presented on Table 9-4. A temporary noise level increase of 20 dBA is considered a *potentially significant* impact.

TABLE 9-4: DAYTIME CONSTRUCTION NOISE LEVEL INCREASES

Receiver Location[1]	Total Project Construction Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	66.8	L1	61.3	67.9	6.6	20	No
R2	69.1	L2	68.7	71.9	3.2	20	No
R3	70.6	L3	58.7	70.9	12.2	20	No
R4	72.1	L4	60.9	72.4	11.5	20	No
R5	66.9	L5	57.2	67.3	10.1	20	No

[1] Construction noise source and receiver locations are shown on Exhibit 9-A.
[2] Total Project daytime construction noise levels as shown on Table 9-2.
[3] Reference noise level measurement locations as shown on Exhibit 5-A.
[4] Observed daytime ambient noise levels as shown on Table 5-1.
[5] Represents the combined ambient conditions plus the Project construction activities.
[6] The noise level increase expected with the addition of the proposed Project construction activities.

As indicated in Table 9-4, the Project will contribute construction noise level increases ranging from 3.2 to 12.2 dBA L_{eq} during the daytime hours at the nearest receiver locations. The unmitigated construction noise analysis shows that the nearest receiver locations will not exceed the *substantial* 20 dBA L_{eq} noise level increase significance threshold during Project construction activities. The temporary construction noise level increase analysis shows that the noise impacts due to Project construction noise are considered *less than significant*.

9.6 CONSTRUCTION VIBRATION ANALYSIS

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. It is expected that ground-borne vibration from Project construction activities would cause only intermittent, localized intrusion. Ground vibration levels associated with various types of construction equipment are summarized in Table 9-5. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential Project construction vibration levels using the following vibration assessment methods defined by the Caltrans. To describe the human response (annoyance) associated with vibration impacts, Caltrans provides the following equation: $PPV (in/sec)_{equip} = PPV (in/sec)_{ref} \times (25/D)^{1.5}$.

TABLE 9-5: VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	PPV (in/sec) (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089

Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual

Table 9-6 presents the expected typical construction equipment vibration levels at the nearest receiver locations. At distances ranging from 33 to 164 feet from typical Project construction activities (at the Project site boundary), construction vibration levels are estimated to range from 0.01 to 0.14. Based on maximum acceptable continuous vibration threshold of 0.20 PPV (in/sec) (in/sec), the typical Project construction vibration levels will satisfy the building damage thresholds at all receiver locations. Therefore, the Project-related vibration impacts are considered less than significant during the construction activities at the Project site.

Moreover, the vibration levels reported at the sensitive receiver locations are unlikely to be sustained during the entire construction period but will occur rather only during the times that heavy construction equipment is operating adjacent to the Project site perimeter.

TABLE 9-6: TYPICAL CONSTRUCTION EQUIPMENT VIBRATION LEVELS

Receiver Location[1]	Distance to Const. Activity (Feet)[2]	Typical Construction Vibration Levels PPV (in/sec)[3]					Thresholds PPV (in/sec)[4]	Thresholds Exceeded?[5]
		Small bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Highest Vibration Level		
R1	164'	0.00	0.00	0.00	0.01	0.01	0.20	No
R2	47'	0.00	0.01	0.03	0.08	0.08	0.20	No
R3	51'	0.00	0.01	0.03	0.07	0.07	0.20	No
R4	33'	0.00	0.02	0.05	0.14	0.14	0.20	No
R5	151'	0.00	0.00	0.01	0.01	0.01	0.20	No

[1] Construction receiver locations are shown on Exhibit 9-A.
[2] Distance from receiver location to Project construction boundary.
[3] Based on the Vibration Source Levels of Construction Equipment (Table 9-5).
[4] FRTA Transit Noise and Vibration Impact Assessment, September 2018.
[5] Does the peak vibration exceed the acceptable vibration thresholds?
"PPV" = Peak Particle Velocity

10 REFERENCES

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26. *Prediction of parking area noise in Australian conditions.* **Johnson, Laurence Nicol and Paul.** Paper Number 39, s.l. : Gold Coast, Australia, 2-4 November 2011, Vol. Proceedings of ACOUSTICS 2011.

11 CERTIFICATION

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

William Maddux, INCE
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URBAN CROSSROADS, INC.
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EDUCATION

Bachelor of Science in Urban and Regional Planning
California Polytechnic State University, Pomona • June 2000

PROFESSIONAL AFFILIATIONS

ASA – Acoustical Society of America
AEP – Association of Environmental Planners
AWMA – Air and Waste Management Association
INCE – Institute of Noise Control Engineers

PROFESSIONAL CERTIFICATIONS

Approved Acoustical Consultant • County of San Diego
FHWA Traffic Noise Model of Training • November 2004
CadnaA Basic and Advanced Training Certificate • October 2008

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APPENDIX 3.1:

CITY OF LOMA LINDA MUNICIPAL CODE

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APPENDIX 3.2:

COUNTY OF SAN BERNARDINO DEVELOPMENT CODE

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APPENDIX 5.1:

STUDY AREA PHOTOS

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APPENDIX 5.2:

NOISE LEVEL MEASUREMENT WORKSHEETS

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APPENDIX 8.1:

HVAC

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APPENDIX 8.2:

OPERATIONAL NOISE LEVEL CALCULATIONS

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APPENDIX 9.1:

CONSTRUCTION NOISE LEVEL CALCULATIONS

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APPENDIX F

VMT ASSESSMENT

MEMORANDUM

URBAN CROSSROADS

DATE: October 14, 2024
TO: Marie Gilliam, RPG, Inc.
FROM: Alex So, Urban Crossroads, Inc.
JOB NO: 15959-01 VMT

LOMA LINDA MEDICAL BUILDING VEHICLE MILES TRAVELED (VMT) ANALYSIS

Urban Crossroads, Inc. has completed the following Vehicle Miles Traveled (VMT) Analysis for Loma Linda Medical Building (**Project**), which is located on the southeast corner of Barton Road and Anderson Street in the City of Loma Linda.

PROJECT OVERVIEW

The Project is to consist of the development of a 105,000-square-foot, five-story medical office building. A site plan for the Project is provided in Attachment A.

BACKGROUND

The California Environmental Quality Act (CEQA) requires all lead agencies to adopt VMT as the measure for identifying transportation impacts for land use projects. To comply with CEQA, the County of San Bernardino adopted Transportation Impact Study Guidelines (July 9, 2019) (**County Guidelines**) (1). It is our understanding that the City of Loma Linda relies on the County Guidelines to assess VMT, therefore this VMT analysis has been developed based on the adopted County Guidelines.

VMT SCREENING

County Guidelines identify that a project may have a less than significant transportation impact if it meets one or more VMT screening criteria. Each of the screening criteria listed in the County Guidelines are described in Table 1 along with a determination of the Project's eligibility to meet each criterion.

TABLE 1: SCREENING FOR LAND USE PROJECTS EXEMPT FROM VMT ANALYSIS

Screening Criteria	Description	Result
Local Serving Land Use	Local-Serving Retail under 50,000 square feet and Local Essential Services such as K-12 schools, day care centers, and community institutions shortens non-discretionary trips by putting those goods and services closer to residents, resulting in an overall reduction in VMT.	Does not meet.
Project's Generating Less Than 110 Daily Trips	Projects generating fewer than 110 daily trips are presumed to have a less than significant impact on VMT.	Does not meet.
Transit Priority Area (TPA)	Projects located within a TPA (i.e., within a half mile of an existing major transit stop or an existing stop along a high-quality transit corridor) are presumed to have less than significant impact on VMT.	Does not meet.
Low VMT Area	Projects located in a low VMT generating area of the County are beneficial to the region as they can reduce VMT per person/employee.	Does not meet.

As shown in Table 1, the Project was not found to meet any eligible screening criteria and consistent with the County Guidelines, a Project-level VMT analysis has been prepared.

VMT ANALYSIS

TRAFFIC MODELING METHODOLOGY

County Guidelines identify the San Bernardino Transportation Analysis Model (SBTAM) as the appropriate tool for conducting VMT forecasting and analysis for land use projects in San Bernardino County area, as it considers interaction between different land uses based on socio-economic data (SED), such as population, households, and employment. The current version of SBTAM 3.2 was last released in June 2024 and represents the most current sub-regional transportation model for San Bernardino County.

VMT ANALYSIS METHODOLOGY

Consistent with County Guidelines, project-generated VMT has been estimated using the Production/Attraction method. Project-generated VMT is presented as home-based work (HBW) VMT per employee. HBW VMT per employee is an efficiency metric representing VMT generated on a typical weekday for HBW trips per employee. County Guidelines note that HBW VMT per employee should be used to evaluate employment projects and would apply to office, industrial, governmental, institutional, and other employment generating projects.

PRODUCTION/ATTRACTION VMT

The Production/Attraction (PA) method for calculating VMT sums all weekday VMT generated by Home-Based (HB) and HBW trips with at least one trip-end in the study area (i.e., Project Traffic Analysis Zone or TAZ) by trip purpose. Productions are land use types that generate trips (residences), and attractions are land use types that attract trips (employment). The PA method allows project VMT to be evaluated based on trip purpose, which is consistent with both the State of California's Office of Planning and Research (OPR) Technical Advisory and County Guidelines.

BOUNDARY VMT METHOD

The boundary method is the sum of all weekday VMT on the roadway network within a designated boundary (i.e., County boundary or other designated geographic area). The boundary method estimates VMT by multiplying vehicle trips on each roadway segment within the boundary by that segment's length. This is the only VMT method that captures the effect of cut-through and/or displaced traffic. This approach consists of all trips, including those trips that do not begin or end in the designated boundary. In addition, a 10-mile radius surrounding the Project has also been utilized to provide a more accurate and complete accounting of trips coming to and from the Project.

VMT SIGNIFICANCE THRESHOLD

As stated in County Guidelines, the appropriate VMT metric for non-residential employment projects is VMT per employee.[1] The County Guidelines state a project would result in a significant project-generated VMT impact if the following condition is met:

- A project should be considered to have a significant impact if the project VMT per person/employee is greater than 4% below the existing VMT per person/employee for the County.

Additionally, if the Project is inconsistent with the Regional Transportation Plan or Sustainable Community Strategy (RTP/SCS), the Project's cumulative effect on VMT would be considered significant if it results in the following condition:

- Cumulative year VMT per service population (population + employment) increases in the with project condition as compared to the no project condition.

It is our understanding that the Project will not be seeking a general plan amendment or change of zone. Therefore, the Project is determined to be consistent with the current RTP/SCS. Notwithstanding, a cumulative analysis will also be performed in order to disclose any potential cumulative impacts.

COUNTY OF SAN BERNARDINO VMT PER EMPLOYEE THRESHOLD

The County of San Bernardino VMT per employee value has been calculated using SBTAM. Table 2 presents the resulting County of San Bernardino existing VMT per employee value of 22.9 and 4% below existing VMT per employee of **22.0**.

TABLE 2: COUNTY OF SAN BERNARDINO VMT PER EMPLOYEE

	County of San Bernardino
Employee	905,822
HBW VMT	20,807,238
VMT per Employee	22.9
County Threshold	22.0

[1] County Guidelines; Page 20

PROJECT VMT ESTIMATES

To estimate project-generated VMT, standard land use information such as building square footage must first be converted into a SBTAM-compatible dataset. The SBTAM model utilizes socio-economic data (SED) (e.g., population and employment) as key inputs for the purposes of vehicle trip estimation. To isolate project-generated VMT, the existing SED data within Project TAZ 53817102 was moved to an adjacent TAZ 53817101. The remaining SED data of Project TAZ 53817102 only includes the Project's land use SED data. Table 3 presents the SED inputs used to represent the Project in the Project's TAZ within SBTAM.

TABLE 3: EMPLOYMENT ESTIMATES

Land Use	Quantity (SF)	Employees[1]
Medical Office	105,000	279

[1] Employee estimates were provided by the City of Loma Linda.

Table 4 presents the Project's employees, Project-generated VMT, and the resulting VMT per employee. SBTAM outputs can be found in Attachment B.

TABLE 4: PROJECT-GENERATED VMT

	Baseline
Employees	279
HBW VMT	6,541
VMT per Employee	23.5
County Threshold	22.0
Does Project Exceed Threshold?	Yes

As shown in Table 4, the Project is estimated to generate HBW VMT per employee above the County's threshold of 22.0 VMT per employee.

VMT REDUCTION STRATEGIES

The Project is forecasted to exceed the County's threshold and will require VMT reduction strategies in the form of trip reduction measures to reduce VMT to the extent feasible. Table 5 presents the percent over the County's threshold, VMT over the County's threshold, and the percent reduction in Project-generated VMT required to fully mitigate the VMT impact, resulting in a required 6.2% for the Project.

TABLE 5: REQUIRED VMT REDUCTION

	Project
VMT Over Threshold	+408
VMT % Reduction Required	-6.2%

The California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (December 2021) (**Handbook**) (2) has been utilized to determine trip reduction measures that may be applicable to the Project. The Handbook describes methods to quantify reductions in greenhouse gas emissions and, in the case of Transportation measures (i.e., trip reduction strategies), the associated reductions to VMT. This evaluation will focus on a review of the Handbook's Transportation measures that are determined to be applicable to the Project.

SELECTING MEASURES

To determine which Transportation measures should be considered from the Handbook, land use type, scale, and locational context are each identified as key factors for determining an individual measure's applicability to a development project. The Handbook contains a fact sheet for each measure that describes the measure, locational context, scale of application, implementation requirements, and other considerations that should be reviewed to determine a measure's applicability.

PROJECT TYPE

Project type is an important consideration when determining which measures are applicable for consideration. For example, measures associated with neighborhood design are not applicable to an office project, whereas trip reduction programs intended to reduce employee commute VMT would not be applicable to an apartment project.

SCALE

The Handbook identifies that measures can be applied at different scales or geographic levels, however, "some measures may only be applicable at the project-level, whereas others may be more appropriate within a broader planning context such as for a general plan or climate action plan." The geographic levels considered in the Handbook include Project/Site and Plan/Community. Project/Site applies to measures that can reduce VMT at the scale of an individual development project or employer. Plan/Community refers to measures that reduce VMT at the scale of a specific plan, general plan or climate action plan. Transportation measures can be quantified at either the Project/Site scale or the Plan/Community scale, but never both.[2]

LOCATIONAL CONTEXT

The Handbook describes locational context as "used to identify trip reduction measures within the transportation sector that are appropriate in certain types of neighborhoods differentiated by transportation characteristics and level of development (e.g., rural, suburban, and urban)." More specifically, rural, suburban, and urban are defined as follows.

Rural: An area characterized by little development. Compared to urban and suburban areas, rural areas have a lower density of residences, higher numbers of single-family residences, and higher numbers of vehicle dependent land use patterns. Where applicable, the Handbook provides three land use distinctions within the rural locational context category—R_a, R_b, and R_c. R_a refers to rural areas within a master-planned community. These rural areas often include a broad offering of amenities and services, which may be accessed by walking or other alternative forms of transportation. R_b refers to rural areas adjacent to a commuter rail station with convenient rail service to a major employment center. As the name implies, these rural areas have greater access to commuter rail as an alternative mode of transportation. R_c refers to rural areas with transit service and that are near jobs/services.

[2] Handbook, Page 37

Suburban: An area characterized by dispersed, low-density, single-use, automobile dependent land use patterns, usually outside of the central city. Also known as a suburb.

Urban: An area located within the central city with higher density land uses than in the suburbs. Often characterized by multi-family housing, tall office buildings, and dense retail.

The Project's locational context is determined to be suburban.

TRANSPORTATION MEASURES

As noted in the Handbook, the Transportation section measures "promote transit and alternative transportation, support use of alternatively fueled vehicles, or encourage land use planning practices that reduce vehicle trips and vehicle miles traveled (VMT). Measures within the transportation sector are separated into six subsectors: Land Use, Neighborhood Design, Parking or Road Pricing/Management, Transit, Trip Reduction Programs, and Clean Vehicles and Fuels."[3] For the purposes of this evaluation, the measures listed within the Trip Reduction Programs subsector that are focused on reducing employee commute VMT would be most applicable to the Project's office land use.

TRIP REDUCTION PROGRAMS SUBSECTOR

Each fact sheet within the Trip Reduction Programs subsector was reviewed to determine each measure's applicability to the Project.

The following explores all applicable mitigation measures for an office project located in a rural/suburban area. The quantification below assumes that a potential future tenant implements this measure using default values supplied by the Handbook's calculation fact sheet. Generally, trip reduction programs are more appropriate for the building occupant or tenant (i.e., employer) to implement and monitor rather than the building owner or developer.

T-7 COMMUTE TRIP REDUCTION (CTR) MARKETING

The Project will include a marketing strategy to promote the Project site employer's CTR program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT. The following features (or similar alternatives) of the marketing strategy are essential for effectiveness.

- On-site or online commuter information services.
- Employee transportation coordinators.
- On-site or online transit pass sales.
- Guaranteed ride home service.

[3] Handbook, Page 30

TABLE 6: T-7 VMT CALCULATION VARIABLES

ID	Variable	Value	Unit	Source
Output				
A	Percent reduction in GHG emissions from project/site employee commute VMT	0-4.0	%	calculated
User Inputs				
B	Percent of employees eligible for program	0-100	%	user input
Constants, Assumptions, and Available Defaults				
C	Percent reduction in employee commute vehicle trips	-4	%	TRB 2010
D	Adjustment from vehicle trips to VMT	1	unitless	assumed

$$A = B \times C \times D$$

The Project will provide employees with materials and online resources as a means to promote the commute trip reduction program. As calculated for the Project, with proper implementation and 90%[4] of the Project's employees eligible, this design feature is expected to reduce home-based work (HBW) attraction VMT by 3.6%. HBW attraction VMT is VMT generated by trips originating or ending at the Project.

T-8 Ridesharing Program

The Project will provide a ridesharing program and establish a permanent transportation management association with funding requirements for employers. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips and VMT. Ridesharing must be promoted through a multifaceted approach. Examples include the following.

- Designating a certain percentage of desirable parking spaces for ridesharing vehicles.
- Designating adequate passenger loading and unloading and waiting areas for ridesharing vehicles.
- Providing an app or website for coordinating rides.

TABLE 7: T-8 VMT CALCULATION VARIABLES

ID	Variable	Value	Unit	Source
Output				
A	Percent reduction in GHG emissions from project/site employee commute VMT	0-8.0	%	calculated
User Inputs				
B	Percent of employees eligible for program	0-100	%	user input
Constants, Assumptions, and Available Defaults				
C	Percent reduction in employee commute VMT	4	%	SANDAG 2019

[4] Employees who might not be able to participate could include those who work nighttime hours when transit and rideshare services are not available or employees who are required to drive to work as part of their job duties. As the Project is estimated to operate during typical business hours, it is expected that 90% of the employees will be operating during hours in which services associated with reduction measures are available.

$$A = B \times C$$

The Project could be designed to provide carpool/vanpool/EV parking designated spaces in locations of easy and convenient accessibility to the Project building. As calculated for the Project, with proper implementation and 90%[5] of the Project's employees eligible, the Project is expected to reduce HBW attraction VMT by 3.6%.

T-10 End-of-Trip Bicycle Facilities

This measure is listed in the Handbook as available to projects in a suburban setting. As described in the Handbook, "the measure will install and maintain end-of-trip facilities for employee use. End-of-trip facilities include bike parking, bike lockers, showers, and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and GHG emissions."[6] The fact sheet for this measure was utilized to calculate the Project's potential VMT reduction.

TABLE 8: T-10 VMT CALCULATION VARIABLES

ID	Variable	Value	Unit	Source
A	Percent reduction in GHG emissions from project/site employee commute VMT	0.1-4.4	%	calculated
User Inputs				
	None			
Constants, Assumptions, and Available Defaults				
B	Bike mode adjustment factor	1.78 or 4.86[1]	unitless	Buehler 2012
C	Existing bicycle trip length for all trips in region	2.2	miles	FHWA 2017a
D	Existing vehicle trip length for all trips in region	11.7	miles	FHWA 2017a
E	Existing bicycle mode share for work trips in region	0.4	%	FHWA 2017b
F	Existing vehicle mode share for work trips in region	95.3	%	FHWA 2017b

[1]The bike mode adjustment factor should be provided by the user based on type of bike facility. A study found that commuters with showers, lockers, and bike parking at work are associated with 4.86 times greater likelihood to commute by bicycle when compared to individuals without any bicycle facilities at work. Individuals with bike parking, but no showers and lockers at the workplace, are associated with 1.78 times greater likelihood to cycle to work than those without trip-end facilities.

$$A = \frac{C \times \left(E - (B \times E)\right)}{D \times F}$$

The Project can include building elements for bicycle trip end facilities (i.e., parking) for commuters that choose to bicycle as a mode of travel. This will promote an alternative mode choice of commuting for employees. As calculated, the Project will reduce HBW attraction VMT by 0.1%.

TOTAL VMT REDUCTIONS

The Handbook states that effectiveness levels for multiple measures within a subsector may be multiplied to determine a combined effectiveness level. Because the combination of measures and independence of measures are complicated, the Handbook recommends that measure

[5] Employees who might not be able to participate could include those who work nighttime hours when transit and rideshare services are not available or employees who are required to drive to work as part of their job duties. As the Project is estimated to operate during typical business hours, it is expected that 90% of the employees will be operating during hours in which services associated with reduction measures are available.
[6] Handbook, Page 100

reductions within a subsector be multiplied unless the user can provide substantial evidence indicating that emission reductions are independent of one another and that they should therefore be added. The total VMT reduction was calculated by combining the allowable reduction of each individual non-mutually-exclusive measure within trip reduction subsector using the following equation as provided by the Handbook:

$$Reduction_{Subsector} = 1 - [(1 - A) \times (1 - B) \times (1 - C) \ldots]$$

The Project's VMT reduction is as follows:

$$-7.2\% = 1 - [(1 - 3.6\%) \times (1 - 3.6\%) \times (1 - 0.1\%)]$$

As outlined through the VMT reduction calculations presented above, with the inclusion of the VMT mitigation measures, the Project is estimated to reduce HBW VMT impact by 7.2%. Table 9 shows the updated HBW VMT per employee and updated significance findings with the inclusion of the aforementioned reductions.

TABLE 9: UPDATED VMT ESTIMATES WITH VMT REDUCTION MEASURES

	Baseline
Unmitigated Project HBW VMT	6,541
Mitigated HBW VMT	471
Mitigated Project HBW VMT	6,070
Employees	279
Mitigated Project HBW VMT per Employee	21.8
City Threshold	22.0
Does Mitigated Project Exceed Threshold?	No

As shown in Table 9, the Project's estimated VMT per employee would fall below the County's VMT impact threshold with the implementation of the trip reduction measures described previously.

PROJECT'S CUMULATIVE EFFECT ON VMT

Table 10 presents total VMT calculated using the boundary method for the Project. Table 10 presents total VMT and VMT per service population estimates based on the boundary method for the County's boundary and a 10-mile sub-regional boundary.

TABLE 10: CUMULATIVE BOUNDARY VMT

	County Boundary		10-Mile Boundary	
Cumulative	No Project	With Project	No Project	With Project
Service Population[1]	3,761,191	3,761,470	984,954	985,233
Boundary VMT	94,743,867	94,725,486	27,633,649	27,602,097
VMT per Service Population	25.2	25.2	28.1	28.0
Change in VMT per Service Population	0.0		-0.1	

[1] Service population refers to population and employment

As presented above, boundary VMT per service population is estimated to not increase under With Project conditions.

SUMMARY

Based on the results of this analysis, the following findings are made:

- The Project was evaluated against screening criteria as outlined in the County Guidelines.
- The Project was not found to meet any applicable screening criteria and a VMT analysis was performed.
- Project-generated VMT estimates were calculated from SBTAM and compared to the County's adopted impact threshold of 4% below existing Countywide VMT per employee. Project-generated VMT per employee was found to be above the County's impact threshold.
- Urban Crossroads performed a review of potential VMT reduction strategies that would have the potential to reduce Project-generated VMT to below the County's adopted impact threshold. With proper implementation of the trip reductions strategies described previously in this analysis, Project-generated VMT is mitigated to be below the adopted impact threshold.
- The Project's cumulative effect on VMT was found to be unchanged or below the County's adopted impact threshold of no net increase in VMT per service population under With Project conditions, which is below the adopted impact threshold.

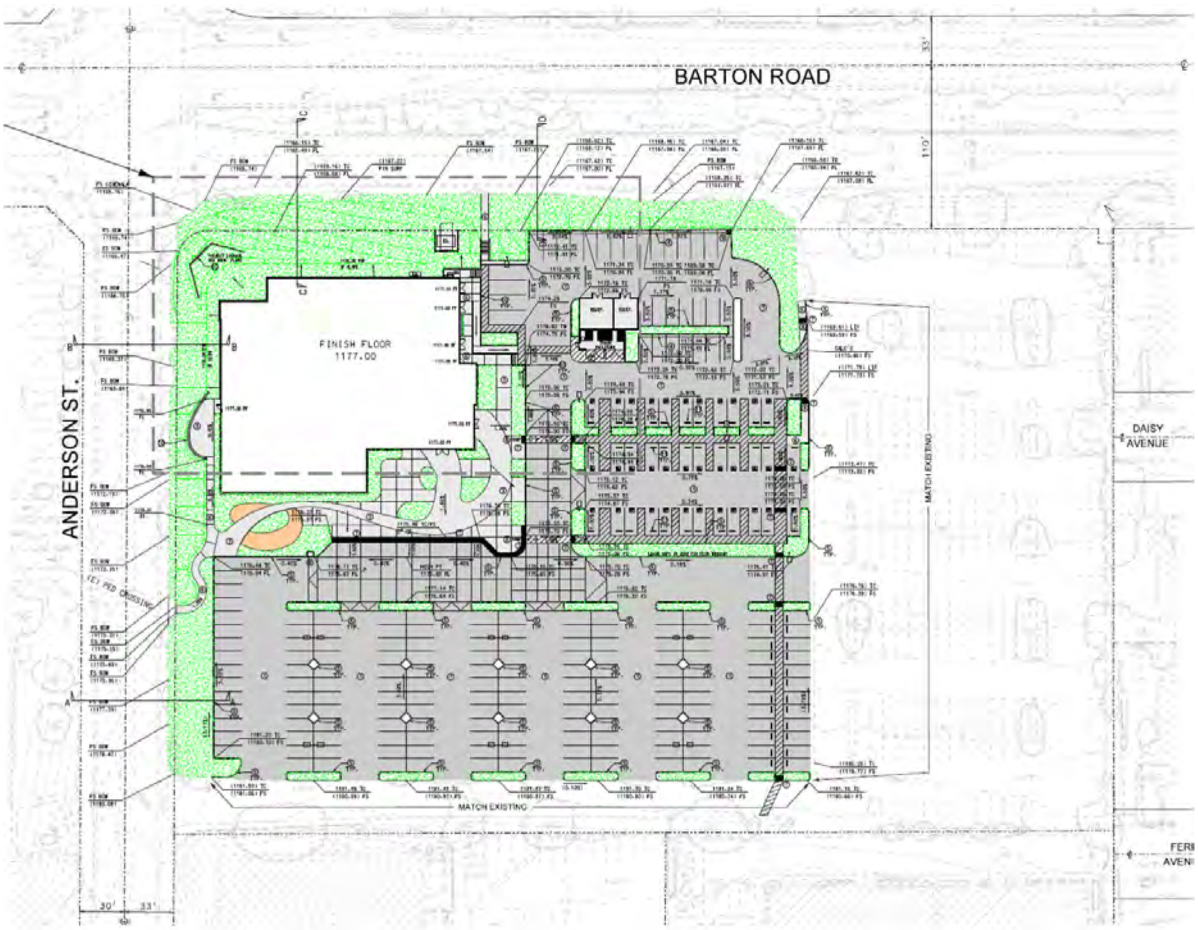
If you have any questions, please contact me directly at aso@urbanxroads.com.

REFERENCES

1. **San Bernardino County.** *Transportation Impact Study Guidelines.* July 2019.
2. **CAPCOA.** *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity.* December 2021.

ATTACHMENT A

PROJECT SITE PLAN


BARTON ROAD
ANDERSON ST.
FINISH FLOOR
1177.00
DAISY
AVENUE
MATCH EXISTING
MATCH EXISTING

ATTACHMENT B

SBTAM OUTPUTS

TABLE B-1: SBTAM 2019 & 2050 OUTPUTS

	2019	2050
TAZ	53817102	53817102
HBW VMT From	0	0
HBW VMT To	6447.468055	7029.25999
HBW VMT Intra	0	0
HBW VT From	0	0
HBW VT To	432.075709	447.330025
HBW VT Intra	0	0
HBW TripLen From	0	0
HBW TripLen To	14.922079	15.713812
HBW TripLen Intra	0	0
HBW TripLen All	14.922079	15.713812
HB VMT From	0	0
HB VMT To	9570.111507	9882.627135
HB VMT Intra	0	0
HB VT From	0	0
HB VT To	848.900571	823.589705
HB VT Intra	0	0
HB TripLen From	0	0
HB TripLen To	11.273536	11.999454
HB TripLen Intra	0	0
HB TripLen All	11.273536	11.999454
NHB VMT From	1926.375933	2007.905682
NHB VMT To	2697.697902	2826.549423
NHB VMT Intra	2.321974	1.980786
NHB VT From	351.375972	357.033208
NHB VT To	394.744128	404.295919
NHB VT Intra	4.028302	3.436388
NHB TripLen From	5.482378	5.623863
NHB TripLen To	6.834042	6.991289
NHB TripLen Intra	0.576415	0.576415
NHB TripLen All	6.228006	6.376198

APPENDIX G

LLUMC RIDESHARING PROGRAM

LOMA LINDA UNIVERSITY
HEALTH

LLUH Rideshare Program Regulations

For this document, the term LLUH means any entity within the Loma Linda Organization. This includes but is not limited to Loma Linda University, Loma Linda Medical Center, Loma Linda University Children's Hospital, Loma Linda University Health Care, Loma Linda University Behavioral Medicine Center, Loma Linda University Shared Services, Loma Linda Adventist Health Center, Faculty Physicians and Surgeons of LLU School of Medicine and the General Conference of SDA. It is the responsibility of the LLUSS / Rideshare, Parking & Traffic Services Department to administer the LLUH Rideshare Program benefits to qualified participants and to monitor all documents for accuracy.

The Rideshare Regulations are established in compliance with Federal & State guidelines as established under the EPA (Environmental Protection Agency) 2002 - Clean Air Act, the California Air Resources Board and the SCAQMD (South Coast Air Quality Management District) Rule 2202 – Employer Emissions Reduction Plan & The on-Road Motor Vehicle Mitigation Plan. LLUH is committed to the reduction of greenhouse gases and vehicle emissions produced by the employees of LLUH during their commutes to and from work as well as the reduction of emissions for the organizations fleet owned vehicles.

Rideshare benefits are fully taxable under IRS (Internal Revenue Service) Codes and will be reported on monthly and/or quarterly basis as benefits are issued to each eligible employee. However, participation in some programs may allow employees to pay for work related transportation with pretax dollars; each employee will be advised of the status of their benefit at the time of registration.

Individual entities of LLUH may choose to enact or fund additional programs above the minimum standard established for the organization. It is the policy of LLUH to comply with all Federal, State and Municipal regulations as established by the above noted agencies.

Terms & Definitions

- **AVR** – Is the Average Vehicle Ridership. This is an adjusted number that is calculated on the Annual Employee Commuter Survey. Adjustments are calculated by ITS based upon the survey results.

- **Bicyclist (Bike)** – A Bicyclist is defined as any individual whose primary means of transportation from their place of residence to their workplace is by means of a bicycle. Any individual who drives a vehicle to a proximity and then bikes the last part of the commute is not classified as a bicyclist.

- **Bus / Transit Rider** – A Bus/Transit rider is defined as any individual whose primary means of transportation from their place of residence to their workplace is by means of public transportation. This includes any employee that drives a vehicle to a common point such as a park and ride facility and transfers to public transportation for the remainder of the trip. The final leg of the trip must be at least three miles in one direction.

- **Carpool** – A Carpool is defined as any vehicle occupied by two - six individuals that originates at a specific location and travels to a single point for the purpose of employment and/or job-related travel.

- **EPA** – The EPA (Environmental Protection Agency) is the lead federal agency that establishes air quality standards, vehicle emissions standards and approves federal grants for alternative fuel source use.

- **ETC** – Employee Transportation Coordinator is an employee of LLUSS / Rideshare, Parking & Traffic Services, whose primary job description is to coordinate employee transportation services, administrate the employee benefit programs, coordinate rideshare partnerships, employee transit partnerships, vanpool partnerships and distribute information and assist in the education of employees for the benefits of ridesharing. ETC will attend SCAQMD and IE Commuter meetings and training sessions, and work with LLUH administration to improve AVR totals and reduce greenhouse emissions.

- **Guaranteed Ride Home** – This is a twice-yearly benefit that is available to all Rideshare members for the purpose of getting home due to an emergency.

- **IE Commuter** – IE Commuter is a joint agency that receives funding from LA Metro, Orange County Transportation Authority, Riverside Transportation Authority, and the San Bernardino County Transportation Authority. This agency offers funding incentives to establish Company Vanpool Programs and first time rideshare participants.

- **IRS** – The Internal Revenue Service oversees all federal tax codes that establish the tax status on all income and benefits related to the LLUH Rideshare Program. All Rideshare Program Benefits are taxable income. Rideshare program participants will receive notification of the tax status of their program benefits.

- **Parking Only** – Parking Only is a Rideshare benefit defined as preferred carpool parking for employees that reside in the same household and carpool and are otherwise ineligible to receive the monetary benefits.

- **Point of Destination** – Is defined as any vehicle where occupants arrive at a common location for the purpose of employment and/or job-related travel. A point of destination can be any single building, or multiple buildings/locations operated by a common organization where buildings are conjoined and/or separated by public roads up to one mile in distance.

- **SCAQMD** – (South Coast Air Quality Management District) is the lead governmental agency that oversees State regulations relating to employers located in the Zone II Emissions Area. The SCAQMD regulates and enforces all standards and issues grants to qualifying organizations for the implementation of alternate fuel systems. They are responsible for auditing the company's records and documents for compliance under the law.

- **Vanpool** – A Vanpool is defined as any group of commuters who meet at a common point or location and travel to a single destination for the purpose of employment and/or job-related travel as established in these definitions.

- **Walker** – A Walker is defined as any individual whose primary means of transportation from their place of residence to their workplace is by means of walking. Any
individual who drives a vehicle to a proximity and then walks the last part of the commute is not classified as a Walker.

Rideshare Membership

Membership in the LLUH Rideshare Program, and the resulting incentives is limited to full-time and part-time benefited employees of Loma Linda University, Loma Linda Medical Center, Loma Linda University Children's Hospital, Loma Linda University Health Care, Loma Linda University Behavioral Medicine Center, Loma Linda University Shared Services, Loma Linda Adventist Health Center, Faculty Physicians and Surgeons of LLU School of Medicine and the General Conference of SDA.

Employees assigned to an 8, 8.5, 9, or 10-hour shift must carpool, ride a bike, walk to work, or ride the bus a minimum of three workdays per week. Employees assigned to a 12-hour shift must carpool, ride a bike, walk to work, or ride the bus a minimum of two workdays per week.

The Carpool program is defined as two to six individuals riding to and from work in the same vehicle; participants may not reside at the same residence. Participants must log their carpool days in the LLUH Find-A-Ride website to qualify for carpool benefits.

Carpool participants who are authorized to park in designated carpool parking areas may do so on the days they carpool only. They must also be registered in the Online Parking System and in good standing.

Rideshare Incentives will be subject to applicable taxes and will be processed by the Department of Rideshare, Parking & Traffic, by the ETC staff and submitted to the Payroll Department, as necessary. If loggings are not submitted for 6 months (2 quarters) participants will be dropped from the Rideshare Program and any accrued benefits will be forfeited.

LLUH reserves the right to modify or discontinue the terms, conditions, and incentives for the Rideshare program at any time.

Rideshare Benefits

LLUH Benefits

For this document, the term LLUH means any entity within the Loma Linda Organization. This includes but is not limited to Loma Linda University, Loma Linda Medical Center, Loma Linda University Children's Hospital, Loma Linda University Health Care, Loma Linda University Behavioral Medicine Center, Loma Linda University Shared Services, Loma Linda Adventist Health Center, Faculty Physicians and Surgeons of LLU School of Medicine and the General Conference of SDA.

- **Bicyclists**
    - Any Rideshare Member that rides their bicycle to and from work is eligible for a $60-dollar quarterly bonus or a $20 dollar gift card. The bonus will be added to the employee's paycheck if all requirements of membership are completed. Members can only receive one or the other incentive.
        - ♣ Employees assigned to an 8, 8.5, 9 or 10-hour shift must ride a bike a minimum of three workdays per week. Employees assigned to a 12-hour shift must ride a bike a minimum of two workdays per week.
- **Bus / Transit**
    - Any Rideshare Member that rides public transportation to and from work is eligible for a $25 dollar a month subsidy from LLUH. Qualifying members may purchase monthly transit passes from the Department of Rideshare, Parking & Traffic. Bus passes must be purchased using cash, check and/or credit card to qualified

members less the subsidy amount.

- ♣ Employees assigned to an 8, 8.5, 9 or10 hour shift must ride a bus a minimum of three workdays per week. Employees assigned to a 12-hour shift must ride a bus a minimum of two workdays per week.

- **Carpool**
  - Any Rideshare Member that participates in a qualified carpool team to and from work is eligible for ten gallons worth of gas coupons per month or a $25 gift card. Members can only receive one or the other incentive.
    - ♣ Employees assigned to an 8, 8.5, 9 or 10-hour shift must rideshare a minimum of three workdays per week. Employees assigned to a 12-hour shift must rideshare a minimum of two workdays per week.

- **Vanpool**
  - Any Rideshare Member enrolled in the LLUH Vanpool program is eligible for the following benefits:
    - ♣ A $50 dollar a month subsidy paid directly to the Vanpool. Authorized agent.
    - ♣ Pre-Tax payroll deductions to pay the members share of Vanpool expenses; said payments will be made directly to Vanpool authorized agent by LLUH.
  - All needed documents will be completed by ETC staff members.

- **Walker**
  - Any Rideshare Member that walks to and from work is eligible for a $60-dollar quarterly bonus or a $20 gift card. The bonus will be added to the employee's paycheck if all requirements of membership are completed. Members can only receive one or the other incentive.
    - ♣ Employees assigned to an 8, 8.5, 9, or 10-hour shift must ride a bike a minimum of three workdays per week. Employees assigned to a 12-hour shift must ride a bike a minimum of two workdays per week.

Quarterly Rideshare Raffles

- All participating members of the rideshare program will be entered into our Quarterly raffles. The Rideshare Raffles are conducted for each quarter of the year. Please see the attached for quarterly raffle details.

LLUH Benefit Limitations

- **New Rideshare Members** – New members that sign up for the Rideshare Program will be participate in the IE Commuter Incentive Program; benefits for the first three months will be paid by IE Commuter. After the first three months the employee will be switched to the LLUH Rideshare Program and benefits will be administered and distributed by the Department of Rideshare, Parking & Traffic. This limitation applies to all levels of registration except for Vanpool members.

Please note benefits will only be awarded if member meets the minimum requirements of the program.

APPENDIX H

MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MONITORING and REPORTING PROGRAM

Project Case No's: PPD no. P23-180

Applicant: Loma Linda University Medical Center (LLUMC) **Project Name**: Pediatric Medical Office Building

Lead Agency: City of Loma Linda **Date:** December 5, 2024

Mitigation Measures No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date /Initials
Cultural Resources					
Mitigation Measure CUL-1: If cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease until a qualified archaeologist meeting Secretary of Interior standards is hired to assess the find and resources are recovered and/or recorded. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, in order to provide Tribal input with regards to potential significance and treatment..	Applicant/ Contractor; City of Loma Linda Community Development Department, and Qualified Archaeologist	In the event cultural resources are discovered	Review of finds	On-site inspection	
Mitigation Measure CUL-2: If significant pre-contact cultural resources, as defined by CEQA, are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan and any resources collected shall be curated with an appropriate reposition. This plan shall be provided to Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) in its draft form for review and comment. The archaeologist shall monitor the remainder of the project and implement the Monitoring and Treatment Plan accordingly. A final report shall be filed with the City Planner documenting any archaeological resources found and their disposition	Qualified Archaeologist	If avoidance to cultural resources cannot be ensured	Receipt of Monitoring and Treatment Plan	Review of plan	

Mitigation Measures No. / Implementing Action	Responsible for Monitoring	Monitoring Frequency	Timing of Verification	Method of Verification	Verified Date /Initials
Mitigation Measure CUL-3: If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project. . A report shall be filed with the City Planner documenting any human remains or funerary objects found and their disposition	Applicant/ Contractor; City of Loma Linda Community Development Department, and County Coroner	In the event human remains or funerary objects are found	Following inspection by the County Coroner	On-site inspection	
Transportation					
Mitigation Measure TRA-1 Commute Trip Reduction (CTR) Marketing Program The Project shall formulate a marketing strategy to promote and educate employees about their travel to work choices beyond driving, such as carpooling, taking transit, walking, and biking in order to reduce VMT. The project proponent is encouraged to integrate the MOB CTR program, to the extent practical, with any similar program that may exist for the LLUMC as a whole. The Project CTR program shall be submitted to the City Planner for approval prior to the issuance of Occupancy Permits. The following features (or similar alternatives) have been found to be critical to CTR program effectiveness: • On-site or online commuter information services. • Employee transportation coordinators • On-site or online transit pass sales. • Guaranteed ride home service.	City of Loma Linda Community Development Department	Upon receipt of Draft CTR Marketing Program from applicant	Prior to the issuance of Occupancy Permits	Review of CTR Marketing Program	
Mitigation Measure TRA – 2 End-of-Trip Bicycle Facilities The proposed Project shall install and maintain end-of-trip bicycle facilities on-site for employee use. End-of-trip facilities may include bike parking, bike lockers, showers, and personal lockers	City of Loma Linda Community Development Department	Upon receipt of final project building plans	Prior to the issuance of Occupancy Permits		