
APPENDIX A

AIR QUALITY, GREENHOUSE GAS, AND ENERGY IMPACT STUDY

913 California Street

Air Quality, Greenhouse Gas, and Energy Impact Study

City of Redlands, CA

Prepared for:

JD Fuel, Inc.

Mr. Chandresh Ravaliya
2640 Camino Del Sol
Fullerton, CA 92833

Prepared by:

MD Acoustics, LLC

Tyler Klassen, EIT
1197 Los Angeles Ave, Ste C-256
Simi Valley, CA 93065

Date: 2/17/2025



Noise Study Reports | Vibration Studies | Air Quality | Greenhouse Gas | Health Risk Assessments

P) AZ - 602.774.1950

P) CA - 805.426.4477

www.mdacoustics.com
info@mdacoustics.com

TABLE OF CONTENTS

1.0	Introduction	1
1.1	Purpose of Analysis and Study Objectives	1
1.2	Project Summary	1
1.2.1	Site Location	1
1.2.2	Project Description	1
1.2.3	Sensitive Receptors	1
1.3	Executive Summary of Findings and Mitigation Measures	2
2.0	Regulatory Framework and Background	6
2.1	Air Quality Regulatory Setting	6
2.1.1	National and State	6
2.1.2	South Coast Air Quality Management District	8
2.1.3	City of Redlands	11
2.2	Greenhouse Gas Regulatory Setting	12
2.2.1	International	12
2.2.2	National	13
2.2.3	California	15
2.2.4	South Coast Air Quality Management District	21
2.2.5	County of San Bernardino	23
2.2.5	City of Redlands	23
2.3	Energy Regulatory Setting	24
2.3.1	Federal Regulations	24
2.3.2	State Regulations	25
3.0	Setting	32
3.1	Existing Physical Setting	32
3.1.1	Local Climate and Meteorology	32
3.1.2	Local Air Quality	33
3.1.3	Attainment Status	36
3.2	Greenhouse Gases	37
3.3	Energy	39
3.3.1	Overview	39
3.3.2	Electricity and Natural Gas	41
3.3.3	Transportation Energy Resources	42
4.0	Modeling Parameters and Assumptions.....	44
4.1	Construction	44
4.2	Operations	45
4.3	Localized Construction Analysis	45
4.4	Localized Operational Analysis	47
5.0	Thresholds of Significance	48
5.1	Air Quality Thresholds of Significance	48

5.1.1	CEQA Guidelines for Air Quality	48
5.1.2	Regional Significance Thresholds for Construction Emissions	48
5.1.3	Regional Significance Thresholds for Operational Emissions	49
5.1.4	Thresholds for Localized Significance	49
5.2	Greenhouse Gas Thresholds of Significance	49
5.2.1	CEQA Guidelines for Greenhouse Gas	49
5.3	Toxic Air Contaminants	50
6.0	Air Quality Emissions Impact	51
6.1	Construction Air Quality Emissions Impact	51
6.1.1	Regional Construction Emissions	51
6.1.2	Localized Construction Emissions	52
6.1.3	Construction-Related Human Health Impacts	52
6.1.4	Construction-Related Toxic Air Contaminant Impact	52
6.2	Operational Air Quality Emissions Impact	53
6.2.1	Regional Operational Emissions	53
6.2.2	Localized Operational Emissions	54
6.2.3	Operations-Related Human Health Impacts	54
6.3	CO Hot Spot Emissions	55
6.4	Odors	55
6.5	Cumulative Regional Air Quality Impacts	56
6.6	Air Quality Compliance	56
7.0	Greenhouse Gas Impact Analysis.....	58
7.1	Construction Greenhouse Gas Emissions Impact	58
7.2	Operational Greenhouse Gas Emissions Impact	58
7.3	Greenhouse Gas Plan Consistency	59
7.4	Cumulative Regional Greenhouse Gas Impacts	59
8.0	Energy Analysis	60
8.1	Construction Energy Demand	60
8.1.1	Construction Equipment Electricity Usage Estimates	60
8.1.2	Construction Equipment Fuel Estimates	60
8.1.3	Construction Worker Fuel Estimates	61
8.1.4	Construction Vendor/Hauling Fuel Estimates	62
8.1.5	Construction Energy Efficiency/Conservation Measures	63
8.2	Operational Energy Demand	63
8.2.1	Transportation Fuel Consumption	63
8.2.2	Facility Energy Demands (Electricity and Natural Gas)	64
8.3	Renewable Energy and Energy Efficiency Plan Consistency	65
8.4	Cumulative Regional Energy Impacts	66
9.0	References	67

LIST OF APPENDICES

Appendix A:	
CalEEMod Emission Output	
Appendix B:	
EMFAC2017 Output	

LIST OF EXHIBITS

Exhibit A	4
Location Map	4
Exhibit B	5
Site Plan	5

LIST OF TABLES

Table 1: Land Use Summary.....	1
Table 2: Ambient Air Quality Standards	7
Table 3: Meteorological Summary.....	33
Table 4: Local Area Air Quality Levels from Local Monitoring Stations.....	34
Table 5: South Coast Air Basin Attainment Status.....	36
Table 6: Description of Greenhouse Gases.....	38
Table 7: Total Electricity System Power (California 2019).....	40
Table 8: SCE 2019 Power Content Mix	41
Table 9: Construction Equipment Assumptions ¹	46
Table 10: Regional Significance - Construction Emissions (pounds/day)	51
Table 11: Localized Significance – Construction	52
Table 12: Regional Significance - Unmitigated Operational Emissions (lbs/day)	53
Table 13: Localized Significance - Unmitigated Operational Emissions	54
Table 14: Construction Greenhouse Gas Emissions	58
Table 15: Opening Year Unmitigated Project-Related Greenhouse Gas Emissions	58
Table 16: Project Construction Power Cost and Electricity Usage	60
Table 17: Construction Equipment Fuel Consumption Estimates	61
Table 18: Construction Worker Fuel Consumption Estimates	62
Table 19: Construction Vendor Fuel Consumption Estimates (MHD Trucks) ¹	62
Table 20: Construction Hauling Fuel Consumption Estimates (HHD Trucks) ¹	63

Table 21: Estimated Vehicle Operations Fuel Consumption	64
Table 22: Project Unmitigated Annual Operational Energy Demand Summary ¹	65

GLOSSARY OF TERMS

AQMP	Air Quality Management Plan
CAAQS	California Ambient Air Quality Standards
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CFCs	Chlorofluorocarbons
CH ₄	Methane
CNG	Compressed natural gas
CO	Carbon monoxide
CO ₂	Carbon dioxide
CO ₂ e	Carbon dioxide equivalent
DPM	Diesel particulate matter
GHG	Greenhouse gas
HFCs	Hydrofluorocarbons
LST	Localized Significant Thresholds
MTCO ₂ e	Metric tons of carbon dioxide equivalent
MMTCO ₂ e	Million metric tons of carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen Oxides
NO ₂	Nitrogen dioxide
N ₂ O	Nitrous oxide
O ₃	Ozone
PFCs	Perfluorocarbons
PM	Particle matter
PM ₁₀	Particles that are less than 10 micrometers in diameter
PM _{2.5}	Particles that are less than 2.5 micrometers in diameter
PMI	Point of maximum impact
PPM	Parts per million
PPB	Parts per billion
RTIP	Regional Transportation Improvement Plan
RTP	Regional Transportation Plan
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SF ₆	Sulfur hexafluoride
SIP	State Implementation Plan
SO _x	Sulfur Oxides
SRA	Source/Receptor Area
TAC	Toxic air contaminants
VOC	Volatile organic compounds
WRCC	Western Regional Climate Center

1.0 Introduction

1.1 Purpose of Analysis and Study Objectives

This air quality and greenhouse gas (GHG) analysis was prepared to evaluate whether the estimated criteria pollutants and GHG emissions generated from the Project would cause a significant impact to the air resources in the Project area as well as evaluate whether the estimated energy usage by the project would cause a significant impact to the local energy resources. This assessment was conducted within the context of the California Environmental Quality Act (CEQA, California Public Resources Code Sections 21000, et seq.). The assessment is consistent with the methodology and emission factors endorsed by South Coast Air Quality Management District (SCAQMD), California Air Resource Board (CARB), and the United States Environmental Protection Agency (US EPA).

1.2 Project Summary

1.2.1 Site Location

The project site is located at the SWC of I-10 and California Street in the City of Redlands, CA (APN: 0631-032-04), as shown in Exhibit A. The site is currently zoned as General Commercial. The land directly surrounding the site to the north and east is zoned as Commercial General, and residential to the southwest. California Street borders the site to the east. An aerial of the project site is shown in Exhibit A.

1.2.2 Project Description

The proposed project comprises a 3,588 sq ft car wash, 1,450 coffee shop with Drive-Thru, and a 90-room hotel on approximately 5 acres. The site plan is illustrated in Exhibit B.

Construction activities within the Project area will consist of site preparation, grading, building construction, paving, and architectural coating. Table 1 summarizes the land use description for the Project Site.

Table 1: Land Use Summary

Land Use	Unit Amount	Size Metric
Hotel	90	Rooms
Automobile Care Center	3.588	Thousand Square Feet
Fast Food Restaurant with Drive Thru	1.450	Thousand Square Feet
Parking Lot	1.31	Acres

1.2.3 Sensitive Receptors

Sensitive receptors are considered land uses or other types of population groups that are more sensitive to air pollution than others due to their exposure. Sensitive population groups include children, the elderly, the acutely and chronically ill, and those with cardio-respiratory diseases. For CEQA purposes, a

sensitive receptor would be a location where a sensitive individual could remain for 24-hours or longer, such as residences, hospitals, and schools (etc).

The closest existing sensitive receptors (to the site area) are residential land uses located 165 feet to the southwest of the project site.

1.3 Executive Summary of Findings and Mitigation Measures

The following is a summary of the analysis results:

Construction-Source Emissions

Project construction-source emissions would not exceed applicable regional thresholds of significance established by the SCAQMD. For localized emissions, the Project will not exceed applicable Localized Significance Thresholds (LSTs) established by the SCAQMD.

Project construction-source emissions would not conflict with the Basin Air Quality Management Plan (AQMP). As discussed herein, the Project will comply with all applicable SCAQMD construction-source emission reduction rules and guidelines. Project construction source emissions would not cause or substantively contribute to violation of the California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS).

Established requirements addressing construction equipment operations, and construction material use, storage, and disposal requirements act to minimize odor impacts that may result from construction activities. Moreover, construction-source odor emissions would be temporary, short-term, and intermittent in nature and would not result in persistent impacts that would affect substantial numbers of people. Potential construction-source odor impacts are therefore considered less-than-significant.

Operational-Source Emissions

The Project operational-sourced emissions would not exceed applicable regional thresholds of significance established by the SCAQMD. Project operational-source emissions would not result in or cause a significant localized air quality impact as discussed in the Operations-Related Local Air Quality Impacts section of this report. Additionally, Project-related traffic will not cause or result in carbon dioxide (CO) concentrations exceeding applicable state and/or federal standards (CO “hotspots”). Project operational-source emissions would therefore not adversely affect sensitive receptors within the vicinity of the Project.

Project operational-source emissions would not conflict with the Basin Air Quality Management Plan (AQMP). The Project’s emissions meet SCAQMD regional thresholds and will not result in a significant cumulative impact. The Project does not propose any such uses or activities that would result in potentially significant operational-source odor impacts. Potential operational-source odor impacts are therefore considered less-than-significant.

Project-related GHG emissions meet the San Bernardino County and SCAQMD draft threshold. Therefore, Project emissions are considered to be less than significant. The Project also complies with the goals of the CARB Scoping Plan, Assembly Bill (AB) 32, Senate Bill (SB) 32, County of San Bernardino

Greenhouse Gas Emissions Reduction Plan, the County of San Bernardino Climate Action Plan, and City of Redlands Climate Action Plan.

Neither construction nor operation of the project would result in wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources. The proposed project does not include any unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities and is an industrial project that is not proposing any additional features that would require a larger energy demand than other industrial projects of similar scale and configuration

Mitigation Measures

3. Construction Measures

No construction mitigation required.

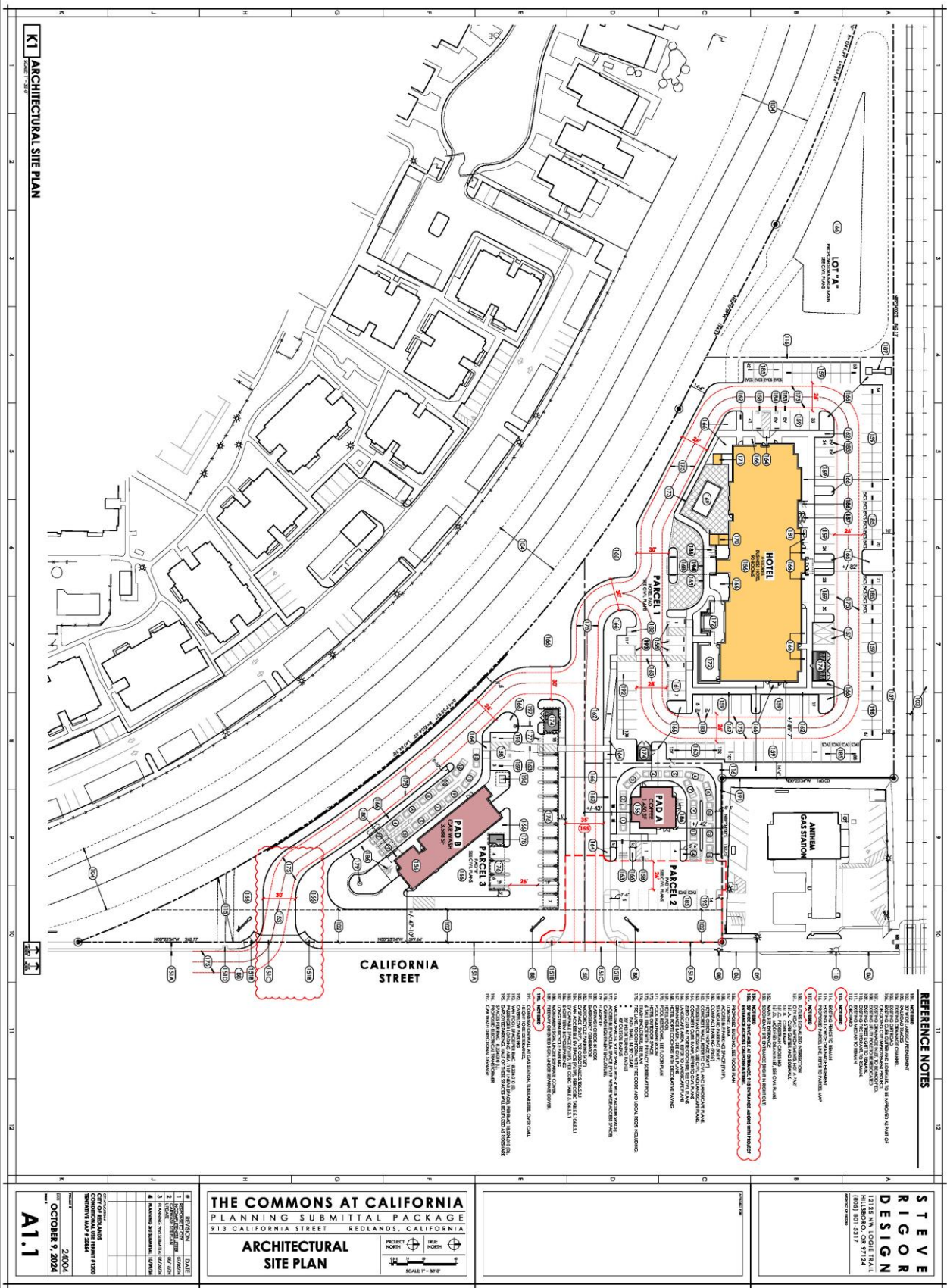
B. Operational Measures

No operational mitigation required.

Exhibit A Location Map



Exhibit B
Site Plan



2.0 Regulatory Framework and Background

2.1 Air Quality Regulatory Setting

Air pollutants are regulated at the national, state, and air basin level; each agency has a different level of regulatory responsibility. The United States EPA regulates at the national level. CARB regulates at the state level. SCAQMD regulates at the air basin level.

2.1.1 National and State

The EPA is responsible for global, international, and interstate air pollution issues and policies. The EPA sets national vehicle and stationary source emission standards, oversees approval of all State Implementation Plans, provides research and guidance for air pollution programs, and sets National Air Quality Standards, also known as federal standards. There are six common air pollutants, called criteria pollutants, which were identified from the provisions of the Clean Air Act of 1970.

- Ozone
- Nitrogen Dioxide
- Lead
- Particulate Matter (PM10 and PM2.5)
- Carbon Monoxide
- Particulate Matter
- Sulfur Dioxide

The federal standards were set to protect public health, including that of sensitive individuals; thus, the standards continue to change as more medical research is available regarding the health effects of the criteria pollutants. Primary federal standards are the levels of air quality necessary, with an adequate margin of safety, to protect the public health.

A State Implementation Plan is a document prepared by each state describing existing air quality conditions and measures that will be followed to attain and maintain federal standards. The State Implementation Plan for the State of California is administered by CARB, which has overall responsibility for statewide air quality maintenance and air pollution prevention. California's State Implementation Plan incorporates individual federal attainment plans for regional air districts—air district prepares their federal attainment plan, which sent to CARB to be approved and incorporated into the California State Implementation Plan. Federal attainment plans include the technical foundation for understanding air quality (e.g., emission inventories and air quality monitoring), control measures and strategies, and enforcement mechanisms. See <http://www.arb.ca.gov/research/aqs/aqs.htm> for additional information on criteria pollutants and air quality standards.

The federal and state ambient air quality standards are summarized in Table 2 and can also be found at https://ww2.arb.ca.gov/sites/default/files/2024-08/AAQS%20Table_ADA_FINAL_07222024.pdf.

Table 2: Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ¹		National Standards ²		
		Concentrations ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Ozone (O3)	1-Hour	0.09 ppm	Ultraviolet Photometry	--	Same as Primary Standard	Ultraviolet Photometry
	8-Hour	0.070 ppm		0.070 ppm (147 µg/m³)		
Respirable Particulate Matter (PM10) ⁸	24-Hour	50 µg/m³	Gravimetric or Beta Attenuation	150 µ/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m³		--		
Fine Particulate Matter (PM2.5) ⁸	24-Hour	--	--	35 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m³	Gravimetric or Beta Attenuation	9.0 µg/m³	15 µg/m³	
Carbon Monoxide (CO)	1-Hour	20 ppm (23 µg/m³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 µg/m³)	--	Non-Dispersive Infrared Photometry (NDIR)
	8-Hour	9.0 ppm (10 µg/m³)		9 ppm (10 µg/m³)	--	
Nitrogen Dioxide (NO ₂) ⁹	1-Hour	0.18 ppm (339 µg/m³)	Gas Phase Chemiluminescence	100 ppb (188 µg/m³)	--	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (357 µg/m³)		0.053 ppm (100 µg/m³)	Same as Primary Standard	
Sulfur Dioxide (SO ₂) ¹⁰	1-Hour	0.25 ppm (655 µg/m³)	Ultraviolet Fluorescence	75 ppb (196 µg/m³)	--	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3-Hour	--		--	0.5 ppm (1300 mg/m³)	
	24-Hour	0.04 ppm (105 µg/m³)		0.14 ppm (for certain areas) ¹⁰	--	
	Annual Arithmetic Mean	--		0.130ppm (for certain areas) ¹⁰	--	
Lead ^{11,12}	30 Day Average	1.5 µg/m³	Atomic Absorption	--	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Calendar Qtr	--		1.5 µg/m³ (for certain areas) ¹²		
	Rolling 3-Month Average	--		0.15 µg/m³		
Visibility Reducing Particles ¹³	8-Hour	See footnote 13	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24-Hour	25 µg/m³	Ion Chromatography			
Hydrogen Sulfide	1-Hour	0.03 ppm (42 µg/m³)	Ultraviolet Fluorescence			
Vinyl Chloride ¹¹	24-Hour	0.01 ppm (26 µg/m³)	Gas Chromatography			

Notes:

- California standards for ozone, carbon monoxide, sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM₁₀, PM_{2.5}, 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.
- 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/m³ is equal to or less than one. For PM_{2.5}, 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.
- 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.
- Any equivalent measurement method which can be shown to the satisfaction of CARB to give equivalent results at or near the level of the air quality standard may be used.
- National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

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.

7. On February 7, 2024, the national annual PM_{2.5} primary standard was lowered from 12 µg/m³ to 9.0 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
8. 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.
9. On June 2, 2010, a new 1-hour SO₂ 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 SO₂ 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.
10. 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.
11. The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ 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.
12. In 1989, CARB converted the general statewide 10-mile visibility standard to an instrumental equivalent of “extinction of 0.23 per kilometer.”

Several pollutants listed in Table 2 are not addressed in this analysis. Analysis of lead is not included in this report because the Project is not anticipated to emit lead. Visibility-reducing particles are not explicitly addressed in this analysis because particulate matter is addressed. The Project is not expected to generate or be exposed to vinyl chloride because proposed Project uses do not utilize the chemical processes that create this pollutant and there are no such uses in the Project vicinity. The proposed Project is not expected to cause exposure to hydrogen sulfide because it would not generate hydrogen sulfide in any substantial quantity.

2.1.2 South Coast Air Quality Management District

The agency for air pollution control for the South Coast Air Basin (basin) is SCAQMD. SCAQMD is responsible for controlling emissions primarily from stationary sources. SCAQMD maintains air quality monitoring stations throughout the basin. SCAQMD, in coordination with the Southern California Association of Governments, is also responsible for developing, updating, and implementing the Air Quality Management Plan (AQMP) for the basin. An AQMP is a plan prepared and implemented by an air pollution district for a county or region designated as nonattainment of the federal and/or California ambient air quality standards. The term nonattainment area is used to refer to an air basin where one or more ambient air quality standards are exceeded.

Every three (3) years the SCAQMD prepares a new AQMP, updating the previous plan and having a 20-year horizon.

On March 23, 2017, CARB approved the 2016 AQMP. The 2016 AQMP is a regional blueprint for achieving the federal air quality standards and healthful air.

The 2016 AQMP includes both stationary and mobile source strategies to ensure that rapidly approaching attainment deadlines are met, that public health is protected to the maximum extent feasible, and that the region is not faced with burdensome sanctions if the Plan is not approved or if the NAAQS are not met on time. As with every AQMP, a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures is updated with the latest data and methods. The most significant air quality challenge in the Basin is to reduce nitrogen oxide (Nox) emissions sufficiently to meet the upcoming ozone standard deadlines. The primary goal of the 2016 AQMP is to meet clean air standards and protect public health, including ensuring benefits to environmental justice and disadvantaged communities. Now that the plan has been approved by CARB, it has been forwarded to the U.S. Environmental Protection Agency for its review. If approved by EPA, the plan becomes federally enforceable.

South Coast AQMD adopted the 2022 AQMP on December 2, 2022, to address the attainment of the 2015 8-hour ozone standard (70 ppb) for South Coast Air Basin and Coachella Valley. To meet this standard, the AQMP determined NOx emissions must be reduced by 67% percent more than is required by adopted rules and regulations by 2037. The control strategy for the 2022 AQMP includes aggressive new regulations and the development of incentive programs to support early deployment of advanced technologies. The two key areas for incentive programs are (1) promoting widespread deployment of available zero-emission (ZE) and low NOx technologies and (2) developing new ZE and ultra-low NOx technologies for use in cases where the technology is not currently available. South Coast AQMD will prioritize distribution of incentive funding in environmental justice areas and seek opportunities to focus benefits on the most disadvantaged communities. Cost-effectiveness and affordability will be further considered during the rulemaking or incentive program development process.

South Coast Air Quality Management District Rules

The AQMP for the basin establishes a program of rules and regulations administered by SCAQMD to obtain attainment of the state and federal standards. Some of the rules and regulations that apply to this Project include, but are not limited to, the following:

SCAQMD Rule 402 prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

SCAQMD Rule 403 governs emissions of fugitive dust during construction and operation activities. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Applicable suppression techniques are indicated below and include but are not limited to the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas in active for 10 days or more).
- Water active sites in sufficient quantity to prevent generation of dust plumes.
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet of freeboard in accordance with the requirements of California Vehicle Code (CVC) section 23114.
- Pave construction access roads at least 100 feet onto the site from the main road.
- Water unpaved roads at least once every 2 hours of active operations
- Reduce traffic speeds on all unpaved roads to 15 mph or less.
- Suspension of all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.
- Bumper strips or similar best management practices shall be provided where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Replanting disturbed areas as soon as practical.
- During all construction activities, construction contractors shall sweep on-site and off-site streets if silt is carried to adjacent public thoroughfares, to reduce the amount of particulate matter on public streets.

SCAQMD Rule 481 governs all spray painting and spray coating operations and equipment. Compliance with this rule is achieved through compliance with one of the following conditions:

- The spray coating equipment is operated inside a control enclosure which is approved by the Executive Officer. Any control enclosure for which an application for permit for new construction, alteration, or change of ownership or location is submitted after the date of adoption of this rule shall be exhausted only through filters at a design face velocity not less than 100 feet per minute nor greater than 300 feet per minute, or through a water wash system designed to be equally effective for the purpose of air pollution control.
- Coatings are applied with HVLP, electrostatic and/or airless spray equipment.
- An alternative method of coating application or control is used which has an effectiveness equal to or greater than the equipment specified above.

SCAQMD Rule 1113 governs the sale, use, and manufacturing of architectural coating and limits the VOC content in paints and paint solvents. This rule regulates the VOC content of paints available during construction. Therefore, all paints and solvents used during construction and operation of Project must comply with Rule 1113.

Idling Diesel Vehicle Trucks – Idling for more than 5 minutes in any one location is prohibited within California borders.

Rule 2702. The SCAQMD adopted Rule 2702 on February 6, 2009, which establishes a voluntary air quality investment program from which SCAQMD can collect funds from parties that desire certified GHG emission reductions, pool those funds, and use them to purchase or fund GHG emission reduction projects within two years, unless extended by the Governing Board. Priority will be given to projects that result in co-benefit emission reductions of GHG emissions and criteria or toxic air pollutants within environmental justice areas. Further, this voluntary program may compete with the cap-and-trade program identified for implementation in CARB’s Scoping Plan, or a Federal cap and trade program.

2.1.3 City of Redlands

City of Redlands General Plan

The City of Redlands General Plan contains the following air quality related policies and programs that are applicable to the proposed project:

Principles

- 7-P.44 Protect air quality within the city and support efforts for enhanced regional air quality
- 7-P.45 Aim for a diverse and efficiently operated ground transportation system that generates the minimum amount of pollutants feasible.
- 7-P.46 Increase average vehicle ridership during peak commute hours as a way of reducing vehicle miles traveled and peak period auto travel.
- 7-P.47 Cooperate in efforts to expand bus, rail, and other forms of mass transit in the portion of the South Coast Air Basin within San Bernardino County.
- 7-P.48 Involve environmental groups, the business community, and the general public in the formulation and implementation of programs that enhance air quality in the city and the region.
- 7-P.49 Protect sensitive receptors from exposure to hazardous concentrations of air pollutants.

Actions

- 7-A.144 To the extent practicable and feasible, maintain a system of air quality alerts (such as through the City website, internet, e-mail to City employees, and other tools) based on South Coast Air Quality Management District forecasts. Consider providing incentives to City employees to use alternative transportation modes during alert days.
- 7-A.145 Provide, whenever possible, incentives for carpooling, flex time, shortened work weeks, telecommuting, and other means of reducing vehicular miles traveled.

- 7-A.146 Promote expansion of all forms of mass transit to the urbanized portions of San Bernardino, Orange, Los Angeles, and Riverside counties. Support public transit providers in efforts to increase funding for transit improvements to supplement other means of travel.
- 7-A.147 Cooperate with the ongoing efforts of the U.S. Environmental Protection Agency, the South Coast Air Quality Management District, and the State of California Air Resources Board in improving air quality in the regional air basin.
- 7-A.148 Develop requirements for retrofitting existing residential buildings within the 500-foot AQMD buffer along the freeway to abate air pollution, and limitations on new residential developments within the buffer.
- 7-A.149 Ensure that construction and grading projects minimize short-term impacts to air quality:
- a. Require grading projects to provide a stormwater pollution prevention plan (SWPPP) in compliance with City requirements, which include standards for best management practices (BMPs) that control pollutants from dust generated by construction activities and those related to vehicle and equipment cleaning, fueling, and maintenance;
 - b. Require grading projects to undertake measures to minimize mono-nitrogen oxides (NO_x) emissions from vehicle and equipment operations; and
 - c. Monitor all construction to ensure that proper steps are implemented.
- 7-A.150 Establish and implement a Transportation Demand Management (TDM) Program.
- 7-A.152 Enforce regulations to prevent trucks from excessive idling in residential areas.
- 7-A.153 Require applicants for sensitive land uses (e.g., residences, schools, daycare centers, playgrounds, and medical facilities) to site development and/or incorporate design features (e.g., pollution prevention, pollution reduction, barriers, landscaping, ventilation systems, or other measures) to minimize the potential impacts of air pollution on sensitive receptors.
- 7-A.154 Require applicants for sensitive land uses within a Proposition 65 warning contour to conduct a health risk assessment and mitigate any health impacts to a less than significant level.

2.2 Greenhouse Gas Regulatory Setting

2.2.1 International

Many countries around the globe have made an effort to reduce GHGs since climate change is a global issue.

Intergovernmental Panel on Climate Change. In 1988, the United Nations and the World Meteorological Organization established the Intergovernmental Panel on Climate Change to assess the scientific, technical and socio-economic information relevant to understanding the scientific basis of risk of human-induced climate change, its potential impacts, and options for adaptation and mitigation.

United Nations. The United States participates in the United Nations Framework Convention on Climate Change (UNFCCC) (signed on March 21, 1994). Under the Convention, governments gather and share information on greenhouse gas emissions, national policies, and best practices; launch national strategies for addressing greenhouse gas 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.

The 2014 UN Climate Change Conference in Lima Peru provided a unique opportunity to engage all countries to assess how developed countries are implementing actions to reduce emissions.

Kyoto Protocol. The Kyoto Protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. It has been estimated that if the commitments outlined in the Kyoto Protocol are met, global GHG emissions could be reduced by an estimated 5 percent from 1990 levels during the first commitment period of 2008 – 2012 (UNFCCC 1997). On December 8, 2012, the Doha Amendment to the Kyoto Protocol was adopted. The amendment includes: New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 2013 – 2020; a revised list of greenhouse gases (GHG) to be reported on by Parties in the second commitment period; and Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

2.2.2 National

Greenhouse Gas Endangerment. On December 2, 2009, the EPA announced that GHGs threaten the public health and welfare of the American people. The EPA also states that GHG emissions from on-road vehicles contribute to that threat. The decision was based on *Massachusetts v. EPA* (Supreme Court Case 05-1120) which argued that GHGs are air pollutants covered by the Clean Air Act and that the EPA has authority to regulate those emissions.

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 United States. On April 1, 2010, the EPA and the Department of Transportation's National Highway Safety Administration announced a joint final rule establishing a national program that would reduce greenhouse gas emissions and improve fuel economy for new cars and trucks sold in the United States.

The first phase of the national program would apply to passenger cars, light-duty trucks, and medium-duty passenger vehicles, covering model years 2012 through 2016. They require these vehicles to meet an estimated combined average emissions level of 250 grams of carbon dioxide per mile, equivalent to

35.5 miles per gallon if the automobile industry were to meet this carbon dioxide level solely through fuel economy improvements. Together, these standards would cut carbon dioxide 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 second phase of the national program would involve proposing new fuel economy and greenhouse gas standards for model years 2017 – 2025 by September 1, 2011.

On October 25, 2010, the EPA and the U.S. Department of Transportation proposed the first national standards to reduce greenhouse gas emissions and improve fuel efficiency of heavy-duty trucks and buses. For combination tractors, the agencies are proposing engine and vehicle standards that begin in the 2014 model year and achieve up to a 20 percent reduction in carbon dioxide emissions and fuel consumption by the 2018 model year. For heavy-duty pickup trucks and vans, the agencies are proposing separate gasoline and diesel truck standards, which phase in starting in the 2014 model year and achieve up to a 10 percent reduction for gasoline vehicles and 15 percent reduction for diesel vehicles by 2018 model year (12 and 17 percent respectively if accounting for air conditioning leakage). Lastly, for vocational vehicles, the agencies are proposing engine and vehicle standards starting in the 2014 model year which would achieve up to a 10 percent reduction in fuel consumption and carbon dioxide emissions by 2018 model year.

Issued by the National Highway Traffic Safety Administration (NHTSA) and EPA in March 2020 (published on April 30, 2020, and effective after June 29, 2020), the Safer Affordable Fuel-Efficient Vehicles Rule would maintain the Corporate Average Fuel Economy (CAFÉ) and CO₂ standards applicable in model year 2020 for model years 2021 through 2026. The estimated CAFÉ and CO₂ standards for model year 2020 are 43.7 mpg and 204 grams of CO₂ per mile for passenger cars and 31.3 mpg and 284 grams of CO₂ per mile for light trucks, projecting an overall industry average of 37 mpg, as compared to 46.7 mpg under the standards issued in 2012. This Rule also excludes CO₂-equivalent emission improvements associated with air conditioning refrigerants and leakage (and, optionally, offsets for nitrous oxide and methane emissions) after model year 2020.¹

Mandatory Reporting of Greenhouse Gases. On January 1, 2010, the EPA started requiring large emitters of heat-trapping emissions to begin collecting GHG data under a new reporting system. Under the rule, suppliers of fossil fuels or industrial greenhouse gases, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of greenhouse gas emissions are required to submit annual reports to the EPA.

Climate Adaption Plan. The EPA Plan identifies priority actions the Agency will take to incorporate considerations of climate change into its programs, policies, rules and operations to ensure they are

¹ National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA), 2018. Federal Register / Vol. 83, No. 165 / Friday, August 24, 2018 / Proposed Rules, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks 2018. Available at: <https://www.gpo.gov/fdsys/pkg/FR-2018-08-24/pdf/2018-16820.pdf>.

effective under future climatic conditions. The following link provides more information on the EPA Plan: <https://www.epa.gov/arc-x/planning-climate-change-adaptation>

2.2.3 California

California Code of Regulations (CCR) Title 24, Part 6. CCR Title 24, Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24) were first established 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 efficiency technologies and methods. Although it was not originally intended to reduce GHG emissions, electricity production by fossil fuels results in GHG emissions and energy efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions.

The Energy Commission adopted 2008 Standards on April 23, 2008, and Building Standards Commission approved them for publication on September 11, 2008. These updates became effective on August 1, 2009. 2013, 2016, and 2019 standards have been approved and became effective July 1, 2014, January 1, 2016, and January 1, 2020, respectively.

California Code of Regulations (CCR) Title 24, Part 11.

All buildings for which an application for a building permit is submitted on or after January 1, 2023 must follow the 2022 standards. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas emissions. The following links provide more information on Title 24, Part 11:

<https://www.dgs.ca.gov/BSC/Codes>

<https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency>

California Green Building Standards.

On January 12, 2010, the State Building Standards Commission unanimously adopted updates to the California Green Building Standards Code, which went into effect on January 1, 2011. The Housing and Community Development (HCD) updated CALGreen through the 2015 Triennial Code Adoption Cycle, during the 2016 to 2017 fiscal year. During the 2022-2023 fiscal year, the Department of Housing and Community Development (HCD) updated CALGreen through the 2023 Triennial Code Adoption Cycle.

The Code is a comprehensive and uniform regulatory code for all residential, commercial and school buildings. CCR Title 24, Part 11: California Green Building Standards (Title 24) became effective in 2001 in response to continued efforts to reduce GHG emissions associated with energy consumption. CCR Title 24, Part 11 now require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. One focus of CCR Title 24, Part 11 is water conservation measures, which reduce GHG emissions by reducing electrical consumption associated with pumping and treating water. CCR Title 24, Part 11 has approximately 52 nonresidential mandatory measures and an additional 130 provisions for optional use. Some key mandatory measures for commercial

occupancies include specified parking for clean air vehicles, a 20 percent reduction of potable water use within buildings, a 50 percent construction waste diversion from landfills, use of building finish materials that emit low levels of volatile organic compounds, and commissioning for new, nonresidential buildings over 10,000 square feet.

The CEC estimates that over 30 years the 2022 Energy Code will provide \$1.5 billion in consumer benefits and reduce 10 million metric tons of GHG. Changes compared to the 2019 Energy Code include increases to on-site renewable energy generation from solar, increases to electric load flexibility to support grid reliability, reduction of emissions from newly constructed buildings, reduction of air pollution for improved public health, and increased adoption of environmentally beneficial efficient electric technologies.

The California Green Building Standards Code does not prevent a local jurisdiction from adopting a more stringent code as state law provides methods for local enhancements. The Code recognizes that many jurisdictions have developed existing construction and demolition ordinances, and defers to them as the ruling guidance provided, they provide a minimum 50-percent diversion requirement. The code also provides exemptions for areas not served by construction and demolition recycling infrastructure. State building code provides the minimum standard that buildings need to meet in order to be certified for occupancy. Enforcement is generally through the local building official. The following link provides more on CalGreen Building Standards:

<http://www.bsc.ca.gov/Home/CALGreen.aspx>

Executive Order S-3-05. California Governor issued Executive Order S-3-05, GHG Emission, in June 2005, which established the following targets:

- By 2010, California shall reduce greenhouse gas emissions to 2000 levels;
- By 2020, California shall reduce greenhouse gas emissions to 1990 levels; and
- By 2050, California shall reduce greenhouse gas emissions to 80 percent below 1990 levels.

The executive order directed the secretary of the California Environmental Protection Agency (CalEPA) to coordinate a multi-agency effort to reduce GHG emissions to the target levels. To comply with the Executive Order, the secretary of CalEPA created the California Climate Action Team (CAT), made up of members from various state agencies and commissions. The team released its first report in March 2006. The report proposed to achieve the targets by building on the voluntary actions of businesses, local governments, and communities and through State incentive and regulatory programs.

Executive Order S-01-07. Executive Order S-1-07 was issued in 2007 and proclaims that the transportation sector is the main source of GHG emissions in the State, since it generates more than 40 percent of the State's GHG emissions. It establishes a goal to reduce the carbon intensity of transportation fuels sold in the State by at least ten percent by 2020. This Order also directs CARB to determine whether this Low Carbon Fuel Standard (LCFS) could be adopted as a discrete early-action measure as part of the effort to meet the mandates in AB 32.

On April 23, 2009 CARB approved the proposed regulation to implement the low carbon fuel standard and began implementation on January 1, 2011. The low carbon fuel standard is anticipated to reduce GHG emissions by about 16 MMT per year by 2020. CARB approved some amendments to the LCFS in December 2011, which were implemented on January 1, 2013. In September 2015, the Board approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted. In 2018, the Board approved amendments to the regulation, which included strengthening and smoothing the carbon intensity benchmarks through 2030 in-line with California's 2030 GHG emission reduction target enacted through SB 32, adding new 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.

The LCFS is designed to encourage the use of cleaner low-carbon transportation fuels in California, encourage the production of those fuels, and therefore, reduce GHG emissions and decrease petroleum dependence in the transportation sector. Separate standards are established for gasoline and diesel fuels and the alternative fuels that can replace each. The standards are "back-loaded", with more reductions required in the last five years, than the first five years. This schedule allows for the development of advanced fuels that are lower in carbon than today's fuels and the market penetration of plug-in hybrid electric vehicles, battery electric vehicles, fuel cell vehicles, and flexible fuel vehicles. It is anticipated that compliance with the low carbon fuel standard will be based on a combination of both lower carbon fuels and more efficient vehicles.

Reformulated gasoline mixed with corn-derived ethanol at ten percent by volume and low sulfur diesel fuel represent the baseline fuels. Lower carbon fuels may be ethanol, biodiesel, renewable diesel, or blends of these fuels with gasoline or diesel as appropriate. Compressed natural gas and liquefied natural gas also may be low carbon fuels. Hydrogen and electricity, when used in fuel cells or electric vehicles are also considered as low carbon fuels for the low carbon fuel standard.

SB 97. Senate Bill 97 (SB 97) was adopted August 2007 and acknowledges that climate change is a prominent environmental issue that requires analysis under CEQA. SB 97 directed the Governor's Office of Planning and Research (OPR), which is part of the State Resource Agency, to prepare, develop, and transmit to CARB guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, by July 1, 2009. The Resources Agency was required to certify and adopt those guidelines by January 1, 2010.

Pursuant to the requirements of SB 97 as stated above, on December 30, 2009, the Natural Resources Agency adopted amendments to the state CEQA guidelines that address GHG emissions. The CEQA Guidelines Amendments changed 14 sections of the CEQA Guidelines and incorporate GHG language throughout the Guidelines. However, no GHG emissions thresholds of significance are provided and no specific mitigation measures are identified. The GHG emission reduction amendments went into effect on March 18, 2010, and are summarized below:

- Climate action plans and other greenhouse gas reduction plans can be used to determine whether a project has significant impacts, based upon its compliance with the plan.
- Local governments are encouraged to quantify the greenhouse gas emissions of proposed projects, noting that they have the freedom to select the models and methodologies that best meet their needs and circumstances. The section also recommends consideration of several qualitative factors that may be used in the determination of significance, such as the extent to which the given Project complies with state, regional, or local GHG reduction plans and policies. OPR does not set or dictate specific thresholds of significance. Consistent with existing CEQA Guidelines, OPR encourages local governments to develop and publish their own thresholds of significance for GHG impacts assessment.
- When creating their own thresholds of significance, local governments may consider the thresholds of significance adopted or recommended by other public agencies, or recommended by experts.
- New amendments include guidelines for determining methods to mitigate the effects of greenhouse gas emissions in Appendix F of the CEQA Guidelines.
- OPR is clear to state that “to qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the Project; general compliance with a plan, by itself, is not mitigation.”
- OPR’s emphasizes the advantages of analyzing GHG impacts on an institutional, programmatic level. OPR therefore approves tiering of environmental analyses and highlights some benefits of such an approach.
- Environmental impact reports (EIRs) must specifically consider a project’s energy use and energy efficiency potential.

AB 32. The California State Legislature enacted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires that greenhouse gases emitted in California be reduced to 1990 levels by the year 2020. “Greenhouse gases” as defined under AB 32 include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. CARB is the state agency charged with monitoring and regulating sources of greenhouse gases. 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.

The CARB Board approved the 1990 greenhouse gas emissions level of 427 million metric tons of carbon dioxide equivalent (MMTCO₂e) on December 6, 2007 (California Air Resources Board 2007). Therefore, emissions generated in California in 2020 are required to be equal to or less than 427 MMTCO₂e. Emissions in 2020 in a “business as usual” scenario are estimated to be 596 MMTCO₂e.

Under AB 32, CARB published its Final Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California. Discrete early action measures are currently underway or are enforceable

by January 1, 2010. CARB has 44 early action measures that apply to the transportation, commercial, forestry, agriculture, cement, oil and gas, fire suppression, fuels, education, energy efficiency, electricity, and waste sectors. Of these early action measures, nine are considered discrete early action measures, as they are regulatory and enforceable by January 1, 2010. CARB estimates that the 44 recommendations are expected to result in reductions of at least 42 MMTCO₂e by 2020, representing approximately 25 percent of the 2020 target.

CARB's Climate Change Scoping Plan (Scoping Plan) contains measures designed to reduce the State's emissions to 1990 levels by the year 2020 (California Air Resources Board 2008). The Scoping Plan identifies recommended measures for multiple greenhouse gas emission sectors and the associated emission reductions needed to achieve the year 2020 emissions target—each sector has a different emission reduction target. Most of the measures target the transportation and electricity sectors. As stated in the Scoping Plan, the key elements of the strategy for achieving the 2020 greenhouse gas target include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
- Achieving a statewide renewables energy mix of 33 percent;
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system;
- Establishing targets for transportation-related greenhouse gas emissions for regions throughout California and pursuing policies and incentives to achieve those targets;
- Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard; and
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State's long-term commitment to AB 32 implementation.

In addition, the Scoping Plan differentiates between "capped" and "uncapped" strategies. "Capped" strategies are subject to the proposed cap-and-trade program. The Scoping Plan states that the inclusion of these emissions within the cap-and-trade program will help ensure that the year 2020 emission targets are met despite some degree of uncertainty in the emission reduction estimates for any individual measure. Implementation of the capped strategies is calculated to achieve a sufficient amount of reductions by 2020 to achieve the emission target contained in AB 32. "Uncapped" strategies that will not be subject to the cap-and-trade emissions caps and requirements are provided as a margin of safety by accounting for additional greenhouse gas emission reductions.⁴

The 2022 Scoping Plan was adopted by CARB in November 2022 and expands upon earlier plans with a target of reducing GHG emissions to 85% below 1990 levels by 2045.

Senate Bill 100. Senate Bill 100 (SB 100) requires 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. SB 100 was adopted September 2018.

The interim thresholds from prior Senate Bills and Executive Orders would also remain in effect. These include Senate Bill 1078 (SB 1078), which requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. Senate Bill 107 (SB 107) which changed the target date to 2010. Executive Order S-14-08, which was signed on November 2008 and expanded the State's Renewable Energy Standard to 33 percent renewable energy by 2020. Executive Order S-21-09 directed CARB to adopt regulations by July 31, 2010 to enforce S-14-08. Senate Bill X1-2 codifies the 33 percent renewable energy requirement by 2020.

SB 375. Senate Bill 375 (SB 375) was adopted September 2008 and aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPO) to adopt a sustainable communities strategy (SCS) or alternate planning strategy (APS) that will prescribe land use allocation in that MPOs Regional Transportation Plan (RTP). CARB, in consultation with each MPO, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's sustainable communities strategy or alternate planning strategy for consistency with its assigned targets.

The proposed Project is located within the Southern California Association of Governments (SCAG), which has authority to develop the SCS or APS. For the SCAG region, the targets set by CARB are at eight percent below 2005 per capita GHG emissions levels by 2020 and 13 percent below 2005 per capita GHG emissions levels by 2035. On April 4, 2012, SCAG adopted the 2012-2035 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), which meets the CARB emission reduction requirements.

On September 3, 2020, SCAG's Regional Council approved and fully adopted the Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy), and the addendum to the Connect SoCal Program Environmental Impact Report. Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Connect SoCal outlines more than \$638 billion in transportation system investments through 2045. Connect SoCal is supported by a combination of transportation and land use strategies that help the region achieve state greenhouse gas emission reduction goals and federal Clean Air Act requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry and utilize resources more efficiently. By integrating the Forecasted Development Pattern with a suite of financially constrained transportation investments, Connect SoCal can reach the regional target of reducing greenhouse gases, or GHGs, from autos and light-duty trucks by 8 percent per capita by 2020, and 19 percent by 2035 (compared to 2005 levels).

City and County land use policies, including General Plans, are not required to be consistent with the RTP and associated SCS or APS. However, new provisions of CEQA would incentivize, through streamlining and other provisions, qualified projects that are consistent with an approved SCS or APS and categorized as “transit priority projects.”

Assembly Bill 939, Assembly Bill, and Senate Bill 1374. Assembly Bill 939 (AB 939) requires that each jurisdiction in California to divert at least 50 percent of its waste away from landfills, whether through waste reduction, recycling or other means. AB 341 requires at least 75 percent of generated waste be source reduced, recycled, or composted by the year 2020. Senate Bill 1374 (SB 1374) requires the California Integrated Waste Management Board to adopt a model ordinance by March 1, 2004 suitable for adoption by any local agency to require 50 to 75 percent diversion of construction and demolition of waste materials from landfills.

Executive Order S-13-08. Executive Order S-13-08 indicates 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 (California Natural Resource Agency 2009) was adopted, which is the “... first statewide, multi-sector, region-specific, and information-based 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. Executive Order B-30-15, establishing a new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030, was signed by Governor Brown in April 2015.

Executive Order B-29-15. Executive Order B-29-15, mandates a statewide 25% reduction in potable water usage and was signed into law on April 1, 2015.

Executive Order B-37-16. Executive Order B-37-16, continuing the State’s adopted water reduction, was signed into law on May 9, 2016. The water reduction builds off the mandatory 25% reduction called for in EO B-29-15.

Executive Order N-79-20. Executive Order N-79-20 was signed into law on September 23, 2020 and mandates 100 percent of in-state sales of new passenger cars and trucks be zero-emission by 2035; 100 percent of medium- and heavy-duty vehicles in the state be zero-emission vehicles by 2045 for all operations where feasible and by 2035 for drayage trucks; and to transition to 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible.

2.2.4 South Coast Air Quality Management District

The Project is within the South Coast Air Basin, which is under the jurisdiction of SCAQMD. SCAQMD Regulation XXVII currently includes three rules:

- The purpose of Rule 2700 is to define terms and post global warming potentials.
- The purpose of Rule 2701, SoCal Climate Solutions Exchange, is to establish a voluntary program to encourage, quantify, and certify voluntary, high quality certified greenhouse gas emission reductions in the SCAQMD.
- Rule 2702, Greenhouse Gas Reduction Program, was adopted on February 6, 2009. The purpose of this rule is to create a Greenhouse Gas Reduction Program for greenhouse gas emission reductions in the SCAQMD. The SCAQMD will fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

SCAQMD Threshold Development

The SCAQMD has established recommended significance thresholds for greenhouse gases for local lead agency consideration (“SCAQMD draft local agency threshold”). SCAQMD has published a five-tiered draft GHG threshold which includes a 10,000 metric ton of CO₂e per year for stationary/industrial sources and 3,000 metric tons of CO₂e per year significance threshold for residential/commercial projects (South Coast Air Quality Management District 2010c). Tier 3 is anticipated to be the primary tier by which the SCAQMD will determine significance for projects. The Tier 3 screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects. A 90-percent emission capture rate means that 90 percent of total emissions from all new or modified stationary source projects would be subject to CEQA analysis. The 90-percent capture rate GHG significance screening level in Tier 3 for stationary sources was derived using the SCAQMD’s annual Emissions Reporting Program.

The current draft 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 or not the Project is consistent with a greenhouse gas reduction plan. If a project is consistent with a qualifying local greenhouse gas reduction plan, it does not have significant greenhouse gas emissions.
- Tier 3 consists of screening values, which the lead agency can choose but must be consistent. A project’s construction emissions are averaged over 30 years and are added to a project’s operational emissions. If a project’s emissions are under one of the following screening thresholds, then the project is less than significant:
 - All land use types: 3,000 MTCO₂e per year; and
 - Based on land use types: residential is 3,500 MTCO₂e per year; commercial is 1,400 MTCO₂e per year; and mixed use is 3,000 MTCO₂e per year
- Tier 4 has the following options:
 - Option 1: Reduce emissions from business as usual by a certain percentage; this percentage is currently undefined;
 - Option 2: Early implementation of applicable AB 32 Scoping Plan measures;
 - Option 3: Year 2020 target for service populations (SP), which includes residents and employees: 4.8 MTCO₂e/SP/year for projects and 6.6 MTCO₂e/SP/year for plans; or

- Option 3, 2035 target: 3.0 MTCO₂e/SP/year for projects and 4.1 MTCO₂e/SP/year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

2.2.5 County of San Bernardino

County of San Bernardino Climate Action Plan

The County of San Bernardino adopted its “Greenhouse Gas Emissions Reduction Plan” in December in 2011. An update to the GHG Emissions Development Review Process was made in 2015 and the current Regional Greenhouse Gas Reduction Plan was adopted in March 2021. The purpose of the GHG Plan is to reduce the County’s internal and external GHG emissions by 46 percent below 2008 levels by year 2030. The GHG Plan includes a two-tiered development review procedure to determine if a project could result in a significant impact related greenhouse gas emissions or otherwise comply with the Plan pursuant to Section 15183.5 of the state CEQA Guidelines.

The initial screening procedure is to determine if a project will emit 3,000 metric tons of carbon dioxide equivalent (MTCO₂e) per year or more. Projects that do not exceed this threshold require no further climate change analysis. Projects exceeding this threshold must meet a minimum 31 percent emissions reduction in order to garner a less than significant determination. This can be met by either (1) achieving 100 points from a menu of mitigation options provided in the GHG Plan or (2) quantifying proposed reduction measures. Projects failing to meet the 31 percent reduction threshold would have a potentially significant impact related to climate change and greenhouse gas emissions. An update to the GHG Emissions Development Review Process was made in March 2015 to both improve upon the menu of options available in the screening tables and to bring performance standards up to current code.

Therefore, to determine whether the Project’s GHG emissions are significant, this analysis uses the County of San Bernardino and SCAQMD draft local agency tier 3 threshold screening threshold of 3,000 MTCO₂e per year for all land use types.

The Project will be subject to the latest requirements of the California Green Building and Title 24 Energy Efficiency Standards (currently 2022) which would reduce Project-related greenhouse gas emissions.

2.2.5 City of Redlands

City of Redlands Climate Action Plan

City of Redlands Climate Action Plan The City approved and adopted the City of Redlands Climate Action Plan (Redlands CAP or CAP) on December 5, 2017. It is a long-range plan to reduce local GHG emissions while providing Redlands with a strategy to grow in a sustainable way to keep the city vibrant and livable by allowing public and private development and redevelopment. The Redlands CAP implements strategies and measures related to transportation and land use, energy, solid waste, and community education and outreach to achieve GHG emissions targets. The CAP identifies how the GHG reduction measures will be implemented and monitored by the City to ensure that progress is being made toward the GHG reduction target.

2.3 Energy Regulatory Setting

Federal and state agencies regulate energy use and consumption through various means and programs. On the federal level, the United States Department of Transportation, the United States Department of Energy, and the United States Environmental Protection Agency are three federal agencies with substantial influence over energy policies and programs. On the state level, the PUC and the California Energy Commissions (CEC) are two agencies with authority over different aspects of energy. Relevant federal and state energy-related laws and plans are summarized below.

2.3.1 Federal Regulations

Corporate Average Fuel Economy (CAFÉ) Standards

First established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFÉ) standards reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA) jointly administer the CAFÉ standards. The U.S. Congress has specified that CAFÉ standards must be set at the “maximum feasible level” with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.²

Issued by NHTSA and EPA in March 2020 (published on April 30, 2020 and effective after June 29, 2020), the Safer Affordable Fuel-Efficient Vehicles Rule would maintain the CAFÉ and CO₂ standards applicable in model year 2020 for model years 2021 through 2026. The estimated CAFÉ and CO₂ standards for model year 2020 are 43.7 mpg and 204 grams of CO₂ per mile for passenger cars and 31.3 mpg and 284 grams of CO₂ per mile for light trucks, projecting an overall industry average of 37 mpg, as compared to 46.7 mpg under the standards issued in 2012.³

² <https://www.nhtsa.gov/lawsregulations/corporate-average-fuel-economy>.

³ National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA), 2018. Federal Register / Vol. 83, No. 165 / Friday, August 24, 2018 / Proposed Rules, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks 2018. Available at: <https://www.epa.gov/regulations-emissions-vehicles-and-engines/safer-affordable-fuel-efficient-safe-vehicles-final-rule>.

Intermodal Surface transportation Efficiency Act of 1991 (ISTEA)

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions.

The Transportation Equity Act of the 21st Century (TEA-21)

The Transportation Equity Act for the 21st Century (TEA-21) was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety.

2.3.2 State Regulations

Integrated Energy Policy Report (IEPR)

Senate Bill 1389 requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the State's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety. The Energy Commission prepares these assessments and associated policy recommendations every two years, with updates in alternate years, as part of the Integrated Energy Policy Report.

The 2019 Integrated Energy Policy Report (2019 IEPR) was adopted February 20, 2020, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2019 IEPR focuses on a variety of topics such as decarbonizing buildings, integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecast, and the California Energy Demand Forecast.⁴

⁴ California Energy Commission. Final 2019 Integrated Energy Policy Report. February 20, 2020. <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2019-integrated-energy-policy-report>

The 2020 IEPR was adopted March 23, 2021 and identifies actions the state and others can take to ensure a clean, affordable, and reliable energy system. In 2020, the IEPR focuses on California's transportation future and the transition to zero-emission vehicles, examines microgrids, lessons learned from a decade of state-supported research, and stakeholder feedback on the potential of microgrids to contribute to a lean and resilient energy system; and reports on California's energy demand outlook, updated to reflect the global pandemic and help plan for a growth in zero-emission plug in electric vehicles.⁵

The 2021 IEPR was adopted February 16, 2022, and covers topics including building decarbonization, energy efficiency, challenges with decarbonizing California's gas system, quantifying the benefits of the Clean Transportation Program, and the California Energy Demand Forecast.⁶

The 2022 IEPR was adopted February 28, 2023, and focused on embedding equity and environmental justice at the CEC, the California Energy Planning Library, the California energy demand forecast, energy reliability, western electricity integration, gasoline cost factors and price spikes, the role of hydrogen in California's clean energy future, fossil gas transition, and distributed energy resources.

The 2023 IEPR, the most recent approved IEPR, was adopted February 14, 2024, and covers topics including accelerated connection of clean energy, California energy demand forecast, potential growth of hydrogen in California, and updates on key issues including: gas system decarbonization, benefits of the clean transportation, and program energy efficiency.

The 2024 and 2025 editions of the IEPR are currently in progress.

State of California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access.

California Building Standards Code (Title 24)

California Building Energy Efficiency Standards (Title 24, Part 6)

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction and

⁵ California Energy Commission. Final 2020 Integrated Energy Policy Report. March 23, 2020. <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2020-integrated-energy-policy-report-update>

⁶ California Energy Commission. Final 2021 Integrated Energy Policy Report. February 16, 2022. <https://www.energy.ca.gov/publications/2021/2021-integrated-energy-policy-report#:~:text=In%20addition%20to%20these%20events,the%20California%20Energy%20Demand%20Forecast.>

system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020. The 2019 Title 24 standards include efficiency improvements to the lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers.

All buildings for which an application for a building permit is submitted on or after January 1, 2020 must follow the 2019 standards. The 2016 residential standards were estimated to be approximately 28 percent more efficient than the 2013 standards, whereas the 2019 residential standards are estimated to be approximately 7 percent more efficient than the 2016 standards. Furthermore, once rooftop solar electricity generation is factored in, 2019 residential standards are estimated to be approximately 53 percent more efficient than the 2016 standards. Under the 2019 standards, nonresidential buildings are estimated to be approximately 30 percent more efficient than the 2016 standards. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas emissions.

California Building Energy Efficiency Standards (Title 24, Part 11)

The 2022 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, went into effect on January 1, 2023. The 2023 CALGreen Code includes mandatory measures for non-residential development related to site development; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality.

The CEC estimates that over 30 years the 2022 Energy Code will provide \$1.5 billion in consumer benefits and reduce 10 million metric tons of GHG. Changes compared to the 2019 Energy Code include increases to on-site renewable energy generation from solar, increases to electric load flexibility to support grid reliability, reduction of emissions from newly constructed buildings, reduction of air pollution for improved public health, and increased adoption of environmentally beneficial efficient electric technologies.

Senate Bill 100

Senate Bill 100 (SB 100) requires 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. SB 100 was adopted September 2018.

The interim thresholds from prior Senate Bills and Executive Orders would also remain in effect. These include Senate Bill 1078 (SB 1078), which requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. Senate Bill 107 (SB 107) which changed the target date to 2010. Executive Order S-14-08, which was signed on November 2008 and expanded the State's Renewable Energy Standard to 33 percent renewable energy by 2020. Executive Order S-21-09 directed the CARB to adopt regulations by July 31, 2010 to enforce S-14-08. Senate Bill X1-2 codifies the 33 percent renewable energy requirement by 2020.

Senate Bill 350

Senate Bill 350 (SB 350) was signed into law October 7, 2015, SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. This will increase the use of Renewables Portfolio Standard (RPS) eligible resources, including solar, wind, biomass, geothermal, and others. In addition, SB 350 requires the state to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. To help ensure these goals are met and the greenhouse gas emission reductions are realized, large utilities will be required to develop and submit Integrated Resource Plans (IRPs). These IRPs will detail how each entity will meet their customers resource needs, reduce greenhouse gas emissions and ramp up the deployment of clean energy resources.

Assembly Bill 32

In 2006 the California State Legislature adopted Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006. AB 32 requires CARB, to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020 through an enforceable statewide emission cap which will be phased in starting in 2012. Emission reductions shall include carbon sequestration projects that would remove carbon from the atmosphere and best management practices that are technologically feasible and cost effective.

Assembly Bill 1493/Pavley Regulations

California Assembly Bill 1493 enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. In 2005, the CARB submitted a "waiver" request to the EPA from a portion of the federal Clean Air Act in order to allow the State to set more stringent tailpipe emission standards for CO₂ and other GHG emissions from passenger vehicles and light duty trucks. On December 19, 2007 the EPA announced that it denied the "waiver" request. On January 21, 2009, CARB submitted a letter to the EPA administrator regarding the State's request to reconsider the waiver denial. The EPA approved the waiver on June 30, 2009.

Executive Order S-1-07/Low Carbon Fuel Standard

Executive Order S-1-07 was issued in 2007 and proclaims that the transportation sector is the main source of GHG emissions in the State, since it generates more than 40 percent of the State's GHG emissions. It establishes a goal to reduce the carbon intensity of transportation fuels sold in the State by at least ten percent by 2020. This Order also directs CARB to determine whether this Low Carbon Fuel Standard (LCFS) could be adopted as a discrete early-action measure as part of the effort to meet the mandates in AB 32.

On April 23, 2009 CARB approved the proposed regulation to implement the low carbon fuel standard and began implementation on January 1, 2011. The low carbon fuel standard is anticipated to reduce GHG emissions by about 16 MMT per year by 2020. CARB approved some amendments to the LCFS in December 2011, which were implemented on January 1, 2013. In September 2015, the Board approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted. In 2018, the Board approved amendments

to the regulation, which included strengthening and smoothing the carbon intensity benchmarks through 2030 in-line with California’s 2030 GHG emission reduction target enacted through SB 32, adding new 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.

The LCFS is designed to encourage the use of cleaner low-carbon transportation fuels in California, encourage the production of those fuels, and therefore, reduce GHG emissions and decrease petroleum dependence in the transportation sector. Separate standards are established for gasoline and diesel fuels and the alternative fuels that can replace each. The standards are “back-loaded”, with more reductions required in the last five years, than during the first five years. This schedule allows for the development of advanced fuels that are lower in carbon than today’s fuels and the market penetration of plug-in hybrid electric vehicles, battery electric vehicles, fuel cell vehicles, and flexible fuel vehicles. It is anticipated that compliance with the low carbon fuel standard will be based on a combination of both lower carbon fuels and more efficient vehicles.

Reformulated gasoline mixed with corn-derived ethanol at ten percent by volume and low sulfur diesel fuel represent the baseline fuels. Lower carbon fuels may be ethanol, biodiesel, renewable diesel, or blends of these fuels with gasoline or diesel as appropriate. Compressed natural gas and liquefied natural gas also may be low carbon fuels. Hydrogen and electricity, when used in fuel cells or electric vehicles are also considered as low carbon fuels for the low carbon fuel standard.

Executive Order N-79-20.

Executive Order N-79-20 was signed into law on September 23, 2020 and mandates 100 percent of in-state sales of new passenger cars and trucks be zero-emission by 2035; 100 percent of medium- and heavy-duty vehicles in the state be zero-emission vehicles by 2045 for all operations where feasible and by 2035 for drayage trucks; and to transition to 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible.

California Air Resources Board

CARB’s Advanced Clean Cars Program

Closely associated with the Pavley regulations, the Advanced Clean Cars emissions control program was approved by CARB in 2012. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles for model years 2015–2025. The components of the Advanced Clean Cars program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of

pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.⁷

Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

The Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13, California Code of Regulations, Division 3, Chapter 10, Section 2435) was adopted to reduce public exposure to diesel particulate matter and other air contaminants by limiting the idling of diesel-fueled commercial motor vehicles. This section applies to diesel-fueled commercial motor vehicles with gross vehicular weight ratings of greater than 10,000 pounds that are or must be licensed for operation on highways. Reducing idling of diesel-fueled commercial motor vehicles reduces the amount of petroleum-based fuel used by the vehicle.

Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen, and other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles

The Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles (Title 13, California Code of Regulations, Division 3, Chapter 1, Section 2025) was adopted to reduce emissions of diesel particulate matter, oxides of nitrogen (NO_x) and other criteria pollutants from in-use diesel-fueled vehicles. This regulation is phased, with full implementation by 2023. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. The newer emission controlled models would use petroleum-based fuel in a more efficient manner.

Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or Senate Bill 375 (SB 375), coordinates land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction mandates established in AB 32.

Senate Bill 375 (SB 375) was adopted September 2008 and aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPO) to adopt a sustainable communities strategy (SCS) or alternate planning strategy (APS) that will prescribe land use allocation in that MPOs Regional Transportation Plan (RTP). CARB, in consultation with each MPO, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB

⁷ California Air Resources Board, California's Advanced Clean Cars Program, January 18, 2017. www.arb.ca.gov/msprog/acc/acc.htm.

is also charged with reviewing each MPO's sustainable communities strategy or alternate planning strategy for consistency with its assigned targets.

3.0 Setting

3.1 Existing Physical Setting

The Project site is located in the City of Redlands within the southwestern portion of County of San Bernardino, which is part of the South Coast Air Basin (SCAB) that includes all of Orange County as well as the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Basin is located on a coastal plain with connecting broad valleys and low hills to the east. Regionally, the South Coast Air Basin is bounded by the Pacific Ocean to the southwest and high mountains to the east forming the inland perimeter.

3.1.1 Local Climate and Meteorology

Dominant airflows provide the driving mechanism for transport and dispersion of air pollution. The mountains surrounding the region form natural horizontal barriers to the dispersion of air contaminants. Air pollution created in the coastal areas and around the Greater Los Angeles area is transported inland until it reaches the mountains where the combination of mountains and inversion layers generally prevent further dispersion. This poor ventilation results in a gradual degradation of air quality from the coastal areas to inland areas. Air stagnation may occur during the early evening and early morning periods of transition between day and nighttime flows. The region also experiences periods of hot, dry winds from the desert, known as Santa Ana winds. If the Santa Ana winds are strong, they can surpass the sea breeze, which blows from the ocean to the land, and carry the suspended dust and pollutants out to the ocean. If the winds are weak, they are opposed by the sea breeze and cause stagnation, resulting in high pollution events.

The annual average temperature varies little throughout much of the basin, ranging from the low to middle 60s, measured in degrees Fahrenheit (°F). With more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas where the Project site is located. The majority of the annual rainfall in the basin occurs between November and April. Summer rainfall is minimal and is generally limited to scattered thunderstorms in the coastal regions and slightly heavier showers in the eastern portion of the basin along the coastal side of the mountains. Year-to-year patterns in rainfall are unpredictable because of fluctuations in the weather.

Temperature inversions limit the vertical depth through which pollution can be mixed. Among the most common temperature inversions in the basin are radiation inversions, which form on clear winter nights when cold air off mountains sink to the valley floor while the air aloft over the valley remains warm. These inversions, in conjunction with calm winds, trap pollutants near the source. Other types of temperature inversions that affect the basin include marine, subsidence, and high-pressure inversions.

Summers are often periods of hazy visibility and occasionally unhealthful air. Strong temperature inversions may occur that limit the vertical depth through which air pollution can be dispersed. Air pollutants concentrate because they cannot rise through the inversion layer and disperse. These inversions are more common and persistent during the summer months. Over time, sunlight produces photochemical reactions within this inversion layer that creates ozone, a particularly harmful air

pollutant. Occasionally, strong thermal convections occur which allows the air pollutants to rise high enough to pass over the mountains and ultimately dilute the smog cloudtrap pollutants such as automobile exhaust near their source. While these inversions may lead to air pollution “hot spots” in heavily developed coastal areas of the basin, there is not enough traffic in inland valleys to cause any winter air pollution problems. Despite light wind conditions, especially at night and in the early morning, winter is generally a period of good air quality in the Project vicinity.

In the winter, light nocturnal winds result mainly from the drainage of cool air off of the mountains toward the valley floor while the air aloft over the valley remains warm. This forms a type of inversion known as a radiation inversion. Such winds are characterized by stagnation and poor local mixing and trap pollutants such as automobile exhaust near their source. While these inversions may lead to air pollution “hot spots” in heavily developed coastal areas of the basin, there is not enough traffic to cause any winter air pollution problems. Despite light wind conditions, especially at night and in the early morning, winter is generally a period of good air quality in the Project vicinity.

The temperature and precipitation levels for the City of Redlands are in Table 3. Table 3 shows that July is typically the warmest month and January is typically the coolest month. Rainfall in the Project area varies considerably in both time and space. Almost all the annual rainfall comes from the fringes of mid-latitude storms from late November to early April, with summers being almost completely dry.

Table 3: Meteorological Summary

Month	Temperature (°F)		Average Precipitation (inches)
	Average High	Average Low	
January	64.8	39.4	2.68
February	66.1	41.3	2.64
March	69.1	43.6	2.28
April	73.8	46.8	1.17
May	78.6	51.2	0.47
June	86.8	55.2	0.10
July	94.5	60.3	0.07
August	94.3	60.7	0.15
September	90.2	57.6	0.28
October	81.0	51.3	0.69
November	72.6	44.0	1.13
December	65.8	39.6	1.89
Annual Average	78.1	49.2	13.6

Notes:

¹ Source: <https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca7306>

3.1.2 Local Air Quality

The SCAQMD is divided into 38 air-monitoring areas with a designated ambient air monitoring station representative of each area. The Project site is located in the City of Redlands in the East San Bernardino Valley (Area 35). The nearest air monitoring station to the Project site with available air quality data is the San Bernardino – 4th Street Station (San Bernardino Station) located approximately 3.8 miles

northwest of the Project site; however, this location does not provide all ambient air quality data. Therefore, additional data was pulled from the SCAQMD historical data for the Central San Bernardino Valley (Area 34) for both sulfur dioxide and carbon monoxide to provide the existing levels. Table 4 presents the monitored pollutant levels within the vicinity. However, it should be noted that due to the air monitoring station distance from the Project site, recorded air pollution levels at the air monitoring station reflect with varying degrees of accuracy, local air quality conditions at the Project site.

Table 4: Local Area Air Quality Levels from Local Monitoring Stations

Pollutant (Standard) ²	Year		
	2021	2022	2023
Ozone:			
Maximum 1-Hour Concentration (ppm)	0.142	0.128	0.143
Days > CAAQS (0.09 ppm)	66	60	58
Maximum 8-Hour Concentration (ppm)	0.112	0.105	0.118
Days > NAAQS (0.07 ppm)	98	96	84
Days > CAAQS (0.070 ppm)	101	103	87
Carbon Monoxide:			
Maximum 1-Hour Concentration (ppm)	2.0	-	1.5
Days > NAAQS (20 ppm)	0	-	0
Maximum 8-Hour Concentration (ppm)	1.6	-	1.0
Days > NAAQS (9 ppm)	0	-	0
Nitrogen Dioxide:			
Maximum 1-Hour Concentration (ppm)	0.056	0.053	0.056
Days > NAAQS (0.25 ppm)	0	0	0
Sulfur Dioxide:			
Maximum 1-Hour Concentration (ppm) ³	0.005	-	0.003
Days > CAAQS (0.04 ppm) ³	0	-	0
Inhalable Particulates (PM10):			
Maximum 24-Hour Concentration (ug/m ³)	182.4	177.8	-
Days > NAAQS (150 ug/m ³)	1	1	0
Days > CAAQS (50 ug/m ³) ³	4	-	-
Annual Average (ug/m ³)	40.5	38.4	-
Annual > NAAQS (50 ug/m ³)	No	No	-
Annual > CAAQS (20 ug/m ³)	Yes	Yes	-
Ultra-Fine Particulates (PM2.5):			
Maximum 24-Hour Concentration (ug/m ³)	57.9	40.1	52.9
Days > NAAQS (35 ug/m ³) ³	1	2	1
Annual Average (ug/m ³) ³	11.8	11.2	10.5
Annual > NAAQS (15 ug/m ³) ³	No	No	No
Annual > CAAQS (12 ug/m ³) ³	No	No	No

¹ Source: obtained from [https://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year-and /or https://www.arb.ca.gov/adam/topfour/topfour1.php](https://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year-and/or-https://www.arb.ca.gov/adam/topfour/topfour1.php)

² CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard; ppm = parts per million

³ No data available.

The monitoring data presented in Table 4 shows that ozone and particulate matter (PM10 and PM2.5) are the air pollutants of primary concern in the Project area, which are detailed below.

Ozone

During the 2021 to 2023 monitoring period, the State 1-hour concentration standard for ozone has been exceeded between 58 and 66 days each year at the San Bernardino Station. The State 8-hour concentration standard for ozone has been exceeded between 87 and 103 days each year over the past three years at the San Bernardino Station. The Federal 8-hour concentration standard for ozone has been exceeded between 84 and 98 days each year over the past three years at the San Bernardino Station.

Ozone is a secondary pollutant as it is not directly emitted. Ozone is the result of chemical reactions between other pollutants, most importantly hydrocarbons and NO₂, which occur only in the presence of bright sunlight. Pollutants emitted from upwind cities react during transport downwind to produce the oxidant concentrations experienced in the area. Many areas of the SCAQMD contribute to the ozone levels experienced at the monitoring station, with the more significant areas being those directly upwind.

Carbon Monoxide

CO is another important pollutant that is due mainly to motor vehicles. The Central San Bernardino Valley Area did not record an exceedance of the state or federal 1-hour or 8-hour CO standards for the last three years.

Nitrogen Dioxide

The San Bernardino Station did not record an exceedance of the State or Federal NO₂ standards for the last three years.

Sulfur Dioxide

The Central San Bernardino Valley area did not record an exceedance of the State SO₂ standards for the last three years.

Particulate Matter

During the 2021 to 2023 monitoring period, the San Bernardino Station recorded 1 day of exceedance in 2021 and 2022 of the State 24-hour concentration standard for PM₁₀ and the State annual concentration standard for PM₁₀ was exceeded in 2021 and 2022. Over the same time period the Federal 24-hour standard for PM₁₀ was not exceeded at the San Bernardino Station.

During the 2021 to 2023 monitoring period, the Federal 24-hour standard for PM_{2.5} was exceeded between 1 and 2 days annually at the San Bernardino Station and the State annual standard for PM_{2.5} was exceeded in 2020.

According to the EPA, some people are much more sensitive than others to breathing fine particles (PM₁₀ and PM_{2.5}). People with influenza, chronic respiratory and cardiovascular diseases, and the elderly may suffer worsening illness and premature death due to breathing these fine particles. People with bronchitis can expect aggravated symptoms from breathing in fine particles. Children may experience decline in lung function due to breathing in PM₁₀ and PM_{2.5}. Other groups considered

sensitive are smokers and people who cannot breathe well through their noses. Exercising athletes are also considered sensitive because many breathe through their mouths during exercise.

3.1.3 Attainment Status

The EPA and CARB designate air basins where ambient air quality standards are exceeded as “nonattainment” areas. If standards are met, the area is designated as an “attainment” area. If there is inadequate or inconclusive data to make a definitive attainment designation, they are considered “unclassified.” National nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards. Each standard has a different definition, or ‘form’ of what constitutes attainment, based on specific air quality statistics. For example, the Federal 8-hour CO standard is not to be exceeded more than once per year; therefore, an area is in attainment of the CO standard if no more than one 8-hour ambient air monitoring values exceeds the threshold per year. In contrast, the federal annual PM_{2.5} standard is met if the three-year average of the annual average PM_{2.5} concentration is less than or equal to the standard. Table 5 lists the attainment status for the criteria pollutants in the basin.

Table 5: South Coast Air Basin Attainment Status

Pollutant	Standard ¹	Averaging Time	Designation ²	Attainment Date ³
1-Hour Ozone	NAAQS	1979 1-Hour (0.12 ppm)	Nonattainment (Extreme)	2/6/2023 (not attained) ⁴
	CAAQS	1-Hour (0.09 ppm)	Nonattainment	N/A
8-Hour Ozone ⁵	NAAQS	1997 8-Hour (0.08 ppm)	Nonattainment (Extreme)	6/15/2024
	NAAQS	2008 8-Hour (0.075 ppm)	Nonattainment (Extreme)	7/20/2032
	NAAQS	2015 8-Hour (0.070 ppm)	Nonattainment (Extreme)	8/3/2038
	CAAQS	8-Hour (0.070 ppm)	Nonattainment	Beyond 2032
CO	NAAQS	1-Hour (35 ppm)	Attainment (Maintenance)	6/11/2007 (attained)
	CAAQS	8-Hour (9 ppm)	Attainment	6/11/2007 (attained)
NO ₂ ⁶	NAAQS	1-Hour (0.1 ppm)	Unclassifiable/Attainment	N/A (attained)
	NAAQS	Annual (0.053 ppm)	Attainment (Maintenance)	9/22/1998 (attained)
	CAAQS	1-hour (0.18 ppm) Annual (0.030 ppm)	Attainment	-
SO ₂ ⁷	NAAQS	1-Hour (75 ppb)	Designations Pending (expect Uncl./Attainment)	N/A (attained)
	NAAQS	24-Hour (0.14 ppm) Annual (0.03 ppm)	Unclassifiable/Attainment	3/19/1979 (attained)
PM ₁₀	NAAQS	1987 24-Hour (150 µg/m ³)	Attainment (Maintenance) ⁸	7/26/2013 (attained)
	CAAQS	24-Hour (50 µg/m ³) Annual (20 µg/m ³)	Nonattainment	N/A
PM _{2.5} ⁹	NAAQS	2006 24-Hour (35 µg/m ³)	Nonattainment (Serious)	12/31/2019

	NAAQS	1997 Annual (15.0 $\mu\text{g}/\text{m}^3$)	Attainment	8/24/2016
	NAAQS	2021 Annual (12.0 $\mu\text{g}/\text{m}^3$)	Nonattainment (Serious)	12/31/2025
	CAAQS	Annual (12.0 $\mu\text{g}/\text{m}^3$)	Nonattainment	N/A
Lead	NAAQS	3-Months Rolling (0.15 $\mu\text{g}/\text{m}^3$)	Nonattainment (Partial) ¹⁰	12/31/2015

Notes:

Source: <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf>

¹ NAAQS = National Ambient Air Quality Standards, CAAQS = California Ambient Air Quality Standards

² U.S. EPA often only declares Nonattainment areas; everywhere else is listed as Unclassifiable/Attainment or Unclassifiable.

³ A design value below the NAAQS for data through the full year or smog season prior to the attainment date is typically required for attainment demonstration.

⁴ 1-hour O₃ standard (0.12 ppm) was revoked, effective June 15, 2005; however, the Basin has not attained this standard based on 2008-2010 data and is still subject to anti-backsliding requirements.

⁵ 1997 8-hour O₃ standard (0.08 ppm) was reduced (0.075 ppm), effective May 27, 2008; the revoked 1997 O₃ standard is still subject to anti-backsliding requirements.

⁶ New NO₂ 1-hour standard, effective August 2, 2010; attainment designations January 20, 2012; annual NO₂ standard retained.

⁷ The 1971 annual and 24-hour SO₂ standards were revoked, effective August 23, 2010; however, these 1971 standards will remain in effect until one year after U.S. EPA promulgates area designations for the 2010 SO₂ 1-hour standard. Area designations are still pending, with Basin expected to be designated Unclassifiable/Attainment.

⁸ Annual PM₁₀ standard was revoked, effective December 18, 2006; 24-hour PM₁₀ NAAQS deadline was 12/31/2006; SCAQMD request for attainment redesignation and PM₁₀ maintenance plan was approved by U.S. EPA on June 26, 2013, effective July 26, 2013.

⁹ Attainment deadline for the 2006 24-Hour PM_{2.5} NAAQS (designation effective December 14, 2009) is December 31, 2019 (end of the 10th calendar year after effective date of designations for Serious nonattainment areas). Annual PM_{2.5} standard was revised on January 15, 2013, effective March 18, 2013, from 15 to 12 $\mu\text{g}/\text{m}^3$. Designations effective April 15, 2015, so Serious area attainment deadline is December 31, 2025.

¹⁰ Partial Nonattainment designation – Los Angeles County portion of Basin only for near-source monitors. Expect redesignation to attainment based on current monitoring data.

3.2 Greenhouse Gases

Constituent gases of the Earth's atmosphere, called atmospheric greenhouse gases (GHG), play a critical role in the Earth's radiation amount by trapping infrared radiation emitted from the Earth's surface, which otherwise would have escaped to space. Prominent greenhouse gases contributing to this process include carbon dioxide (CO₂), methane (CH₄), ozone, water vapor, nitrous oxide (N₂O), and chlorofluorocarbons (CFCs). This phenomenon, known as the Greenhouse Effect, is responsible for maintaining a habitable climate. Anthropogenic (caused or produced by humans) emissions of these greenhouse gases in excess of natural ambient concentrations are responsible for the enhancement of the Greenhouse Effect and have led to a trend of unnatural warming of the Earth's natural climate, known as global warming or climate change. Emissions of gases that induce global warming are attributable to human activities associated with industrial/manufacturing, agriculture, utilities, transportation, and residential land uses. Transportation is responsible for 41 percent of the State's greenhouse gas emissions, followed by electricity generation. Emissions of CO₂ and nitrous oxide (NO₂) are byproducts of fossil fuel combustion. Methane, a potent greenhouse gas, results from off-gassing associated with agricultural practices and landfills. Sinks of CO₂, where CO₂ is stored outside of the atmosphere, include uptake by vegetation and dissolution into the ocean. Table 6 provides a description of each of the greenhouse gases and their global warming potential.

Additional information is available: <https://www.arb.ca.gov/cc/inventory/data/data.htm>

Table 6: Description of Greenhouse Gases

Greenhouse Gas	Description and Physical Properties	Sources
Nitrous oxide	Nitrous oxide (N ₂ O), also known as laughing gas is a colorless gas. It has a lifetime of 114 years. Its global warming potential is 298.	Microbial processes in soil and water, fuel combustion, and industrial processes. In addition to agricultural sources, some industrial processes (nylon production, nitric acid production) also emit N ₂ O.
Methane	Methane (CH ₄) is a flammable gas and is the main component of natural gas. It has a lifetime of 12 years. Its global warming potential is 25.	A natural source of CH ₄ is from the decay of organic matter. Methane is extracted from geological deposits (natural gas fields). Other sources are from the decay of organic material in landfills, fermentation of manure, and cattle farming.
Carbon dioxide	Carbon dioxide (CO ₂) is an odorless, colorless, natural greenhouse gas. Carbon dioxide's global warming potential is 1. The concentration in 2005 was 379 parts per million (ppm), which is an increase of about 1.4 ppm per year since 1960.	Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood.
Chlorofluorocarbons	CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). They are gases formed synthetically by replacing all hydrogen atoms in methane or methane with chlorine and/or fluorine atoms. Global warming potentials range from 3,800 to 8,100.	Chlorofluorocarbons were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. They destroy stratospheric ozone, therefore their production was stopped as required by the Montreal Protocol.
Hydrofluorocarbons	Hydrofluorocarbons (HFCs) are a group of greenhouse gases containing carbon, chlorine, and at least one hydrogen atom. Global warming potentials range from 140 to 11,700.	Hydrofluorocarbons are synthetic manmade chemicals used as a substitute for chlorofluorocarbons in applications such as automobile air conditioners and refrigerants.
Perfluorocarbons	Perfluorocarbons (PFCs) have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above the Earth's surface. They have a lifetime 10,000 to 50,000 years. They have a global warming potential range of 6,200 to 9,500.	Two main sources of perfluorocarbons are primary aluminum production and semiconductor manufacturing.
Sulfur hexafluoride	Sulfur hexafluoride (SF ₆) is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. It has a high global warming potential, 23,900.	This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

Notes:

1. Sources: Intergovernmental Panel on Climate Change 2014a and Intergovernmental Panel on Climate Change 2014b.
https://www.ipcc.ch/publications_and_data/ar4/wg1/en/ch2s2-10-2.html

3.3 Energy

3.3.1 Overview

California's estimated annual energy use as of 2021 included:

- Approximately 277,764 gigawatt hours of electricity;⁸
- Approximately 2,092,612 million cubic feet of natural gas per year⁹;and
- Approximately 15.2 billion gallons of transportation fuel (for the year 2018)¹⁰.

As of 2021, the year of most recent data currently available by the United States Energy Information Administration (EIA), energy use in California by demand sector was:

- Approximately 37.8 percent transportation;
- Approximately 23.2 percent industrial;
- Approximately 20.0 percent residential; and
- Approximately 19.0 percent commercial.¹¹

California's electricity in-state generation system generates approximately 194,127 gigawatt-hours each year. In 2021, California produced approximately 72 percent of the electricity it uses; the rest was imported from the Pacific Northwest (approximately 12 percent) and the U.S. Southwest (approximately 18 percent). Natural gas is the main source for electricity generation at approximately 50.2 percent of the total in-state electric generation system power as shown in Table 7.

<Table 7, next page>

⁸California Energy Commission. Energy Almanac. Total Electric Generation. [Online] 2020.

<https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2019-total-system-electric-generation>.

⁹Natural Gas Consumption by End Use. U.S. Energy Information Administration. [Online] August 31, 2020.

https://www.eia.gov/dnav/ng/ng_cons_sum_dcu_SCA_a.htm.

¹⁰California Energy Commission. Revised Transportation Energy Demand Forecast 2018-2030. [Online] April 19, 2018.

<https://www.energy.ca.gov/assessments/>

¹¹U.S. Energy Information Administration. California Energy Consumption by End-Use Sector.

California State Profile and Energy Estimates. [Online] January 16, 2020 <https://www.eia.gov/state/?sid=CA#tabs-2>

Table 7: Total Electricity System Power (California 2021)

Fuel Type	California In-State Generation (GWh)	Percent of California In-State Generation	Northwest Imports (GWh)	Southwest Imports (GWh)	Total Imports (GWh)	Percent of Imports	California Power Mix (GWh)	Percent California Power Mix
Coal	303	0.2%	181	7,788	7,969	9.5%	8,272	3.0%
Natural Gas	12,036	6.2%	12,042	1,578	13,620	16.3%	25,656	9.2%
Nuclear	97,431	50.2%	45	7,880	7,925	9.5%	105,365	37.9%
Oil	16,477	8.5%	524	8,756	9,280	11.1%	25,758	9.3%
Other (Petroleum Coke/Waste Heat)	37	0.0%	-	-	-	0.0%	37	0.0%
Large Hydro	382	0.2%	68	15	83	0.1%	465	0.2%
Unspecified Sources of Power	-	0.0%	8,156	10,731	18,887	22.6%	18,887	6.80%
Renewables	67,461	34.8%	11,555	14,317	25,872	30.9%	93,333	33.6%
Biomass	5,381	2.8%	684	26	710	1.1%	6,271	2.3%
Geothermal	11,116	5.7%	192	1906	2,098	2.5%	13,214	4.8%
Somall Hydro	2,531	1.3%	304	1	305	0.4%	2,835	1.0%
Solar	33,260	17.1%	220	5,979	6,199	7.4%	39,458	14.2%
Wind	15,173	7.8%	9,976	6,405	16,381	19.6%	31,555	11.4%
Total	194,127	100.00%	32,572	51,064	83,636	100.0%	277,764	100.00%

Notes:

¹ Source: California Energy Commission. 2021 Total System electric Generation. <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2021-total-system-electric-generation>

A summary of and context for energy consumption and energy demands within the State is presented in “U.S. Energy Information Administration, California State Profile and Energy Estimates, Quick Facts” excerpted below:

- California was the seventh-largest producer of crude oil among the 50 states in 2018, and, as of January 2019, it ranked third in oil refining capacity.
- California is the largest consumer of jet fuel among the 50 states and accounted for one-fifth of the nation’s jet fuel consumption in 2018.
- California’s total energy consumption is the second-highest in the nation, but, in 2018, the State’s per capita energy consumption ranked the fourth-lowest, due in part to its mild climate and its energy efficiency programs.
- In 2018, California ranked first in the nation as a producer of electricity from solar, geothermal, and biomass resources and fourth in the nation in conventional hydroelectric power generation.

- In 2018, large- and small-scale solar PV and solar thermal installations provided 19% of California’s net electricity generation¹².

As indicated above, California is one of the nation’s leading energy-producing states, and California per capita energy use is among the nation’s most efficient. Given the nature of the proposed project, the remainder of this discussion will focus on the three sources of energy that are most relevant to the project—namely, electricity and natural gas for building uses, and transportation fuel for vehicle trips associated with the proposed project.

3.3.2 Electricity and Natural Gas

Electricity would be provided to the project by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons, within a service area encompassing approximately 50,000 square miles.¹³ SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers.¹⁴ Table 2 identifies SCE’s specific proportional shares of electricity sources in 2022.

Table 8: SCE 2022 Power Content Mix

Energy Resources	2022 SCE Power Mix
Eligible Renewable ¹	33.2%
Biomass & Biowaste	0.1%
Geothermal	5.7%
Eligible Hydroelectric	0.5%
Solar	17.0%
Wind	9.8%
Coal	0.0%
Large Hydroelectric	3.4%
Natural Gas	24.7%
Nuclear	8.3%
Other	0.1%
Unspecified Sources of power ²	30.3%
Total	100.0%

Notes:

¹² State Profile and Energy Estimates. Independent Statistics and Analysis. [Online] [Cited: January 16, 2020.] <http://www.eia.gov/state/?sid=CA#tabs2>.

¹³ <https://www.sce.com/about-us/who-we-are/leadership/our-service-territory>

¹⁴ California Energy Commission. Utility Energy Supply plans from 2015. https://www.energy.ca.gov/almanac/electricity_data/supply_forms.html

Source: https://www.sce.com/sites/default/files/custom-files/PDF_Files/SCE_2022_Power_Content_Label_B%26W.pdf

(1) The eligible renewable percentage above does not reflect RPS compliance, which is determined using a different methodology.

(2) Unspecified sources of power means electricity from transactions that are not traceable to specific generation sources.

Natural gas would be provided to the project by Southern California Gas (SoCalGas). The following summary of natural gas resources and service providers, delivery systems, and associated regulation is excerpted from information provided by the California Public Utilities Commission (CPUC).

The CPUC regulates natural gas utility service for approximately 11 million customers that receive natural gas from Pacific Gas and Electric (PG&E), Southern California Gas (SoCalGas), San Diego Gas & Electric (SDG&E), Southwest Gas, and several smaller investor-owned natural gas utilities. The CPUC also regulates independent storage operators Lodi Gas Storage, Wild Goose Storage, Central Valley Storage and Gill Ranch Storage.

The vast majority of California's natural gas customers are residential and small commercial customers, referred to as "core" customers. Larger volume gas customers, like electric generators and industrial customers, are called "noncore" customers. Although very small in number relative to core customers, noncore customers consume about 65% of the natural gas delivered by the state's natural gas utilities, while core customers consume about 35%.

The PUC regulates the California utilities' natural gas rates and natural gas services, including in-state transportation over the utilities' transmission and distribution pipeline systems, storage, procurement, metering and billing.

Most of the natural gas used in California comes from out-of-state natural gas basins. In 2017, for example, California utility customers received 38% of their natural gas supply from basins located in the U.S. Southwest, 27% from Canada, 27% from the U.S. Rocky Mountain area, and 8% from production located in California.”¹⁵

3.3.3 Transportation Energy Resources

The project would attract additional vehicle trips with resulting consumption of energy resources, predominantly gasoline and diesel fuel. Gasoline (and other vehicle fuels) are commercially-provided commodities and would be available to the project patrons and employees via commercial outlets.

¹⁵California Public Utilities Commission. Natural Gas and California. http://www.cpuc.ca.gov/natural_gas/

The most recent data available shows the transportation sector emits 39 percent of the total greenhouse gases in the state and about 84 percent of smog-forming oxides of nitrogen (NO_x).^{16,17} About 28 percent of total United States energy consumption in 2021 was for transporting people and goods from one place to another. In 2021, petroleum comprised about 90 percent of all transportation energy use, excluding fuel consumed for aviation and most marine vessels.¹⁸ In 2022, about 134.55 billion gallons (or about 3.20 billion barrels) of finished motor gasoline were consumed in the United States, an average of about 369 million gallons (or about 8.78 million barrels) per day.¹⁹

¹⁶CARB. California Greenhouse Gas Emissions Inventory 2000-2022 – 2024 Edition. <https://ww2.arb.ca.gov/ghg-inventory-data>

¹⁷CARB. 2016 SIP Emission Projection Data.
https://www.arb.ca.gov/app/emsmv/2017/emseic1_query.php?F_DIV=-4&F_YR=2012&F_SEASON=A&SP=SIP105ADJ&F_AREA=CA

¹⁸ US Energy Information Administration. Use of Energy in the United States Explained: Energy Use for Transportation.
https://www.eia.gov/energyexplained/?page=us_energy_transportation

¹⁹ <https://www.eia.gov/tools/faqs/faq.php?id=23&t=10>

4.0 Modeling Parameters and Assumptions

4.1 Construction

Typical emission rates from construction activities were obtained from CalEEMod Version 2022.1.1.22. CalEEMod is a computer model published by the SCAQMD for estimating air pollutant emissions. The CalEEMod program uses the EMFAC2021 computer program to calculate the emission rates specific for the southwestern portion of San Bernardino County for construction-related employee vehicle trips and the OFFROAD2017 computer program to calculate emission rates for heavy truck operations. EMFAC2021 and OFFROAD2017 are computer programs generated by CARB that calculates composite emission rates for vehicles. Emission rates are reported by the program in grams per trip and grams per mile or grams per running hour. Using CalEEMod, the peak daily air pollutant emissions were calculated and presented below. These emissions represent the highest level of emissions for each of the construction phases in terms of air pollutant emissions.

The analysis assesses the emissions associated with the construction of the proposed Project as indicated in Table 1. Construction was estimated to occur over 13 months beginning the fourth quarter of 2024. The phases of the construction activities which have been analyzed below are: 1) site preparation, 2) grading, 3) building construction, 4) paving, and 5) architectural coating. It should be noted that the square footage of the proposed buildings has changed from previous site plans on which the model was based, however the current overall square footage remains below what was modeled (61,553 square feet in the current site plan vs. 65,400 square feet in the model), making for a conservative analysis. For details on construction modeling and construction equipment for each phase, please see Appendix A.

The Project will be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. Compliance with this rule is achieved through application of standard best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 mph, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph and establishing a permanent, stabilizing ground cover on finished sites. In addition, projects that disturb 50 acres or more of soil or move 5,000 cubic yards of materials per day are required to submit a Fugitive Dust Control Plan or a Large Operation Notification Form to SCAQMD. Based on the size of the Project area (approximately 5 acres) and the fact that the Project won't export more than 5,000 cubic yards of material a day a Fugitive Dust Control Plan or Large Operation Notification would not be required.

SCAQMD's Rule 403 minimum requirements require that the application of the best available dust control measures are used for all grading operations and include the application of water or other soil stabilizers in sufficient quantity to prevent the generation of visible dust plumes. Compliance with Rule 403 would require the use of water trucks during all phases where earth moving operations would occur. Compliance with Rule 403 is required. Compliance is shown in the CalEEMod model as application of water three times daily, which is included in the model as a mitigation measure.

4.2 Operations

Operational or long-term emissions occur over the life of the Project. Both mobile and area sources generate operational emissions. Area source emissions arise from consumer product usage, heaters that consume natural gas, gasoline-powered landscape equipment, and architectural coatings (painting). Mobile source emissions from motor vehicles are the largest single long-term source of air pollutants from the operation of the Project. Small amounts of emissions would also occur from area sources such as the consumption of natural gas for heating, from landscaping emissions, and consumer product usage. The operational emissions were estimated using the latest version of CalEEMod.

Mobile Sources

Mobile sources include emissions from the additional vehicle miles generated from the proposed Project. The vehicle trips associated with the proposed Project are based upon the trip generation rates given in the Project-specific trip generation analysis (Ganddini, 2024) which uses the ITE Trip Generation Manual 11th Edition. The trip generation analysis shows a net trip generation rate of 1,619 trips per day for the proposed Project.

The program then applies the emission factors for each trip which is provided by the EMFAC2021 model to determine the vehicular traffic pollutant emissions. The CalEEMod default trip lengths were used in this analysis. Please see CalEEMod output in Appendix A for details.

Area Sources

Area sources include emissions from consumer products, landscape equipment and architectural coatings. Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers, as well as air compressors, generators, and pumps. As specifics were not known about the landscaping equipment fleet, CalEEMod defaults were used to estimate emissions from landscaping equipment.

Per SCAQMD Rule 1113 as amended on June 3, 2011, the architectural coatings that would be applied after January 1, 2014 will be limited to an average of 50 grams per liter or less for buildings and 100 grams per liter or less for parking lot striping. No changes were made to the CalEEMod architectural coating default values.

Per AB 341, at least 75 percent of generated waste will be source reduced, recycled, or composted. This is shown in the CalEEMod model as a mitigation measure; however, it is required.

Energy Usage

2022.1.1.22 CalEEMod defaults were utilized.

4.3 Localized Construction Analysis

The SCAQMD has published a “Fact Sheet for Applying CalEEMod to Localized Significance Thresholds” (South Coast Air Quality Management District 2011b). CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily disturbance activity possible for each

piece of equipment. In order to compare CalEEMod reported emissions against the localized significance threshold lookup tables, the CEQA document should contain in its project design features or its mitigation measures the following parameters:

1. The off-road equipment list (including type of equipment, horsepower, and hours of operation) assumed for the day of construction activity with maximum emissions.
2. The maximum number of acres disturbed on the peak day.
3. Any emission control devices added onto off-road equipment.
4. Specific dust suppression techniques used on the day of construction activity with maximum emissions.

The construction equipment showing the equipment associated with the maximum area of disturbance is shown in Table 9.

Table 9: Construction Equipment Assumptions¹

Activity	Equipment	Number	Acres/8hr-day	Total Acres
Site Preparation	Rubber Tired Dozers	3	0.5	1.5
	Tractors/Loaders/Backhoes	4	0.5	2.0
Total Per Phase				3.5
Grading	Graders	1	0.5	0.5
	Rubber Tired Dozers	1	0.5	0.5
	Tractors/Loaders/Backhoes	3	0.5	1.5
Total Per Phase				2.5

Notes:

¹ Source: South Coast AQMD, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=2>

As shown in Table 9, the maximum number of acres disturbed in a day would be 3.5 acres during site preparation.

The local air quality emissions from construction were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold Look-up Tables and the methodology described in Localized Significance Threshold Methodology, prepared by SCAQMD, revised July 2008. The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NOx, PM10, and PM2.5 from the proposed Project could result in a significant impact to the local air quality. As the Look-up Tables provide thresholds for 1-, 2-, and 5-acre disturbance areas, with lower thresholds for smaller disturbance areas, the emission thresholds were based on a disturbance of 2 acres per day (the closest conservative threshold) at a distance of 50 meters (164 feet) in the East San Bernardino Valley source receptor area (SRA 35).

4.4 Localized Operational Analysis

For operational emissions, the screening tables for a disturbance area of 5 acres per day, as the project is approximately 5 acres, and a distance of 50 meters were used to determine significance. The tables were compared to the Project's onsite operational emissions.

5.0 Thresholds of Significance

5.1 Air Quality Thresholds of Significance

5.1.1 CEQA Guidelines for Air Quality

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

The following air quality significance thresholds are contained in Appendix G of the CEQA Guidelines. A significant impact would occur if the project would:

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

While the final determination of whether a project is significant is within the purview of the Lead Agency pursuant to Section 15064(b) of the CEQA Guidelines, SCAQMD recommends that its quantitative air pollution thresholds be used to determine the significance of project emissions. If the Lead Agency finds that the project has the potential to exceed these air pollution thresholds, the project should be considered to have significant air quality impacts. There are daily emission thresholds for construction and operation of a proposed project in the basin.

5.1.2 Regional Significance Thresholds for Construction Emissions

The following CEQA significance thresholds for construction emissions are established for the Basin:

- | | |
|--------------------------------------|-----------------------------------|
| • 75 pounds per day (lbs/day) of VOC | • 150 lbs/day of PM ₁₀ |
| • 100 lbs/day of NO _x | • 55 lbs/day of PM _{2.5} |
| • 550 lbs/day of CO | • 150 lbs/day of SO ₂ |

Projects in the basin with construction-related emissions that exceed any of the emission thresholds are considered to be significant under SCAQMD guidelines.

5.1.3 Regional Significance Thresholds for Operational Emissions

The daily operational emissions significance thresholds for the basin are as follows:

- 55 pounds per day (lbs/day) of VOC
- 55 lbs/day of NO_x
- 550 lbs/day of CO
- 150 lbs/day of PM₁₀
- 55 lbs/day of PM_{2.5}
- 150 lbs/day of SO₂

Local Microscale Concentration Standards The significance of localized project impacts under CEQA depends on whether ambient CO levels in the vicinity of the project are above or below State and federal CO standards. If ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a State or federal standard, project emissions are considered significant if they increase 1-hour CO concentrations by 1.0 ppm or more or 8-hour CO concentrations by 0.45 ppm or more. The following are applicable local emission concentration standards for CO:

- California State 1-hour CO standard of 20.0 ppm
- California State 8-hour CO standard of 9.0 ppm

5.1.4 Thresholds for Localized Significance

Project-related construction air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the South Coast Air Basin. In order to assess local air quality impacts the SCAQMD has developed Localized Significant Thresholds (LSTs) to assess the project-related air emissions in the project vicinity. The SCAQMD has also provided Final Localized Significant Threshold Methodology (LST Methodology), June 2003, which details the methodology to analyze local air emission impacts. The Localized Significant Threshold Methodology found that the primary emissions of concern are NO₂, CO, PM₁₀, and PM_{2.5}.

The emission thresholds were calculated based on the East San Bernardino Valley source receptor area (SRA 35) and a disturbance of 2 acres per day for construction and 5 acres for operation at a distance of 50 meters (164 feet).

5.2 Greenhouse Gas Thresholds of Significance

5.2.1 CEQA Guidelines for Greenhouse Gas

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

The following greenhouse gas significance thresholds are contained in Appendix G of the CEQA Guidelines, which were amendments adopted into the Guidelines on March 18, 2010, pursuant to SB 97. A significant impact would occur if the project would:

- (a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- (b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

However, despite this, currently neither the CEQA statutes, OPR guidelines, nor the draft proposed changes to the CEQA Guidelines prescribe thresholds of significance or a particular methodology for performing an impact analysis; as with most environmental topics, significance criteria are left to the judgment and discretion of the Lead Agency. As previously discussed (Section 2.2.4 of this report), SCAQMD has drafted interim thresholds. The screening threshold of 3,000 MTCO₂e per year for all land uses was used in this analysis.

5.3 Toxic Air Contaminants

The threshold for toxic air contaminants (TACs) has a maximum incremental cancer risk of 10 per million and a non-cancer (acute and chronic) hazard index of 1.0 or greater. An exceedance to these values would be considered a significant impact.

6.0 Air Quality Emissions Impact

6.1 Construction Air Quality Emissions Impact

The latest version of CalEEMod was used to estimate the onsite and offsite construction emissions. The emissions incorporate Rule 402 and 403. Rule 402 and 403 (fugitive dust) are not considered mitigation measures as the Project by default is required to incorporate these rules during construction.

6.1.1 Regional Construction Emissions

The construction emissions for the Project would not exceed the SCAQMD's daily emission thresholds at the regional level as demonstrated in Table 10. Therefore, would be considered less than significant.

Table 10: Regional Significance - Construction Emissions (pounds/day)

Activity	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Site Preparation						
On-Site ²	3.65	36.00	32.90	0.05	9.27	5.41
Off-Site ³	0.09	0.10	1.12	0.00	0.23	0.05
Total	3.74	36.10	34.02	0.05	9.50	5.46
Grading						
On-Site ²	1.90	18.20	18.80	0.03	3.62	2.11
Off-Site ³	0.18	7.14	4.76	0.04	1.75	0.52
Total	2.08	25.34	23.56	0.07	5.37	2.63
Building Construction						
On-Site ²	1.20	11.20	13.10	0.02	0.50	0.46
Off-Site ³	0.14	0.56	1.95	0.00	0.46	0.11
Total	1.34	11.76	15.05	0.02	0.96	0.57
Paving						
On-Site ²	0.90	6.52	8.84	0.01	0.29	0.26
Off-Site ³	0.10	0.43	1.75	0.00	0.35	0.09
Total	1.00	6.95	10.59	0.01	0.64	0.35
Architectural Coating						
On-Site ²	34.73	0.88	1.14	0.00	0.03	0.03
Off-Site ³	0.02	0.03	0.32	0.00	0.07	0.02
Total	34.75	0.91	1.46	0.00	0.10	0.05
Total of overlapping phases⁴	37.09	19.62	27.10	0.03	1.70	0.97
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds	No	No	No	No	No	No

Notes:

¹ Source: CalEEMod Version 2022.1.1.22

² On-site emissions from equipment operated on-site that is not operated on public roads

³ Off-site emissions from equipment operated on public roads.

⁴ Depending on final construction schedules, building construction, architectural coatings and paving phases may overlap, and this data represents that worst-case scenario.

6.1.2 Localized Construction Emissions

The data provided in Table 11 shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors. Therefore, a less than significant local air quality impact would occur from construction of the proposed Project.

Table 11: Localized Significance – Construction

Phase	On-Site Pollutant Emissions (pounds/day) ¹			
	NOx	CO	PM10	PM2.5
Site Preparation	36.00	32.90	9.27	5.41
Grading	18.20	18.80	3.62	2.11
Building Construction	11.20	13.10	0.50	0.46
Paving	6.52	8.84	0.29	0.26
Architectural Coating	0.88	1.14	0.03	0.03
Peak Daily Emissions Considering Overlapping Phases	36.00	32.90	9.27	5.41
SCAQMD Threshold for 50 meters (164 feet) or less²	200	1,712	21	7
Exceeds Threshold?	No	No	No	No

Notes:

¹ Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for two acres in East San Bernardino Valley Source Receptor Area (SRA 35). This is a conservative threshold as the project will disturb a maximum of 3.5 acres per day (see Table 9).

² The nearest sensitive receptor is located 50 meters southwest; therefore, the 50-meter threshold has been used.

6.1.3 Construction-Related Human Health Impacts

Regarding health effects related to criteria pollutant emissions, the applicable significance thresholds are established for regional compliance with the state and federal ambient air quality standards, which are intended to protect public health from both acute and long-term health impacts, depending on the potential effects of the pollutant. Because regional and local emissions of criteria pollutants during construction of the Project would be below the applicable thresholds, it would not contribute to long-term health impacts related to nonattainment of the ambient air quality standards. Therefore, significant adverse acute health impacts as a result of Project construction are not anticipated.

6.1.4 Construction-Related Toxic Air Contaminant Impact

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed Project. The Office of Environmental Health Hazard Assessment (OEHHA) has issued the Air Toxic Hot Spots Program Risk Assessment Guidelines and Guidance Manual for the Preparation of Health Risk Assessments, February 2015 to provide a description of the algorithms, recommended exposure variates, cancer and noncancer health values, and the air modeling protocols needed to perform a health risk assessment (HRA) under the Air Toxics Hot Spots Information and Assessment Act of 1987. Hazard identification includes identifying all substances that are evaluated for cancer risk and/or non-cancer acute, 8-hour, and chronic health impacts. In addition, identifying any multi-pathway substances that present a cancer risk or chronic non-cancer hazard via non-inhalation routes of exposure.

Diesel particulate matter (DPM) from construction equipment and vehicles is a known carcinogen and has been shown to contribute to premature death, hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function in children.²⁰

CARB In-Use Off-Road Diesel-Fueled Fleets Regulation limits unnecessary idling to 5 minutes, requires all construction fleets to be labeled and reported to CARB, bans Tier 0 equipment, and phases out Tier 1 and 2 equipment thereby replacing fleets with cleaner equipment, and requires that fleets comply with Best Available Control Technology requirements.

The SCAQMD does not require land use development projects to prepare quantitative construction HRAs and therefore has no guidance on the preparation of construction HRAs. SCAQMD recommends a 30-year health risk analysis period. Given the relatively limited construction schedule (13 months) and number of heavy-duty construction equipment, the proposed Project would not result in a long-term substantial source of toxic air containment emissions and corresponding individual cancer risk. Furthermore, construction-based DPM emissions (including diesel exhaust emissions) do not exceed any local or regional thresholds. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the proposed Project.

6.2 Operational Air Quality Emissions Impact

6.2.1 Regional Operational Emissions

The operations-related criteria air quality impacts created by the proposed Project have been analyzed through the use of CalEEMod model. The operating emissions were based on year 2025, which is the anticipated opening year for the Project. The summer and winter emissions created by the proposed Project's long-term operations were calculated and the highest emissions from either summer or winter are summarized in Table 12.

Table 12: Regional Significance - Unmitigated Operational Emissions (lbs/day)

Activity	Pollutant Emissions (pounds/day) ¹					
	VOC	NOx	CO	SO2	PM10	PM2.5
Area Sources ²	2.04	0.02	2.84	0.00	0.01	0.00
Energy Usage ³	0.03	0.57	0.48	0.00	0.04	0.04
Mobile Sources ⁴	6.60	6.65	58.50	0.14	12.00	3.12
Total Emissions	8.67	7.24	61.82	0.14	12.05	3.16
SCAQMD Thresholds	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Notes:

¹ Source: CalEEMod Version 2022.1.1.22. The summer and winter emissions created by the proposed Project's long-term operations were calculated and the highest emissions from either summer or winter are summarized.

²⁰ CARB. Diesel Exhaust and Health. <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>.

² Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.

³ Energy usage consists of emissions from on-site natural gas usage.

⁴ Mobile sources consist of emissions from vehicles and road dust.

Table 12 provides the Project's unmitigated operational emissions. Table 12 shows that the Project does not exceed the SCAQMD daily emission threshold and regional operational emissions are considered to be less than significant.

6.2.2 Localized Operational Emissions

Table 13 shows the calculated emissions for the proposed operational activities compared with appropriate LSTs. The LST analysis only includes on-site sources; however, the CalEEMod software outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions shown in Table 13 include all on-site Project-related stationary sources and 10% of the Project-related new mobile sources.²¹ This percentage is an estimate of the amount of Project-related new vehicle traffic that will occur on-site.

Table 13: Localized Significance - Unmitigated Operational Emissions

On-Site Emission Source	On-Site Pollutant Emissions (pounds/day) ¹			
	NOx	CO	PM10	PM2.5
Area Sources ²	0.02	2.84	0.01	0.00
Energy Usage ³	0.57	0.48	0.04	0.04
On-Site Vehicle Emissions ⁴	0.67	5.85	1.20	0.31
Total Emissions	1.26	9.17	1.25	0.35
SCAQMD Threshold for 50 meters (164 feet)⁵	302	2,890	11	3
Exceeds Threshold?	No	No	No	No

Notes:

¹ Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for five acres in East San Bernardino Valley Source Receptor Area (SRA 35). Project covers approximately 5.093 acres.

² Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.

³ Energy usage consists of emissions from generation of electricity and on-site natural gas usage.

⁴ On-site vehicular emissions based on 1/10 of the gross vehicular emissions and road dust.

⁵ The nearest sensitive receptor is located 50 meters southwest; therefore, the 50-meter threshold has been used.

6.2.3 Operations-Related Human Health Impacts

As stated previously, regarding health effects related to criteria pollutant emissions, the applicable significance thresholds are established for regional compliance with the state and federal ambient air quality standards, which are intended to protect public health from both acute and long-term health impacts, depending on the potential effects of the pollutant. Because regional and local emissions of criteria pollutants during operation of the Project would be below the applicable thresholds, it would

²¹ The project site is approximately 0.1 miles in length at its longest point; therefore the on-site mobile source emissions represent approximately 1/69th of the shortest CalEEMod default distance of 6.9 miles. Therefore, to be conservative, 1/10th the distance (dividing the mobile source emissions by 10) was used to represent the portion of the overall mobile source emissions that would occur on-site.

not contribute to long-term health impacts related to nonattainment of the ambient air quality standards. Therefore, significant adverse acute health impacts as a result of Project operation are not anticipated.

6.3 CO Hot Spot Emissions

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with Project CO levels to the State and Federal CO standards which were presented in above in Section 5.0.

To determine if the proposed Project could cause emission levels in excess of the CO standards discussed above in Section 5.0, a sensitivity analysis is typically conducted to determine the potential for CO “hot spots” at a number of intersections in the general Project vicinity. Because of reduced speeds and vehicle queuing, “hot spots” potentially can occur at high traffic volume intersections with a Level of Service E or worse.

Micro-scale air quality emissions have traditionally been analyzed in environmental documents where the air basin was a non-attainment area for CO. However, the SCAQMD has demonstrated in the CO attainment redesignation request to EPA that there are no “hot spots” anywhere in the air basin, even at intersections with much higher volumes, much worse congestion, and much higher background CO levels than anywhere in San Bernardino County. If the worst-case intersections in the air basin have no “hot spot” potential, any local impacts will be below thresholds.

The Project-specific trip generation analysis showed that the Project is only anticipated to generate 1,619 daily vehicle trips, and the maximum daily traffic volume, including project-related trips, at any intersection within the project vicinity would be 24,500 daily trips (Ganddini). The 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan) showed that an intersection which has a daily traffic volume of approximately 100,000 vehicles per day would not violate the CO standard. The volume of traffic at Project buildout would be well below 100,000 vehicles and below the necessary volume to even get close to causing a violation of the CO standard. Therefore, no CO “hot spot” modeling was performed and no significant long-term air quality impact is anticipated to local air quality with the on-going use of the proposed Project.

6.4 Odors

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are of short-term in nature and the odor emissions are expected cease upon the drying or hardening of the odor producing materials. Diesel exhaust and VOCs would be emitted during construction of the Project, which are objectionable to some; however, emissions would disperse rapidly from the Project site and therefore should not reach an objectionable level at the nearest sensitive receptors. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the proposed Project.

The SCAQMD recommends that odor impacts be addressed in a qualitative manner. Such an analysis shall determine whether the Project would result in excessive nuisance odors, as defined under the California Code of Regulations and Section 41700 of the California Health and Safety Code, and thus would constitute a public nuisance related to air quality.

Potential sources that may emit odors during the on-going operations of the proposed Project would include odor emissions from vehicles and trash storage areas. Due to the distance of the nearest receptors from the Project site and through compliance with SCAQMD's Rule 402 no significant impact related to odors would occur during the on-going operations of the proposed Project.

6.5 Cumulative Regional Air Quality Impacts

Cumulative projects include local development as well as general growth within the project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered, would cover an even larger area. Accordingly, the cumulative analysis for the Project's air quality must be generic by nature.

The Project area is out of attainment for both ozone and PM10 particulate matter. Construction and operation of cumulative projects will further degrade the local air quality, as well as the air quality of the South Coast Air Basin. The greatest cumulative impact on the quality of regional air cell will be the incremental addition of pollutants mainly from increased traffic from residential, commercial, and industrial development and the use of heavy equipment and trucks associated with the construction of these projects. Air quality will be temporarily degraded during construction activities that occur separately or simultaneously. However, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact. The Project does not exceed any of the thresholds of significance and therefore is considered less than significant.

6.6 Air Quality Compliance

The California Environmental Quality Act (CEQA) requires a discussion of any inconsistencies between a proposed project and applicable General Plans and Regional Plans (CEQA Guidelines Section 15125). The regional plan that applies to the proposed Project includes the SCAQMD Air Quality Management Plan (AQMP). Therefore, this section discusses any potential inconsistencies of the proposed Project with the AQMP.

The purpose of this discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and discuss whether the proposed Project would interfere with the region's ability to comply with Federal and State air quality standards. If the decision-makers determine that the proposed Project is inconsistent, the lead agency may consider Project modifications or inclusion of mitigation to eliminate the inconsistency.

The SCAQMD CEQA Handbook states that "New or amended General Plan Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." Strict consistency with all aspects of the plan is usually not required. A proposed Project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

- (1) Whether the Project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- (2) Whether the Project will exceed the assumptions in the AQMP in 2022 or increments based on the year of Project buildout and phase.

Both of these criteria are evaluated in the following sections.

A. Criterion 1 - Increase in the Frequency or Severity of Violations?

Based on the air quality modeling analysis contained in this Air Analysis in Section 6, neither short-term construction impacts, nor long-term operations will result in significant impacts based on the SCAQMD regional and local thresholds of significance.

Therefore, the proposed Project is not projected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the AQMP for the first criterion.

B. Criterion 2 - Exceed Assumptions in the AQMP?

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed Project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the proposed Project are based on the same forecasts as the AQMP. The 2024-2050 Regional Transportation/Sustainable Communities Strategy, prepared by SCAG, 2024, includes sections on mobility, communities, environment, and economy. These sections currently respond directly to federal and state requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA. For this Project, the City of Redlands General Plan defines the assumptions that are represented in the AQMP.

The City of Redlands Zoning map classifies the land use designation of the site as General Commercial. The proposed project would be mix of commercial uses. Therefore, it is not anticipated that the Project would exceed the AQMP assumptions for the Project site and is found to be consistent with the AQMP for the second criterion.

Based on the above, the proposed Project will not result in an inconsistency with the SCAQMD AQMP. Therefore, a less than significant impact will occur.

7.0 Greenhouse Gas Impact Analysis

7.1 Construction Greenhouse Gas Emissions Impact

The greenhouse gas emissions from Project construction equipment and worker vehicles are shown in Table 14. The emissions are from all phases of construction. The total construction emissions amortized over a period of 30 years are estimated at 12.97 metric tons of CO₂e per year. Annual CalEEMod output calculations are provided in Appendix A.

Table 14: Construction Greenhouse Gas Emissions

Activity	Emissions (MTCO ₂ e) ¹
2024	118.00
2025	271.00
Total	389.00
Averaged over 30 years²	12.97

Notes:

1. MTCO₂e=metric tons of carbon dioxide equivalents (includes carbon dioxide, methane and nitrous oxide).
2. The emissions are averaged over 30 years because the average is added to the operational emissions, pursuant to SCAQMD.

* CalEEMod output (Appendix A)

7.2 Operational Greenhouse Gas Emissions Impact

Operational emissions occur over the life of the Project. The operational emissions for the Project are 2,821.78 metric tons of CO₂e per year (see Table 15). Furthermore, as shown in Table 15, the Project's total emissions (with incorporation of construction related GHG emissions) would be 2,834.75 metric tons of CO₂e per year. These emissions do not exceed the County of San Bernardino CAP and SCAQMD screening threshold of 3,000 metric tons of CO₂e per year. Therefore, the Project's GHG emissions are considered to be less than significant.

Table 15: Opening Year Unmitigated Project-Related Greenhouse Gas Emissions

Category	Greenhouse Gas Emissions (Metric Tons/Year) ¹					
	Bio-CO ₂	NonBio-CO ₂	CO ₂	CH ₄	N ₂ O	CO ₂ e
Area Sources ²	0.00	1.33	1.33	0.00	0.00	1.33
Energy Usage ³	0.00	378.00	378.00	0.03	0.00	380.00
Mobile Sources ⁴	0.00	2,248.00	2,248.00	0.11	0.11	2,288.00
Solid Waste ⁵	6.91	0.00	6.91	0.69	0.00	24.20
Water ⁶	0.95	5.14	6.09	0.10	0.00	9.25
Refrigerants	0.00	0.00	0.00	0.00	0.00	119.00
Construction ⁷	0.00	12.80	12.80	0.00	0.00	12.97
Total Emissions	7.86	2,645.27	2,653.13	0.93	0.11	2,834.75
SCAQMD Draft and San Bernardino County Screening Threshold						3,000
Exceeds Threshold?						No

Notes:

¹ Source: CalEEMod Version 2022.1.1.22

² Area sources consist of GHG emissions from consumer products, architectural coatings, and landscape equipment.

³ Energy usage consist of GHG emissions from electricity and natural gas usage.

⁴ Mobile sources consist of GHG emissions from vehicles.

⁵ Solid waste includes the CO₂ and CH₄ emissions created from the solid waste placed in landfills.

⁶ Water includes GHG emissions from electricity used for transport of water and processing of wastewater.

⁷ Construction GHG emissions based on a 30-year amortization rate.

7.3 Greenhouse Gas Plan Consistency

The proposed Project would have the potential to conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

Redlands Climate Action Plan Consistency (CAP)

As described in the regulatory section, the City approved and adopted the City of Redlands Climate Action Plan (Redlands CAP or CAP) on December 5, 2017. The proposed Project would be consistent with the transportation and water utility goals of the CAP by providing EV charging stations for electric vehicles per City requirements and complying with the City's Water Efficient Landscape requirements. The proposed Project would also be consistent with the CAP's energy efficiency goals by complying with the latest California Building Code (Title 24), including the latest CALGreen Code standards. Project construction would also comply with current local and State standards and CAP goals to increase diversion and reduction of waste by diverting construction waste from landfills to recycling. As such, the proposed project would be consistent with the applicable GHG reduction goals within the Redlands CAP.

Therefore, the proposed Project is consistent with the GHG Plan pursuant to Section 15183.5 of the State CEQA Guidelines. The Project will not result in substantial emissions of greenhouse gases and will not conflict with the County of San Bernardino CAP or the goals of AB-32 or SB-32.

7.4 Cumulative Regional Greenhouse Gas Impacts

Cumulative projects include local development as well as general growth within the project area. Construction and operation of cumulative projects will add to greenhouse gas emissions. The greatest cumulative impact will be the incremental addition of pollutants mainly from increased traffic from residential, commercial, and industrial development and the use of heavy equipment and trucks associated with the construction of these projects. As greenhouse gas emissions impacts are cumulative in nature, no typical single project can result in emissions of such a magnitude that it, in and by itself, would be significant on a project basis.

As project emissions meets the SCAQMD draft screening threshold and would be consistent with the goals of the Redlands CAP, no significant greenhouse gas impact would occur from the project.

8.0 Energy Analysis

Information from the CalEEMod 2022.1.1.22 Daily and Annual Outputs contained in the air quality and greenhouse gas analyses above was utilized for this analysis. The CalEEMod outputs detail Project related construction equipment, transportation energy demands, and facility energy demands.

8.1 Construction Energy Demand

8.1.1 Construction Equipment Electricity Usage Estimates

Electrical service will be provided by Southern California Edison (SCE). Based on the 2017 National Construction Estimator, Richard Pray (2017)²², the typical power cost per 1,000 square feet of building construction per month is estimated to be \$2.32. The Project plans to develop the site with 61,553 square feet of new commercial buildings over the course of approximately 13 months. Based on Table 16, the total power cost of the on-site electricity usage during the construction of the proposed Project is estimated to be approximately \$1,856.44. As shown in Table 16, the total electricity usage from Project construction related activities is estimated to be approximately 33,753 kWh.²³

Table 16: Project Construction Power Cost and Electricity Usage

Power Cost (per 1,000 square foot of building per month of construction)	Total Building Size (1,000 Square Foot) ¹	Construction Duration (months)	Total Project Construction Power Cost
\$2.32	61.553	13	\$1,856.44

Cost per kWh	Total Project Construction Electricity Usage (kWh)
\$0.055	33,753

* Assumes the Project will be under the GS-1 General Service rate under SCE.

8.1.2 Construction Equipment Fuel Estimates

Using the CalEEMod data input, the Project's construction phase would consume electricity and fossil fuels as a single energy demand, that is, once construction is completed their use would cease. CARB's 2017 Emissions Factors Tables show that on average aggregate fuel consumption (gasoline and diesel

²² Pray, Richard. 2017 National Construction Estimator. Carlsbad: Craftsman Book Company, 2017.

²³ LADWP's Small Commercial & Multi-Family Service (A-1) is approximately \$0.06 per kWh of electricity Southern California Edison (SCE). Rates & Pricing Choices: General Service/Industrial Rates. https://library.sce.com/content/dam/sce-doclib/public/regulatory/historical/electric/2020/schedules/general-service-&-industrial-rates/ELECTRIC_SCHEDULES_GS-1_2020.pdf

fuel) would be approximately 18.5 hp-hr-gal.²⁴ As presented in Table 17 below, Project construction activities would consume an estimated 33,550 gallons of diesel fuel.

Table 17: Construction Equipment Fuel Consumption Estimates

Phase	Number of Days	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor	HP hrs/day	Total Fuel Consumption (gal diesel fuel) ¹
Site Preparation	5	Rubber Tired Dozers	3	8	367	0.4	3,523	952
	5	Tractors/Loaders/Backhoes	4	8	84	0.37	995	269
Grading	8	Excavators	1	8	36	0.38	109	47
	8	Graders	1	8	148	0.41	485	210
	8	Rubber Tired Dozers	1	8	367	0.4	1,174	508
	8	Tractors/Loaders/Backhoes	3	8	84	0.37	746	323
Building Construction	230	Cranes	1	7	367	0.4	1,028	12,776
	230	Forklifts	3	8	82	0.2	394	4,893
	230	Generator Sets	1	8	14	0.74	83	1,030
	230	Tractors/Loaders/Backhoes	3	8	84	0.37	746	9,274
	230	Welders	1	8	46	0.45	166	2,059
Paving	18	Cement and Mortar Mixers	2	6	10	0.56	67	65
	18	Pavers	1	8	81	0.42	272	265
	18	Paving Equipment	2	6	89	0.36	384	374
	18	Rollers	2	6	36	0.38	164	160
	18	Tractors/Loaders/Backhoes	1	8	84	0.37	249	242
Architectural Coating	18	Air Compressors	1	6	37	0.48	107	104
CONSTRUCTION FUEL DEMAND (gallons of diesel fuel)								33,550

Notes:

¹Using Carl Moyer Guidelines Table D-21 Fuel consumption rate factors (bhp-hr/gal) for engines less than 750 hp.

(Source: https://www.arb.ca.gov/msprog/moyer/guidelines/2017gl/2017_gl_appendix_d.pdf)

8.1.3 Construction Worker Fuel Estimates

It is assumed that all construction worker trips are from light duty autos (LDA) along area roadways. With respect to estimated VMT, the construction worker trips would generate an estimated 128,043 VMT. Vehicle fuel efficiencies for construction workers were estimated in the air quality and greenhouse gas analysis using information generated using CARB's EMFAC model (see Appendix B for details). Table 18 shows that an estimated 4,216 gallons of fuel would be consumed for construction worker trips.

²⁴ Aggregate fuel consumption rate for all equipment was estimated at 18.5 hp-hr/day (from CARB's 2017 Emissions Factors Tables and fuel consumption rate factors as shown in Table D-21 of the Moyer Guidelines: https://www2.arb.ca.gov/sites/default/files/classic/msprog/moyer/guidelines/2017/2017_cmpgl.pdf).

Table 18: Construction Worker Fuel Consumption Estimates

Phase	Number of Days	Worker Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Site Preparation	5	17.5	18.5	1,619	30.37	53
Grading	8	15	18.5	2,220	30.37	73
Building Construction	230	27.2	18.5	115,736	30.37	3,810
Paving	18	20	18.5	6,660	30.37	219
Architectural Coating	18	5.43	18.5	1,808	30.37	60
Total Construction Worker Fuel Consumption						4,216

Notes:

¹ Assumptions for the worker trip length and vehicle miles traveled are consistent with CalEEMod 2022.1.1.22 defaults.

8.1.4 Construction Vendor/Hauling Fuel Estimates

Tables 19 and 20 show the estimated fuel consumption for vendor and hauling during building construction and architectural coating. With respect to estimated VMT, the vendor and hauling trips would generate an estimated 39,434 VMT. For the architectural coatings it is assumed that the contractors would be responsible for bringing coatings and equipment with them in their light duty vehicles.²⁵ Tables 19 and 20 show that an estimated 5,274 gallons of fuel would be consumed for vendor and hauling trips.

Table 19: Construction Vendor Fuel Consumption Estimates (MHD Trucks)¹

Phase	Number of Days	Vendor Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Site Preparation	5	0	10.2	0	8.38	0
Grading	8	0	10.2	0	8.38	0
Building Construction	230	10.7	10.2	25,102	8.38	2,997
Paving	18	10	10.2	1,836	8.38	219
Architectural Coating	18	0	10.2	0	8.38	0
Total Vendor Fuel Consumption						3,216

Notes:

¹ Assumptions for the vendor trip length and vehicle miles traveled are consistent with CalEEMod 2022.1.1.22 defaults.

²⁵ Vendors delivering construction material or hauling debris from the site during grading would use medium to heavy duty vehicles with an average fuel consumption of 9.22 mpg for medium heavy-duty trucks and 6.74 mpg for heavy heavy-duty trucks (see Appendix B for details).

Table 20: Construction Hauling Fuel Consumption Estimates (HHD Trucks)¹

Phase	Number of Days	Hauling Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Site Preparation	5	0	20	0	6.07	0
Grading	8	78.1	20	12,496	6.07	2,058
Building Construction	230	0	20	0	6.07	0
Paving	18	0	20	0	6.07	0
Architectural Coating	18	0	20	0	6.07	0
Total Construction Hauling Fuel Consumption						2,058

Notes:

¹Assumptions for the hauling trip length and vehicle miles traveled are consistent with CalEEMod 2022.1.1.22 defaults.

8.1.5 Construction Energy Efficiency/Conservation Measures

Construction equipment used over the approximately 13-month construction phase would conform to CARB regulations and California emissions standards. In addition, the CARB Airborne Toxic Control Measure limits idling times of construction vehicles to no more than five minutes, thereby minimizing unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment.

Construction of the proposed commercial development would require the typical use of energy resources. There are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

8.2 Operational Energy Demand

Energy consumption in support of or related to Project operations would include transportation energy demands (energy consumed by employee and patron vehicles accessing the Project site) and facilities energy demands (energy consumed by building operations and site maintenance activities).

8.2.1 Transportation Fuel Consumption

The largest source of operational energy use would be vehicle operation of customers. The site is located in an urban area. Using the CalEEMod output, an average trip for all vehicles was assumed to be 10.379 miles. To show a worst-case analysis, it was assumed that vehicles would operate 365 days per year. Table 21 shows the worst-case estimated annual fuel consumption for all classes of vehicles from autos

to heavy-heavy trucks.²⁶ Table 21 shows that an estimated 254,096 gallons of fuel would be consumed per year for the operation of the proposed Project.

Table 21: Estimated Vehicle Operations Fuel Consumption

Vehicle Type	Vehicle Mix	Number of Vehicles	Average Trip (miles) ¹	Daily VMT	Average Fuel Economy (mpg)	Total Gallons per Day	Total Annual Fuel Consumption (gallons)
Light Auto	Automobile	903.8	10.379	9,380	30.37	308.83	112,724
Light Truck	Automobile	93.7	10.379	973	25.00	38.91	14,204
Light Truck	Automobile	288.7	10.379	2,996	24.89	120.41	43,950
Medium Truck	Automobile	228.2	10.379	2,369	20.18	117.38	42,844
Light Heavy Truck	2-Axle Truck	44.0	10.379	456	16.06	28.42	10,371
Light Heavy Truck 10,000 lbs +	2-Axle Truck	11.9	10.379	123	15.14	8.14	2,973
Medium Heavy Truck	3-Axle Truck	19.5	10.379	203	8.38	24.20	8,832
Heavy Heavy Truck	4-Axle Truck	29.2	10.379	303	6.07	49.86	18,197
Total		1,619	--	16,803	--	696.15	--
Total Annual Fuel Consumption							254,096

Notes:

¹ The trip generation assessment, the Project is to generate 1,619 total net new trips. Default CalEEMod vehicle fleet mix utilized.

¹Based on the size of the site and relative location, trips were assumed to be local rather than regional.

Trip generation generated by the proposed Project are consistent with other similar commercial uses of similar scale and configuration as reflected in the trip generation analysis (Ganddini, 2024). That is, the proposed Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips, nor associated excess and wasteful vehicle energy consumption. Therefore, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

8.2.2 Facility Energy Demands (Electricity and Natural Gas)

The annual natural gas and electricity demands were provided per the CalEEMod output and are provided in Table 22.

<Table 22, next page>

²⁶ Average fuel economy based on aggregate mileage calculated in EMFAC 2021 for opening year (2025). See Appendix B for EMFAC output.

Table 22: Project Unmitigated Annual Operational Energy Demand Summary¹

Natural Gas Demand	kBTU/year
Automobile Care Center	128,444
Hotel	1,820,905
Fast Food Restaurant with Drive Through	165,693
Total	2,115,042
Electricity Demand	kWh/year
Automobile Care Center	28,565
Hotel	972,767
Fast Food Restaurant with Drive Through	50,847
Parking Lot	49,988
Total	1,102,167

Notes:

¹Taken from the CalEEMod 2022.1.1.22 annual output.

As shown in Table 22, the estimated electricity demand for the proposed Project is approximately 1,102,167 kWh per year. In 2022, the non-residential sector of the County of San Bernardino consumed approximately 10,328 million kWh of electricity.²⁷ In addition, the estimated natural gas consumption for the proposed Project is approximately 2,115,042 kBTU per year. In 2022, the non-residential sector of the County of San Bernardino consumed approximately 295 million therms, or 29.5 billion kBTU, of gas.²⁸ Therefore, the increase in both electricity and natural gas demand from the proposed Project is insignificant compared to the County's 2022 demand.

8.3 Renewable Energy and Energy Efficiency Plan Consistency

Regarding federal transportation regulations, the Project site is located in an already developed area. Access to/from the Project site is from existing roads. These roads are already in place so the Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be proposed pursuant to the ISTEPA because SCAG is not planning for intermodal facilities in the Project area.

Regarding the State's Energy Plan and compliance with Title 24 CCR energy efficiency standards, the applicant is required to comply with the California Green Building Standard Code requirements for energy efficient buildings and appliances as well as utility energy efficiency programs implemented by the SCE and Southern California Gas Company.

²⁷ California Energy Commission, Electricity Consumption by County. <https://ecdms.energy.ca.gov/elecbycounty.aspx>

²⁸ California Energy Commission, Gas Consumption by County. <http://ecdms.energy.ca.gov/gasbycounty.aspx>

Regarding the State's Renewable Energy Portfolio Standards, the Project would be required to meet or exceed the energy standards established in the California Green Building Standards Code, Title 24, Part 11 (CALGreen). CalGreen Standards require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials.

8.4 Cumulative Regional Energy Impacts

Cumulative projects include local development as well as general growth within the project area. The greatest cumulative impact on the regional energy usage will be from increased traffic from residential, commercial, and industrial development and the use of heavy equipment and trucks associated with the construction of these projects. However, as the Project's natural gas and electricity usage will both be under 0.01% of the County of San Bernardino's 2022 usage, the Project is considered less than significant.

9.0 References

The following references were used in the preparing this analysis.

California Air Pollution Control Officers Association

2009 Health Risk Assessments for Proposed Land Use Projects

California Air Resources Board

2008 Resolution 08-43

2008 Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act

2008 ARB Recommended Interim Risk Management Policy for Inhalation-Based Residential Cancer Risk – Frequently Asked Questions

2008 Climate Change Scoping Plan, a framework for change.

2011 Supplement to the AB 32 Scoping Plan Functional Equivalent Document

2013 Revised Emission Factors for Gasoline Marketing Operations at California Gasoline Dispensing Facilities

2014 First Update to the Climate Change Scoping Plan, Building on the Framework Pursuant to AB32, the California Global Warming Solutions Act of 2006. May.

2018 Historical Air Quality, Top 4 Summary

County of San Bernardino

2007 County of San Bernardino 2007 General Plan, March 13 (amended April 24, 2014).

2011 County of San Bernardino Greenhouse Gas Emissions Reduction Plan.

Governor's Office of Planning and Research

2008 CEQA and Climate: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review

2009 CEQA Guideline Sections to be Added or Amended

Office of Environmental Health Hazard Assessment

2015 Air Toxics Hot Spots Program Risk Assessment Guidelines

South Coast Air Quality Management District

- | | |
|------|---|
| 1993 | CEQA Air Quality Handbook |
| 2005 | Rule 403 Fugitive Dust |
| 2007 | 2007 Air Quality Management Plan |
| 2008 | Final Localized Significance Threshold Methodology, Revised |
| 2011 | Appendix A Calculation Details for CalEEMod |
| 2012 | Final 2012 Air Quality Management Plan |
| 2016 | Final 2016 Air Quality Management Plan |

Appendix A:

CalEEMod Emission Output

913 Redlands Detailed Report

Table of Contents

- 1. Basic Project Information
 - 1.1. Basic Project Information
 - 1.2. Land Use Types
 - 1.3. User-Selected Emission Reduction Measures by Emissions Sector
- 2. Emissions Summary
 - 2.1. Construction Emissions Compared Against Thresholds
 - 2.2. Construction Emissions by Year, Unmitigated
 - 2.4. Operations Emissions Compared Against Thresholds
 - 2.5. Operations Emissions by Sector, Unmitigated
- 3. Construction Emissions Details
 - 3.1. Site Preparation (2024) - Unmitigated
 - 3.3. Grading (2024) - Unmitigated
 - 3.5. Building Construction (2024) - Unmitigated
 - 3.7. Building Construction (2025) - Unmitigated

3.9. Paving (2025) - Unmitigated

3.11. Architectural Coating (2025) - Unmitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	913 Redlands
Construction Start Date	9/2/2024
Operational Year	2025
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.50
Precipitation (days)	24.0
Location	34.06530282312673, -117.22734132495239
County	San Bernardino-South Coast
City	Redlands
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5394
EDFZ	10
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.22

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
------------------	------	------	-------------	-----------------------	------------------------	--------------------------------	------------	-------------

Automobile Care Center	3.00	1000sqft	0.07	2,995	0.00	—	—	—
Hotel	90.0	Room	3.00	60,960	0.00	—	—	—
Fast Food Restaurant with Drive Thru	1.45	1000sqft	0.03	1,450	0.00	—	—	—
Parking Lot	1.31	Acre	1.31	0.00	10,000	—	—	—

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.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.26	10.9	15.4	0.03	0.44	0.45	0.88	0.40	0.11	0.51	—	3,111	3,111	0.14	0.08	2.35	3,142
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	34.7	36.1	34.0	0.06	1.60	7.89	9.49	1.47	3.99	5.47	—	8,658	8,658	0.74	0.92	0.32	8,950
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.38	5.78	7.91	0.01	0.23	0.27	0.47	0.21	0.11	0.27	—	1,620	1,620	0.07	0.04	0.55	1,635
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.43	1.05	1.44	< 0.005	0.04	0.05	0.09	0.04	0.02	0.05	—	268	268	0.01	0.01	0.09	271

2.2. Construction Emissions by Year, Unmitigated

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

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.26	10.9	15.4	0.03	0.44	0.45	0.88	0.40	0.11	0.51	—	3,111	3,111	0.14	0.08	2.35	3,142
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	3.73	36.1	34.0	0.06	1.60	7.89	9.49	1.47	3.99	5.47	—	8,658	8,658	0.74	0.92	0.32	8,950
2025	34.7	11.0	14.8	0.03	0.44	0.45	0.88	0.40	0.11	0.51	—	3,080	3,080	0.14	0.08	0.06	3,108
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.29	2.71	3.12	0.01	0.11	0.27	0.38	0.10	0.11	0.21	—	702	702	0.04	0.03	0.28	713
2025	2.38	5.78	7.91	0.01	0.23	0.24	0.47	0.21	0.06	0.27	—	1,620	1,620	0.07	0.04	0.55	1,635
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.05	0.49	0.57	< 0.005	0.02	0.05	0.07	0.02	0.02	0.04	—	116	116	0.01	0.01	0.05	118
2025	0.43	1.05	1.44	< 0.005	0.04	0.04	0.09	0.04	0.01	0.05	—	268	268	0.01	0.01	0.09	271

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.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.67	6.78	61.8	0.14	0.14	11.9	12.1	0.14	3.03	3.16	47.5	16,666	16,713	5.59	0.68	772	17,826
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	7.72	7.22	49.4	0.13	0.14	11.9	12.1	0.13	3.03	3.16	47.5	15,754	15,801	5.61	0.70	720	16,870
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7.99	7.35	53.2	0.14	0.14	11.7	11.9	0.14	2.98	3.12	47.5	15,902	15,949	5.62	0.70	742	17,041
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.46	1.34	9.70	0.02	0.03	2.14	2.17	0.02	0.54	0.57	7.86	2,633	2,641	0.93	0.12	123	2,821

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.60	6.19	58.5	0.14	0.10	11.9	12.0	0.09	3.03	3.12	—	14,339	14,339	0.67	0.65	53.4	14,602
Area	2.04	0.02	2.84	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	11.7	11.7	< 0.005	< 0.005	—	11.7
Energy	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	2,284	2,284	0.16	0.01	—	2,292
Water	—	—	—	—	—	—	—	—	—	—	5.76	31.1	36.8	0.59	0.01	—	55.9
Waste	—	—	—	—	—	—	—	—	—	—	41.7	0.00	41.7	4.17	0.00	—	146
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	718	718
Total	8.67	6.78	61.8	0.14	0.14	11.9	12.1	0.14	3.03	3.16	47.5	16,666	16,713	5.59	0.68	772	17,826
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.12	6.65	48.9	0.13	0.10	11.9	12.0	0.09	3.03	3.12	—	13,438	13,438	0.69	0.67	1.38	13,657
Area	1.57	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	2,284	2,284	0.16	0.01	—	2,292
Water	—	—	—	—	—	—	—	—	—	—	5.76	31.1	36.8	0.59	0.01	—	55.9
Waste	—	—	—	—	—	—	—	—	—	—	41.7	0.00	41.7	4.17	0.00	—	146

Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	718	718
Total	7.72	7.22	49.4	0.13	0.14	11.9	12.1	0.13	3.03	3.16	47.5	15,754	15,801	5.61	0.70	720	16,870
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.07	6.77	50.7	0.13	0.10	11.7	11.8	0.09	2.98	3.07	—	13,578	13,578	0.69	0.68	23.0	13,820
Area	1.89	0.02	1.95	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.01	8.01	< 0.005	< 0.005	—	8.04
Energy	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	2,284	2,284	0.16	0.01	—	2,292
Water	—	—	—	—	—	—	—	—	—	—	5.76	31.1	36.8	0.59	0.01	—	55.9
Waste	—	—	—	—	—	—	—	—	—	—	41.7	0.00	41.7	4.17	0.00	—	146
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	718	718
Total	7.99	7.35	53.2	0.14	0.14	11.7	11.9	0.14	2.98	3.12	47.5	15,902	15,949	5.62	0.70	742	17,041
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.11	1.23	9.26	0.02	0.02	2.14	2.16	0.02	0.54	0.56	—	2,248	2,248	0.11	0.11	3.81	2,288
Area	0.35	< 0.005	0.36	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.33	1.33	< 0.005	< 0.005	—	1.33
Energy	0.01	0.10	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	378	378	0.03	< 0.005	—	380
Water	—	—	—	—	—	—	—	—	—	—	0.95	5.14	6.09	0.10	< 0.005	—	9.25
Waste	—	—	—	—	—	—	—	—	—	—	6.91	0.00	6.91	0.69	0.00	—	24.2
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	119	119
Total	1.46	1.34	9.70	0.02	0.03	2.14	2.17	0.02	0.54	0.57	7.86	2,633	2,641	0.93	0.12	123	2,821

3. Construction Emissions Details

3.1. Site Preparation (2024) - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.65	36.0	32.9	0.05	1.60	—	1.60	1.47	—	1.47	—	5,296	5,296	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.49	0.45	< 0.005	0.02	—	0.02	0.02	—	0.02	—	72.5	72.5	< 0.005	< 0.005	—	72.8
Dust From Material Movement	—	—	—	—	—	0.11	0.11	—	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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.09	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.0	12.0	< 0.005	< 0.005	—	12.1
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.10	1.12	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	231	231	0.01	0.01	0.03	234
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
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.21	3.21	< 0.005	< 0.005	0.01	3.25
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.53	0.53	< 0.005	< 0.005	< 0.005	0.54
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
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

3.3. Grading (2024) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.90	18.2	18.8	0.03	0.84	—	0.84	0.77	—	0.77	—	2,958	2,958	0.12	0.02	—	2,969

Dust From Material Movement	—	—	—	—	—	2.78	2.78	—	1.34	1.34	—	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.40	0.41	< 0.005	0.02	—	0.02	0.02	—	0.02	—	64.8	64.8	< 0.005	< 0.005	—	65.1
Dust From Material Movement	—	—	—	—	—	0.06	0.06	—	0.03	0.03	—	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.07	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.7	10.7	< 0.005	< 0.005	—	10.8
Dust From Material Movement	—	—	—	—	—	0.01	0.01	—	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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.09	0.96	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	198	198	0.01	0.01	0.02	200
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
Hauling	0.11	7.05	3.80	0.04	0.10	1.45	1.55	0.07	0.40	0.47	—	5,502	5,502	0.61	0.89	0.30	5,781

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.40	4.40	< 0.005	< 0.005	0.01	4.46
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
Hauling	< 0.005	0.16	0.08	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	121	121	0.01	0.02	0.11	127
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.73	0.73	< 0.005	< 0.005	< 0.005	0.74
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
Hauling	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	20.0	20.0	< 0.005	< 0.005	0.02	21.0

3.5. Building Construction (2024) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	1.58	1.85	< 0.005	0.07	—	0.07	0.06	—	0.06	—	338	338	0.01	< 0.005	—	339
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.03	0.29	0.34	< 0.005	0.01	—	0.01	0.01	—	0.01	—	55.9	55.9	< 0.005	< 0.005	—	56.1
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.13	0.16	1.74	0.00	0.00	0.36	0.36	0.00	0.08	0.08	—	359	359	0.02	0.01	0.04	363
Vendor	0.01	0.40	0.21	< 0.005	< 0.005	0.09	0.10	< 0.005	0.03	0.03	—	336	336	0.03	0.05	0.02	352
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.26	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	51.2	51.2	< 0.005	< 0.005	0.10	52.0
Vendor	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	47.4	47.4	< 0.005	0.01	0.06	49.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.48	8.48	< 0.005	< 0.005	0.02	8.60
Vendor	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.84	7.84	< 0.005	< 0.005	0.01	8.21
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

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	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	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.13	10.4	13.0	0.02	0.43	—	0.43	0.40	—	0.40	—	2,398	2,398	0.10	0.02	—	2,406
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.55	5.13	6.41	0.01	0.21	—	0.21	0.20	—	0.20	—	1,178	1,178	0.05	0.01	—	1,182
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.94	1.17	< 0.005	0.04	—	0.04	0.04	—	0.04	—	195	195	0.01	< 0.005	—	196
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.12	2.12	0.00	0.00	0.36	0.36	0.00	0.08	0.08	—	383	383	0.02	0.01	1.42	389
Vendor	0.01	0.37	0.20	< 0.005	< 0.005	0.09	0.10	< 0.005	0.03	0.03	—	331	331	0.03	0.05	0.93	347
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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.13	1.60	0.00	0.00	0.36	0.36	0.00	0.08	0.08	—	351	351	0.02	0.01	0.04	355
Vendor	0.01	0.38	0.20	< 0.005	< 0.005	0.09	0.10	< 0.005	0.03	0.03	—	331	331	0.03	0.05	0.02	346
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.07	0.83	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	175	175	0.01	0.01	0.30	177
Vendor	< 0.005	0.19	0.10	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.01	—	162	162	0.01	0.02	0.20	170
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.15	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.9	28.9	< 0.005	< 0.005	0.05	29.4
Vendor	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	26.9	26.9	< 0.005	< 0.005	0.03	28.2
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

3.9. Paving (2025) - Unmitigated

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

Location	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	0.71	6.52	8.84	0.01	0.29	—	0.29	0.26	—	0.26	—	1,351	1,351	0.05	0.01	—	1,355
Paving	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.71	6.52	8.84	0.01	0.29	—	0.29	0.26	—	0.26	—	1,351	1,351	0.05	0.01	—	1,355
Paving	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.32	0.44	< 0.005	0.01	—	0.01	0.01	—	0.01	—	66.6	66.6	< 0.005	< 0.005	—	66.8
Paving	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.0	11.0	< 0.005	< 0.005	—	11.1
Paving	< 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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.09	1.56	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	282	282	0.01	0.01	1.05	286
Vendor	0.01	0.34	0.19	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	308	308	0.02	0.05	0.87	324
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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.10	1.17	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	258	258	0.01	0.01	0.03	262

Vendor	0.01	0.36	0.19	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	309	309	0.02	0.05	0.02	323
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	0.01	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	12.9	12.9	< 0.005	< 0.005	0.02	13.1
Vendor	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	15.2	15.2	< 0.005	< 0.005	0.02	16.0
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.14	2.14	< 0.005	< 0.005	< 0.005	2.17
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.52	2.52	< 0.005	< 0.005	< 0.005	2.64
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (2025) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	34.6	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.01	0.04	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.58	6.58	< 0.005	< 0.005	—	6.61
Architectural Coatings	1.71	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.09	1.09	< 0.005	< 0.005	—	1.09
Architectural Coatings	0.31	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.03	0.32	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	70.2	70.2	< 0.005	< 0.005	0.01	71.1
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
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
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.51	3.51	< 0.005	< 0.005	0.01	3.56
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
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
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.58	0.58	< 0.005	< 0.005	< 0.005	0.59

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
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

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	—	41.6	41.6	< 0.005	< 0.005	—	41.8
Hotel	—	—	—	—	—	—	—	—	—	—	—	1,418	1,418	0.09	0.01	—	1,423
Fast Food Restaurant with Drive Thru	—	—	—	—	—	—	—	—	—	—	—	74.1	74.1	< 0.005	< 0.005	—	74.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	72.9	72.9	< 0.005	< 0.005	—	73.1
Total	—	—	—	—	—	—	—	—	—	—	—	1,606	1,606	0.10	0.01	—	1,612
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Automobil Care Center	—	—	—	—	—	—	—	—	—	—	—	41.6	41.6	< 0.005	< 0.005	—	41.8
Hotel	—	—	—	—	—	—	—	—	—	—	—	1,418	1,418	0.09	0.01	—	1,423
Fast Food Restaurant with Drive Thru	—	—	—	—	—	—	—	—	—	—	—	74.1	74.1	< 0.005	< 0.005	—	74.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	72.9	72.9	< 0.005	< 0.005	—	73.1
Total	—	—	—	—	—	—	—	—	—	—	—	1,606	1,606	0.10	0.01	—	1,612
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Automobil e Care Center	—	—	—	—	—	—	—	—	—	—	—	6.89	6.89	< 0.005	< 0.005	—	6.92
Hotel	—	—	—	—	—	—	—	—	—	—	—	235	235	0.01	< 0.005	—	236
Fast Food Restaurant with Drive Thru	—	—	—	—	—	—	—	—	—	—	—	12.3	12.3	< 0.005	< 0.005	—	12.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	12.1	12.1	< 0.005	< 0.005	—	12.1
Total	—	—	—	—	—	—	—	—	—	—	—	266	266	0.02	< 0.005	—	267

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

Automobile Care Center	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	41.2	41.2	< 0.005	< 0.005	—	41.3
Hotel	0.03	0.49	0.41	< 0.005	0.04	—	0.04	0.04	—	0.04	—	584	584	0.05	< 0.005	—	585
Fast Food Restaurant with Drive Thru	< 0.005	0.04	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	53.1	53.1	< 0.005	< 0.005	—	53.2
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
Total	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	678	678	0.06	< 0.005	—	680
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Automobile Care Center	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	41.2	41.2	< 0.005	< 0.005	—	41.3
Hotel	0.03	0.49	0.41	< 0.005	0.04	—	0.04	0.04	—	0.04	—	584	584	0.05	< 0.005	—	585
Fast Food Restaurant with Drive Thru	< 0.005	0.04	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	53.1	53.1	< 0.005	< 0.005	—	53.2
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
Total	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	678	678	0.06	< 0.005	—	680
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Automobile Care Center	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.82	6.82	< 0.005	< 0.005	—	6.83
Hotel	< 0.005	0.09	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	96.6	96.6	0.01	< 0.005	—	96.9

Fast Food Restaurant with Drive Thru	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.79	8.79	< 0.005	< 0.005	—	8.82
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
Total	0.01	0.10	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	112	112	0.01	< 0.005	—	113

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	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	1.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.47	0.02	2.84	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	11.7	11.7	< 0.005	< 0.005	—	11.7
Total	2.04	0.02	2.84	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	11.7	11.7	< 0.005	< 0.005	—	11.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	1.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural	0.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	1.57	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.06	< 0.005	0.36	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.33	1.33	< 0.005	< 0.005	—	1.33
Total	0.35	< 0.005	0.36	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.33	1.33	< 0.005	< 0.005	—	1.33

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	0.54	2.80	3.34	0.06	< 0.005	—	5.12
Hotel	—	—	—	—	—	—	—	—	—	—	4.37	22.7	27.0	0.45	0.01	—	41.5
Fast Food Restaurant with Drive Thru	—	—	—	—	—	—	—	—	—	—	0.84	4.37	5.21	0.09	< 0.005	—	8.00

Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	1.24	1.24	< 0.005	< 0.005	—	1.25
Total	—	—	—	—	—	—	—	—	—	—	5.76	31.1	36.8	0.59	0.01	—	55.9
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	0.54	2.80	3.34	0.06	< 0.005	—	5.12
Hotel	—	—	—	—	—	—	—	—	—	—	4.37	22.7	27.0	0.45	0.01	—	41.5
Fast Food Restaurant with Drive Thru	—	—	—	—	—	—	—	—	—	—	0.84	4.37	5.21	0.09	< 0.005	—	8.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	1.24	1.24	< 0.005	< 0.005	—	1.25
Total	—	—	—	—	—	—	—	—	—	—	5.76	31.1	36.8	0.59	0.01	—	55.9
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	0.09	0.46	0.55	0.01	< 0.005	—	0.85
Hotel	—	—	—	—	—	—	—	—	—	—	0.72	3.75	4.47	0.07	< 0.005	—	6.87
Fast Food Restaurant with Drive Thru	—	—	—	—	—	—	—	—	—	—	0.14	0.72	0.86	0.01	< 0.005	—	1.32
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.21	0.21	< 0.005	< 0.005	—	0.21
Total	—	—	—	—	—	—	—	—	—	—	0.95	5.14	6.09	0.10	< 0.005	—	9.25

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	6.17	0.00	6.17	0.62	0.00	—	21.6
Hotel	—	—	—	—	—	—	—	—	—	—	26.6	0.00	26.6	2.65	0.00	—	92.9
Fast Food Restaurant with Drive Thru	—	—	—	—	—	—	—	—	—	—	9.00	0.00	9.00	0.90	0.00	—	31.5
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	41.7	0.00	41.7	4.17	0.00	—	146
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	6.17	0.00	6.17	0.62	0.00	—	21.6
Hotel	—	—	—	—	—	—	—	—	—	—	26.6	0.00	26.6	2.65	0.00	—	92.9
Fast Food Restaurant with Drive Thru	—	—	—	—	—	—	—	—	—	—	9.00	0.00	9.00	0.90	0.00	—	31.5
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	41.7	0.00	41.7	4.17	0.00	—	146
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Automobil Care Center	—	—	—	—	—	—	—	—	—	—	1.02	0.00	1.02	0.10	0.00	—	3.57
Hotel	—	—	—	—	—	—	—	—	—	—	4.40	0.00	4.40	0.44	0.00	—	15.4
Fast Food Restaurant with Drive Thru	—	—	—	—	—	—	—	—	—	—	1.49	0.00	1.49	0.15	0.00	—	5.21
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	6.91	0.00	6.91	0.69	0.00	—	24.2

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Automobil e Care Center	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	621	621
Hotel	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	95.3	95.3
Fast Food Restaurant with Drive Thru	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.27	2.27
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	718	718
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Automobil Care Center	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	621	621
Hotel	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	95.3	95.3
Fast Food Restaurant with Drive Thru	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.27	2.27
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	718	718
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Automobil e Care Center	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	103	103
Hotel	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	15.8	15.8
Fast Food Restaurant with Drive Thru	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	119	119

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)

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

Equipment Type	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	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	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	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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequeste red	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequeste red	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	10/1/2024	10/8/2024	5.00	5.00	—
Grading	Grading	10/9/2024	10/20/2024	5.00	8.00	—
Building Construction	Building Construction	10/21/2024	9/8/2025	5.00	230	—

Paving	Paving	9/9/2025	10/4/2025	5.00	18.0	—
Architectural Coating	Architectural Coating	10/5/2025	10/30/2025	5.00	18.0	—

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

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	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	—	10.2	HHDT,MHDT
Grading	Hauling	78.1	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	27.2	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	10.7	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	20.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	10.0	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	5.43	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	98,108	32,703	3,424

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	—	7.50	0.00	—
Grading	—	5,000	8.00	0.00	—
Paving	0.00	0.00	0.00	0.00	1.31

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
----------	--------------------	-----------

Automobile Care Center	0.00	0%
Hotel	0.00	0%
Fast Food Restaurant with Drive Thru	0.00	0%
Parking Lot	1.31	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	532	0.03	< 0.005
2025	0.00	532	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
Total all Land Uses	1,619	1,619	1,619	590,935	16,803	16,803	16,803	6,133,139

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	98,108	32,703	3,424

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)
Automobile Care Center	28,565	532	0.0330	0.0040	128,444
Hotel	972,767	532	0.0330	0.0040	1,820,905
Fast Food Restaurant with Drive Thru	50,847	532	0.0330	0.0040	165,693
Parking Lot	49,988	532	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)
Automobile Care Center	281,773	0.00
Hotel	2,283,009	0.00
Fast Food Restaurant with Drive Thru	440,124	0.00
Parking Lot	0.00	160,591

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Automobile Care Center	11.4	—
Hotel	49.3	—
Fast Food Restaurant with Drive Thru	16.7	—
Parking Lot	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
Automobile Care Center	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Automobile Care Center	Supermarket refrigeration and condensing units	R-404A	3,922	26.5	16.5	16.5	18.0
Hotel	Household refrigerators and/or freezers	R-134a	1,430	0.00	0.60	0.00	1.00
Hotel	Other commercial A/C and heat pumps	R-410A	2,088	1.80	4.00	4.00	18.0
Hotel	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
Fast Food Restaurant with Drive Thru	Household refrigerators and/or freezers	R-134a	1,430	0.00	0.60	0.00	1.00
Fast Food Restaurant with Drive Thru	Other commercial A/C and heat pumps	R-410A	2,088	1.80	4.00	4.00	18.0
Fast Food Restaurant with Drive Thru	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

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

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

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

5.16.2. Process Boilers

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

5.17. User Defined

Equipment Type	Fuel Type
----------------	-----------

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
--------------------------	----------------------	---------------	-------------

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
--------------------	---------------	-------------

5.18.2. Sequestration

5.18.2.1. Unmitigated

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

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	26.6	annual days of extreme heat
Extreme Precipitation	4.20	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	6.46	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	100
AQ-PM	57.4
AQ-DPM	82.8
Drinking Water	96.3
Lead Risk Housing	29.2
Pesticides	74.7
Toxic Releases	44.2
Traffic	81.0
Effect Indicators	—
CleanUp Sites	81.9
Groundwater	47.6
Haz Waste Facilities/Generators	96.8
Impaired Water Bodies	12.5
Solid Waste	0.00
Sensitive Population	—
Asthma	34.7
Cardio-vascular	45.1
Low Birth Weights	75.6
Socioeconomic Factor Indicators	—
Education	39.2
Housing	89.1

Linguistic	17.3
Poverty	55.9
Unemployment	14.4

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	37.76466059
Employed	27.51186963
Median HI	26.53663544
Education	—
Bachelor's or higher	60.5800077
High school enrollment	100
Preschool enrollment	11.52316181
Transportation	—
Auto Access	62.47914795
Active commuting	28.56409598
Social	—
2-parent households	37.02040293
Voting	39.83061722
Neighborhood	—
Alcohol availability	30.07827538
Park access	50.53252919
Retail density	65.94379571
Supermarket access	72.28281791
Tree canopy	43.62889773

Housing	—
Homeownership	9.303220839
Housing habitability	37.12305916
Low-inc homeowner severe housing cost burden	73.38637239
Low-inc renter severe housing cost burden	66.31592455
Uncrowded housing	31.19466188
Health Outcomes	—
Insured adults	48.58206082
Arthritis	92.2
Asthma ER Admissions	65.8
High Blood Pressure	95.2
Cancer (excluding skin)	82.6
Asthma	30.0
Coronary Heart Disease	94.7
Chronic Obstructive Pulmonary Disease	71.2
Diagnosed Diabetes	92.6
Life Expectancy at Birth	79.7
Cognitively Disabled	52.2
Physically Disabled	60.6
Heart Attack ER Admissions	32.7
Mental Health Not Good	41.5
Chronic Kidney Disease	95.6
Obesity	56.2
Pedestrian Injuries	53.3
Physical Health Not Good	67.2
Stroke	91.3
Health Risk Behaviors	—

Binge Drinking	13.6
Current Smoker	36.3
No Leisure Time for Physical Activity	67.1
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	7.3
Elderly	81.9
English Speaking	84.0
Foreign-born	37.0
Outdoor Workers	85.1
Climate Change Adaptive Capacity	—
Impervious Surface Cover	69.4
Traffic Density	74.6
Traffic Access	23.0
Other Indices	—
Hardship	54.2
Other Decision Support	—
2016 Voting	58.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	72.0
Healthy Places Index Score for Project Location (b)	32.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	No demolition required
Operations: Vehicle Data	Per traffic study
Land Use	Per site plan

Appendix B:

EMFAC2021 Output

Source: EMFAC2021 (v1.0.2) Emissions Inventory

Region Type: Sub-Area

Region: San Bernardino (SC)

Calendar Year: 2025

Season: Annual

Vehicle Classification: EMFAC2007 Categories

Units: miles/day for CVMT and EVMT, trips/day for Trips, kWh/day for Energy Consumption, tons/day for Emissions, 1000 gallons/day for Fuel Consumption

Region	Calendar Year	Vehicle Category	Model Year	Speed	Fuel	Total VMT	Trips	Fuel Consumption	Combined VMT	Combined Fuel Consumption	MPG	Vehicle Category
San Bernardino (SC)	2025	HHDT	Aggregate	Aggregate	Gasoline	177.2217014	77.42629477	0.044579975	1799286.466	296.266338	6.07320588	HHDT
San Bernardino (SC)	2025	HHDT	Aggregate	Aggregate	Diesel	1799109.244	221962.6286	296.221758				
San Bernardino (SC)	2025	LDA	Aggregate	Aggregate	Gasoline	20012363.19	2124445.407	659.2303928	20047185.15	660.0337543	30.37296959	LDA
San Bernardino (SC)	2025	LDA	Aggregate	Aggregate	Diesel	34821.96021	4226.27462	0.803361461				
San Bernardino (SC)	2025	LDT1	Aggregate	Aggregate	Gasoline	1386010.237	172343.7907	55.44488475	1386149.107	55.45059701	24.99791132	LDT1
San Bernardino (SC)	2025	LDT1	Aggregate	Aggregate	Diesel	138.8700264	27.0666175	0.005712258				
San Bernardino (SC)	2025	LDT2	Aggregate	Aggregate	Gasoline	8156000.659	925465.374	328.0141754	8180878.513	328.7471614	24.88501643	LDT2
San Bernardino (SC)	2025	LDT2	Aggregate	Aggregate	Diesel	24877.85405	2707.611895	0.732985994				
San Bernardino (SC)	2025	LHDT1	Aggregate	Aggregate	Gasoline	633447.7463	252725.1192	45.45107153	1067733.969	66.4699942	16.06339795	LHDT1
San Bernardino (SC)	2025	LHDT1	Aggregate	Aggregate	Diesel	434286.2222	143435.7701	21.01892267				
San Bernardino (SC)	2025	LHDT2	Aggregate	Aggregate	Gasoline	99825.11713	42072.64494	8.149183621	287350.1658	18.98407565	15.13637909	LHDT2
San Bernardino (SC)	2025	LHDT2	Aggregate	Aggregate	Diesel	187525.0486	61496.05385	10.83489203				
San Bernardino (SC)	2025	MDV	Aggregate	Aggregate	Gasoline	5833561.643	672637.6073	289.7409456	5909936.122	292.8920116	20.17786723	MDV
San Bernardino (SC)	2025	MDV	Aggregate	Aggregate	Diesel	76374.47974	8796.885424	3.151065928				
San Bernardino (SC)	2025	MHDT	Aggregate	Aggregate	Gasoline	76828.767	28559.88167	14.58515666	735499.3107	87.80936102	8.376092277	MHDT
San Bernardino (SC)	2025	MHDT	Aggregate	Aggregate	Diesel	658670.5437	188328.1928	73.22420436				