

APPENDIX 2

DATE: February 5, 2025
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JOB NO: 16322-03 AQ & GHG Assessment

MISSION SPRINGS WATER DISTRICT AIR QUALITY & GREENHOUSE GAS ASSESSMENT

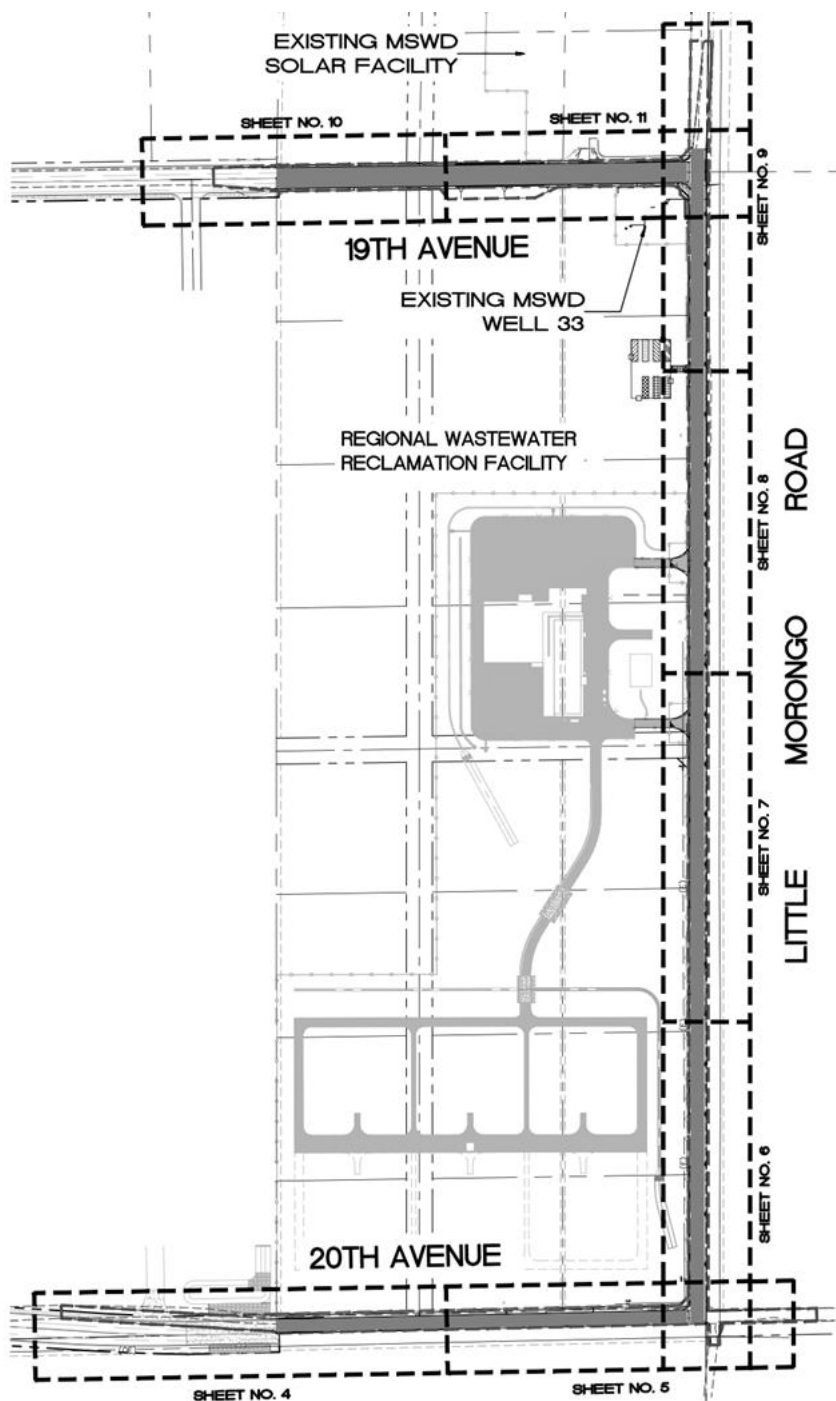
Kaitlyn Dodson-Hamilton

Urban Crossroads, Inc. is pleased to provide the following Air Quality & Greenhouse Gas Assessment for the Mission Springs Water District (**Project**). The Project will occur within various compacted dirt roadways located north, east, and south of the Nancy Wright Regional Wastewater Reclamation Facility (Wright RWRf) along 19th Street, Little Morongo Road, and 20th Avenue, in the City of Desert Hot Springs. The roadway improvements would occur only along the northern, western, and southern boundaries of MSWD's Nancy Wright Regional Wastewater Reclamation Facility.

PROJECT OVERVIEW

Mission Springs Water District (MSWD or District) provides water and sewer services to the communities of Desert Hot Springs, West Garnet, North Palm Springs, and various portions of unincorporated Riverside County. In August of 2019, MSWD certified the Environmental Impact Report (EIR) for the West Valley Water Reclamation Program, which consisted of constructing municipal wastewater collection and treatment systems that would facilitate the elimination of individual septic systems that overlie the Mission Creek aquifer. The West Valley Water Reclamation Program consisted of three components: construction of a wastewater treatment plant (the Wright RWRf), construction of a conveyance system connection existing sewer areas to the Wright RWRf, and construction a collection system for the QOPP Area M2 (to be served by the Wright RWRf). As part of the District's continued development of the Wright RWRf, the City of Desert Hot Springs conditioned the District to complete paving of the compacted dirt roadways that serve the site. Thus, the District will serve as the California Environmental Quality Act (CEQA) lead agency for the proposed project, which would involve installation of asphalt pavement along the Wright RWRf's boundaries on 19th Street, Little Morongo Road, and 20th Avenue. The proposed roadway segments are illustrated on Exhibit 1, shown below.

EXHIBIT 1: SITE PLAN



The proposed Project involves installation of 1.08 miles or 5,700 LF of paved roadway along the boundaries of the District's Wright RWRP, in place of the existing roadway condition, which is simply compacted dirt. The Project plans are provided as Appendix 1 to this document. The purpose of the Project is to improve the paved roadway network in the City of Desert Hot Springs to accommodate the Wright RWRP's development, reduce fugitive dust generation from automobiles traveling on the existing dirt roadways, and enhance access to future development in the area that may be served by these roadway improvements.

The roadway would be 32 feet in width, with the whole of the right-of-way (ROW) to be 44 feet in width, accommodating curb, and gutter and future sidewalk construction within the additional 12 feet of ROW. The intersection at Little Morongo Road and 20th Avenue, as well as at Little Morongo Road and 19th Avenue would require installation of stop signs. The stop signs and other signage will be developed in conformance with City of Desert Hot Springs requirements.

The roadway itself consists of 6 inches of class II aggregate base course, over 12 inches of compacted native soil that will then be paved over with 4.5 inches of asphalt concrete. Curb and gutter would be installed utilizing concrete.

Mission Creek is also to the east of Little Morongo Road, and the roadway will be designed to avoid the Mission Creek drainage, as it has historically. In order to maintain flows running south at the intersection of Little Morongo Road and 20th Avenue, the proposed vertical street profile design along 20th street is continuing the existing high point at approx. 150-feet east of Little Morongo Road.

SUMMARY OF FINDINGS

Results of the assessment indicate that the Project would result in a less than significant with respect to air quality and greenhouse gases (GHG).

PROJECT AIR QUALITY IMPACTS

AIR QUALITY SETTING

SALTON SEA AIR BASIN (SSAB)

The Project site is located within SSAB within the jurisdiction of the SCAQMD. The SSAB is aligned in a north-west-southwest orientation stretching from Banning Pass to the Mexican border. The regional climate, as well as the temperature, wind, humidity, precipitation, and amount of sunshine significantly influence the air quality in the Basin.

The climate of the Coachella Valley is a continental, desert-type climate, with hot summers, mild winters, and very little annual rainfall. Precipitation is less than six inches annually and occurs mostly in the winter months from active frontal systems and in the late summer months from thunderstorms. Almost all of the annual rainfall comes from the fringes of mid-latitude storms from late November to early April with summers often being completely dry. Temperatures exceed 100 degrees Fahrenheit (°F), on the average, for four months each year, with daily highs near 110 °F during July and August. Summer nights are cooler with minimum temperatures in the mid-70s. During the winter season, daytime highs are quite mild, but the dry air is conducive to nocturnal radiational cooling, with early morning lows around 40 °F.

The Coachella Valley and adjacent areas are exposed to frequent gusty winds. The flat terrain of the valley and strong temperature differentials, created by intense solar heating, produce

moderate winds and deep thermal convection. Wind speeds exceeding 31 miles per hour (mph) occur most frequently in April and May. On an annual basis, strong winds (greater than 31 mph) are observed 0.6 percent of the time and speeds of less than 6.8 mph account for more than one-half of the observed winds. Prevailing winds are from the northwest through southwest, with secondary flows from the southeast. The strongest and most persistent winds typically occur immediately to the east of Banning Pass, which is noted as a wind power generation resource area. Aside from this locale, the wind conditions in the remainder of the Coachella Valley are geographically distinct. Stronger winds tend to occur closer to the foothills. Less frequently, widespread gusty winds occur over all areas of the Valley.

Portions of the SSAB experience surface inversions almost every day of the year. Inversions in the SSAB are attributed to strong surface heating, but are usually broken, allowing pollutants to disperse more easily. Weak surface inversions are caused by cooling of air in contact with the cold surface of the earth at night. In the valleys and low-lying areas, this condition is intensified by the addition of cold air flowing downslope from the hills and pooling on the valley floor. In addition, inversions in the SSAB caused by the presence of the Pacific high-pressure cell can cause the air mass aloft to sink. As the air descends, compressional heating warms the air to a temperature higher than the air below. This subsidence inversion can act as a nearly impenetrable lid to the vertical mixing of pollutants. These inversions can persist for one or more days, causing air stagnation and the buildup of pollutants. Subsidence inversions are common from November through June and are relatively absent from July through October.

Within the Project area, there is a natural sand migration process, called “blowsand,” that has direct and indirect effects on air quality. Blowsand produces particulate matter (PM₁₀) in two ways: (1) by direct particle erosion and fragmentation as natural PM₁₀, and (2) by secondary effects, as sand deposits on road surfaces.

Also, where water has already receded around the Salton Sea, the surface areas contain a salty mix of sediments that can change from a hardened salt crust to a fluffy soft layer of dust depending upon the season. Exposed sediments could elevate PM₁₀ levels throughout the region. Almost 120,000 acres of Salton Sea lakebed could be exposed as inflows to the Sea decrease in future years. Local communities may be affected by 60,000 potentially dust-blowing acres, which will cause PM₁₀ levels to rise.

Criteria Pollutants

Both the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established ambient air quality standards for common pollutants. These ambient air quality standards are levels of contaminants representing safe levels that avoid specific adverse health effects associated with each pollutant. The ambient air quality standards cover what are called “criteria” pollutants because the health and other effects of each pollutant are described in criteria documents. The six criteria pollutants are ozone (O₃) (precursor emissions include NO_x and reactive organic gases (ROG), CO, particulate matter (PM), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. The Riverside County portion of the SSAB is designated as a nonattainment area for the federal O₃, PM₁₀, and PM_{2.5} standards and is also a nonattainment area for the state standards for O₃ and PM₁₀.

Toxic Air Contaminants (TAC) Trend

In 1984, as a result of public concern for exposure to airborne carcinogens, CARB adopted regulations to reduce the amount of TAC emissions resulting from mobile and area sources, such as cars, trucks, stationary products, and consumer products. According to the Ambient and Emission Trends of Toxic Air Contaminants in California journal article (1) which was prepared for CARB, results show that between 1990-2012, ambient concentration and emission trends for the seven TACs responsible for most of the known cancer risk associated with airborne exposure in California have declined significantly (between 1990 and 2012). The seven TACs studied include those that are derived from mobile sources: diesel particulate matter (DPM), benzene (C₆H₆), and 1,3-butadiene (C₄H₆); those that are derived from stationary sources: perchloroethylene (C₂Cl₄) and hexavalent chromium (Cr(VI)); and those derived from photochemical reactions of emitted VOCs: formaldehyde (CH₂O) and acetaldehyde (C₂H₄O).¹ The decline in ambient concentration and emission trends of these TACs are a result of various regulations CARB has implemented to address cancer risk.

Sensitive Receptors

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, and individuals with pre-existing respiratory or cardiovascular illness. Structures that house these persons or places where they gather are defined as "sensitive receptors." These structures typically include uses such as residences, hotels, and hospitals where an individual can remain for 24 hours. Consistent with the localized significance threshold (LST) Methodology, the nearest land use where an individual could remain for 24 hours to the Project site has been used to determine construction and operational air quality impacts for emissions of PM₁₀ and PM_{2.5}, since PM₁₀ and PM_{2.5} thresholds are based on a 24-hour averaging time. Commercial and industrial facilities are not included in the definition of sensitive receptor because employees and patrons do not typically remain onsite for a full 24 hours but are typically onsite for eight hours or less. The LST Methodology states that "*LSTs based on shorter averaging periods, such as the NO₂ and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours (2).*"

Receptors in the Project study area are described below. All distances are measured from the Project site boundary to the outdoor living areas (e.g., backyards) or at the building façade, whichever is closer to the Project site. Receptors in the Project study area are shown in Exhibit 2 under the Localized Construction Emissions section later in the report.

- Receptor R1 represents the Wright RWRF, approximately 171 feet west of the Project site.
- Receptor R2 represents the existing residence at 17851 Louise Street, approximately 4,022 feet northwest of the Project site.
- Receptor R3 represents the existing residence at 64665 Thumb Drive, approximately 4,280 feet north of the Project site.

¹ It should be noted that ambient DPM concentrations are not measured directly. Rather, a surrogate method using the coefficient of haze (COH) and elemental carbon (EC) is used to estimate DPM concentrations.

- Receptor R4 represents the existing residence at 17280 Little Morongo Road, approximately 3,857 feet north of the Project site.

REGULATORY BACKGROUND

FEDERAL REGULATIONS

The EPA is responsible for setting and enforcing the national ambient air quality standards (NAAQS) for O₃, CO, NO_x, SO₂, PM₁₀, and lead (Pb) (3). The EPA has jurisdiction over emissions sources that are under the authority of the federal government including aircraft, locomotives, and emissions sources outside state waters (Outer Continental Shelf). The EPA also establishes emission standards for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission requirements of CARB.

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The CAA establishes the federal air quality standards, the NAAQS, and specifies future dates for achieving compliance (4). The CAA also mandates that each state submit and implement state implementation plans (SIPs) for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met.

The 1990 amendments to the CAA that identify specific emission reduction goals for areas not meeting the NAAQS require a demonstration of reasonable further progress toward attainment and incorporate additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions) (5) (6). Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants O₃, NO₂, SO₂, PM₁₀, CO, PM_{2.5}, and Pb. The NAAQS were amended in July 1997 to include an additional standard for O₃ and to adopt a NAAQS for PM_{2.5}.

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

CALIFORNIA REGULATIONS

CARB

The CARB, which became part of the California EPA (CalEPA) in 1991, is responsible for ensuring implementation of the California Clean Air Act (AB 2595), responding to the federal CAA, and for regulating emissions from consumer products and motor vehicles. AB 2595 mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the state ambient air quality standards by the earliest practical date. The CARB established the California ambient air quality standards (CAAQS) for all pollutants for which the federal government has NAAQS and, in addition, establishes standards for SO₄,

visibility, hydrogen sulfide (H₂S), and vinyl chloride (C₂H₃Cl). Generally, the CAAQS are more stringent than the NAAQS (7) (8).

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

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

- Application of Best Available Retrofit Control Technology to existing sources;
- Developing control programs for area sources (e.g., architectural coatings and solvents) and indirect sources (e.g., motor vehicle use generated by residential and commercial development);
- A District permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions;
- Implementing reasonably available transportation control measures and assuring a substantial reduction in growth rate of vehicle trips and miles traveled;
- Significant use of low emissions vehicles by fleet operators;
- Sufficient control strategies to achieve a 5% or more annual reduction in emissions or 15% or more in a period of three years for ROGs, NO_x, CO and PM₁₀. However, air basins may use an alternative emission reduction strategy that achieves a reduction of less than 5% per year under certain circumstances.

AQMP

Currently, the NAAQS and CAAQS are exceeded in most parts of the SSAB. In response, the SCAQMD has adopted a series of AQMP to meet the state and federal ambient air quality standards (9). AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

APPLICABLE REGULATORY REQUIREMENTS

SCAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings) (10) (11).

SCAQMD Rule 403

This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent and reduce fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust and requires best available control measures to be applied to earth moving and grading activities. This rule is intended to reduce PM₁₀ emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM₁₀ suppression techniques are summarized below.

- Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
- All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.
- All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
- Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the workday to remove soil tracked onto the paved surface.

METHODOLOGY

The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, as such the latest version available at the time of this report has been utilized in this analysis. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures (12). Accordingly, the latest version of CalEEMod has been used for this Project to determine construction and operational air quality and GHG emissions.

Standards of Significance

The criteria used to determine the significance of potential Project-related air quality impacts are taken from the California Environmental Quality Act Guidelines (*CEQA Guidelines*) (14 CCR §§15000, et seq.). Based on these thresholds, a project would result in a significant impact related to air quality if it would (13):

- **Threshold 1:** Conflict with or obstruct implementation of the applicable air quality plan.
- **Threshold 2:** Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.
- **Threshold 3:** Expose sensitive receptors to substantial pollutant concentrations.
- **Threshold 4:** Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

AIR QUALITY REGIONAL EMISSIONS THRESHOLDS

The SCAQMD has developed regional significance thresholds for criteria pollutants, as summarized in Table 1 (14). The SCAQMD's CEQA Air Quality Significance Thresholds (March 2023) indicate that any projects in the SSAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

TABLE 1: MAXIMUM DAILY REGIONAL EMISSIONS THRESHOLDS

Pollutant	Construction	Operations
NO _x	100 lbs./day	55 lbs./day
VOC	75 lbs./day	55 lbs./day
PM ₁₀	150 lbs./day	150 lbs./day
PM _{2.5}	55 lbs./day	55 lbs./day
SO _x	150 lbs./day	150 lbs./day
CO	550 lbs./day	550 lbs./day

lbs./day – Pounds Per Day

CONSTRUCTION ACTIVITIES

Construction activities associated with the Project would result in emissions of VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}. Construction-related emissions are expected from the following activities:

- Road Clearing
- Sub-Grade Construction
- Curb and Gutter Installation
- Asphalt Concrete Paving

GRADING ACTIVITIES

Dust is typically a major concern during grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called “fugitive emissions.” Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. The total excavation volume will be around 7,000 cubic yards, the total fill volume of around 3,000 cubic yards. This will generate approximately 4,000 cubic yards of excess material that will be exported off site. It is anticipated that excess soils will be deposited at the Wright RWRP or other approved nearby site and treated with appropriate long-term dust suppression measures.

ON-ROAD TRIPS

Construction generates on-road vehicle emissions from vehicle usage for workers, vendors, and haul trucks commuting to and from the site. For worker trips, it is assumed that up to 15 individuals will be working on the construction site per day, though the number of construction workers will vary between 8 and 15 per day. According to the equipment list, it is assumed that a vendor truck will visit the site regularly. Hauling trips are estimated based on CalEEMod default parameters.

CONSTRUCTION DURATION

For purposes of analysis, construction of the Project is expected to commence in June 2025 and would last through October 2025. The construction schedule utilized in the analysis represents a “worst-case” analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.² The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per *CEQA Guidelines* (15).

CONSTRUCTION EQUIPMENT

The equipment modeled is based on information provided by the Project Applicant. Consistent with industry standards and typical construction practices, each piece of equipment will operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the code.

REGIONAL CONSTRUCTION EMISSIONS SUMMARY

The estimated maximum daily construction emissions are summarized in Table 2, and as shown, the Project construction-source emissions would not exceed SCAQMD regional thresholds. Thus, the Project would result in a less than significant impact associated with construction activities. Detailed Construction model outputs are presented in Attachment A.

TABLE 2: REGIONAL CONSTRUCTION EMISSIONS SUMMARY

Source	Emissions (lbs./day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer						
2025	2.33	19.50	20.60	0.04	3.15	1.76
Winter						
2025	1.19	9.08	11.50	0.02	0.65	0.43
Maximum Daily Emissions	2.33	19.50	20.60	0.04	3.15	1.76
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

¹PM₁₀ and PM_{2.5} source emissions reflect 3x daily watering per SCAQMD Rule 403 for fugitive dust.

² As shown in the CalEEMod User's Guide Version 2022.1.1, Section 4.3 “Off-Road Equipment” as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

REGIONAL OPERATIONAL EMISSIONS

The proposed Project primarily involves construction activity. No new trips would be anticipated to be generated by this use. The purpose of the Project is to improve the paved roadway network in the City of Desert Hot Springs to accommodate the Wright RWRP's development, reduce fugitive dust generation from automobiles traveling on the existing dirt roadways, and enhance access to future development in the area that may be served by these roadway improvements. As such, the Project would not violate an air quality standard or contribute to an existing violation. Therefore, Project operations would not result in a cumulatively considerable net increase of any criteria pollutant and impacts would be less than significant.

LOCALIZED CONSTRUCTION EMISSIONS

For this Project, the appropriate SRA for the LST analysis is the SCAQMD Coachella Valley monitoring station (SRA 30). LSTs apply to CO, NO₂, PM₁₀, and PM_{2.5}. The SCAQMD produced look-up tables for projects less than or equal to 5 acres in size. The SCAQMD's screening look-up tables are utilized in determining localized impacts. It should be noted that since the look-up tables identify thresholds at only 1 acre, 2 acres, and 5 acres, linear regression has been utilized to determine localized significance thresholds.

The analysis makes use of methodology included in the SCAQMD *Final Localized Significance Threshold Methodology* (LST Methodology) (2). The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as Localized Significance Thresholds (LSTs). The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4³. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the sensitive receptor.

The SCAQMD recommends that the nearest sensitive receptor be considered when determining the Project's potential to cause an individual or cumulatively significant impact. Receptors in the Project study area shown on Exhibit 2. The nearest land use where an individual could remain for 24 hours to the Project site has been used to determine localized construction and operational air quality impacts for emissions of PM₁₀ and PM_{2.5} (since PM₁₀ and PM_{2.5} thresholds are based on a 24-hour averaging time).

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

EXHIBIT 2: SENSITIVE RECEPTOR LOCATIONS



LEGEND:

Site Boundary

Receptor Locations

Distance from receptor to Project site boundary (in feet)

The nearest receptor used for evaluation of localized impacts of PM₁₀ and PM_{2.5} is location R4 existing residence at 17280 Little Morongo Road, approximately 3,857 feet (1,176 meters) north of the Project site. It should be noted that the look-up tables only identify thresholds up to a 500-meter distance. As a conservative measure, the 500-meter distance will be used in lieu of the 1,176-meter distance in order to evaluate localized PM₁₀ and PM_{2.5} emission impacts.

As previously stated, and consistent with LST Methodology, the nearest industrial/commercial use to the Project site is used to determine construction and operational LST air impacts for emissions of NO_x and CO as the averaging periods for these pollutants are shorter (8 hours or less) and it is reasonable to assume that an individual could be present at these sites for periods of one to 8 hours. The nearest receptor used for evaluation of localized impacts of NO_x and CO is location Receptor R1 which represents the Wright RWRF, situated approximately 171 feet (52 meters) west of the Project site. As such, for evaluation of localized NO_x and CO, a 52-meter distance will be used.

Table 3 identifies the localized impacts at the nearest receptor location in the vicinity of the Project. Outputs from the model runs for construction LSTs are provided in Attachment A. For analytical purposes, emissions associated with peak construction activities are considered for purposes of LSTs since these phases represent the maximum localized emissions that would occur. Any other construction phases of development that overlap would result in lesser emissions and consequently lesser impacts than what is disclosed herein. As shown in Table 3, emissions resulting from the construction will not exceed the numerical thresholds of significance established by the SCAQMD for any criteria pollutant. Thus, a less than significant impact would occur for localized Project-related construction-source emissions and no mitigation is required.

TABLE 3: PROJECT LOCALIZED CONSTRUCTION IMPACTS (1 OF 2)

On-Site Emissions	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Road Clearing				
Maximum Daily Emissions	16.00	15.80	2.39	1.51
SCAQMD Localized Threshold	169	1,434	214	105
Threshold Exceeded?	NO	NO	NO	NO
Sub-Grade Construction				
Maximum Daily Emissions	18.40	18.50	2.64	1.63
SCAQMD Localized Threshold	169	1,434	214	105
Threshold Exceeded?	NO	NO	NO	NO
Curb and Gutter Installation				
Maximum Daily Emissions	10.90	14.10	0.62	0.46
SCAQMD Localized Threshold	169	1,434	214	105
Threshold Exceeded?	NO	NO	NO	NO

TABLE 3: PROJECT LOCALIZED CONSTRUCTION IMPACTS (2 OF 2)

On-Site Emissions	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Asphalt and Concrete Paving				
Maximum Daily Emissions	8.94	10.50	0.40	0.37
SCAQMD Localized Threshold	169	1,434	214	105
Threshold Exceeded?	NO	NO	NO	NO

LOCALIZED OPERATIONAL EMISSIONS

According to SCAQMD localized significance threshold methodology, LSTs would apply to the operational phase of a proposed Project if the Project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). As previously discussed, the purpose of the Project is to improve the paved roadway network in the City of Desert Hot Springs to accommodate the Wright RWRP's development, reduce fugitive dust generation from automobiles traveling on the existing dirt roadways, and enhance access to future development in the area that may be served by these roadway improvements. The Project will not include stationary or mobile sources. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

AIR QUALITY IMPACTS – CONSISTENCY WITH THRESHOLD NO. 1***Would the Project conflict with or obstruct implementation of the applicable air quality plan?***

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

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

In December 2022, the SCAQMD released the Final 2022 AQMP (2022 AQMP). The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the CAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels (16). Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and

planning assumptions, including the 2020-2045 RTP/SCS, a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements (17). The Project's consistency with the AQMP will be determined using the 2022 AQMP as discussed below. SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal metropolitan planning organization (MPO) requirements under the Sustainable communities and Climate Protection Act. The proposed Project would be developed in accordance with all applicable rules and regulations contained in those plans. It should be noted that although the 2024-2050 RTP was released after approval of the 2022 AQMP, the 2022 AQMP is reliant in part upon the general plan land use designations.

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the 1993 CEQA Handbook (18). These indicators are discussed below.

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

The violations that under this criterion refer to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded.

CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded. As evaluated, the Project's regional and localized construction and operational-source emissions would not exceed applicable regional significance thresholds. As such, a less than significant impact is expected.

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

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

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

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

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

AIR QUALITY IMPACTS – CONSISTENCY WITH THRESHOLD NO. 2

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

The Project, as evaluated herein would not exceed the regional or localized air quality significance thresholds. The CAAQS designates the Project site as nonattainment for O₃, PM₁₀, and PM_{2.5} while the NAAQS designates the Project site as nonattainment for O₃ and PM_{2.5}.

The SCAQMD has published a report on how to address cumulative impacts from air pollution: White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (19). In this report the SCAQMD clearly states (Page D-3):

“...the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.”

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

Construction Impacts

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

Operational Impacts

The Project-specific evaluation of emissions presented in the preceding analysis demonstrates that proposed Project operational-source air pollutant emissions would not result in exceedances

of regional thresholds. Therefore, the proposed Project operational-source emissions would be considered less than significant on a project-specific and cumulative basis.

AIR QUALITY IMPACTS – CONSISTENCY WITH THRESHOLD NO. 3

Would the expose sensitive receptors to substantial pollutant concentrations?

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

Additionally, the Project will not exceed the SCAQMD localized significance thresholds during operational activity. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations as the result of Project operations.

CO “HOT SPOT” ANALYSIS

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

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

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

AIR QUALITY IMPACTS – CONSISTENCY WITH THRESHOLD NO. 4

Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

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

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

The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required (20).

PROJECT GHG ANALYSIS

CLIMATE CHANGE SETTING

Global climate change (GCC) is the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years.

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

consequences, this memo will evaluate the potential for the proposed Project to have a significant effect upon the environment as a result of its potential contribution to the greenhouse effect.

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO₂, N₂O, CH₄, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radiative heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages.

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

For the purposes of this analysis, emissions of CO₂, CH₄, and N₂O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases.

REGULATORY SETTING

Executive Order S-3-05

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

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

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

Assembly Bill (AB) 32

The California State Legislature enacted AB 32, which requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. GHGs, as defined under AB 32, include CO₂, CH₄, N₂O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Since AB 32 was enacted, a seventh chemical, nitrogen trifluoride, has also been added to the list of GHGs. CARB is the state agency charged with monitoring and regulating sources of GHGs. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 states the following:

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

CARB approved the 1990 GHG emissions level of 427 million metric ton of CO₂ equivalent per year (MMTCO₂e) on December 6, 2007 (21). 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” (BAU) scenario were estimated to be 596 MMTCO₂e, which do not account for reductions from AB 32 regulations (22). At that level, a 28.4% reduction was required to achieve the 427 MMTCO₂e 1990 inventory. In October 2010, CARB prepared an updated BAU 2020 forecast to account for the recession and slower forecasted growth. The forecasted inventory without the benefits of adopted regulation is now estimated at 545 MMTCO₂e. Therefore, under the updated forecast, a 21.7% reduction from BAU is required to achieve 1990 levels (23).

Progress in Achieving AB 32 Targets and Remaining Reductions Required

The State has made steady progress in implementing AB 32 and achieving targets included in Executive Order S-3-05. The progress is shown in updated emission inventories prepared by CARB for 2000 through 2012 (24). The State has achieved the Executive Order S-3-05 target for 2010 of reducing GHG emissions to 2000 levels. As shown below, the 2010 emission inventory achieved this target.

- 1990: 427 MMTCO₂e (AB 32 2020 target)
- 2000: 463 MMTCO₂e (an average 8% reduction needed to achieve 1990 base)
- 2010: 450 MMTCO₂e (an average 5% reduction needed to achieve 1990 base)

CARB has also made substantial progress in achieving its goal of achieving 1990 emissions levels by 2020. As described earlier in this section, CARB revised the 2020 BAU inventory forecast to account for new lower growth projections, which resulted in a new lower reduction from BAU to achieve the 1990 base. The previous reduction from 2020 BAU needed to achieve 1990 levels was 28.4% and the latest reduction from 2020 BAU is 21.7%.

- 2020: 545 MMTCO₂e BAU (an average 21.7% reduction from BAU needed to achieve 1990 base)

Senate Bill (SB) 32

On September 8, 2016, Governor Jerry Brown signed the SB 32 and its companion bill, AB 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80% below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature (25).

AB 197

A condition of approval for SB 32 was the passage of AB 197. AB 197 requires that CARB consider the social costs of GHG emissions and prioritize direct reductions in GHG emissions at mobile sources and large stationary sources. AB 197 also gives the California legislature more oversight over CARB through the addition of two legislatively appointed members to the CARB Board and the establishment a legislative committee to make recommendations about CARB programs to the legislature.

Executive Order B-55-18 and SB 100

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

Title 24 California Code of Regulations (CCR)

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption.

The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, industrial, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission.

CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that was effective on January 1, 2023⁴. As construction of the Project is anticipated to be completed in 2025, the Project would be required to comply with the Title 24 standards in place at that time.

SCAQMD

SCAQMD is the agency responsible for air quality planning and regulation in the SSAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a

⁴ The 2022 California Green Building Standard Code will be published July 1, 2022.

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

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

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
 - Residential and commercial land use: 3,000 metric ton of CO₂ equivalent (MTCO₂e/yr.)
 - Industrial land use: 10,000 MTCO₂e/yr.
 - Based on land use type: residential: 3,500 MTCO₂e/yr.; commercial: 1,400 MTCO₂e/yr.; or mixed use: 3,000 MTCO₂e/yr.
- Tier 4 has the following options:
 - Option 1: Reduce Business-as-Usual (BAU) emissions by a certain percentage; this percentage is currently undefined.
 - Option 2: Early implementation of applicable AB 32 Scoping Plan measures
 - Option 3: 2020 target for service populations (SP), which includes residents and employees: 4.8 MTCO₂e per SP per year for projects and 6.6 MTCO₂e per SP per year for plans;
 - Option 3, 2035 target: 3.0 MTCO₂e per SP per year for projects and 4.1 MTCO₂e per SP per year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

The SCAQMD's interim thresholds used the Executive Order S-3-05 year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO₂ concentrations at 450 ppm, thus stabilizing global climate.

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

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

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

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

Connect SoCal 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy

On April 4, 2024, SCAG's Regional Council adopted the Connect SoCal 2024-2050 RTP/SCS. The SCAG 2024 Connect SoCal refers to the SCAG's RTP/SCS for the year 2024. It outlines a comprehensive vision and plan for transportation and sustainable growth across Southern California, addressing issues such as transportation infrastructure, land use, housing, and environmental sustainability. The plan aims to guide development and policy decisions to support a more connected, efficient, and sustainable future for the region (26).

City of Desert Hot Springs Climate Action Plan

The City of Desert Hot Springs CAP (CAP) was adopted by the City Council in June 2013 (27). The CAP was developed to address global climate change through the reduction of harmful GHG emissions at the community level, and as part of California's mandated statewide GHG emissions reduction goals under AB 32. Desert Hot Springs CAP states that in order for the community to reach AB 32 goals, a 36.4 percent reduction from 2010 baseline emissions or a 43.2-percent reduction from 2020 BAU emissions by 2020 will need to be met. The City has identified 80 measures that will be implemented over a course of eight years, beginning in 2013. These measures include energy efficiency and conservation in areas of community development, including transportation, development planning, public and private sector construction and operations, as well as residential and non-residential projects. The City promotes public and

private efforts to create and operate alternative solar and electrical productions that utilize local renewable sources. The CAP also states the ability to develop and implement a solar ready ordinance that would require new buildings and homes to be prepared for solar installation.

GHG IMPACTS

Standards of Significance

According to the *CEQA Guidelines* Appendix G thresholds, to determine whether impacts from GHG emissions are significant. Would the project:

- **Threshold 1:** Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- **Threshold 2:** Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

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

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

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

- **Consideration #1:** The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.
- **Consideration #2:** Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- **Consideration #3:** The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project’s incremental contribution of GHG emissions. In determining the significance of impacts, the lead agency may consider a project’s consistency with the State’s long-term climate goals or strategies, provided that substantial evidence supports the agency’s analysis of how those goals or strategies address the project’s incremental contribution to climate change and its conclusion that the project’s incremental contribution is not cumulatively considerable.

Discussion on Establishment of Significance Thresholds

The City of Desert Hot Springs has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. A screening threshold of 3,000 MTCO₂e/yr to determine if additional analysis is required is an acceptable approach for small projects. This approach is a widely accepted screening threshold used by the City of Desert Hot Springs and numerous cities in the SSAB and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans ("SCAQMD Interim GHG Threshold"). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required (28). As noted by the SCAQMD:

"...the...screening level for stationary sources is based on an emission capture rate of 90% for all new or modified projects...the policy objective of [SCAQMD's] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90% of all new or modified stationary source projects. A GHG significance threshold based on a 90% emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90% emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than 1% of future 2050 statewide GHG emissions target (85 [MMTCO₂e/yr]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology] (BACT) for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility."

Thus, and based on guidance from the SCAQMD, if a non-industrial project would emit GHGs less than 3,000 MTCO₂e/yr, the project is not considered a substantial GHG emitter and the GHG impact is less than significant, requiring no additional analysis and no mitigation. Conversely, if a non-industrial project would emit GHGs in excess of 3,000 MTCO₂e/yr, then the project could be considered a substantial GHG emitter, requiring additional analysis and potential mitigation. As previously discussed, a screening threshold of 3,000 MTCO₂e/yr is an acceptable approach for small projects to determine if additional analysis is required and is therefore applied for this Project.

GHG IMPACTS – CONSISTENCY WITH THRESHOLD NO. 1

Would the Project have the potential to generate direct or indirect GHG emissions that would result in a significant impact on the environment?

PROJECT GHG EMISSIONS

The estimated GHG emissions for the Project land use are summarized in Table 4. The estimated GHG emission includes emissions from Carbon Dioxide (CO₂), Methane (CH₄), Nitrous Oxide (N₂O), and Refrigerants (R). As shown in Table 4, the Project would generate a total of approximately 5.67 MTCO₂e/yr. Detailed model outputs for the proposed Project are presented in Attachment A.

TABLE 4: TOTAL PROJECT GHG EMISSIONS

Source	Emissions (MT/year)				Total CO ₂ e
	CO ₂	CH ₄	N ₂ O	Refrigerants	
Annual construction-related emissions amortized over 30 years	168.00	0.01	<0.05	0.03	170.00
Total CO ₂ e (All Sources)	5.67				

As shown in Table 4, the Project will result in approximately 5.67 MTCO₂e/yr; the proposed Project would not exceed the City's screening threshold of 3,000 MTCO₂e/yr. Thus, the Project would not have the potential to result in a cumulatively considerable impact with respect to GHG emissions and Project GHG emissions would have a less than significant impact.

GHG IMPACTS – CONSISTENCY WITH THRESHOLD NO. 2

Would the Project have the potential to conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?

Pursuant to 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions (29).

The 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 % below 1990 levels no later than 2045, as directed by Assembly Bill 1279. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon (30).

The Project is consistent with the applicable policies specified for the Project area in SCAG's Sustainable Community Strategy/ Regional Transportation Plan, which pursuant to SB 375 calls for the integration of transportation for achievement of the GHG-emissions target for the region. Thus, a less than significant impact related to GHG emissions from Project construction and operation would occur and no mitigation is required.

This Project involves the construction paved roadway network in the City of Desert Hot Springs to accommodate the Wright RWRP's development, reduce fugitive dust generation from automobiles traveling on the existing dirt roadways, and enhance access to future development in the area that may be served by these roadway improvements, designed to align with the goals

of the City's CAP. Sustainable construction practices will be implemented to minimize environmental impact and reduce GHG emissions. Measures will be taken to protect local ecosystems and engage with the community to address any concerns. By adhering to the CAP's objectives, this project aims to contribute positively to the City's sustainability goals while ensuring the efficient delivery of essential services.

CONCLUSION

Results of the assessment indicate that the Project is not anticipated to result in a significant impact during construction or operational activities associated with air quality and GHG.

If you have any questions or comments, I can be reached at hqureshi@urbanxroads.com.

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ATTACHMENT A
CALEEMOD PROPOSED PROJECT EMISSIONS MODEL OUTPUTS

Street Improvements for the Regional Wastewater Reclamation Facility 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
- 3. Construction Emissions Details
 - 3.1. Road Clearing (2025) - Unmitigated
 - 3.3. Subgrade Construction (2025) - Unmitigated
 - 3.5. Curb and Gutter Installation (2025) - Unmitigated
 - 3.7. Asphalt and Concrete Paving (2025) - Unmitigated
- 4. Operations Emissions Details
 - 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

5.18. 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	Street Improvements for the Regional Wastewater Reclamation Facility
Construction Start Date	6/2/2025
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.30
Precipitation (days)	11.2
Location	33.907441, -116.529286
County	Riverside-Salton Sea
City	Desert Hot Springs
Air District	South Coast AQMD
Air Basin	Salton Sea
TAZ	5638
EDFZ	11
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Road Construction	1.08	Mile	6.20	0.00	—	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.77	2.33	19.5	20.6	0.04	0.82	2.33	3.15	0.75	1.01	1.76	—	5,094	5,094	0.18	0.18	2.88	5,154
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.42	1.19	9.08	11.5	0.02	0.40	0.24	0.65	0.37	0.06	0.43	—	2,763	2,763	0.11	0.03	0.03	2,776
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.56	0.47	3.75	4.27	0.01	0.16	0.35	0.51	0.15	0.14	0.29	—	1,017	1,017	0.04	0.02	0.20	1,026
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.10	0.09	0.68	0.78	< 0.005	0.03	0.06	0.09	0.03	0.03	0.05	—	168	168	0.01	< 0.005	0.03	170

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	2.77	2.33	19.5	20.6	0.04	0.82	2.33	3.15	0.75	1.01	1.76	—	5,094	5,094	0.18	0.18	2.88	5,154

Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.42	1.19	9.08	11.5	0.02	0.40	0.24	0.65	0.37	0.06	0.43	—	2,763	2,763	0.11	0.03	0.03	2,776
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.56	0.47	3.75	4.27	0.01	0.16	0.35	0.51	0.15	0.14	0.29	—	1,017	1,017	0.04	0.02	0.20	1,026
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.10	0.09	0.68	0.78	< 0.005	0.03	0.06	0.09	0.03	0.03	0.05	—	168	168	0.01	< 0.005	0.03	170

3. Construction Emissions Details

3.1. Road Clearing (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.21	1.85	16.0	15.8	0.03	0.69	—	0.69	0.63	—	0.63	—	3,524	3,524	0.14	0.03	—	3,536
Dust From Material Movement	—	—	—	—	—	—	1.70	1.70	—	0.88	0.88	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Street Improvements for the Regional Wastewater Reclamation Facility Detailed Report, 1/27/2025

Off-Road Equipment	0.05	0.05	0.39	0.39	< 0.005	0.02	—	0.02	0.02	—	0.02	—	86.9	86.9	< 0.005	< 0.005	—	87.2
Dust From Material Movement	—	—	—	—	—	—	0.04	0.04	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14.4	14.4	< 0.005	< 0.005	—	14.4
Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.08	1.43	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	223	223	0.01	0.01	0.77	226
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	5.00	5.00	< 0.005	< 0.005	0.01	5.06
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.83	0.83	< 0.005	< 0.005	< 0.005	0.84
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Subgrade Construction (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.63	2.21	18.4	18.5	0.04	0.80	—	0.80	0.74	—	0.74	—	3,948	3,948	0.16	0.03	—	3,962
Dust From Material Movement	—	—	—	—	—	—	1.84	1.84	—	0.89	0.89	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.30	0.25	2.07	2.08	< 0.005	0.09	—	0.09	0.08	—	0.08	—	443	443	0.02	< 0.005	—	445
Dust From Material Movement	—	—	—	—	—	—	0.21	0.21	—	0.10	0.10	—	—	—	—	—	—	—

Street Improvements for the Regional Wastewater Reclamation Facility Detailed Report, 1/27/2025

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.05	0.38	0.38	< 0.005	0.02	—	0.02	0.02	—	0.02	—	73.4	73.4	< 0.005	< 0.005	—	73.7
Dust From Material Movement	—	—	—	—	—	—	0.04	0.04	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.11	0.10	1.91	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	297	297	0.01	0.01	1.03	301
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	31.6	31.6	< 0.005	< 0.005	0.09	33.0
Hauling	0.03	0.02	0.91	0.21	0.01	0.02	0.22	0.23	0.02	0.06	0.07	—	817	817	0.01	0.13	1.76	858
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.15	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	30.3	30.3	< 0.005	< 0.005	0.05	30.7
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.56	3.56	< 0.005	< 0.005	< 0.005	3.70
Hauling	< 0.005	< 0.005	0.11	0.02	< 0.005	< 0.005	0.02	0.03	< 0.005	0.01	0.01	—	91.8	91.8	< 0.005	0.01	0.09	96.3
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.02	5.02	< 0.005	< 0.005	0.01	5.09
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.59	0.59	< 0.005	< 0.005	< 0.005	0.61
Hauling	< 0.005	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	15.2	15.2	< 0.005	< 0.005	0.01	15.9

3.5. Curb and Gutter Installation (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.74	1.46	10.9	14.1	0.03	0.48	—	0.48	0.45	—	0.45	—	3,071	3,071	0.12	0.02	—	3,082
Dust From Material Movement	—	—	—	—	—	—	0.14	0.14	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	0.80	1.04	< 0.005	0.04	—	0.04	0.03	—	0.03	—	227	227	0.01	< 0.005	—	228
Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.02	0.02	0.15	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	37.6	37.6	< 0.005	< 0.005	—	37.7
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.11	0.10	1.91	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	297	297	0.01	0.01	1.03	301
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	31.6	31.6	< 0.005	< 0.005	0.09	33.0
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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	20.0	20.0	< 0.005	< 0.005	0.03	20.2
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.34	2.34	< 0.005	< 0.005	< 0.005	2.44
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.31	3.31	< 0.005	< 0.005	0.01	3.35
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.39	0.39	< 0.005	< 0.005	< 0.005	0.40
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Asphalt and Concrete Paving (2025) - Unmitigated

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

Street Improvements for the Regional Wastewater Reclamation Facility Detailed Report, 1/27/2025

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.34	1.12	8.94	10.5	0.02	0.40	—	0.40	0.37	—	0.37	—	2,504	2,504	0.10	0.02	—	2,513
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.34	1.12	8.94	10.5	0.02	0.40	—	0.40	0.37	—	0.37	—	2,504	2,504	0.10	0.02	—	2,513
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.34	0.40	< 0.005	0.02	—	0.02	0.01	—	0.01	—	96.1	96.1	< 0.005	< 0.005	—	96.4
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.9	15.9	< 0.005	< 0.005	—	16.0
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.09	1.72	0.00	0.00	0.24	0.24	0.00	0.06	0.06	—	267	267	0.01	0.01	0.92	271
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	31.6	31.6	< 0.005	< 0.005	0.09	33.0
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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.10	0.97	0.00	0.00	0.24	0.24	0.00	0.06	0.06	—	227	227	0.01	0.01	0.02	230
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	31.7	31.7	< 0.005	< 0.005	< 0.005	33.0
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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.33	9.33	< 0.005	< 0.005	0.02	9.45
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.21	1.21	< 0.005	< 0.005	< 0.005	1.26
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.54	1.54	< 0.005	< 0.005	< 0.005	1.56
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.20	0.20	< 0.005	< 0.005	< 0.005	0.21
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	0.00

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

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

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Road Clearing	Linear, Grubbing & Land Clearing	6/2/2025	6/14/2025	5.00	9.00	—
Subgrade Construction	Linear, Drainage, Utilities, & Sub-Grade	6/15/2025	8/11/2025	5.00	41.0	—
Curb and Gutter Installation	Linear, Drainage, Utilities, & Sub-Grade	8/12/2025	9/17/2025	5.00	27.0	—
Asphalt and Concrete Paving	Linear, Paving	9/18/2025	10/7/2025	5.00	14.0	—

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
Road Clearing	Tractors/Loaders/Back hoes	Diesel	Average	1.00	8.00	84.0	0.37
Road Clearing	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Road Clearing	Dumpers/Tenders	Diesel	Average	1.00	8.00	16.0	0.38
Road Clearing	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Road Clearing	Other Construction Equipment	Diesel	Average	1.00	8.00	82.0	0.42
Road Clearing	Off-Highway Trucks	Diesel	Average	1.00	8.00	376	0.38
Subgrade Construction	Tractors/Loaders/Back hoes	Diesel	Average	1.00	8.00	84.0	0.37
Subgrade Construction	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Subgrade Construction	Plate Compactors	Diesel	Average	1.00	8.00	8.00	0.43

Street Improvements for the Regional Wastewater Reclamation Facility Detailed Report, 1/27/2025

Subgrade Construction	Dumpers/Tenders	Diesel	Average	1.00	8.00	16.0	0.38
Subgrade Construction	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Subgrade Construction	Graders	Diesel	Average	1.00	8.00	148	0.41
Subgrade Construction	Rollers	Diesel	Average	1.00	8.00	36.0	0.38
Subgrade Construction	Off-Highway Trucks	Diesel	Average	1.00	8.00	376	0.38
Curb and Gutter Installation	Tractors/Loaders/Back hoes	Diesel	Average	1.00	8.00	84.0	0.37
Curb and Gutter Installation	Plate Compactors	Diesel	Average	1.00	8.00	8.00	0.43
Curb and Gutter Installation	Dumpers/Tenders	Diesel	Average	1.00	8.00	16.0	0.38
Curb and Gutter Installation	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Curb and Gutter Installation	Rubber Tired Loaders	Diesel	Average	1.00	8.00	150	0.36
Curb and Gutter Installation	Graders	Diesel	Average	1.00	8.00	148	0.41
Curb and Gutter Installation	Rollers	Diesel	Average	1.00	8.00	36.0	0.38
Curb and Gutter Installation	Off-Highway Trucks	Diesel	Average	1.00	8.00	376	0.38
Asphalt and Concrete Paving	Pavers	Diesel	Average	1.00	8.00	81.0	0.42
Asphalt and Concrete Paving	Plate Compactors	Diesel	Average	1.00	8.00	8.00	0.43
Asphalt and Concrete Paving	Dumpers/Tenders	Diesel	Average	1.00	8.00	16.0	0.38
Asphalt and Concrete Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36

Asphalt and Concrete Paving	Other Construction Equipment	Diesel	Average	1.00	8.00	82.0	0.42
Asphalt and Concrete Paving	Rollers	Diesel	Average	1.00	8.00	36.0	0.38
Asphalt and Concrete Paving	Off-Highway Trucks	Diesel	Average	1.00	8.00	376	0.38

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Road Clearing	—	—	—	—
Road Clearing	Worker	15.0	18.5	LDA,LDT1,LDT2
Road Clearing	Vendor	0.00	10.2	HHDT,MHDT
Road Clearing	Hauling	0.00	20.0	HHDT
Road Clearing	Onsite truck	—	—	HHDT
Subgrade Construction	—	—	—	—
Subgrade Construction	Worker	20.0	18.5	LDA,LDT1,LDT2
Subgrade Construction	Vendor	1.00	10.2	HHDT,MHDT
Subgrade Construction	Hauling	12.0	20.0	HHDT
Subgrade Construction	Onsite truck	—	—	HHDT
Curb and Gutter Installation	—	—	—	—
Curb and Gutter Installation	Worker	20.0	18.5	LDA,LDT1,LDT2
Curb and Gutter Installation	Vendor	1.00	10.2	HHDT,MHDT
Curb and Gutter Installation	Hauling	0.00	20.0	HHDT
Curb and Gutter Installation	Onsite truck	—	—	HHDT
Asphalt and Concrete Paving	—	—	—	—
Asphalt and Concrete Paving	Worker	18.0	18.5	LDA,LDT1,LDT2
Asphalt and Concrete Paving	Vendor	1.00	10.2	HHDT,MHDT

Asphalt and Concrete Paving	Hauling	0.00	20.0	HHDT
Asphalt and Concrete Paving	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)
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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)
Road Clearing	—	—	6.20	0.00	—
Subgrade Construction	—	4,000	6.20	0.00	—
Curb and Gutter Installation	—	—	6.20	0.00	—

5.6.2. Construction Earthmoving Control Strategies

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

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
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5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	532	0.03	< 0.005

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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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	24.8	annual days of extreme heat
Extreme Precipitation	0.20	annual days with precipitation above 20 mm

Sea Level Rise	—	meters of inundation depth
Wildfire	3.09	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 $\frac{3}{4}$ 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	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A

Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	91.1
AQ-PM	4.06
AQ-DPM	14.0
Drinking Water	25.8
Lead Risk Housing	39.6
Pesticides	14.3
Toxic Releases	3.98
Traffic	59.9
Effect Indicators	—

CleanUp Sites	0.00
Groundwater	0.00
Haz Waste Facilities/Generators	26.7
Impaired Water Bodies	0.00
Solid Waste	54.8
Sensitive Population	—
Asthma	50.6
Cardio-vascular	58.7
Low Birth Weights	13.9
Socioeconomic Factor Indicators	—
Education	73.8
Housing	59.7
Linguistic	48.7
Poverty	95.2
Unemployment	55.0

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	25.81804183
Employed	23.88040549
Median HI	16.89978186
Education	—
Bachelor's or higher	26.08751444
High school enrollment	2.489413576
Preschool enrollment	1.873476197
Transportation	—

Street Improvements for the Regional Wastewater Reclamation Facility Detailed Report, 1/27/2025

Auto Access	42.71782369
Active commuting	10.08597459
Social	—
2-parent households	35.96817657
Voting	48.09444373
Neighborhood	—
Alcohol availability	80.90594123
Park access	8.340818683
Retail density	1.745155909
Supermarket access	5.864237136
Tree canopy	1.308866932
Housing	—
Homeownership	80.90594123
Housing habitability	65.12254587
Low-inc homeowner severe housing cost burden	43.62889773
Low-inc renter severe housing cost burden	64.41678429
Uncrowded housing	45.28422944
Health Outcomes	—
Insured adults	2.55357372
Arthritis	0.0
Asthma ER Admissions	54.0
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	24.6

Cognitively Disabled	43.0
Physically Disabled	5.4
Heart Attack ER Admissions	51.2
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	91.1
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	67.0
Elderly	5.7
English Speaking	42.6
Foreign-born	50.4
Outdoor Workers	10.8
Climate Change Adaptive Capacity	—
Impervious Surface Cover	84.9
Traffic Density	32.5
Traffic Access	23.0
Other Indices	—
Hardship	74.8
Other Decision Support	—

2016 Voting	47.2
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7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	33.0
Healthy Places Index Score for Project Location (b)	8.00
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	Construction anticipated to take place over a period of 4 months
Construction: Off-Road Equipment	Equipment based on information provided by Project Applicant
Construction: Trips and VMT	Up to 15 workers will working construction per day. Vendor trips represent delivery trucks