AIR QUALITY, ENERGY, AND GREENHOUSE GAS EMISSIONS IMPACT ANALYSIS

DIAMOND RANCH HIGH SCHOOL SOLAR FARM PROJECT

CITY OF POMONA

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
Air Basin	South Coast Air Basin
AQMP	Air Quality Management Plan
BACT	Best Available Control Technology
BSFC	Brake Specific Fuel Consumption
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFCs	chlorofluorocarbons
Cf_4	tetrafluoromethane
C_2F_6	hexafluoroethane
C_2H_6	ethane
CH_4	Methane
City	City of Pomona
CO	Carbon monoxide
CO_2	Carbon dioxide
CO_2e	Carbon dioxide equivalent
CPUC	California Public Utilities Commission
CWSC	California Water Service Company
DPM	Diesel particulate matter
EPA	Environmental Protection Agency
ºF	Fahrenheit
FTIP	Federal Transportation Improvement Program
GHG	Greenhouse gas
GWP	Global warming potential
HAP	Hazardous Air Pollutants
HFCs	Hydrofluorocarbons

IPCC	International Panel on Climate Change
kWhr	kilowatt-hour
LCFS	Low Carbon Fuel Standard
LST	Localized Significant Thresholds
MATES	Multiple Air Toxics Exposure Study
$MMTCO_2e$	Million metric tons of carbon dioxide equivalent
MPO	Metropolitan Planning Organization
MSAT	Mobile Source Air Toxics
MWh	Megawatt-hour
NAAQS	National Ambient Air Quality Standards
NO_x	Nitrogen oxides
NO_2	Nitrogen dioxide
OPR	Office of Planning and Research
Pfc	Perfluorocarbons
PM	Particle matter
PM10	Particles that are less than 10 micrometers in diameter
PM2.5	Particles that are less than 2.5 micrometers in diameter
PPM	Parts per million
PPB	Parts per billion
PPT	Parts per trillion
RTIP	Regional Transportation Improvement Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCAG	Southern California Association of Governments
SF_6	Sulfur Hexafluoride
SIP	State Implementation Plan
SO_x	Sulfur oxides
TAC	Toxic air contaminants
UNFCCC	United Nations' Framework Convention on Climate Change
VOC	Volatile organic compounds

1.0 INTRODUCTION

1.1 Purpose of Analysis and Study Objectives

This Air Quality, Energy, and Greenhouse Gas (GHG) Emissions Impact Analysis has been completed to determine the air quality, energy, and GHG emissions impacts associated with the proposed Diamond Ranch High School Solar Farm project (proposed project). The following is provided in this report:

- A description of the proposed project;
- A description of the atmospheric setting;
- A description of the criteria pollutants and GHGs;
- A description of the air quality regulatory framework;
- A description of the energy conservation regulatory framework;
- A description of the GHG emissions regulatory framework;
- A description of the air quality, energy, and GHG emissions thresholds including the California Environmental Quality Act (CEQA) significance thresholds;
- An analysis of the conformity of the proposed project with the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP);
- An analysis of the short-term construction related and long-term operational air quality, energy, and GHG emissions impacts; and
- An analysis of the conformity of the proposed project with all applicable energy and GHG emissions reduction plans and policies.

1.2 Site Location and Study Area

The project site is located on the northern portion of the Diamond Ranch High School (DRHS) campus that is located at 100 Diamond Ranch Road in the City of Pomona (City). The project site was rough graded during construction of DRHS in the mid 1990s and has since remained undeveloped. The project site is bounded by State Route 60 (SR 60) and single-family homes to the north, vacant land and Phillips Ranch Road to the east, the DRHS ball fields to the south, and vacant land to the west. The project local study area is shown in Figure 1.

Sensitive Receptors in Project Vicinity

The nearest sensitive receptors to the project site are the single-family homes located on the north side of SR 60 that are as near 500 feet north of the project site. There are also multi-family homes located on the east side of Phillips Ranch Road that are as near as 1,000 feet east of the proposed driveway to the project site.

1.3 Proposed Project Description

The project consists of the installation and operation of a ground-mounted solar photovoltaic (PV) power generating system, supporting structures, inverter modules, pad mounted transformers, access roads and fencing, and on-site switchgear. The proposed site plan is shown in Figure 2.

A 2.8-megawatt direct current (MW DC) solar power system and a 480-volt switchgear station would be constructed in the main development footprint, located north of the DRHS campus, of the project site. A total of 4,284 PV panels would be installed on ground-mounted racks. The panels would have a maximum length of 13 feet 9 inches and tilted at a 20-degree angle. They would have a maximum height of 6 feet 7 inches above the final grade. The panels would be mounted on a racking system supported by piles and positioned to face south, toward the DRHS campus. Piles which would support the racks would have a maximum depth of 8 feet. A prefabricated, compact switchgear station would be installed south of the arrays. The switchgear would be 12 feet 6 inches by 6 feet 6 inches and 8 feet in height. It would control, protect, and isolate the electrical systems and would be made up of circuit breakers, fuses, and switches that are mounted in a metal enclosure.

An underground 12-kilovolt (kV) circuit would be installed from the switchgear station to a new 20-foot by 22-foot meter station proposed near Diamond Ranch Road. From the meter station, underground interconnect cables would be installed to existing Southern California Edison (SCE) electrical utility vaults on the south side of Diamond Ranch Road, located generally across an existing driveway apron, which would be expanded as a result of the project.

The project would include 26-foot-wide service roads within the project site to provide vehicle access to maintain the panels. A main east-west road would be constructed on the south side of the solar farm, and three north-south "finger" roads would be installed between the solar panels. The service roads would be accessed from the driveway apron on Diamond Ranch Road, east of the existing tennis courts. Parking would be available along the east-west internal road and near the driveway apron. Perimeter fencing would be installed around the solar farm; gated access would be from the driveway apron.

The renewable energy generated by the project would be distributed to the existing SCE 12-kV distribution line located beneath Diamond Ranch Road and exported to SCE's grid to offset electricity use at 20 District-owned properties. Project implementation would not require additional improvements at any off-site District properties or impact student enrollment at DRHS or other schools.

The proposed improvements would require intermittent maintenance and cleaning of the panels, including washing of the panels. Maintenance activities would occur up to twice a year and be scheduled to avoid potential conflict with school activities and operations. Maintenance would include washing panels with water and a biodegradable detergent; trimming and/or removing vegetation to prevent shading of the panels and potential damage of the system; and removing trash from the site.

The entire project site would be graded. Approximately 38,000 cubic yards of soil would be cut and approximately 10,100 cubic yards of soil would fill the low-lying areas. The site would be designed with a 1 percent slope toward the southwest corner of the site to direct stormwater runoff an existing concrete channel, located immediately off-site. Once the proposed arrays are installed, a 0.75-inch layer of crushed gravel would be placed over the entire project site.

Construction would begin in the first quarter of 2026 and last 12 months. Construction staging and laydown would occur with the development footprint, including in the dirt area at the project site entrance near Diamond Ranch Road. Construction activities would be scheduled to minimize disruptions to campus programs.

1.4 Executive Summary

Standard Air Quality, Energy, and GHG Regulatory Conditions

The proposed project will be required to comply with the following regulatory conditions from the SCAQMD and State of California (State).

South Coast Air Quality Management District Rules

The following lists the SCAQMD rules that are applicable, but not limited to the proposed project.

- Rule 402 Nuisance – Controls the emissions of odors and other air contaminants;
- Rule 403 Fugitive Dust – Controls the emissions of fugitive dust;
- Rules 1108 and 1108.1 Cutback and Emulsified Asphalt – Controls the VOC content in asphalt;
- Rule 1113 Architectural Coatings – Controls the VOC content in paints and solvents; and
- Rule 1143 Paint Thinners – Controls the VOC content in paint thinners.

State of California Rules

The following lists the State of California Code of Regulations (CCR) air quality emission rules that are applicable, but not limited to the proposed project.

- CCR Title 13, Article 4.8, Chapter 9, Section 2449 – In use Off-Road Diesel Vehicles;
- CCR Title 13, Section 2025 – On-Road Diesel Truck Fleets;
- CCR Title 24 Part 6 – California Building Energy Standards; and
- CCR Title 24 Part 11 – California Green Building Standards.

Summary of Analysis Results

The following is a summary of the proposed project's impacts with regard to the State CEQA Guidelines air quality, energy, and GHG emissions checklist questions.

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

Less than significant impact.

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

Less than significant impact.

Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact.

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

Less than significant impact.

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

Less than significant impact.

Conflict with or obstruct a state or local plan for renewable energy;

Less than significant impact.

Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than significant impact.

Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?

Less than significant impact.

1.5 Mitigation Measures for the Proposed Project

This analysis found that implementation of the State and SCAQMD air quality, energy, and GHG emissions reductions regulations were adequate to limit criteria pollutants, toxic air contaminants, odors, and GHG emissions from the proposed project to less than significant levels. No mitigation measures are required for the proposed project with respect to air quality, energy, and GHG emissions.



SOURCE: Google Maps

VISTA ENVIRONMENTAL

Figure 1
Project Local Study Area



Source: Southland

VISTA ENVIRONMENTAL

Figure 2
Proposed Site Plan

2.0 AIR POLLUTANTS

Air pollutants are generally classified as either criteria pollutants or non-criteria pollutants. Federal ambient air quality standards have been established for criteria pollutants, whereas no ambient standards have been established for non-criteria pollutants. For some criteria pollutants, separate standards have been set for different periods. Most standards have been set to protect public health. For some pollutants, standards have been based on other values (such as protection of crops, protection of materials, or avoidance of nuisance conditions). A summary of federal and state ambient air quality standards is provided in the Regulatory Framework section.

2.1 Criteria Pollutants and Ozone Precursors

The criteria pollutants consist of: ozone, nitrogen oxides (NOx), CO, sulfur oxides (Sox), lead, and particulate matter (PM). The ozone precursors consist of NO_x and VOC. These pollutants can harm your health and the environment, and cause property damage. The Environmental Protection Agency (EPA) calls these pollutants "criteria" air pollutants because it regulates them by developing human health-based and/or environmentally-based criteria for setting permissible levels. The following provides descriptions of each of the criteria pollutants and ozone precursors.

Nitrogen Oxides

NOx is the generic term for a group of highly reactive gases which contain nitrogen and oxygen. While most NOx are colorless and odorless, concentrations of nitrogen dioxide (NO_2) can often be seen as a reddish-brown layer over many urban areas. NOx form when fuel is burned at high temperatures, as in a combustion process. The primary manmade sources of NO_x are motor vehicles, electric utilities, and other industrial, commercial, and residential sources that burn fuel. NOx reacts with other pollutants to form, ground-level ozone, nitrate particles, acid aerosols, as well as NO_2, which cause respiratory problems. NO_x and the pollutants formed from NO_x can be transported over long distances, following the patterns of prevailing winds. Therefore, controlling NOx is often most effective if done from a regional perspective, rather than focusing on the nearest sources.

Ozone

Ozone is not usually emitted directly into the air, instead it is created by a chemical reaction between NOx and VOCs in the presence of sunlight. Motor vehicle exhaust, industrial emissions, gasoline vapors, chemical solvents as well as natural sources emit NOx and VOC that help form ozone. Ground-level ozone is the primary constituent of smog. Sunlight and hot weather cause ground-level ozone to form with the greatest concentrations usually occurring downwind from urban areas. Ozone is subsequently considered a regional pollutant. Ground-level ozone is a respiratory irritant and an oxidant that increases susceptibility to respiratory infections and can cause substantial damage to vegetation and other materials. Because NOx and VOC are ozone precursors, the health effects associated with ozone are also indirect health effects associated with significant levels of NOx and VOC emissions.

Carbon Monoxide

CO is a colorless, odorless gas that is formed when carbon in fuel is not burned completely. It is a component of motor vehicle exhaust, which contributes approximately 56 percent of all CO emissions nationwide. In cities, 85 to 95 percent of all CO emissions may come from motor vehicle exhaust. Other sources of CO emissions include industrial processes (such as metals processing and chemical manufacturing), residential wood burning, and natural sources such as forest fires. Woodstoves, gas

stoves, cigarette smoke, and unvented gas and kerosene space heaters are indoor sources of CO. The highest levels of CO in the outside air typically occur during the colder months of the year when inversion conditions are more frequent. The air pollution becomes trapped near the ground beneath a layer of warm air. CO is described as having only a local influence because it dissipates quickly. Since CO concentrations are strongly associated with motor vehicle emissions, high CO concentrations generally occur in the immediate vicinity of roadways with high traffic volumes and traffic congestion, active parking lots, and in automobile tunnels. Areas adjacent to heavily traveled and congested intersections are particularly susceptible to high CO concentrations.

CO is a public health concern because it combines readily with hemoglobin and thus reduces the amount of oxygen transported in the bloodstream. The health threat from lower levels of CO is most serious for those who suffer from heart disease such as angina, clogged arteries, or congestive heart failure. For a person with heart disease, a single exposure to CO at low levels may cause chest pain and reduce that person's ability to exercise; repeated exposures may contribute to other cardiovascular effects. High levels of CO can affect even healthy people. People who breathe high levels of CO can develop vision problems, reduced ability to work or learn, reduced manual dexterity, and difficulty performing complex tasks. At extremely high levels, CO is poisonous and can cause death.

Sulfur Oxides

SOx gases are formed when fuel containing sulfur, such as coal and oil is burned, as well as from the refining of gasoline. SOx dissolves easily in water vapor to form acid and interacts with other gases and particles in the air to form sulfates and other products that can be harmful to people and the environment. Exposure to SOx gases can cause respiratory symptoms (bronchoconstriction, possible wheezing or shortness of breath) during exercise or physical activity in persons with asthma and cause possible allergic sensitization, airway inflammation, and asthma development.

Lead

Lead is a metal found naturally in the environment as well as manufactured products. The major sources of lead emissions have historically been motor vehicles and industrial sources. Due to the phase out of leaded gasoline, metal processing is now the primary source of lead emissions to the air. High levels of lead in the air are typically only found near lead smelters, waste incinerators, utilities, and lead-acid battery manufacturers. Exposure of fetuses, infants and children to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure.

Particulate Matter

PM is the term for a mixture of solid particles and liquid droplets found in the air. PM is made up of a number of components including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles. The size of particles is directly linked to their potential for causing health problems. Particles that are less than 10 micrometers in diameter (PM10) that are also known as *Respirable Particulate Matter* are the particles that generally pass through the throat and nose and enter the lungs. Once inhaled, these particles can affect the heart and lungs and cause serious health effects. Particles that are less than 2.5 micrometers in diameter (PM2.5) that are also known as *Fine Particulate Matter* have been designated as a subset of PM10 due to their increased negative health impacts and its ability to remain suspended in the air longer and travel further.

Volatile Organic Compounds

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

VOC is not classified as a criteria pollutant, since VOCs by themselves are not a known source of adverse health effects. The primary health effects of VOCs result from the formation of ozone and its related health effects. High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. Carcinogenic forms of hydrocarbons, such as benzene, are considered TACs. There are no separate health standards for VOCs as a group.

2.2 Other Pollutants of Concern

Toxic Air Contaminants

In addition to the above-listed criteria pollutants, TACs are another group of pollutants of concern. TACs is a term that is defined under the California Clean Air Act and consists of the same substances that are defined as Hazardous Air Pollutants (HAPs) in the Federal Clean Air Act. There are over 700 hundred different types of TACs with varying degrees of toxicity. Sources of TACs include industrial processes such as petroleum refining and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. Cars and trucks release at least 40 different toxic air contaminants. The most important of these TACs, in terms of health risk, are diesel particulates, benzene, formaldehyde, 1,3-butadiene, and acetaldehyde. Public exposure to TACs can result from emissions from normal operations as well as from accidental releases. Health effects of TACs include cancer, birth defects, neurological damage, and death.

TACs are less pervasive in the urban atmosphere than criteria air pollutants, however they are linked to short-term (acute) or long-term (chronic or carcinogenic) adverse human health effects. There are hundreds of different types of TACs with varying degrees of toxicity. Sources of TACs include industrial processes, commercial operations (e.g., gasoline stations and dry cleaners), and motor vehicle exhaust.

According to *The California Almanac of Emissions and Air Quality 2013 Edition*, the majority of the estimated health risk from TACs can be attributed to relatively few compounds, the most important of which is diesel particulate matter (DPM). DPM is a subset of PM2.5 because the size of diesel particles are typically 2.5 microns and smaller. The identification of DPM as a TAC in 1998 led the California Air Resources Board (CARB) to adopt the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-fueled Engines and Vehicles in October 2000. The plan's goals are a 75-percent reduction in DPM by 2010 and an 85-percent reduction by 2020 from the 2000 baseline. Diesel engines emit a complex mixture of air pollutants, composed of gaseous and solid material. The visible emissions in diesel exhaust are known as particulate matter or PM, which includes carbon particles or "soot." Diesel exhaust also contains a variety of harmful gases and over 40 other cancer-causing substances. California's identification of DPM as a TAC was based on its potential to cause cancer, premature deaths, and other health problems. Exposure to DPM is a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. Overall, diesel engine emissions are responsible for the majority of California's potential airborne cancer risk from combustion sources.

Asbestos

Asbestos is listed as a TAC by CARB and as a HAP by the EPA. Asbestos occurs naturally in mineral formations and crushing or breaking these rocks, through construction or other means, can release asbestiform fibers into the air. Asbestos emissions can result from the sale or use of asbestos-containing materials, road surfacing with such materials, grading activities, and surface mining. The risk of disease is dependent upon the intensity and duration of exposure. When inhaled, asbestos fibers may remain in the lungs and with time may be linked to such diseases as asbestosis, lung cancer, and mesothelioma. The nearest likely locations of naturally occurring asbestos, as identified in the *General Location Guide for Ultramafic Rocks in California*, prepared by the California Division of Mines and Geology, is located in Santa Barbara County. The nearest historic asbestos mine to the project site, as identified in the *Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California,* prepared by U.S. Geological Survey, is located at Asbestos Mountain, which is approximately 95 miles east of the project site in the San Jacinto Mountains. Due to the distance to the nearest natural occurrences of asbestos, the project site is not likely to contain asbestos.

3.0 GREENHOUSE GASES

3.1 Greenhouse Gases

Constituent gases of the Earth's atmosphere, called atmospheric GHGs, play a critical role in the Earth's radiation amount by trapping infrared radiation from the Earth's surface, which otherwise would have escaped to space. Prominent GHGs contributing to this process include carbon dioxide (CO_2), methane (CH_4), ozone, water vapor, nitrous oxide (N_2O), and chlorofluorocarbons (CFCs). This phenomenon, known as the Greenhouse Effect, is responsible for maintaining a habitable climate. Anthropogenic (caused or produced by humans) emissions of these GHGs in excess of natural ambient concentrations are responsible for the enhancement of the Greenhouse Effect and have led to a trend of unnatural warming of the Earth's natural climate, known as global warming or climate change. Emissions of gases that induce global warming are attributable to human activities associated with industrial/manufacturing, agriculture, utilities, transportation, and residential land uses. Emissions of CO_2 and N_2O are byproducts of fossil fuel combustion. Methane, a potent GHG, results from off-gassing associated with agricultural practices and landfills. Sinks of CO_2, where CO_2 is stored outside of the atmosphere, include uptake by vegetation and dissolution into the ocean. The following provides a description of each of the GHGs and their global warming potential.

Water Vapor

Water vapor is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. The feedback loop in which water is involved is critically important to projecting future climate change. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to "hold" more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop will continue is unknown as there is also dynamics that put the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the Earth's surface and heat it up).

Carbon Dioxide

The natural production and absorption of CO_2 is achieved through the terrestrial biosphere and the ocean. However, humankind has altered the natural carbon cycle by burning coal, oil, natural gas, and wood. Since the industrial revolution began in the mid 1700s, each of these activities has increased in scale and distribution. CO_2 was the first GHG demonstrated to be increasing in atmospheric concentration with the first conclusive measurements being made in the last half of the 20th century. Prior to the industrial revolution, concentrations were fairly stable at 280 parts per million (ppm). The International Panel on Climate Change (IPCC) indicates that concentrations were 379 ppm in 2005, an increase of more than 30 percent. Left unchecked, the IPCC projects that concentration of CO_2 in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources. This could result in an average global temperature rise of at least two degrees Celsius or 3.6 degrees Fahrenheit.

Methane

CH_4 is an extremely effective absorber of radiation, although its atmospheric concentration is less than that of CO_2. Its lifetime in the atmosphere is brief (10 to 12 years), compared to some other GHGs (such as CO_2, N_2O, and CFCs). CH_4 has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other anthropocentric sources include fossil-fuel combustion and biomass burning.

Nitrous Oxide

Concentrations of N_2O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration of this GHG was documented at 314 parts per billion (ppb). N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. N_2O is also commonly used as an aerosol spray propellant (i.e., in whipped cream bottles, in potato chip bags to keep chips fresh, and in rocket engines and race cars).

Chlorofluorocarbons

CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs have no natural source, but were first synthesized in 1928. They were used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and in 1989 the European Community agreed to ban CFCs by 2000 and subsequent treaties banned CFCs worldwide by 2010. This effort was extremely successful, and the levels of the major CFCs are now remaining level or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.

Hydrofluorocarbons

Hydrofluorocarbons (HFCs) are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF_3), HFC-134a (CF_3CH_2F), and HFC-152a (CH_3CHF_2). Prior to 1990, the only significant emissions were HFC-23. HFC-134a use is increasing due to its use as a refrigerant. Concentrations of HFC-23 and HFC-134a in the atmosphere are now about 10 parts per trillion (ppt) each. Concentrations of HFC-152a are about 1 ppt. HFCs are manmade for applications such as automobile air conditioners and refrigerants.

Perfluorocarbons

Perfluorocarbons (PFCs) have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). Concentrations of CF_4 in the atmosphere are over 70 ppt. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing.

Sulfur Hexafluoride

Sulfur Hexafluoride (SF_6) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF_6 has the highest global warming potential of any gas evaluated; 23,900 times that of CO_2. Concentrations in the 1990s were about 4 ppt. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

Aerosols

Aerosols are particles emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light. Cloud formation can also be affected by aerosols. Sulfate aerosols are emitted when fuel containing sulfur is burned. Black carbon (or soot) is emitted during biomass burning due to the incomplete combustion of fossil fuels. Particulate matter regulation has been lowering aerosol concentrations in the United States; however, global concentrations are likely increasing.

3.2 Global Warming Potential

GHGs have varying global warming potential (GWP). The GWP is the potential of a gas or aerosol to trap heat in the atmosphere; it is the cumulative radiative forcing effects of a gas over a specified time horizon resulting from the emission of a unit mass of gas relative to the reference gas, CO_2. The GHGs listed by the IPCC and the CEQA Guidelines are discussed in this section in order of abundance in the atmosphere. Water vapor, the most abundant GHG, is not included in this list because its natural concentrations and fluctuations far outweigh its anthropogenic (human-made) sources. To simplify reporting and analysis, GHGs are commonly defined in terms of their GWP. The IPCC defines the GWP of various GHG emissions on a normalized scale that recasts all GHG emissions in terms of CO_2e. As such, the GWP of CO_2 is equal to 1. The GWP values used in this analysis are based on the 2007 IPCC Fourth Assessment Report, which are used in the CalEEMod Model Version 2022.1 and are detailed in Table A. The IPCC has updated the GWP of some gases in their Sixth Assessment Report, however the new values have not yet been incorporated into the CalEEMod model that has been utilized in this analysis.

Table A – Global Warming Potentials, Atmospheric Lifetimes and Abundances of GHGs

Gas	Atmospheric Lifetime (years)[1]	Global Warming Potential (100 Year Horizon)[2]	Atmospheric Abundance
Carbon Dioxide (CO_2)	50-200	1	379 ppm
Methane (CH_4)	9-15	25	1,774 ppb
Nitrous Oxide (N_2O)	114	298	319 ppb
HFC-23	270	14,800	18 ppt
HFC-134a	14	1,430	35 ppt
HFC-152a	1.4	124	3.9 ppt
PFC: Tetrafluoromethane (CF_4)	50,000	7,390	74 ppt
PFC: Hexafluoroethane (C_2F_6)	10,000	12,200	2.9 ppt
Sulfur Hexafluoride (SF_6)	3,200	22,800	5.6 ppt

Notes:
[1] Defined as the half-life of the gas.
[2] Compared to the same quantity of CO_2 emissions and is based on the Intergovernmental Panel On Climate Change (IPCC) 2007 standard, which is utilized in CalEEMod (Version 2022.1),that is used in this report (CalEEMod user guide, April 2022).
Definitions: ppm = parts per million; ppb = parts per billion; ppt = parts per trillion
Source: IPCC 2007, EPA 2015

3.3 Greenhouse Gas Emissions Inventory

According to the Carbon Dioxide Information Analysis Center[1], 9,855 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) emissions were created globally in the year 2014. According to the EPA, the breakdown of global GHG emissions by sector consists of: 25 percent from electricity and heat production; 21 percent from industry; 24 percent from agriculture, forestry and other land use activities; 14 percent from transportation; 6 percent from building energy use; and 10 percent from all other sources of energy use[2].

According to *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2022,* prepared by EPA, April 2024, total U.S. GHG emissions in 2022 were 6,343.2 million metric tons (MMT) of CO_2e emissions. Total U.S. emissions have decreased by 3.0 percent between 1990 and 2022, which is down from a high of 15.2 percent above 1990 levels in 2007. Emissions increased from 2021 to 2022 by 0.2 percent. The increase in total GHG emissions was driven largely in an increase in CO_2 emissions from fossil fuel combustion.

According to *California Greenhouse Gas Emissions for 2000 to 2022 Trends of Emissions and Other Indicators*, prepared by the CARB, September 20, 2024, the State of California created 371.1 $MMTCO_2e$ in 2022. The 2022 emissions were 9.3 $MMTCO_2e$ lower than in 2021. The 2022 emissions data shows the State is continuing its established long-term trend of GHG emissions declines, despite the anomalous emissions trends from 2019 through 2021, due in large part to the impacts of the COVID-19 pandemic. The transportation sector showed the largest decrease in emissions of 5.2 $MMTCO_2e$ compared to 2021.

1 Obtained from: https://cdiac.ess-dive.lbl.gov/trends/emis/tre_glob_2014.html
2 Obtained from: https://www.epa.gov/ghgemissions/global-greenhouse-gas-emissions-data

4.0 AIR QUALITY MANAGEMENT

The air quality at the project site is addressed through the efforts of various federal, state, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for improving the air quality are discussed below.

4.1 Federal – United States Environmental Protection Agency

The Clean Air Act, first passed in 1963 with major amendments in 1970, 1977 and 1990, is the overarching legislation covering regulation of air pollution in the United States. The Clean Air Act has established the mandate for requiring regulation of both mobile and stationary sources of air pollution at the state and federal level. The EPA was created in 1970 in order to consolidate research, monitoring, standard-setting and enforcement authority into a single agency.

The EPA is responsible for setting and enforcing the National Ambient Air Quality Standards (NAAQS) for atmospheric pollutants. It regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. NAAQS pollutants were identified using medical evidence and are shown below in Table B.

Table B – State and Federal Criteria Pollutant Standards

Air Pollutant	Concentration / Averaging Time		Most Relevant Effects
	California Standards	Federal Primary Standards	
Ozone	0.09 ppm / 1-hour 0.07 ppm / 8-hour	0.070 ppm, / 8-hour	a) Pulmonary function decrements and localized lung injury in humans and animals; (b) asthma exacerbation; (c) chronic obstructive pulmonary disease (COPD) exacerbation; (d) respiratory infection; (e) increased school absences, and hospital admissions and emergency department (ED) visits for combined respiratory diseases; (e) increased mortality; (f) possible metabolic effects. Vegetation damage; property damage
Carbon Monoxide (CO)	20.0 ppm / 1-hour 9.0 ppm / 8-hour	35.0 ppm / 1-hour 9.0 ppm / 8-hour	Visibility reduction (a) Aggravation of angina pectoris and other aspects of coronary heart disease; (b) decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (c) possible impairment of central nervous system functions; (d) possible increased risk to fetuses; (f) possible increased risk of pulmonary disease; (g) possible emergency department visits for respiratory diseases overall and visits for asthma.
Nitrogen Dioxide (NO_2)	0.18 ppm / 1-hour 0.030 ppm / annual	100 ppb / 1-hour 0.053 ppm / annual	Short-term (a) asthma exacerbations (“asthma attacks”) Long-term (a) asthma development; (b) higher risk of all-cause, cardiovascular, and respiratory mortality. Both short and long term NO2 exposure is also associated with chronic obstructive pulmonary disease (COPD) risk. Potential impacts on cardiovascular health, mortality and cancer, aggravate chronic respiratory disease. Contribution to atmospheric discoloration

Air Pollutant	Concentration / Averaging Time		Most Relevant Effects
	California Standards	Federal Primary Standards	
Sulfur Dioxide (SO_2)	0.25 ppm / 1-hour 0.04 ppm / 24-hour	75 ppb / 1-hour	Respiratory symptoms (bronchoconstriction, possible wheezing or shortness of breath) during exercise or physical activity in persons with asthma. Possible allergic sensitization, airway inflammation, asthma development.
Respirable Particulate Matter (PM_{10})	50 µg/m^3 / 24-hour 20 µg/m^3 / annual	150 µg/m^3 / 24-hour	Short -term (a) increase in mortality rates; (b) increase in respiratory infections; (c) increase in number and severity of asthma attacks; (d) COPD exacerbation; (e) increase in combined respiratory-diseases and number of hospital admissions; (f) increased mortality due to cardiovascular or respiratory diseases; (g) increase in hospital admissions for acute respiratory conditions; (h) increase in school absences; (i) increase in lost work days; (j) decrease in respiratory function in children; (k) increase medication use in children and adults with asthma. Long-term (a) reduced lung function growth in children; (b) changes in lung development; (c) development of asthma in children; (d) increased risk of cardiovascular diseases; (e) increased total mortality from lung cancer; (f) increased risk of premature death. Possible link to metabolic, nervous system, and reproductive and developmental effects for short-term and long-term exposure to PM2.5.
Suspended Particulate Matter ($PM_{2.5}$)	12 µg/m^3 / annual	35 µg/m^3 / 24-hour 12 µg/m^3 / annual	
Sulfates	25 µg/m^3 / 24-hour	No Federal Standards	(a) Decrease in lung function; (b) aggravation of asthmatic symptoms; (c) vegetation damage; (d) Degradation of visibility; (e) property damage
Lead	1.5 µg/m^3 / 30-day	0.15 µg/m^3 /3-month rolling	(a) Learning disabilities; (b) impairment of blood formation and nerve function; (c) cardiovascular effects, including coronary heart disease and hypertension Possible male reproductive system effects
Hydrogen Sulfide	0.03 ppm / 1-hour	No Federal Standards	Exposure to lower ambient concentrations above the standard may result in objectionable odor and may be accompanied by symptoms such as headaches, nausea, dizziness, nasal irritation, cough, and shortness of breath

Source: 2022 AQMP, SCAQMD, 2022.

As part of its enforcement responsibilities, the EPA requires each state with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the national standards. The SIP must integrate federal, state, and local components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the SIP. The CARB defines attainment as the category given to an area with no violations in the past three years. As indicated below in Table C, the Air Basin has been designated by EPA for the national standards as a non-attainment area for ozone and PM2.5 and partial non-attainment for lead. Currently, the Air Basin is in attainment with the national ambient air quality standards for CO, PM10, SO_2, and NO_2.

Table C – National Air Quality Standards Attainment Status – South Coast Air Basin

Criteria Pollutant	Averaging Time	Designation[a]	Attainment Date[b]
Ozone	1979 1-Hour (0.12 ppm)	Nonattainment (Extreme)	2/6/2023 (revised deadline)
	2015 8-Hour (0.07 ppm)[d]	Nonattainment (Extreme)	8/3/2038
	2008 8-Hour (0.075 ppm)[d]	Nonattainment (Extreme)	7/20/2032
	1997 8-Hour (0.08 ppm)[d]	Nonattainment (Extreme)	6/15/2024
PM2.5[e]	2006 24-Hour (35 µg/m^3)	Nonattainment (Serious)	12/31/2019
	2012 Annual (12 µg/m^3)	Nonattainment (Serious)	12/31/2021
	1997 Annual (15 µg/m^3)	Attainment (final determination pending)	4/5/2015 (attained 2013)
PM10[f]	1987 24-Hour (150 µg/m^3)	Attainment (Maintenance)	7/26/2013 (attained)
Lead[g]	2008 3-Months Rolling (0.15 µg/m^3)	Nonattainment (Partial) (Attainment determination requested)	12/31/2015
CO	1971 1-Hour (35 ppm)	Attainment (Maintenance)	6/11/2007
	1971 8-Hour (9 ppm)	Attainment (Maintenance)	6/11/2007
NO_2[h]	2010 1-Hour (100 ppb)	Unclassifiable/Attainment	N/A (attained)
	1971 Annual (0.053 ppm)	Attainment (Maintenance)	9/22/1998 (attained)
SO_2[i]	2010 1-Hour (75 ppb)	Unclassifiable/Attainment	1/9/2018
	1971 24-Hour (0.14 ppm)	Unclassifiable/Attainment	3/19/1979

Source: SCAQMD, 2022

Notes:

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

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

c) The 1979 1-hour ozone NAAQS (0.12 ppm) was revoked, effective June 15, 2005; however, the Basin has not attained this standard and therefore has some continuing obligations with respect to the revoked standard; original attainment date was 11/15/2010; the revised attainment date is 2/6/2023.

d) The 2008 8-hour ozone NAAQS (0.075 ppm) was revised to 0.070 ppm, effective 12/28/20115 with classifications and implementation goals to be finalized by 10/1/2017; the 1997 8-hour ozone NAAQS (0.08 ppm) was revoked in the 2008 ozone implementation rule, effective 4/6/2015; there are continuing obligations under the revoked 1997 and revised 2008 ozone NAAQS until they are attained.

e) The attainment deadline for the 2006 24-Hour PM2.5 NAAQS was 12/31/15 for the former "moderate" classification; the EPA approved reclassification to "serious", effective 2/12/16 with an attainment deadline of 12/31/2019; the 2012 (proposal year) annual PM2.5 NAAQS was revised on 1/15/2013, effective 3/18/2013, from 15 to 12 µg/m^3; new annual designations were final 1/15/2015, effective 4/15/2015; on 7/25/2016 the EPA finalized a determination that the Basin attained the 1997 annual (15.0 µg/m^3) and 24-hour PM2.5 (65 µg/m^3) NAAQS, effective 8/24/2016.

f) The annual PM10 standard was revoked, effective 12/18/2006; the 24-hour PM10 NAAQS deadline was 12/31/2006; the Basin's Attainment Re-designation Request and PM10 Maintenance Plan was approved by the EPA on 6/26/2103, effective 7/26/2013.

g) Partial Nonattainment designation – Los Angeles County portion of the Basin only for near-source monitors; expect to remain in attainment based on current monitoring data; attainment re-designation request pending.

h) New 1-hour NO_2 NAAQS became effective 8/2/2010, with attainment designations 1/20/2012; annual NO_2 NAAQS retained.

i) The 1971 annual and 24-hour SO_2 NAAQS were revoked, effective 8/23/2010.

Despite substantial improvements in air quality over the past few decades, some air monitoring stations in the Air Basin still exceed the NAAQS and frequently record the highest ozone levels in the United States. In 2020, monitoring stations in the Air Basin exceeded the most current federal standards on a total of 181 days (49 percent of the year), including: 8-hour ozone (157 days over the 2015 ozone NAAQS), 24-hour PM2.5 (39 days), PM10 (3 days), and NO_2 (1 day). Nine of the top 10 stations in the nation most frequently exceeding the 2015 8-hour ozone NAAQS in 2020 were located within the Air Basin, including stations in San Bernardino, Riverside, and Los Angeles Counties (SCAQMD, 2022).

PM2.5 levels in the Air Basin have improved significantly in recent years. Since 2015, none of the monitoring stations in the Air Basin have recorded violations of the former 1997 annual PM2.5 NAAQS (15.0 µg/m^3). On July 25, 2016 the U.S. EPA finalized a determination that the Air Basin attained the 1997 annual (15.0 µg/m^3) and 24-hour PM2.5 (65 µg/m^3) NAAQS, effective August 24, 2016. However, the Air Basin does not meet the 2012 annual PM2.5 NAAQS (12.0 µg/m^3), with six monitoring stations having design values above the standard for the 2018-2020 period (SCAQMD, 2022).

4.2 State – California Air Resources Board

The CARB, which is a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, the CARB conducts research, sets the California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. The CAAQS for criteria pollutants in the Air Basin are shown in Table D. In addition, the CARB establishes emission standards for motor vehicles sold in California, consumer products (e.g. hairspray, aerosol paints, and barbeque lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

Table D – California Ambient Air Quality Standards Attainment Status – South Coast Air Basin

Criteria Pollutant	Averaging Time	Level[a]	Designation[b]
Ozone	1-Hour	0.09 ppm	Nonattainment
	8-Hour	0.070 ppm	Nonattainment
PM2.5	Annual	12 µg/m^3	Nonattainment
PM10	24-Hour	50 µg/m^3	Nonattainment
	Annual	20 µg/m^3	Nonattainment
Lead	30-Day Average	1.5 µg/m^3	Attainment
CO	1-Hour	20 ppm	Attainment
	8-Hour	9.0 ppm	Attainment
NO_2	1-Hour	0.18 ppm	Attainment
	Annual	0.030	Attainment[c]
SO_2	1-Hour	0.25 ppm	Attainment
	24-Hour	0.04 ppm	Attainment
Sulfates	24-Hour	25 µg/m^3	Attainment
Hydrogen Sulfide	1-Hour	0.03 ppm	Unclassified

Source: SCAQMD, 2022

Notes:

a) CA State standards, or CAAQS, for ozone, SO_2, NO_2, PM10 and PM2.5 are values not to be exceeded; lead, sulfates and H_2S standards are values not to be equaled or exceeded; CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

b) CA State designations shown were updated by CARB in 2019, based on the 2016-2018 3-year period; stated designations are based on a 3-year data period after consideration of outliers and exceptional events.

c) The CA-60 near road portion of San Bernardino, Riverside and Los Angeles Counties has recently been redesignated as an attainment area based on data collected between 2018 and 2020

As shown in Table D, the Air Basin has been designated by the CARB as a non-attainment area for ozone, PM10 and PM2.5. Currently, the Air Basin is in attainment with the ambient air quality standards for lead, CO, NO_2, SO_2 and sulfates, and is unclassified for Hydrogen Sulfide.

The following lists the State of California Code of Regulations (CCR) air quality emission rules that are applicable, but not limited to school projects in the State.

Assembly Bill 2588

The Air Toxics "Hot Spots" Information and Assessment Act (Assembly Bill [AB] 2588, 1987, Connelly) was enacted in 1987 as a means to establish a formal air toxics emission inventory risk quantification program. AB 2588, as amended, establishes a process that requires stationary sources to report the type and quantities of certain substances their facilities routinely release in California. The data is ranked by high, intermediate, and low categories, which are determined by: the potency, toxicity, quantity, volume, and proximity of the facility to nearby receptors.

CARB Regulation for In-Use Off-Road Diesel Vehicles

On July 26, 2007, the CARB adopted California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 to reduce DPM and NOx emissions from in-use off-road heavy-duty diesel vehicles in California. Such vehicles are used in construction, mining, and industrial operations. The regulation limits idling to no more than five consecutive minutes, requires reporting and labeling, and requires disclosure of the regulation upon vehicle sale. Performance requirements of the rule are based on a fleet's average NOx emissions, which can be met by replacing older vehicles with newer, cleaner vehicles or by applying exhaust retrofits. The regulation was amended in 2010 to delay the original timeline of the performance requirement making the first compliance deadline January 1, 2014 for large fleets (over 5,000 horsepower), 2017 for medium fleets (2,501-5,000 horsepower), and 2019 for small fleets (2,500 horsepower or less). As of January 1, 2023, no commercial operation is allowed to add Tier 0, Tier 1, or Tier 2 engines to their fleets. It should be noted that commercial fleets may continue to use their existing Tiers 0, 1, and 2 equipment, if they can demonstrate that the average emissions from their entire fleet emissions meet the NOx emissions targets.

CARB Resolution 08-43 for On-Road Diesel Truck Fleets

On December 12, 2008 the CARB adopted Resolution 08-43, which limits NOx, PM10 and PM2.5 emissions from on-road diesel truck fleets that operate in California. On October 12, 2009 Executive Order R-09-010 was adopted that codified Resolution 08-43 into Section 2025, title 13 of the California Code of Regulations. This regulation requires that by the year 2023 all commercial diesel trucks that operate in California shall meet model year 2010 (Tier 4 Final) or latter emission standards. This regulation also provides a few exemptions including a onetime per year 3-day pass for trucks registered outside of California. All on-road diesel trucks utilized during construction of the proposed project will be required to comply with Resolution 08-43.

4.3 Regional – Southern California

The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Air Basin. To that end, as a regional agency, the SCAQMD works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments and cooperates actively with all federal and state agencies.

South Coast Air Quality Management District

SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emission sources, and enforces such measures through educational programs or fines, when necessary. SCAQMD is directly responsible for reducing emissions from stationary, mobile, and indirect sources. It has responded to this requirement by preparing a sequence of AQMPs. The *Final 2022 Air Quality Management Plan* (2022 AQMP) was adopted by CARB on January 26, 2023 and has been incorporated into the State Implementation Plan (SIP). The 2022 AQMP establishes actions and strategies

to reduce ozone levels to the U.S. EPA 2015 ozone standard of 70 ppb by 2037. The 2022 AQMP promotes extensive use of zero-emission technologies across all stationary and mobile sources coupled with rules and regulations, investment strategies, and incentives.

Although SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate air quality issues associated with plans and new development projects throughout the Air Basin. Instead, this is controlled through local jurisdictions in accordance with CEQA. In order to assist local jurisdictions with air quality compliance issues the *CEQA Air Quality Handbook* (SCAQMD CEQA Handbook), prepared by SCAQMD, 1993, with the most current updates found at http://www.aqmd.gov/ceqa/hdbk.html, was developed in accordance with the projections and programs detailed in the AQMPs. The purpose of the SCAQMD CEQA Handbook is to assist Lead Agencies, as well as consultants, project proponents, and other interested parties in evaluating a proposed project's potential air quality impacts. Specifically, the SCAQMD CEQA Handbook explains the procedures that SCAQMD recommends be followed for the environmental review process required by CEQA. The SCAQMD CEQA Handbook provides direction on how to evaluate potential air quality impacts, how to determine whether these impacts are significant, and how to mitigate these impacts. The SCAQMD intends that by providing this guidance, the air quality impacts of plans and development proposals will be analyzed accurately and consistently throughout the Air Basin, and adverse impacts will be minimized.

The following lists the SCAQMD rules that are applicable but not limited to school development projects in the Air Basin.

Rule 402 - Nuisance

Rule 402 prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which causes injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. Compliance with Rule 402 will reduce local air quality and odor impacts to nearby sensitive receptors.

Rule 403- Fugitive Dust

Rule 403 governs emissions of fugitive dust during construction activities and requires that no person shall cause or allow the emissions of fugitive dust such that dust remains visible in the atmosphere beyond the property line or the dust emission exceeds 20 percent opacity, if the dust is from the operation of a motorized vehicle. Compliance with this rule is achieved through application of standard Best Available Control Measures, which include but are not limited to the measures below. Compliance with these rules would reduce local air quality impacts to nearby sensitive receptors.

- Utilize either a pad of washed gravel 50 feet long, 100 feet of paved surface, a wheel shaker, or a wheel washing device to remove material from vehicle tires and undercarriages before leaving project site.
- Do not allow any track out of material to extend more than 25 feet onto a public roadway and remove all track out at the end of each workday.
- Water all exposed areas on active sites at least three times per day and pre-water all areas prior to clearing and soil moving activities.

- Apply nontoxic chemical stabilizers according to manufacturer specifications to all construction areas that will remain inactive for 10 days or longer.
- Pre-water all material to be exported prior to loading, and either cover all loads or maintain at least 2 feet of freeboard in accordance with the requirements of California Vehicle Code Section 23114.
- Replant all disturbed area as soon as practical.
- Suspend all grading activities when wind speeds (including wind gusts) exceed 25 miles per hour.
- Restrict traffic speeds on all unpaved roads to 15 miles per hour or less.

Rules 1108 and 1108.1 – Cutback and Emulsified Asphalt

Rules 1108 and 1108.1 govern the sale, use, and manufacturing of asphalt and limits the VOC content in asphalt. This rule regulates the VOC contents of asphalt used during construction as well as any on-going maintenance during operations. Therefore, all asphalt used during construction and operation of the proposed project must comply with SCAQMD Rules 1108 and 1108.1.

Rule 1113 – Architectural Coatings

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

Rule 1143 – Paint Thinners

Rule 1143 governs the sale, use, and manufacturing of paint thinners and multi-purpose solvents that are used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations. This rule regulates the VOC content of solvents used during construction. Solvents used during construction and operation of the proposed project must comply with SCAQMD Rule 1143.

Southern California Association of Governments

The SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG is the federally designated Metropolitan Planning Organization (MPO) for the majority of the southern California region and is the largest MPO in the nation. With respect to air quality planning, SCAG has prepared the *2024-2050 Regional Transportation Plan/Sustainable Communities Strategy* (Connect SoCal 2024), adopted by SCAG on April 4, 2024 which is based on the regional development and growth forecasts provided in the *2023 Federal Transportation Improvement* Program (2023 FTIP), adopted October 2022. In September 2024, SCAG adopted the *Final 2025 Federal Transportation Improvement Program* (2025 FTIP), that provides a comprehensive listing of projects that will receive federal funding and/or are regionally significant projects that are proposed over the Federal Fiscal years of 2024/2025 through 2027/2028 as well as years 2028/2029 and 2029/2030 that have been included for informational purposes. The projects included in the 2025 FTIP are consistent with programs and projects and subsequent amendments contained in Connect SoCal 2024.

Although the Connect SoCal 2024 and 2025 FTIP are primarily planning documents for future transportation projects, a key component of these plans are to integrate land use planning with

transportation planning that promotes higher density infill development in close proximity to existing transit service. The Connect SoCal 2024, 2025 FTIP, and 2022 AQMP are based on projections originating within the City and County General Plans.

4.4 Local – City of Pomona

Local jurisdictions, such as the City of Pomona, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City is also responsible for the implementation of transportation control measures as outlined in the AQMPs. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals. In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation.

In accordance with the CEQA requirements, the City does not, however, have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the City and region will meet federal and state standards. Instead, the City relies on the expertise of the SCAQMD and utilizes the SCAQMD CEQA Handbook as the guidance document for the environmental review of plans and development proposals within its jurisdiction.

5.0 ENERGY CONSERVATION MANAGEMENT

The regulatory setting related to energy conservation is primarily addressed through State and City regulations, which are discussed below.

5.1 State

Energy conservation management in the State was initiated by the 1974 Warren-Alquist State Energy Resources Conservation and Development Act that created the California Energy Resource Conservation and Development Commission (currently named California Energy Commission [CEC]), which was originally tasked with certifying new electric generating plants based on the need for the plant and the suitability of the site of the plant. In 1976 the Warren-Alquist Act was expanded to include new restrictions on nuclear generating plants that effectively resulted in a moratorium of any new nuclear generating plants in the State. The following details specific regulations adopted by the State in order to reduce the consumption of energy.

California Code of Regulations (CCR) Title 20

On November 3, 1976 the CEC adopted the *Regulations for Appliance Efficiency Standards Relating to Refrigerators, Refrigerator-Freezers and Freezers and Air Conditioners,* which were the first energy-efficiency standards for appliances. The appliance efficiency regulations have been updated several times by the CEC and the most current version is the *2016 Appliance Efficiency Regulations*, adopted January 2017 and now includes almost all types of appliances and lamps that use electricity, natural gas as well as plumbing fixtures. The authority for the CEC to control the energy-efficiency of appliances is detailed in CCR Title 20, Division 2, Chapter 4, Article 4, Sections 1601-1609.

California Code of Regulations (CCR) Title 24, Part 6

CCR Title 24, Part 6: *California's Energy Efficiency Standards for Residential and Nonresidential Buildings* (Title 24) were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The California Energy Commission (CEC) is the agency responsible for the standards that are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. In 2008 the State set an energy-use reduction goal of zero-net-energy use of all new homes by 2020 and the CEC was mandated to meet this goal through revisions to the Title 24, Part 6 regulations.

The Title 24 standards are updated on a three-year schedule and since 2008 the standards have been incrementally moving to the 2020 goal of the zero-net-energy use. The 2022 Title 24 standards are the current standards that went into effect on January 1, 2023.

According to the Title 24 Part 6 Fact Sheet, the CEC estimates that over 30 years the 2022 Title 24 standards will reduce GHG emissions by 16,230 $MMTCO_2e$ per year, when compared to the 2019 Title 24 standards, which is equivalent of taking 3,641 gas cars off the road each year. The 2022 Title 24 standards will: (1) Increase onsite renewable energy generation; (2) Increases electric load flexibility to support grid reliability; (3) Reduces emissions from newly constructed buildings; (4) Reduces air pollution for improved public health; and (5) Encourages adoption of environmentally beneficial efficient electric technologies.

California Code of Regulations Title 24, Part 11

CCR Title 24, Part 11: *California Green Building Standards* (CalGreen Code) was developed in response to continued efforts to reduce GHG emissions associated with energy consumption. The CalGreen Code is also updated every three years and the current version is the 2022 CalGreen Code that went into effect on January 1, 2023.

The CALGreen Code contains requirements for construction site selection; storm water control during construction; construction waste reduction; indoor water use reduction; material selection; natural resource conservation; site irrigation conservation; and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for verifying that all building systems (e.g., heating and cooling equipment and lighting systems) are functioning at their maximum efficiency.

The CALGreen Code provides standards for bicycle parking, carpool/vanpool/electric vehicle spaces, light and glare reduction, grading and paving, energy efficient appliances, renewable energy, graywater systems, water efficient plumbing fixtures, recycling and recycled materials, pollutant controls (including moisture control and indoor air quality), acoustical controls, storm water management, building design, insulation, flooring, and framing, among others. Implementation of the CALGreen Code measures reduces energy consumption and vehicle trips and encourages the use of alternative-fuel vehicles, which reduces pollutant emissions.

Some of the notable changes in the 2022 CalGreen Code over the prior 2019 CalGreen Code for nonresidential development mandatory requirements include the repeal of designated parking spaces for clean air vehicles and an increase in the number of electric vehicle (EV) ready parking spaces. The 2022 CalGreen Code also added new requirements for installed Level 2 or direct-current fast charger EV charging stations for autos, EV charging readiness for loading docks, enhanced thermal insulation, and acoustical ceilings.

Senate Bill 1020

Senate Bill 1020 (SB 1020) was adopted September 16, 2022 and would speed up the timeline retail electricity is supplied by renewable energy sources over the prior adoption timelines provided in SB 100, SB 350, SB 1078, SB 107, and SB X1-2. SB 1020 requires that retail sales of electricity are from renewable energy resources and zero-carbon resources supply 90 percent by December 31, 2035, 95 percent by December 31, 2040, and 100 percent by December 31, 2045.

Executive Order N-79-20

The California Governor issued Executive Order N-79-20 on September 23, 2020 that requires all new passenger cars and trucks and commercial drayage trucks sold in California to be zero-emissions by the year 2035 and all medium- heavy-duty vehicles (commercial trucks) sold in the state to be zero-emission by 2045 for all operations where feasible. Executive Order N-79-20 also requires all off-road vehicles and equipment to transition to 100 percent zero-emission equipment, where feasible by 2035.

Executive Order B-48-18 and Assembly Bill 2127

The California Governor issued Executive Order B-48-18 on January 26, 2018 that orders all state entities to work with the private sector to put at least five million zero-emission vehicles on California roads by 2030 and to install 200 hydrogen fueling stations and 250,000 EV chargers by 2025. Currently there are approximately 350,000 electric vehicles operating in California, which represents approximately 1.5

percent of the 24 million vehicles total currently operating in California. Implementation of Executive Order B-48-18 would result in approximately 20 percent of all vehicles in California to be zero emission electric vehicles. Assembly Bill 2127 (AB 2127) was codified into statute on September 13, 2018 and requires that the California Energy Commission working with the State Air Resources Board prepare biannual assessments of the statewide EV charging infrastructure needed to support the levels of zero emission vehicle adoption required for the State to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030.

Assembly Bill 1109

California Assembly Bill 1109 (AB 1109) was adopted October 2007, also known as the Lighting Efficiency and Toxics Reduction Act, prohibits the manufacturing of lights after January 1, 2010 that contain levels of hazardous substances prohibited by the European Union pursuant to the R Restriction of Hazardous Substances Directive. AB 1109 also requires reductions in energy usage for lighting and is structured to reduce lighting electrical consumption by: (1) At least 50 percent reduction from 2007 levels for indoor residential lighting; and (2) At least 25 percent reduction from 2007 levels for indoor commercial and all outdoor lighting by 2018. AB 1109 would reduce GHG emissions through reducing the amount of electricity required to be generated by fossil fuels in California.

Assembly Bill 1493

California Assembly Bill 1493 (also known as the Pavley Bill, in reference to its author Fran Pavley) was enacted on July 22, 2002 and required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. In 2004, CARB approved the "Pavley I" regulations limiting the amount of GHGs that may be released from new passenger automobiles that are being phased in between model years 2009 through 2016. These regulations will reduce GHG emissions by 30 percent from 2002 levels by 2016. In June 2009, the EPA granted California the authority to implement GHG emission reduction standards for light duty vehicles, in September 2009, amendments to the Pavley I regulations were adopted by CARB and implementation of the "Pavley I" regulations started in 2009.

The second set of regulations "Pavley II" was developed in 2010, and is being phased in between model years 2017 through 2025 with the goal of reducing GHG emissions by 45 percent by the year 2020 as compared to the 2002 fleet. The Pavley II standards were developed by linking the GHG emissions and formerly separate toxic tailpipe emissions standards previously known as the "LEV III" (third stage of the Low Emission Vehicle standards) into a single regulatory framework. The new rules reduce emissions from gasoline-powered cars as well as promote zero-emissions auto technologies such as electricity and hydrogen, and through increasing the infrastructure for fueling hydrogen vehicles. In 2009, the U.S. EPA granted California the authority to implement the GHG standards for passenger cars, pickup trucks and sport utility vehicles and these GHG emissions standards are currently being implemented nationwide.

The EPA has performed a midterm evaluation of the longer-term standards for model years 2022-2025, and based on the findings of this midterm evaluation, the EPA proposed The Safer Affordable Fuel Efficient (SAFE) Vehicles Proposed Rule for Model Years 2021-2026 that amends the corporate average fuel economy (CAFE) and GHG emissions standards for light vehicles for model years 2021 through 2026. The SAFE Vehicles Rule were made effective on June 29, 2020.

5.2 Local – City of Pomona

The *City of Pomona Energy Action Plan*, November 2012, provides an Energy Resources Component that details the following applicable goals and policies.

Goal 2

Achieve greater electricity efficiency in Pomona's existing nonresidential building stock.

Policy 2.1 – Educate Pomona's businesses about opportunities to conserve energy costs through improvements in daily operations

Policy 2.2 – Support the use of energy-efficient appliances and equipment in leased and owner-occupied businesses.

Policy 2.3 – Facilitate retrofits and energy efficiency improvements within the nonresidential building stock to increase local business participation in energy efficiency programs.

Policy 2.4 – Encourage tenant improvements for renter-occupied businesses at large.

Policy 2.5 – Reduce electricity used for outdoor lighting.

Policy 2.6 – Promote cost savings retrofits in large nonresidential facilities.

Goal 3

New buildings will have no net impact on community energy demand.

Policy 3.1 - Work with project applicants through the plan review process to encourage the maximization of energy-efficient design of new buildings.

Policy 3.2 - Participate in a regional effort to implement energy efficiency standards for new development.

Policy 3.3 - Encourage the use of energy-efficient appliances and equipment in new buildings.

Goal 4

Encourage all new developments and significant remodels to be compatible with Title 24 and CAL Green Standards.

Policy 4.1 - Work with major educational facilities located in the City to be a model for energy efficiency and green building standards.

Goal 5

Reduce community water consumption in new and existing development to conserve electricity and promote energy efficiency.

Policy 5.1 - Encourage water-efficient practices through educational efforts to promote the conservation of electricity for water pumping and treatment.

Policy 5.3 - Support water-wise landscaping with drought-resistant species to reduce the electricity demand for water transport and treatment.

Goal 6

Maximize use of shading and cooling to sustain a comfortable and energy-efficient urban environmental.

Policy 6.1 - Maximize the cooling of buildings through tree planting and shading to reduce electricity demands.

Policy 6.2 - Reduce building electricity demands through voluntary standards and outreach to promote cool roofs and surfaces.

Policy 6.3 - Incorporate use of groundcovers rather than pavement to reduce heat reflection.

6.0 GLOBAL CLIMATE CHANGE MANAGEMENT

The regulatory setting related to global climate change is addressed through the efforts of various international, federal, state, regional, and local government agencies. These agencies work jointly, as well as individually, to reduce GHG emissions through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for global climate change regulations are discussed below.

6.1 International

In 1988, the United Nations established the IPCC to evaluate the impacts of global climate change and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling GHG emissions. The parties of the UNFCCC adopted the Kyoto Protocol, which set binding GHG reduction targets for 37 industrialized countries, the objective of reducing their collective GHG emissions by five percent below 1990 levels by 2012. The Kyoto Protocol has been ratified by 182 countries, but has not been ratified by the United States. It should be noted that Japan and Canada opted out of the Kyoto Protocol and the remaining developed countries that ratified the Kyoto Protocol have not met their Kyoto targets. The Kyoto Protocol expired in 2012 and the amendment for the second commitment period from 2013 to 2020 has not yet entered into legal force. The Parties to the Kyoto Protocol negotiated the Paris Agreement in December 2015, agreeing to set a goal of limiting global warming to less than 2 degrees Celsius compared with pre-industrial levels. The Paris Agreement has been adopted by 195 nations with 147 ratifying it, including the United States by President Obama, who ratified it by Executive Order on September 3, 2016. On June 1, 2017, President Trump announced that the United States is withdrawing from the Paris Agreement, on January 21, 2021 President Biden signed an executive order rejoining the Paris Agreement, and on January 20, 2025 President Trump signed an executive order withdrawing from the Paris Agreement.

Additionally, the Montreal Protocol was originally signed in 1987 and substantially amended in 1990 and 1992. The Montreal Protocol stipulates that the production and consumption of compounds that deplete ozone in the stratosphere—CFCs, halons, carbon tetrachloride, and methyl chloroform—were to be phased out, with the first three by the year 2000 and methyl chloroform by 2005.

6.2 Federal – United States Environmental Protection Agency

The EPA is responsible for implementing federal policy to address global climate change. The Federal government administers a wide array of public-private partnerships to reduce U.S. GHG intensity. These programs focus on energy efficiency, renewable energy, methane, and other non-CO_2 gases, agricultural practices and implementation of technologies to achieve GHG reductions. EPA implements several voluntary programs that substantially contribute to the reduction of GHG emissions.

In Massachusetts v. Environmental Protection Agency (Docket No. 05–1120), argued November 29, 2006 and decided April 2, 2007, the U.S. Supreme Court held that not only did the EPA have authority to regulate GHGs, but the EPA's reasons for not regulating this area did not fit the statutory requirements. As such, the U.S. Supreme Court ruled that the EPA should be required to regulate CO_2 and other GHGs as pollutants under the federal Clean Air Act.

In response to the Consolidations Appropriations Act, 2008 (H.R. 2764; Public Law 110-161), EPA proposed a rule on March 10, 2009 that requires mandatory reporting of GHG emissions from large sources in the United States. On September 22, 2009, the Final Mandatory Reporting of GHG Rule was signed and published in the Federal Register on October 30, 2009. The rule became effective on December 29, 2009. This rule requires suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHG emissions to submit annual reports to the EPA.

On December 7, 2009, the EPA Administrator signed two distinct findings under section 202(a) of the Clean Air Act. One is an endangerment finding that finds concentrations of the six GHGs in the atmosphere threaten the public health and welfare of current and future generations. The other is a cause or contribute finding, that finds emissions from new motor vehicles and new motor vehicle engines contribute to the GHG pollution which threatens public health and welfare. These actions did not impose any requirements on industry or other entities, however, since 2009 the EPA has been providing GHG emission standards for vehicles and other stationary sources of GHG emissions that are regulated by the EPA. On September 13, 2013 the EPA Administrator signed 40 CFR Part 60, that limits emissions from new sources to 1,100 pounds of CO_2 per mega-watt hour (MWh) for fossil fuel-fired utility boilers and 1,000 pounds of CO_2 per MWh for large natural gas-fired combustion units.

On August 3, 2015, the EPA announced the Clean Power Plan, emissions guidelines for U.S. to follow in developing plans to reduce GHG emissions from existing fossil fuel-fired power plants (Federal Register Vol. 80, No. 205, October 23 2015). On October 11, 2017, the EPA issued a formal proposal to repeal the Clean Power Plan and on June 19, 2019 the EPA replaced the Clean Power Plan with the Affordable Clean Energy rule that is anticipated to lower power sector GHG emissions by 11 million tons by the year 2030.

On April 30, 2020, the EPA and the National Highway Safety Administration published the Final Rule for the *Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule). Part One of the Rule revokes California's authority to set its own GHG emissions standards and zero-emission vehicle mandates in California, which results in one emission standard to be used nationally for all passenger cars and light trucks that is set by the EPA.

6.3 State

The CARB has the primary responsible for implementing state policy to address global climate change, however there are State regulations related to global climate change that affect a variety of State agencies. CARB, which is a part of the CalEPA, is responsible for the coordination and administration of both the federal and state air pollution control programs within California. In this capacity, the CARB conducts research, sets CAAQS, compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. In addition, the CARB establishes emission standards for motor vehicles sold in California, consumer products (e.g. hairspray, aerosol paints, and barbeque lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

In 2008, CARB approved a Climate Change Scoping Plan that proposes a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health" (CARB 2008). The Climate Change Scoping Plan has a range of GHG reduction actions which include direct regulations; alternative compliance mechanisms; monetary and non-monetary incentives; voluntary

actions; market-based mechanisms such as a cap-and-trade system. In 2014, CARB approved the First Update to the Climate Change Scoping Plan (CARB, 2014) that identifies additional strategies moving beyond the 2020 targets to the year 2050. On December 14, 2017 CARB adopted the California's 2017 Climate Change Scoping Plan, November 2017 (CARB, 2017) that provides specific statewide policies and measures to achieve the 2030 GHG reduction target of 40 percent below 1990 levels by 2030 and the aspirational 2050 GHG reduction target of 80 percent below 1990 levels by 2050. On December 15, 2022, CARB adopted the *2022 Scoping Plan for Achieving Carbon Neutrality,* November 16, 2022 (CARB, 2022) that lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279.

In addition to the Scoping Plans, the State has passed the following laws directing CARB to develop actions to reduce GHG emissions, which are listed below in chronological order, with the most current first.

California Code of Regulations Title 24, Part 6

The Title 24 Part 6 standards have been developed by the CEC primarily for energy conservation and is described in more detail above in Section 5.1 under Energy Conservation Management. It should be noted that implementation of the Title 24 Part 6 building standards would also reduce GHG emissions, since energy usage is the primary source of human generated GHG emissions.

California Code of Regulations Title 24, Part 11

The CalGreen Building standards have been developed by the CEC primarily for energy conservation and is described in more detail above in Section 5.1 under Energy Conservation Management. It should be noted that implementation of the CalGreen Building standards would also reduce GHG emissions, since energy usage is the primary source of human generated GHG emissions.

Senate Bill 1020

SB 1020 requires that by December 1, 2045 that 100 percent of retail sales of electricity to be generated from renewable or zero-carbon emission sources of electricity and is described in more detail above in Section 5.1 under Energy Conservation Management.

Executive Order B-55-18 and Assembly Bill 1279

The California Governor issued Executive Order B-55-18 in September 2018 that establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045. This executive order directs CARB to work with relevant State agencies to develop a framework for implementation and accounting that tracks progress toward this goal as well as ensuring future scoping plans identify and recommend measures to achieve this carbon neutrality goal. Assembly Bill 1279 was passed by the legislature in September 2022 that codifies the carbon neutrality targets provided in Executive Order B-55-18. The *2022 Scoping Plan for Achieving Carbon Neutrality,* adopted by CARB on December 16, 2022, was prepared in order to meet the carbon neutrality goal targets developed in Executive Order B-55-18 and codified in Assembly Bill 1279.

Executive Order N-79-20

EO N-79-20 establish targets for when all new vehicles and equipment are zero-emission and is described in more detail above in Section 5.1 under Energy Conservation Management.

Executive Order B-48-18 and Assembly Bill 2127

Executive Order B-48-18 and AB 2127 provides measures to put at least five million zero-emission vehicles on California roads by 2030 and to install 200 hydrogen fueling stations and 250,000 electric vehicle chargers by 2025 and is described in more detail above in Section 5.1 under Energy Conservation Management.

Executive Order B-30-15, Senate Bill 32 and Assembly Bill 197

The California Governor issued Executive Order B-30-15 on April 29, 2015 that aims to reduce California's GHG emissions 40 percent below 1990 levels by 2030. This executive order aligns California's GHG reduction targets with those of other international governments, such as the European Union that set the same target for 2030 in October, 2014. This target will make it possible to reach the ultimate goal of reducing GHG emissions 80 percent under 1990 levels by 2050 that is based on scientifically established levels needed in the U.S.A to limit global warming below 2 degrees Celsius – the warming threshold at which scientists say there will likely be major climate disruptions such as super droughts and rising sea levels. Assembly Bill 197 (AB 197) (September 8, 2016) and Senate Bill 32 (SB 32) (September 8, 2016) codified into statute the GHG emissions reduction targets of at least 40 percent below 1990 levels by 2030 as detailed in Executive Order B-30-15. AB 197 also requires additional GHG emissions reporting that is broken down to sub-county levels and requires CARB to consider the social costs of emissions impacting disadvantaged communities.

Executive Order B-29-15

The California Governor issued Executive Order B-29-15 on April 1, 2015 and directed the State Water Resources Control Board to impose restrictions to achieve a statewide 25 percent reduction in urban water usage and directed the Department of Water Resources to replace 50 million square feet of lawn with drought tolerant landscaping through an update to the State's Model Water Efficient Landscape Ordinance. The Ordinance also requires installation of more efficient irrigation systems, promotion of greywater usage and onsite stormwater capture, and limits the turf planted in new residential landscapes to 25 percent of the total area and restricts turf from being planted in median strips or in parkways unless the parkway is next to a parking strip and a flat surface is required to enter and exit vehicles. Executive Order B-29-15 would reduce GHG emissions associated with the energy used to transport and filter water.

Assembly Bill 341 and Senate Bills 939 and 1374

Senate Bill 939 (SB 939) requires that each jurisdiction in California to divert at least 50 percent of its waste away from landfills, whether through waste reduction, recycling or other means. Senate Bill 1374 (SB 1374) requires the California Integrated Waste Management Board to adopt a model ordinance by March 1, 2004 suitable for adoption by any local agency to require 50 to 75 percent diversion of construction and demolition of waste materials from landfills. Assembly Bill 341 (AB 341) was adopted in 2011 and builds upon the waste reduction measures of SB 939 and 1374, and sets a new target of a 75 percent reduction in solid waste generated by the year 2020.

Senate Bill 375

Senate Bill 375 (SB 375) was adopted September 2008 in order to support the State's climate action goals to reduce GHG emissions through coordinated regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires CARB to set regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established targets for 2020 and 2035 for each MPO within the State. It was up to each MPO to adopt a sustainable communities

strategy (SCS) that will prescribe land use allocation in that MPOs Regional Transportation Plan (RTP) to meet CARB's 2020 and 2035 GHG emission reduction targets. These reduction targets are required to be updated every eight years and the most current targets are detailed at: https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets, which provides GHG emissions reduction targets for SCAG of 8 percent by 2020 and 19 percent by 2035.

The Connect SoCal 2024 provides a 2035 GHG emission reduction target of 19 percent reduction over the 2005 per capita emissions levels. The Connect SoCal 2024 include new initiatives of land use, transportation and technology to meet the 19 percent GHG emission reduction target for 2035. CARB is also charged with reviewing SCAG's RTP/SCS for consistency with its assigned targets.

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

Assembly Bill 1109

AB 1109 requires reductions in energy usage for lighting and is described in more detail above in Section 5.1 under Energy Conservation Management.

Executive Order S-1-07

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

In 2009 CARB approved the proposed regulation to implement the LCFS. The standard was challenged in the courts, but has been in effect since 2011 and was re-approved by the CARB in 2015. The LCFS is anticipated to reduce GHG emissions by about 16 MMT per year by 2020. The LCFS is designed to provide a framework that uses market mechanisms to spur the steady introduction of lower carbon fuels. The framework establishes performance standards that fuel producers and importers must meet annually. Reformulated gasoline mixed with corn-derived ethanol and low-sulfur diesel fuel represent the baseline fuels. Lower carbon fuels may be ethanol, biodiesel, renewable diesel, or blends of these fuels with gasoline or diesel. Compressed natural gas and liquefied natural gas also may be low-carbon fuels. Hydrogen and electricity, when used in fuel cells or electric vehicles, are also considered as low-carbon fuels.

Senate Bill 97

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

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

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

Assembly Bill 32

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

In 2007 CARB released the calculated Year 1990 GHG emissions of 431 $MMTCO_2e$. The 2020 target of 431 $MMTCO_2e$ requires the reduction of 78 $MMTCO_2e$, or approximately 16 percent from the State's projected 2020 business as usual emissions of 509 $MMTCO_2e$ (CARB, 2014). Under AB 32, CARB was required to adopt regulations by January 1, 2011 to achieve reductions in GHGs to meet the 1990 cap by 2020. Early measures CARB took to lower GHG emissions included requiring operators of the largest industrial facilities that emit 25,000 metric tons of CO_2 in a calendar year to submit verification of GHG emissions by

December 1, 2010. The CARB Board also approved nine discrete early action measures that include regulations affecting landfills, motor vehicle fuels, refrigerants in cars, port operations and other sources, all of which became enforceable on or before January 1, 2010.

Assembly Bill 1493

AB 1493 or the Pavley Bill sets tailpipe GHG emissions limits for passenger vehicles in California as well as fuel economy standards and is described in more detail above in Section 5.1 under Energy Conservation Management.

6.4 Regional – Southern California

The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Air Basin. To that end, as a regional agency, the SCAQMD works directly with SCAG, county transportation commissions, and local governments and cooperates actively with all federal and state agencies.

South Coast Air Quality Management District

SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emission sources, and enforces such measures through educational programs or fines, when necessary. SCAQMD is directly responsible for reducing emissions from stationary, mobile, and indirect sources. The SCAQMD is also responsible for GHG emissions for projects where it is the lead agency. However, for other projects in the SCAB where it is not the lead agency, it is limited to providing resources to other lead agencies in order to assist them in determining GHG emission thresholds and GHG reduction measures. In order to assist local agencies with direction on GHG emissions, the SCAQMD organized a working group, which is described below.

SCAQMD Working Group

Since neither CARB nor the OPR has developed GHG emissions threshold, the SCAQMD formed a Working Group to develop significance thresholds related to GHG emissions. At the September 28, 2010 Working Group meeting, the SCAQMD released its most current version of the draft GHG emissions thresholds, which recommends a tiered approach that either provides a quantitative annual thresholds of 3,500 $MTCO_2e$ for residential uses, 1,400 $MTCO_2e$ for commercial uses, and 3,000 $MTCO_2e$ for mixed uses. An alternative annual threshold of 3,000 $MTCO_2e$ for all land use types is also proposed.

Southern California Association of Governments

As detailed above in Section 4.3, the current applicable RTP/SCS for the project area region is the Connect SoCal 2024 and 2025 FTIP, which have been prepared to meet the GHG emissions reduction targets set by SB 375 for the SCAG region of 19 percent reduction over the 2005 per capita emissions levels. The Connect SoCal 2024 includes new land use, transportation, and technology strategies to meet the new 19 percent GHG emission reduction target for 2035.

Although the Connect SoCal 2024 and 2025 FTIP are primarily planning documents for future transportation projects, a key component of these plans are to integrate land use planning with transportation planning that promotes higher density infill development in close proximity to existing transit service. These plans form the basis for the land use and transportation components of the 2022 AQMP, which are utilized in the preparation of air quality forecasts and in the consistency analysis included in the 2022 AQMP. The Connect SoCal 2024, 2025 FTIP, and 2022 AQMP are based on projections originating within the City and County General Plans.

6.5 Local – City of Pomona

Local jurisdictions, such as the City of Pomona, have the authority and responsibility to reduce GHG emissions through their police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of GHG emissions resulting from its land use decisions. In accordance with CEQA requirements and the CEQA review process, the City assesses the global climate change potential of new development projects, requires mitigation of potentially significant global climate change impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation.

7.0 ATMOSPHERIC SETTING

7.1 South Coast Air Basin

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

7.2 Local Climate

The climate of southeastern Los Angeles County is characterized by hot dry summers, mild moist winters with infrequent rainfall, moderate afternoon breezes, and generally fair weather. Occasional periods of strong Santa Ana winds and winter storms interrupt the otherwise mild weather pattern. Although the Air Basin is semi-arid, the air near the surface in south coastal Los Angeles County is typically moist because of the presence of a shallow marine layer. Except for infrequent periods when dry air is brought into the Air Basin by offshore winds, the ocean effect is dominant. Periods of heavy fog are frequent and low stratus clouds, often referred to as "high fog" are a characteristic feature.

Winds are an important parameter in characterizing the air quality environment of a project site because they both determine the regional pattern of air pollution transport and control the rate of dispersion near a source. Daytime winds in south coastal Los Angeles County are usually light breezes from off the coast as air moves regionally onshore from the cool Pacific Ocean to the warm Mojave Desert interior of Southern California. These winds allow for good local mixing, but as discussed above, these coastal winds carry significant amounts of industrial and automobile air pollutants from the densely urbanized western portion of the Air Basin into the interior valleys which become trapped by the mountains that border the eastern and northern edges of the Air Basin.

In the summer, strong temperature inversions may occur that limit the vertical depth through which air pollution can be dispersed. Air pollutants concentrate because they cannot rise through the inversion layer and disperse. These inversions are more common and persistent during the summer months. Over time, sunlight produces photochemical reactions within this inversion layer that creates ozone, a particularly harmful air pollutant. Occasionally, strong thermal convections occur which allows the air pollutants to rise high enough to pass over the mountains and ultimately dilute the smog cloud.

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

The temperature and precipitation levels for Pomona Fairplex, which is the nearest weather station to the project site with historical data is shown below in Table E. Table E shows that August is typically the warmest month and December is typically the coolest month. Rainfall in the project area varies

considerably in both time and space. Almost all the annual rainfall comes from the fringes of mid-latitude storms from late November to early April, with summers being almost completely dry.

Table E – Monthly Climate Data

Month	Average Maximum Temperature (°F)	Average Minimum Temperature (°F)	Average Total Precipitation (inches)
January	65.5	38.1	3.56
February	67.6	40.3	3.49
March	70.1	42.3	2.82
April	74.2	45.6	2.82
May	77.8	50.0	0.35
June	84.1	53.4	0.10
July	91.0	57.7	0.01
August	91.1	58.1	0.07
September	88.4	55.3	0.26
October	80.6	49.8	0.78
November	73.2	42.6	1.56
December	66.4	38.4	2.77
Annual	**77.8**	**47.6**	**16.97**

Source: https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca7050

7.3 Monitored Local Air Quality

The air quality at any site is dependent on the regional air quality and local pollutant sources. Regional air quality is determined by the release of pollutants throughout the Air Basin. Improvements in cleaner technology and strict regulations have reduced ozone levels since its peak in the mid-twentieth century. However, ozone levels have remained unacceptably high over the past decade despite significant reductions. This trend is due to the changes in climate and other weather conditions such as the increase in hot, stagnant days that can lead to the formation of ozone that we have experienced in recent years. (SCAQMD, 2022).

SCAQMD has divided the Air Basin into 38 air-monitoring areas with a designated ambient air monitoring station representative of each area. The project site is located on the northwestern edge of Air Monitoring Area 10, which covers the Pomona and Walnut Valley portion of Los Angeles County. Since not all air monitoring stations measure all of the tracked pollutants, the data from the following two monitoring stations, listed in the order of proximity to the project site have been used: Pomona Station (Pomona Station) and Glendora-Laurel Monitoring Station (Glendora Station).

The Pomona Station is located approximately 3.4 miles northeast of the project site at 924 N. Garey Ave, Pomona and the Glendora Station is located approximately 9.2 miles northwest of the project site at 840 Laurel, Glendora. The monitoring data is presented in Table F and shows the most recent three years of monitoring data from CARB. Ozone and NO_2 were measured at the Pomona Station and PM10 and PM2.5 were measured at the Glendora Station. CO measurements have not been provided, since CO is currently in attainment in the Air Basin and monitoring of CO within the Air Basin ended on March 31, 2013.

Table F – Local Area Air Quality Monitoring Summary

Pollutant (Standard)	Year 2021	2022	2023
Ozone: [1]			
Maximum 1-Hour Concentration (ppm)	0.120	0.131	0.147
Days > CAAQS (0.09 ppm)	0	**1**	**3**
Maximum 8-Hour Concentration (ppm)	0.092	0.096	0.113
Days > NAAQS (0.070 ppm)	**41**	**46**	**56**
Days > CAAQs (0.070 ppm)	**43**	**49**	**56**
Nitrogen Dioxide:[1]			
Maximum 1-Hour Concentration (ppb)	71.4	58.4	62.4
Days > NAAQS (100 ppb)	0	0	0
Days > CAAQS (180 ppb)	0	0	0
Inhalable Particulates (PM10) :[2]			
Maximum 24-Hour National Measurement (ug/m^3)	121.5	83.6	126.7
Days > NAAQS (150 ug/m^3)	0	0	0
Days > CAAQS (50 ug/m^3)	ND	ND	ND
Annual Arithmetic Mean (AAM) (ug/m^3)	27.7	25.7	23.4
Annual > NAAQS (50 ug/m^3)	No	No	No
Annual > CAAQS (20 ug/m^3)	**Yes**	**Yes**	**Yes**
Ultra-Fine Particulates (PM2.5):[2]			
Maximum 24-Hour National Measurement (ug/m^3)	97.0	56.0	99.3
Days > NAAQS (35 ug/m^3)	**4**	**1**	**2**
Annual Arithmetic Mean (AAM) (ug/m^3)	ND	8.5	8.1
Annual > NAAQS and CAAQS (12 ug/m^3)	ND	No	No

Notes: Exceedances are listed in **bold.** CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard; ppm = parts per million; ppb = parts per billion; ND = no data available.

[1] Data obtained from the Pomona Station.

[2] Data obtained from the Glendora Station.

Source: http://www.arb.ca.gov/adam/

Ozone

During the last three years, the State 1-hour concentration standard for ozone has been exceeded between 0 and 3 days each year at the Pomona Station. The State 8-hour ozone standard has been exceeded between 43 and 56 days each year over the last three years at the Pomona Station. The Federal 8-hour ozone standard has been exceeded between 41 and 56 days each year over the last three years at the Pomona Station. Ozone is a secondary pollutant as it is not directly emitted. Ozone is the result of chemical reactions between other pollutants, most importantly hydrocarbons and NO_2, which occur only in the presence of bright sunlight. Pollutants emitted from upwind cities react during transport downwind to produce the oxidant concentrations experienced in the area. Many areas of Southern California contribute to the ozone levels experienced at this monitoring station, with the more significant areas being those directly upwind.

Nitrogen Dioxide

The Pomona Station did not record an exceedance of either the Federal or State 1-hour NO_2 standards for the last three years.

Particulate Matter

The State 24-hour concentration standard for PM10 had no data available the Glendora Station. Over the past three years the Federal 24-hour standard for PM10 has not been exceeded at the Glendora Station. The annual PM10 concentration at the Glendora Station has exceeded the State standard for all of the past three years and has not exceeded the Federal standard for the past three years.

Over the past three years the 24-hour concentration standard for PM2.5 has been exceeded between 1 and 4 days each year at the Glendora Station. The annual PM2.5 concentrations at the Glendora Station has not exceeded either the State or Federal standard for the past three years. Particulate levels in the area are due to natural sources, grading operations, and motor vehicles.

According to the EPA, some people are much more sensitive than others to breathing fine particles (PM10 and PM2.5). People with influenza, chronic respiratory and cardiovascular diseases, and the elderly may suffer worsening illness and premature death due to breathing these fine particles. People with bronchitis can expect aggravated symptoms from breathing in fine particles. Children may experience decline in lung function due to breathing in PM10 and PM2.5. Other groups considered sensitive are smokers and people who cannot breathe well through their noses. Exercising athletes are also considered sensitive, because many breathe through their mouths during exercise.

7.4 Toxic Air Contaminant Levels in the Air Basin

In order to determine the Air Basin-wide risks associated with major airborne carcinogens, the SCAQMD conducted the Multiple Air Toxics Exposure Study (MATES) studies. According to the MATES V study (SCAQMD, 2021), the project site has an estimated cancer risk of 381 per million persons chance of cancer in the vicinity of the project site. In comparison, the average cancer risk for the Air Basin is 455 per million persons. The MATES V study that monitored air toxins between May 1, 2018 to April 30, 2019 found that cancer risk from air toxics has declined significantly in the Air Basin with a 40 percent decrease in cancer risk since the monitoring for the MATES IV study that occurred between July 1, 2012 and June 30, 2013 and an 84 percent decrease in cancer risk since the monitoring for the MATES II study that occurred between April 1, 1998 and March 31, 1999.

The MATES V study also analyzed impacts specific to the communities experiencing environmental injustices (EJ communities) that were evaluated using the Senate Bill 535 definition of disadvantaged communities, which found that between MATES IV and MATES V, the cancer risk from air toxics decreased by 57 percent in EJ communities overall, compared to a 53 percent reduction in non-EJ communities.

In order to provide a perspective of risk, it is often estimated that the incidence in cancer over a lifetime for the U.S. population ranges between 1 in 3 to 4 and 1 in 3, or a risk of about 300,000 per million persons. The MATES-III study referenced a Harvard Report on Cancer Prevention, which estimated that of cancers associated with known risk factors, about 30 percent were related to tobacco, about 30 percent were related to diet and obesity, and about 2 percent were associated with environmental pollution related exposures that includes hazardous air pollutants.

8.0 MODELING PARAMETERS AND ASSUMPTIONS

8.1 CalEEMod Model Input Parameters

The criteria air pollution and GHG emissions impacts created by the proposed project have been analyzed through use of the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.29 (see Appendix A). CalEEMod Version 2022.1 is a computer model published by the California Air Pollution Control Officers Association (CAPCOA) for estimating air pollutant and GHG emissions. The CalEEMod 2022.1 program uses the EMFAC2021 computer program to calculate the emission rates specific for the South Coast Air Basin portion of Los Angeles County for employee, vendor and haul truck vehicle trips and the OFFROAD2007 and OFFROAD2011 computer programs to calculate emission rates for heavy equipment operations. EMFAC2021, OFFROAD2007 and OFFROAD2011 are computer programs generated by the CARB that calculates composite emission rates for vehicles. Emission rates are reported by the program in grams per trip and grams per mile or grams per running hour.

The project characteristics in the CalEEMod model were set to a project location of South Coast Air Basin portion of Los Angeles County, utility companies of Southern California Edison and Southern California Gas Company and a project opening year of 2027.

Land Use Parameters

The proposed project would disturb up to 11.35 acres and would consist of development of a solar energy facility that would include installation of 4,284 PV panels on ground-mounted racks, and access roads and fencing. The proposed project would also include installation of supporting structures, inverter modules, pad mounted transformers, and onsite switchgear that would all be located on concrete pads and/or structures that total approximately 2,195 square feet. The Project would include 26-foot-wide gravel service roads within the project site to provide vehicle access to maintain the panels. The proposed project's land use parameters that were entered into the CalEEMod model are shown in Table G.

Table G – CalEEMod Land Use Parameters

Proposed Land Use	Land Use Subtype in CalEEMod	Land Use Size[1]	Lot Acreage[2]	Building Area (square feet)	Landscaped Area[3] (square feet)
Solar Panels and Access Roads	Other Non-Asphalt Surfaces	11 AC	11.0	--	23,957
Switch Gear	User Defined Industrial	2.19 TSF	0.35	2,195	762

Notes:
[1] AC = Acre; TSF = Thousand Square Feet
[2] Lot acreage calculated based on the total area disturbed of 11.35-acres.
[3] Landscaped Area based on 5% of total area landscaped.

Construction Parameters

Construction of the proposed project is anticipated to start in the first quarter of 2026 and last 12 months. The construction-related GHG emissions were based on a 30-year amortization rate as recommended in the SCAQMD GHG Working Group meeting on November 19, 2009. The phases of construction activities that have been analyzed are detailed below and include: 1) Site Preparation and Access Road Construction, 2) Grading, 3) Electrical Infrastructure; 4) PV System and Switch Stations Installation, and 5) Placement of Gravel and Site Cleanup.

CalEEMod provides the selection of "mitigation" to account for project conditions that would result in less emissions than a project without these conditions, however it should be noted that this "mitigation" may represent regulatory requirements. This includes the required to adherence to SCAQMD Rule 403, which requires that the Best Available Control Measures be utilized to reduce fugitive dust emissions and was modeled in CalEEMod by selection of mitigation of water all exposed areas three times per day, water unpaved roads twice daily, reduce vehicle speeds on dirt roads and sweep paved roads once per month.

Site Preparation & Access Road Construction

The site preparation and access road construction phase would consist of construction of the access road from Diamond Ranch Road and removing any vegetation, tree stumps, and stones onsite prior to grading. The site preparation was modeled as starting January 2026 and occurring over 10 workdays. The site preparation activities would generate an average of 20 worker trips per day. In order to account for water truck emissions, three onsite truck trips per day with a half-mile length was added to the site preparation phase. The onsite equipment would consist of one grader, three rubber-tired dozers, and four of either tractors, loaders, or backhoes.

Grading

The grading phase was modeled as starting after completion of the site preparation phase and was modeled as occurring over 40 workdays. During the grading phase it is anticipated that approximately 38,000 cubic yards of soil would be cut and approximately 10,100 cubic yards of soil would fill the low-lying areas, which will require 27,900 cubic yards of dirt to be exported from the project site. The export of dirt would generate an average of 87.2 haul truck trips per day over the duration of the grading phase.

The onsite equipment would consist of two excavators, one grader, one rubber-tired dozer, two scrapers, and two of either tractors, loaders, or backhoes, which is based on the CalEEMod default equipment mix. The grading activities would generate an average of 20 workers trips per day. In order to account for water truck emissions, three onsite truck trips per day with a half-mile length was added to the grading phase.

Electrical Infrastructure

The electrical infrastructure construction phase would consist of installation of underground utilities and was modeled as a trenching phase in CalEEMod. The electrical infrastructure phase would occur after the completion of the grading phase and was modeled as occurring over 40 working days. This phase would generate 20 worker trips and 6 vendor trips per day. The onsite equipment would consist of the simultaneous operation of 2 excavators, 1 rubber tired loader, and 2 of either tractors, loaders, or backhoes.

PV System and Switch Stations Installation

The PV system Installation and testing phase includes installation of mounting posts, assembling the structural components, mounting PV modules, and wiring. This phase would occur after completion of the site preparation phase and was modeled as occurring over six months. This phase was modeled as a Building Construction phase in CalEEMod. This phase would generate up to 100 worker trips per day and up to 50 vendor truck trips per day. The onsite equipment was modeled as consisting of one air compressor, one cranes, three forklifts, one generator set, one welder, and three of either tractors, loaders, or backhoes.

Placement of Gravel and Site Clean-up

The placement of gravel and site clean-up phase would include placement of a 0.75-inch layer of crushed gravel over the entire project site as well as removal of all waste material and debris from the project site. It is anticipated that approximately 1,525 cubic yards of gravel will be imported to the project site. The import of gravel would generate an average of 9.55 haul truck trips per day over the duration of this phase.

The placement of gravel and site cleanup phase would occur after the PV system installation phase and was modeled as occurring over twenty workdays. This phase was modeled as a Grading phase in CalEEMod. This phase would generate up to 15 worker trips per day. In order to account for water truck emissions, three onsite truck trips per day with a half-mile length was added to the site preparation phase. The onsite equipment was modeled as consisting of one grader, one rubber-tired loader, and four of either tractors, loaders, or backhoes.

Operational Emissions Modeling

The operations-related criteria air pollutant emissions and GHG emissions created by the proposed project have been analyzed through use of the CalEEMod model. The proposed project was analyzed in the CalEEMod model based on the land use parameters provided above and the parameters entered for each operational source is described below.

Mobile Sources

Mobile sources include emissions the additional vehicle miles generated from the proposed project. It is anticipated that on average, one worker would visit the site each day during operation of the project, which would result in the generation two daily trips from the operation of the project, which was entered into the CalEEMod model. No other changes were made to the default mobile source parameters in the CalEEMod model.

Area Sources

Area sources include emissions from consumer products, landscape equipment, and architectural coatings. The area source emissions were based on the on-going use of the proposed project in the CalEEMod model. No changes were made to the default area source parameters in the CalEEMod model.

Energy Usage

Energy usage includes emissions from electricity and natural gas used onsite. Both the electricity and natural gas emission rates were set to zero, since no natural gas will be used onsite and the proposed project would consist of the operation of a 2.8 MW solar system, which would result in the generation of electricity.

Solid Waste

Waste includes the GHG emissions associated with the processing of waste from the proposed project as well as the GHG emissions from the waste once it is interred into a landfill. The analysis was based on the default CalEEMod waste generation rate of zero tons of solid waste per year from operation of the proposed project. No changes were made to the default solid waste parameters or mitigation measures in the CalEEMod model.

Water and Wastewater

Water is based on the GHG emissions associated with the energy used to transport and filter the water. In addition, to the use of water for limited landscaping, the solar panels may be cleaned with water, which would utilize up to 8,000 gallons per cleaning3. As such, 8,000 gallons per year was added to the CalEEMod default 346,674 gallons per for a total of 354,674 gallons per year entered in to the CalEEMod model. No other changes were made to the default water and wastewater parameters in the CalEEMod model.

8.2 Energy Use Calculations

The proposed project is anticipated to consume energy during both construction and operation of the proposed project and the parameters utilized to calculate energy use from construction and operation of the proposed project are detailed separately below.

Construction-Related Energy Use

Construction of the proposed project is anticipated to use energy in the forms of petroleum fuel for both off-road equipment as well as from the transport of workers and materials to and from the project site and the calculations for each source are described below.

Off-Road Construction Equipment

The off-road construction equipment fuel usage was calculated through use of the CalEEMod model's default off-road equipment assumptions detailed above in Section 8.1. For each piece of off-road equipment, the fuel usage was calculated through use of the *2017 Off-road Diesel Emission Factors* spreadsheet, prepared by CARB (https://ww3.arb.ca.gov/msei/ordiesel.htm). The Spreadsheet provides the following formula to calculate fuel usage from off-road equipment:

Fuel Used = Load Factor x Horsepower x Total Operational Hours x BSFC / Unit Conversion

Where:

Load Factor - Obtained from CalEEMod default values

Horsepower – Obtained from CalEEMod default values

Total Operational Hours – Calculated by multiplying CalEEMod default daily hours by CalEEMod default number of working days for each phase of construction

BSFC – Brake Specific Fuel Consumption (pounds per horsepower-hour) – If less than 100 Horsepower = 0.408, if greater than 100 Horsepower = 0.367

Unit Conversion – Converts pounds to gallons = 7.109

Table H shows the off-road construction equipment fuel calculations based on the above formula. Table H shows that the off-road equipment utilized during construction of the proposed project would consume 35,985 gallons of diesel fuel.

3 Obtained from: *Air Quality and Greenhouse Gas Emissions Impact Analysis Vidal Solar Project County of San Bernardino*, prepared by Vista Environmental, February 1, 2022

Table H – Off-Road Equipment and Fuel Consumption from Construction of the Proposed Project

Equipment Type	Equipment Quantity	Horse-power	Load Factor	Operating Hours per Day	Total Operational Hours[1]	Fuel Used (gallons)
Phase 1: Site Preparation & Access Road Construction						
Grader	1	148	0.41	6	80	251
Rubber Tired Dozers	3	367	0.40	8	240	1,819
Tractors/Loaders/Backhoes	4	84	0.37	8	320	571
Phase 2: Grading						
Excavators	2	36	0.38	8	640	502
Grader	1	148	0.41	8	320	1,002
Rubber Tired Dozer	1	367	0.40	8	320	2,425
Scrapers	2	423	0.48	8	640	6,708
Tractors/Loaders/Backhoes	2	84	0.37	8	640	1,142
Phase 3: Electrical Infrastructure						
Excavators	2	36	0.38	8	640	502
Rubber tired Loader	1	150	0.36	8	320	892
Generator Set	1	14	0.74	8	320	190
Tractors/Loaders/Backhoes	4	84	0.37	8	1,280	2,283
Phase 4: PV System & Switch Stations Installation						
Air Compressor	1	37	0.48	8	1,160	1,182
Crane	1	367	0.29	7	1,015	5,577
Forklifts	3	82	0.20	8	3,480	3,275
Generator Set	1	14	0.74	8	1,160	690
Tractors/Loaders/Backhoes	3	84	0.37	7	3,045	5,432
Welder	1	46	0.45	8	1,160	1,378
Phase 5: Placement of Gravel & Site Clean-Up						
Grader	1	37	0.48	8	160	163
Rubber Tired Loader	1	150	0.36	8	160	446
Tractors/Loaders/Backhoes	4	84	0.37	8	640	1,142
Total Off-Road Equipment Diesel Fuel Used during Construction (gallons)						**35,985**

Notes:
[1] Based on: 10 days for Phase 1; 40 days for Phase 2; 40 days for Phase 3; 145 days for Phase 4; and 20 days for Phase 5.
Source: CalEEMod Version 2022.1 (see Appendix A); CARB, 2017.

On-Road Construction-Related Vehicle Trips

The on-road construction-related vehicle trips fuel usage was calculated through use of the construction vehicle trip assumptions from the CalEEMod model run as detailed above in Section 8.1. The calculated total construction miles was then divided by the fleet average for the South Coast Air Basin portion of Los Angeles County miles per gallon rates for the year 2026 calculated through use of the EMFAC2021 model and the EMFAC2021 model printouts are shown in Appendix B. The worker trips were based on the combined fleet average miles per gallon rates for gasoline powered automobiles, SUVs and pickup trucks and the vendor and haul truck trips were based on the combined T6 and T7 diesel trucks fleet average miles per gallon rate. Table I shows the on-road construction vehicle trips modeled in CalEEMod and the fuel usage calculations.

Table I – On-Road Vehicle Trips and Fuel Consumption from Construction of Proposed Project

Vehicle Trip Types / Fuel Type	Daily Trips	Trip Length (miles)	Total Miles per Day	Total Miles per Phase[1]	Fleet Average Miles per Gallon[2]	Fuel Used (gallons)
Phase 1: Site Preparation & Access Road Construction						
Worker (Gasoline)	20	18.5	370	3,700	26.5	140
Water Truck (Diesel)	3	0.5	1.5	15	7.5	2
Phase 2: Grading						
Worker (Gasoline)	12.5	18.5	370	14,800	26.5	559
Haul (Diesel)	87.2	20	1,744	69,760	7.5	9,328
Water Truck (Diesel)	3	0.5	1.5	60	7.5	8
Phase 3: Electrical Infrastructure						
Worker (Gasoline)	20	18.5	370	14,800	26.5	559
Vendor (Diesel)	6	10.2	61	2,448	7.5	327`
Phase 4: PV System & Switch Stations Installation						
Worker (Gasoline)	100	18.5	1,850	268,250	26.5	10,124
Vendor (Diesel)	50	10.2	510	73,950	7.5	9,888
Phase 5: Placement of Gravel & Site Clean-Up						
Worker (Gasoline)	15	18.5	278	5,550	26.5	209
Haul (Diesel)	9.55	20	191	3,820	7.5	511
Water Truck (Diesel)	3	0.5	1.5	30	7.5	4
				Total Gasoline Fuel Used from On-Road Worker Vehicles (gallons)		**11,590**
				Total Diesel Fuel Used from On-Road Vendor Truck Vehicles (gallons)		**20,068**

Notes:
[1] Based on: 10 days for Phase 1; 40 days for Phase 2; 40 days for Phase 3; 145 days for Phase 4; and 20 days for Phase 5.
[2] From EMFAC 2021 model (see Appendix B).
Source: CalEEMod Version 2022.1; CARB, 2018.

Table I shows that the on-road construction-related vehicle trips would consume 11,590 gallons of gasoline and 20,068 gallons of diesel fuel. As detailed above, Table H shows that the off-road construction equipment would consume 35,985 gallons of diesel fuel. This would result in the total consumption of 11,590 gallons of gasoline and 56,053 gallons of diesel fuel from construction of the proposed project.

Operations-Related Energy Use

The operation of the proposed project is anticipated to use energy in the form of petroleum fuel. Other forms of energy usage include electricity and natural gas. Both the electricity and natural gas emission rates were set to zero, since no natural gas will be used onsite and the proposed project would consist of the operation of a 2.8 MW solar system, which would result in the generation of electricity.

Operational Petroleum Fuel

The on-road operations-related vehicle trips fuel usage was calculated through use of the total annual vehicle miles traveled assumptions from the CalEEMod model run as detailed above in Section 8.1, which found that operation of the proposed project would generate 6,452 vehicle miles traveled per year. The calculated total operational miles were then divided by the combined fleet average miles per gallon rates for gasoline powered automobiles, SUVs and pickup trucks for the South Coast Air Basin portion of Los Angeles County fleet average rate of 26.5 miles per gallon, which was calculated through use of the

EMFAC2021 model. The EMFAC2021 model printouts are shown in Appendix B. Based on the above calculation methodology, operational vehicle trips generated from the proposed project would consume 244 gallons of gasoline per year.

9.0 THRESHOLDS OF SIGNIFICANCE

9.1 Regional Air Quality

Many air quality impacts that derive from dispersed mobile sources, which are the dominate pollution generators in the Air Basin, often occurs hours later and miles away after photochemical processes have converted primary exhaust pollutants into secondary contaminants such as ozone. The incremental regional air quality impact of an individual project is generally very small and difficult to measure. Therefore, SCAQMD has developed significance thresholds based on the volume of pollution emitted rather than on actual ambient air quality because the direct air quality impact of a project is not quantifiable on a regional scale. The SCAQMD CEQA Handbook states that any project in the Air Basin with daily emissions that exceed any of the identified significance thresholds should be considered as having an individually and cumulatively significant air quality impact. For the purposes to this air quality impact analysis, a regional air quality impact would be considered significant if emissions exceed the SCAQMD significance thresholds identified in Table J.

Table J – SCAQMD Regional Criteria Pollutant Emission Thresholds of Significance

	Pollutant Emissions (pounds/day)						
	VOC	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**	**Lead**
Construction	75	100	550	150	150	55	3
Operation	55	55	550	150	150	55	3

Source: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25

9.2 Local Air Quality

Project-related construction air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. In order to assess local air quality impacts the SCAQMD has developed Localized Significant Thresholds (LSTs) to assess the project-related air emissions in the project vicinity. SCAQMD has also provided *Final Localized Significance Threshold Methodology* (LST Methodology), July 2008, which details the methodology to analyze local air emission impacts. The LST Methodology found that the primary emissions of concern are NO_2, CO, PM10, and PM2.5.

The LST Methodology provides Look-Up Tables with different thresholds based on the location and size of the project site and distance to the nearest sensitive receptors. As detailed above in Section 7.3, the project site is located in Air Monitoring Area 10, which covers the Pomona and Walnut Valley portion of Los Angeles County.

The Look-Up Tables include site acreage sizes of 1-acre, 2-acres and 5-acres. The *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds*, prepared by SCAQMD, 2015, provides guidance on how to determine the appropriate site acreage size to utilize for a project. The Fact Sheet details the site acreage should be based on the maximum number of acres disturbed on the peak day of construction that is calculated on the construction equipment list utilized in the CalEEMod model, where crawler tractors, graders, and rubber-tired dozers are all assumed to disturb 0.5-acre in an 8-hour day and scrapers are assumed to disturb 1.0-acre in an 8-hour day. It should be noted that the methodology in the Fact Sheet was developed from the CalEEMod User Guide Appendix A, page 9, where the same acres disturbed per

equipment type is detailed and is utilized in the CalEEMod model in order to determine the acres per day disturbed during site preparation and grading phases.

Table K lists all of the construction equipment modeled in CalEEMod and utilizes the methodology in the Fact Sheet to calculate the acres disturbed per day. As shown in Table K, the maximum disturbed per day would occur during the grading phase when 3.0-acres would be disturbed. Since the Look-Up Tables do not provide a 3-acre option, the 2-acre project site shown in the Look-Up Tables have been utilized in this analysis, in order to provide a conservative analysis.

Table K – Construction Equipment Modeled in CalEEMod and Acres Disturbed per Day

Construction Activity	Equipment Type	Equipment Quantity	Acres Disturbed per piece of Equipment per Day[1]	Operating Hours per Day	Acres Disturbed per Day
Site Preparation & Access Road Construction	Grader	1	0.5	8	0.5
	Rubber Tired Dozers	3	0.5	8	1.5
	Tractors/Loaders/Backhoes	4	0	8	0
			Total Acres Disturbed per Day During Phase 1		2.0
Grading	Graders	1	0.5	8	0.5
	Excavators	2	0	8	0
	Rubber Tired Dozers	1	0.5	8	0.5
	Scrapers	2	1.0	8	2.0
	Tractors/Loaders/Backhoes	2	0	8	0
			Total Acres Disturbed per Day During Phase 2		3.0
Electrical Infrastructure	Excavators	2	0	8	0
	Rubber Tired Loader	1	0	8	0
	Generator Set	1	0	8	0
	Tractors/Loaders/Backhoes	4	0	8	0
			Total Acres Disturbed per Day During Phase 3		0
PV System and Switch Stations Installation	Air Compressor	1	0	8	0
	Crane	1	0	7	0
	Forklifts	3	0	8	0
	Generator Set	1	0	8	0
	Tractors/Loaders/Backhoes	3	0	7	0
	Welder	1	0	8	0
			Total Acres Disturbed per Day During Phase 4		0
Placement of Gravel and Site Clean-Up	Grader	1	0.5	8	0.5
	Rubber Tired Loader	1	0	8	0
	Tractors/Loaders/Backhoes	4	0	8	0
			Total Acres Disturbed per Day During Phase 5		0
			Maximum Acres Disturbed during All Construction Activities		**3.0**

Notes:
[1] Based on the Fact Sheet for Applying CalEEMod to Localized Significance Thresholds where crawler tractors, graders, and rubber-tired dozers disturb 0.5-acre in an 8-hour day and scrapers disturb 1.0-acre in an 8-hour day. All other equipment disturbs 0 acres per 8-hour day.
Source: CalEEMod Version 2022.1; SCAQMD, 2015.

The nearest sensitive receptors to the project site are the single-family homes located on the north side of SR 60 that are as near 500 feet (152 meters) north of the project site. As such, the 100 meter and 200 meter thresholds provided in the Look-up Tables were interpolated to find the 152 meter thresholds. Table L below shows the LSTs for NO_2, PM10 and PM2.5 for both construction and operational activities.

Table L – SCAQMD Local Air Quality Thresholds of Significance

Activity	Allowable Emissions (pounds/day)[1]			
	NOx	CO	PM10	PM2.5
Construction	282	3,765	49	16
Operation	282	3,765	12	4

Notes:
[1] The nearest sensitive receptors are the single-family homes located as near as 500 feet (152 meters) north of the project site. As such, the 100 meter and 200 meter thresholds were interpolated to find the 152 meter thresholds.
Source: Calculated from SCAQMD's Mass Rate Look-up Tables for two acres in Air Monitoring Area 10, Pomona and Walnut Valley.

9.3 Toxic Air Contaminants

According to the SCAQMD CEQA Handbook, any project that has the potential to expose the public to toxic air contaminants in excess of the following thresholds would be considered to have a significant air quality impact:

- If the Maximum Incremental Cancer Risk is 10 in one million or greater; or
- Toxic air contaminants from the proposed project would result in a Hazard Index increase of 1 or greater.

In order to determine if the proposed project may have a significant impact related to toxic air contaminants (TACs), the *Health Risk Assessment Guidance for analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, (Diesel Analysis) prepared by SCAQMD, August 2003, recommends that if the proposed project is anticipated to create TACs through stationary sources or regular operations of diesel trucks on the project site, then the proximity of the nearest receptors to the source of the TAC and the toxicity of the hazardous air pollutant (HAP) should be analyzed through a comprehensive facility-wide health risk assessment (HRA).

9.4 Odor Impacts

The SCAQMD CEQA Handbook states that an odor impact would occur if the proposed project creates an odor nuisance pursuant to SCAQMD Rule 402, which states:

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

If the proposed project results in a violation of Rule 402 with regards to odor impacts, then the proposed project would create a significant odor impact.

9.5 Energy Conservation

The *2022 CEQA California Environmental Quality Act Statutes & Guidelines* (2022 CEQA Guideline) include an Energy Section that analyzes the proposed project's energy consumption in order to avoid or reduce inefficient, wasteful or unnecessary consumption of energy. Appendix F of the 2022 CEQA Statute and Guidelines, states the following:

> The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:
>
> (1) Decreasing overall per capita energy consumption,
>
> (2) Decreasing reliance on fossil fuels such as coal, natural gas and oil, and
>
> (3) Increasing reliance on renewable energy sources.

Since the Energy Section was recently added, no state or local agencies have adopted specific criteria or thresholds to be utilized in an energy impact analysis. However, Appendix F, Subsection II.C of the 2022 CEQA Guidelines provides the following criteria for determining significance.

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project life cycle including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
2. The effects of the project on local and regional energy supplies and on requirement for additional capacity.
3. The effects of the project on peak and base period demands for electricity and other forms of energy.
4. The degree to which the project complies with existing energy standards.
5. The effects of the project on energy resources.
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

If the proposed project creates inefficient, wasteful or unnecessary consumption of energy during construction or operation activities or conflicts with a state or local plan for renewable energy or energy efficiency, then the proposed project would create a significant energy impact.

9.6 Greenhouse Gas Emissions

The proposed project is located within the jurisdiction of the SCAQMD. In order to identify significance criteria under CEQA for development projects, SCAQMD initiated a Working Group, which provided detailed methodology for evaluating significance under CEQA. At the September 28, 2010 Working Group meeting, the SCAQMD released its most current version of the draft GHG emissions thresholds, which recommends a tiered approach that provides a quantitative annual threshold of 3,000 $MTCO_2e$ for all land use projects. Although the SCAQMD provided substantial evidence supporting the use of the above threshold, as of November 2017, the SCAQMD Board has not yet considered or approved the Working Group's thresholds.

It should be noted that SCAQMD's Working Group's thresholds were prepared prior to the issuance of Executive Order B-30-15 on April 29, 2015 that provided a reduction goal of 40 percent below 1990 levels by 2030. This target was codified into statute through passage of AB 197 and SB 32 in September 2016. However, to date no air district or local agency within California has provided guidance on how to address

AB 197 and SB 32 with relation to land use projects. In addition, the California Supreme Court's ruling on *Cleveland National Forest Foundation v. San Diego Association of Governments* (Cleveland v. SANDAG), Filed July 13, 2017 stated:

> SANDAG did not abuse its discretion in declining to adopt the 2050 goal as a measure of significance in light of the fact that the Executive Order does not specify any plan or implementation measures to achieve its goal. In its response to comments, the EIR said: "It is uncertain what role regional land use and transportation strategies can or should play in achieving the EO's 2050 emissions reduction target. A recent California Energy Commission report concludes, however, that the primary strategies to achieve this target should be major 'decarbonization' of electricity supplies and fuels, and major improvements in energy efficiency [citation].

Although, the above court case was referencing California's GHG emission targets for the year 2050, at this time it is also unclear what role land use strategies can or should play in achieving the AB 197 and SB 32 reduction goal of 40 percent below 1990 levels by 2030. As such this analysis has relied on the SCAQMD Working Group's recommended thresholds. Therefore, the proposed project would be considered to create a significant cumulative GHG impact if the proposed project would exceed the annual threshold of 3,000 $MTCO_2e$.

The GHG emissions analysis for both construction and operation of the proposed project can be found below in Sections 10.8 and 10.9.

10.0 IMPACT ANALYSIS

10.1 CEQA Thresholds of Significance

Consistent with CEQA and the State CEQA Guidelines, a significant impact related to air quality, energy, and GHG emissions would occur if the proposed project is determined to:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard;
- Expose sensitive receptors to substantial pollutant concentrations;
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people;
- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation;
- Conflict with or obstruct a state or local plan for renewable energy;
- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

10.2 Air Quality Compliance

The proposed project would not conflict with or obstruct implementation of the SCAQMD Air Quality Management Plan (AQMP). The following section discusses the proposed project's consistency with the SCAQMD AQMP.

SCAQMD Air Quality Management Plan

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

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

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

(1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

(2) Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Both of these criteria are evaluated in the following sections.

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

Based on the air quality modeling analysis contained in this report, short-term regional construction air emissions would not result in significant impacts based on SCAQMD regional thresholds of significance discussed above in Section 9.1 or local thresholds of significance discussed above in Section 9.2. The ongoing operation of the proposed project would generate air pollutant emissions that are inconsequential on a regional basis and would not result in significant impacts based on SCAQMD thresholds of significance discussed above in Section 9.1. The analysis for long-term local air quality impacts showed that local pollutant concentrations would not be projected to exceed the air quality standards. Therefore, a less than significant long-term impact would occur and no mitigation would be required.

Therefore, based on the information provided above, the proposed project would be consistent with the first criterion.

Criterion 2 - Exceed Assumptions in the AQMP?

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed project with the assumptions in the 2022 AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the proposed project are based on the same forecasts as the AQMP. The 2022 AQMP was developed through use of the planning forecasts provided in the Connect SoCal and 2019 FTIP. The Connect SoCal is a major planning document for the regional transportation and land use network within Southern California. The Connect SoCal is a long-range plan that is required by federal and state requirements placed on SCAG and is updated every four years. The 2019 FTIP provides long-range planning for future transportation improvement projects that are constructed with state and/or federal funds within Southern California. Local governments are required to use these plans as the basis of their plans for the purpose of consistency with applicable regional plans under CEQA. For this project, the *Phillips Ranch Specific Plan Areas I and II City of Pomona* (Specific Plan) Land Use Plan defines the assumptions that are represented in AQMP.

The project site is currently designated as Open Space (O) Specific Plan in the General Plan and is zoned Open Space (O). The Specific Plan provides the following definition for the Open Space District: "*This district is intended to provide for permanent open spaces, government facilities in the community, and low-intensity, outdoor recreation facilities*." Since the proposed project is located on the property for Diamond Ranch High School and the power generated by the solar panels will be utilized by Diamond Ranch High School as well as other District facilities, the proposed project is effectively an expansion of the current High School use, which is an allowed use in the Open Space land use designation and zoning. As such, the proposed project is not anticipated to exceed the AQMP assumptions for the project site and is found to be consistent with the AQMP for the second criterion.

Based on the above, the proposed project will not result in an inconsistency with the SCAQMD AQMP. Therefore, a less than significant impact will occur in relation to implementation of the AQMP.

Level of Significance

Less than significant impact.

10.3 Cumulative Net Increase in Non-Attainment Pollution

The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard. The following section calculates the potential air emissions associated with the construction and operations of the proposed project and compares the emissions to the SCAQMD standards.

Construction Emissions

The construction activities for the proposed project are anticipated to include construction of a solar farm. The CalEEMod model has been utilized to calculate the construction-related criteria pollutant emissions from the proposed project and the input parameters utilized in this analysis have been detailed in Section 8.1. The maximum daily regional construction emissions by season are shown below in Table M and the CalEEMod printouts are shown in Appendix A.

Table M – Construction-Related Criteria Pollutant Emissions

	Pollutant Emissions (pounds/day)					
Season and Year of Construction	**VOC**	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
Winter 2026	3.55	34.8	33.6	0.10	7.46	4.04
Summer 2026	1.65	13.1	21.8	0.04	2.17	0.81
Maximum Daily Construction Emissions	**3.55**	**34.8**	**33.6**	**0.10**	**7.46**	**4.04**
SCQAMD Regional Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
SCAQMD Local Thresholds	**--**	**282**	**3,765**	**--**	**49**	**16**
Exceeds Thresholds?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1.

Table M shows that none of the analyzed criteria pollutants would exceed the regional thresholds during construction of the proposed project. Table M also shows that the proposed project's regional construction-related criteria pollutant emissions that consist of both onsite and offsite emissions sources would not exceed the local thresholds, which provides for a worst-case analysis, since the local thresholds are for analyzing only the emissions created onsite. Therefore, less than significant regional and local air quality impacts would occur from construction of the proposed project.

Operational Emissions

The on-going operation of the proposed project would result in a long-term increase in air quality emissions. This increase would be due to emissions from the project-generated vehicle trips, emissions from energy usage, onsite area source emissions created from the on-going use of the proposed project. The operations-related regional criteria air quality impacts created by the proposed project have been analyzed through use of the CalEEMod model and the input parameters utilized in this analysis have been detailed in Section 8.1. The worst-case summer or winter VOC, NOx, CO, SO_2, PM10, and PM2.5 daily

regional emissions created from the proposed project's long-term operations have been calculated and are summarized below in Table N and the CalEEMod emissions printouts are shown in Appendix A.

Table N – Operational Criteria Pollutant Emissions

	Pollutant Emissions (pounds/day)					
Activity	**VOC**	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
Mobile Sources[1]	0.01	0.01	0.06	<0.01	0.01	<0.01
Area Sources[2]	0.14	<0.01	0.10	<0.01	<0.01	<0.01
Energy Usage[3]	0.00	0.00	0.00	0.00	0.00	0.00
Total Emissions	**0.15**	**0.01**	**0.16**	**<0.01**	**0.01**	**<0.01**
SCQAMD Regional Operational Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
SCAQM Local Operational Thresholds	**--**	**282**	**3,765**	**--**	**12**	**4**
Exceeds Threshold?	No	No	No	No	No	No

Notes:
[1] Mobile sources consist of emissions from vehicles and road dust.
[2] Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
[3] Energy usage consists of emissions from natural gas usage. No natural gas hook-ups are part of the proposed project.
Source: Calculated from CalEEMod Version 2022.1.

The data provided in Table N shows that none of the analyzed criteria pollutants would exceed the regional emissions thresholds during operation of the proposed project. Table N also shows that the proposed project's regional operations-related criteria pollutant emissions that consist of both onsite and offsite emissions sources would not exceed the local thresholds, which provides for a worst-case analysis, since the local thresholds are for analyzing only the emissions created onsite. Therefore, less than significant regional and local air quality impacts would occur from operation of the proposed project.

Therefore, the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant.

Level of Significance

Less than significant impact.

10.4 Sensitive Receptors

The proposed project would not expose sensitive receptors to substantial pollutant concentrations. The local concentrations of criteria pollutant emissions produced in the nearby vicinity of the proposed project, which may expose sensitive receptors to substantial concentrations have been calculated above in Section 10.3 for both construction and operations, which are discussed separately below. The discussion below also includes an analysis of the potential impacts from toxic air contaminant emissions.

The nearest sensitive receptors to the project site are the single-family homes located on the north side of SR 60 that are as near 500 feet north of the project site. There are also multi-family homes located on the east side of Phillips Ranch Road that are as near as 1,000 feet east of the proposed driveway to the project site.

Construction-Related Sensitive Receptor Impacts

Construction activities may expose sensitive receptors to substantial pollutant concentrations of localized criteria pollutant concentrations and from toxic air contaminant emissions created from onsite construction equipment, which are described below.

Local Criteria Pollutant Impacts from Construction

The local air quality impacts from construction of the proposed project has been analyzed above in Section 10.3 and found that the construction of the proposed project would not exceed the local NOx, CO, PM10 and PM2.5 thresholds of significance discussed above in Section 9.2. Therefore, construction of the proposed project would create a less than significant construction-related impact to local air quality and no mitigation would be required.

Toxic Air Contaminants Impacts from Construction

The greatest potential for toxic air contaminant emissions would be related to diesel particulate matter (DPM) emissions associated with heavy equipment operations during construction of the proposed project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk". "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. It should be noted that the most current cancer risk assessment methodology recommends analyzing a 30-year exposure period for the nearby sensitive receptors (OEHHA, 2015).

Given the relatively limited number of heavy-duty construction equipment, the varying distances that construction equipment would operate to the nearby sensitive receptors, and the short-term construction schedule, the proposed project would not result in a long-term (i.e., 30 or 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment to no more than five minutes, requires equipment operators to label each piece of equipment and provide annual reports to CARB of their fleet's usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet, and currently no commercial operator is allowed to purchase Tier 0, Tier 1 or Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets that become more stringent each year between years 2014 and 2023. Therefore, due to the limitations in off-road construction equipment DPM emissions from implementation of Section 2448, a less than significant short-term TAC impacts would occur during construction of the proposed project from DPM emissions.

Operations-Related Sensitive Receptor Impacts

The on-going operations of the proposed project may expose sensitive receptors to substantial pollutant concentrations from the potential local air quality impacts from onsite operations and from possible toxic air contaminant impacts.

Local Criteria Pollutant Impacts from Onsite Operations

The local air quality impacts from the operation of the proposed project would occur from onsite sources such as architectural coatings, landscaping equipment, and onsite usage of natural gas appliances. The analysis provided above in Section 10.3 found that the operation of the proposed project would not

exceed the local NOx, CO, PM10 and PM2.5 thresholds of significance discussed above in Section 9.2. Therefore, the on-going operations of the proposed project would create a less than significant operations-related impact to local air quality due to on-site emissions and no mitigation would be required.

Operations-Related Toxic Air Contaminant Impacts

Although the proposed solar PV panels and the transformers utilized in the substation are made with toxic materials, only a negligible amount of TAC emissions are emitted from off-gassing from the PV panels, which would not create TAC concentrations high enough to create a significant cancer risk from TAC emissions. Due to the negligible amount of TAC emissions created from the PV panels and transformers and distance that the nearest sensitive receptors, a less than significant TAC impact would occur from operation of the proposed project.

Therefore, operation of the proposed project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations.

Level of Significance

Less than significant impact.

10.5 Odor Emissions

The proposed project would not create objectionable odors affecting a substantial number of people. Individual responses to odors are highly variable and can result in a variety of effects. Generally, the impact of an odor results from a variety of factors such as frequency, duration, offensiveness, location, and sensory perception. The frequency is a measure of how often an individual is exposed to an odor in the ambient environment. The intensity refers to an individual's or group's perception of the odor strength or concentration. The duration of an odor refers to the elapsed time over which an odor is experienced. The offensiveness of the odor is the subjective rating of the pleasantness or unpleasantness of an odor. The location accounts for the type of area in which a potentially affected person lives, works, or visits; the type of activity in which he or she is engaged; and the sensitivity of the impacted receptor.

Sensory perception has four major components: detectability, intensity, character, and hedonic tone. The detection (or threshold) of an odor is based on a panel of responses to the odor. There are two types of thresholds: the odor detection threshold and the recognition threshold. The detection threshold is the lowest concentration of an odor that will elicit a response in a percentage of the people that live and work in the immediate vicinity of the project site and is typically presented as the mean (or 50 percent of the population). The recognition threshold is the minimum concentration that is recognized as having a characteristic odor quality, this is typically represented by recognition by 50 percent of the population. The intensity refers to the perceived strength of the odor. The odor character is what the substance smells like. The hedonic tone is a judgment of the pleasantness or unpleasantness of the odor. The hedonic tone varies in subjective experience, frequency, odor character, odor intensity, and duration. Potential odor impacts have been analyzed separately for construction and operations below.

Construction-Related Odor Impacts

Potential sources that may emit odors during construction activities include the application of coatings such as asphalt pavement, paints and solvents and from emissions from diesel equipment. Standard construction requirements that limit the time of day when construction may occur as well as SCAQMD

Rule 1113 that limits the VOC content in paints and solvents would minimize odor impacts from construction. As such, the objectionable odors that may be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the project site's boundaries. Through compliance with the applicable regulations that reduce odors and due to the transitory nature of construction odors, a less than significant odor impact would occur and no mitigation would be required.

Operations-Related Odor Impacts

The proposed project would consist of the development of solar farm, which does not include any components that are a known sources of odors. Therefore, a less than significant odor impact would occur from operation of the proposed project and no mitigation would be required.

Therefore, a less than significant odor impact would occur and no mitigation would be required.

Level of Significance

Less than significant impact.

10.6 Energy Consumption

The proposed project would impact energy resources during construction and operation. Energy resources that would be potentially impacted include petroleum-based fuel supplies and distribution systems. No natural gas hook-ups would be required as part of the project and as such, no natural gas consumption has been analyzed. Since the proposed project would consist of the operation of a 2.8 MW solar system, which would result in the generation of electricity, only construction-relate electricity consumption has been analyzed.

Petroleum-based fuels currently account for a majority of the California's transportation energy sources and primarily consist of diesel and gasoline types of fuels. However, the state has been working on developing strategies to reduce petroleum use. Over the last decade California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHG emissions from the transportation sector, and reduce vehicle miles traveled (VMT). Accordingly, petroleum-based fuel consumption in California has declined. In 2023, 3,039 million gallons of gasoline and 290 million gallons of diesel was sold in Los Angeles County[4].

The following section calculates the potential energy consumption associated with the construction and operations of the proposed project and provides a determination if any energy utilized by the proposed project is wasteful, inefficient, or unnecessary consumption of energy resources.

Construction Energy

The proposed project would consume energy resources during construction in three (3) general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, as well as delivery and haul truck trips (e.g. hauling of demolition material to off-site reuse and disposal facilities);
2. Electricity associated with the conveyance of water that would be used during Project construction for dust control (supply and conveyance) and electricity to power any necessary

4 Obtained from: https://www.energy.ca.gov/media/3874

lighting during construction, electronic equipment, or other construction activities necessitating electrical power; and,

3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction-Related Electricity

During construction of the proposed project, the consumption of electricity would include offsite uses as well as from portable generators for onsite construction activities. Due to the large size of the project site and limited construction period, it would not be practical to provide temporary power lines to provide electricity for onsite construction needs. Electricity consumed during project construction would vary throughout the construction period based on the construction activities being performed. Various construction activities include electricity associated with the conveyance of water that would be used during project construction for dust control (supply and conveyance) and electricity to power the manufacturing of parts and electronic equipment, or other construction activities necessitating electrical power. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction. Overall, construction activities associated with the proposed project would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies and infrastructure. Therefore, the use of electricity during project construction would not be wasteful, inefficient, or unnecessary. Construction of the project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

Construction-Related Petroleum Fuel Use

Petroleum-based fuel usage represents the highest amount of transportation energy potentially consumed during construction, which would be utilized by both off-road equipment operating on the project site and on-road automobiles transporting workers to and from the project site and on-road trucks transporting equipment and supplies to the project site.

The off-road construction equipment fuel usage was calculated through use of the off-road equipment assumptions and fuel use assumptions shown above in Section 8.2, which found that construction of the proposed project would consume 11,590 gallons of gasoline and 56,053 gallons of diesel fuel. This equates to 0.0004 percent of the gasoline and 0.019 percent of the diesel used annually in Los Angeles County. As such, the construction-related petroleum use would be nominal, when compared to current county-wide petroleum usage rates.

Construction activities associated with the proposed project would be required to adhere to all State and SCAQMD regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. As such, construction activities for the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Impacts regarding transportation energy would be less than significant. Development of the proposed project would not result in the need to manufacture construction materials or create new building material facilities specifically to supply the proposed project. It is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete, it is reasonable to assume that the production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business.

Operational Energy

The operation of the proposed project is anticipated to use energy in the form of petroleum fuel. Other forms of energy usage include electricity and natural gas. No natural gas will be used onsite and the proposed project would consist of the operation of a 2.8 MW solar system, which would result in the generation of electricity. The proposed project would require the use of petroleum-based fuels to power automobiles transporting workers to and from the project site and trucks transporting equipment and supplies to the project site.

As detailed above in Section 8.2 the proposed project would consume 244 gallons of gasoline fuel per year from vehicle travel. This equates to 0.00001 percent of the gasoline consumed in Los Angeles County annually. As such, the operations-related petroleum use would be nominal, when compared to current petroleum usage rates.

In conclusion, the proposed project would comply with regulatory compliance measures outlined by the State and City related to air quality (see section 4.0 above), energy (see section 5.0 above), and GHGs (see section 6.0 above). Additionally, the proposed project would be constructed in accordance with all applicable City Building and Fire Codes. Therefore, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be less than significant.

Level of Significance

Less than significant impact.

10.7 Energy Plan Consistency

The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The applicable energy plan for the proposed project is the *City of Pomona Energy Action Plan*, November 2012. The proposed project's consistency with the applicable energy-related policies in the General Plan are shown in Table O.

Table O – Proposed Project Compliance with City of Pomona Energy Action Plan Energy Policies

General Plan Energy Policy	Proposed Project Consistency with General Plan Policies
Goal 2 - Achieve greater electricity efficiency in Pomona's existing nonresidential building stock.	**Consistent.** The proposed solar farm will provide a source of renewable electricity to be used at the District's existing structures throughout the City.
Policy 2.1 - Educate Pomona's businesses about opportunities to conserve energy costs through improvements in daily operations	**Not Applicable.** This policy is only applicable for the City to implement.
Policy 2.2 - Support the use of energy-efficient appliances and equipment in leased and owner-occupied businesses.	**Consistent.** The proposed project will be consistent with the Title 20 standards for energy-efficient appliances and equipment.
Policy 2.3 - Facilitate retrofits and energy efficiency improvements within the nonresidential building stock to increase local business participation in energy efficiency programs.	**Not Applicable.** This policy is only applicable for the City to implement.
Policy 2.4 - Encourage tenant improvements for renter-occupied businesses at large.	**Not Applicable.** This policy is only applicable for renter-occupied businesses.

General Plan Energy Policy	Proposed Project Consistency with General Plan Policies
Policy 2.5 - Reduce electricity used for outdoor lighting.	**Consistent.** All lighting installed on the project site will meet the 2022 Title 24, Part 11 standards that require all new outdoor lighting to be energy-efficient.
Policy 2.6 - Promote cost savings retrofits in large nonresidential facilities.	**Not Applicable.** The proposed project does not include any existing nonresidential facilities.
Goal 3 - New buildings will have no net impact on community energy demand.	**Consistent.** The proposed project will have a minimal amount of structures limited to housing electrical equipment. Since the project consists of a solar farm, the project will have a positive impact for energy demand.
Policy 3.1 - Work with project applicants through the plan review process to encourage the maximization of energy-efficient design of new buildings.	**Consistent.** The proposed project will have a minimal amount of structures limited to housing electrical equipment that would not include air conditioning.
Policy 3.2 - Participate in a regional effort to implement energy efficiency standards for new development.	**Not Applicable.** This policy is only applicable to the City's development of regional programs.
Policy 3.3 - Encourage the use of energy-efficient appliances and equipment in new buildings.	**Consistent.** The proposed project will be consistent with the Title 20 standards for energy-efficient appliances and equipment.
Goal 4 - Encourage all new developments and significant remodels to be compatible with Title 24 and CAL Green Standards.	**Consistent.** The proposed project will be consistent with Title 24 and Gal Green Standards.
Policy 4.1 - Work with major educational facilities located in the City to be a model for energy efficiency and green building standards.	**Not Applicable.** This policy is only applicable to the City goals with educational facilities.
Goal 5 - Reduce community water consumption in new and existing development to conserve electricity and promote energy efficiency.	**Consistent.** The proposed project has been designed to reduce water consumption to conserve electricity and promote energy efficiency.
Policy 5.1 - Encourage water-efficient practices through educational efforts to promote the conservation of electricity for water pumping and treatment.	**Not Applicable.** This policy is only applicable to the City goals for water pumping and treatment.
Policy 5.2 - Support water-wise landscaping with drought-resistant species to reduce the electricity demand for water transport and treatment.	**Consistent.** All landscaping associated with the project will only utilize drought-resistant species to reduce the electricity demand for water transport and treatment.
Goal 6 - Maximize use of shading and cooling to sustain a comfortable and energy-efficient urban environmental.	**Not Applicable.** The project does not include any structures that will be habitable or air conditioned.
Policy 6.1 - Maximize the cooling of buildings through tree planting and shading to reduce electricity demands.	**Not Applicable.** The project does not include any structures that will be habitable or air conditioned.
Policy 6.2 - Reduce building electricity demands through voluntary standards and outreach to promote cool roofs and surfaces.	**Not Applicable.** This policy is only applicable to the City goals for voluntary standards and outreach.
Policy 6.3 - Incorporate use of groundcovers rather than pavement to reduce heat reflection.	**Consistent.** The only pavement would be for the mounting of equipment. The project driveways will be gravel.

Source: City of Pomona, 2012.

As shown in Table O, the proposed project would be consistent with all applicable energy-related policies provided in the City's Energy Plan. Therefore, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

Level of Significance

Less than significant impact.

10.8 Generation of Greenhouse Gas Emissions

The proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The proposed project would consist of development of a PV solar energy facility. The proposed project is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste disposal, water usage, and construction equipment. The project's GHG emissions have been calculated with the CalEEMod model based on the construction and operational parameters detailed above in Section 8.1. A summary of the results is shown below in Table P and the CalEEMod model run is provided in Appendix A.

Table P – Project Related Greenhouse Gas Annual Emissions

	Greenhouse Gas Emissions (Metric Tons per Year)			
Category	**CO_2**	**CH_4**	**N_2O**	**CO_2e**
Construction				
Year 2026	691	0.03	0.04	704
Amortized Construction Emissions (30 years)[1]	23.0	<0.01	<0.01	23.5
Operations	--	--	--	0.11
Mobile Sources	2.20	<0.01	<0.01	2.23
Area Sources	0.04	<0.01	<0.01	0.04
Energy Usage	0.00	0.00	0.00	0.00
Waste and Wastewater	0.30	<0.01	<0.01	0.30
Solid Waste	<0.01	<0.01	<0.01	<0.01
Refrigeration	-	-	-	0.00
Total Operational Emissions	2.54	<0.01	<0.01	2.57
Total GHG Emissions (Construction & Operations)	**25.6**	**<0.01**	**<0.01**	**26.0**
SCAQMD Draft Threshold of Significance				**3,000**
Exceed Thresholds?				**No**

Notes:
[1] Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009.
Source: CalEEMod Version 2022.1.

The data provided in Table P shows that the proposed project would create 26 $MTCO_2e$ per year. According to the SCAQMD draft threshold of significance detailed above in Section 9.6, a cumulative global climate change impact would occur if the GHG emissions created from the on-going operations would exceed 3,000 $MTCO_2e$ per year. Therefore, a less than significant generation of greenhouse gas emissions would occur from development of the proposed project. Impacts would be less than significant.

Level of Significance

Less than significant impact.

10.9 Greenhouse Gas Plan Consistency

The proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. The proposed project consists of the development of a solar farm. As detailed above in Section 10.8, the proposed project is anticipated to generate 26 $MTCO_2e$ per year, which does not account for the GHG emissions reductions that would occur from the proposed project's generation of a non-carbon source of electricity and when that is accounted for development of the proposed project would result in a net decrease in GHG emissions.

The applicable plans include the City of Pomona Energy Action Plan, the 2022 CARB Scoping Plan, and the Connect SoCal 2024. All of these Plans promote the development of solar PV projects similar to the proposed project. Therefore, the proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

Level of Significance

Less than significant impact.

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APPENDIX A

CalEEMod Model Printouts

Diamond Ranch HS Solar Farm Detailed Report

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1.1. Basic Project Information

Data Field	Value
Project Name	Diamond Ranch HS Solar Farm
Construction Start Date	1/1/2026
Operational Year	2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.60
Precipitation (days)	18.8
Location	34.02543572138231, -117.77804164655754
County	Los Angeles-South Coast
City	Pomona
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5030
EDFZ	7
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
Other Non-Asphalt Surfaces	11.0	Acre	11.0	0.00	23,957	—	—	—

User Defined Industrial	2.19	User Defined Unit	0.35	2,195	762	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.65	13.1	21.8	0.04	2.17	0.81	5,489	0.23	0.29	8.80	5,590
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.55	34.8	33.6	0.10	7.46	4.04	12,799	0.61	1.01	0.37	13,117
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.26	11.4	15.2	0.03	1.86	0.78	4,174	0.18	0.24	2.31	4,253
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.23	2.08	2.78	0.01	0.34	0.14	691	0.03	0.04	0.38	704
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—
Threshold	75.0	100	550	150	150	55.0	—	—	—	—	—
Unmit.	No	No	No	No	No	No	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—
Threshold	75.0	100	550	150	150	55.0	—	—	—	—	—
Unmit.	No	No	No	No	No	No	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

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

Year	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
2026	1.65	13.1	21.8	0.04	2.17	0.81	5,489	0.23	0.29	8.80	5,590
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
2026	3.55	34.8	33.6	0.10	7.46	4.04	12,799	0.61	1.01	0.37	13,117
Average Daily	—	—	—	—	—	—	—	—	—	—	—
2026	1.26	11.4	15.2	0.03	1.86	0.78	4,174	0.18	0.24	2.31	4,253
Annual	—	—	—	—	—	—	—	—	—	—	—
2026	0.23	2.08	2.78	0.01	0.34	0.14	691	0.03	0.04	0.38	704

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.15	0.01	0.15	< 0.005	0.01	< 0.005	15.9	< 0.005	< 0.005	0.04	16.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.13	0.01	0.05	< 0.005	0.01	< 0.005	14.9	< 0.005	< 0.005	< 0.005	15.1
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.14	0.01	0.12	< 0.005	0.01	< 0.005	15.3	< 0.005	< 0.005	0.02	15.5
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.03	< 0.005	0.02	< 0.005	< 0.005	< 0.005	2.54	< 0.005	< 0.005	< 0.005	2.57

Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—
Threshold	55.0	55.0	550	150	150	55.0	—	—	—	—	—
Unmit.	No	No	No	No	No	No	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—
Threshold	55.0	55.0	550	150	150	55.0	—	—	—	—	—
Unmit.	No	No	No	No	No	No	—	—	—	—	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	—	—	—	—	—	—	—	—	—	3,000
Unmit.	—	—	—	—	—	—	—	—	—	—	No

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01	< 0.005	0.06	< 0.005	0.01	< 0.005	13.7	< 0.005	< 0.005	0.04	13.9
Area	0.14	< 0.005	0.10	< 0.005	< 0.005	< 0.005	0.39	< 0.005	< 0.005	—	0.39
Energy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	1.79	< 0.005	< 0.005	—	1.80
Waste	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Total	0.15	0.01	0.15	< 0.005	0.01	< 0.005	15.9	< 0.005	< 0.005	0.04	16.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01	0.01	0.05	< 0.005	0.01	< 0.005	13.1	< 0.005	< 0.005	< 0.005	13.3
Area	0.13	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00

Water	—	—	—	—	—	—	1.79	< 0.005	< 0.005	—	1.80
Waste	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Total	0.13	0.01	0.05	< 0.005	0.01	< 0.005	14.9	< 0.005	< 0.005	< 0.005	15.1
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01	0.01	0.05	< 0.005	0.01	< 0.005	13.3	< 0.005	< 0.005	0.02	13.5
Area	0.14	< 0.005	0.07	< 0.005	< 0.005	< 0.005	0.27	< 0.005	< 0.005	—	0.27
Energy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	1.79	< 0.005	< 0.005	—	1.80
Waste	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Total	0.14	0.01	0.12	< 0.005	0.01	< 0.005	15.3	< 0.005	< 0.005	0.02	15.5
Annual	—	—	—	—	—	—	—	—	—	—	—
Mobile	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	2.20	< 0.005	< 0.005	< 0.005	2.23
Area	0.03	< 0.005	0.01	< 0.005	< 0.005	< 0.005	0.04	< 0.005	< 0.005	—	0.04
Energy	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	0.30	< 0.005	< 0.005	—	0.30
Waste	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Total	0.03	< 0.005	0.02	< 0.005	< 0.005	< 0.005	2.54	< 0.005	< 0.005	< 0.005	2.57

3. Construction Emissions Details

3.1. Site Preparation & Access Road (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	3.48	31.9	32.4	0.05	1.39	1.28	5,866	0.24	0.05	—	5,886
Dust From Material Movement	—	—	—	—	5.25	2.64	—	—	—	—	—
Onsite truck	< 0.005	0.05	0.03	< 0.005	0.56	0.06	10.1	< 0.005	< 0.005	< 0.005	10.6
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.87	0.89	< 0.005	0.04	0.04	161	0.01	< 0.005	—	161
Dust From Material Movement	—	—	—	—	0.14	0.07	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	0.01	< 0.005	0.27	< 0.005	< 0.005	< 0.005	0.29
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.16	0.16	< 0.005	0.01	0.01	26.6	< 0.005	< 0.005	—	26.7
Dust From Material Movement	—	—	—	—	0.03	0.01	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.05	< 0.005	< 0.005	< 0.005	0.05
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.09	1.10	0.00	0.26	0.06	257	0.01	0.01	0.02	260
Vendor	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
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.01	< 0.005	7.14	< 0.005	< 0.005	0.01	7.24
Vendor	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

Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	< 0.005	< 0.005	1.18	< 0.005	< 0.005	< 0.005	1.20
Vendor	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

3.3. Grading (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.04	27.2	27.6	0.06	1.12	1.03	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	2.40	0.95	—	—	—	—	—
Onsite truck	< 0.005	0.05	0.03	< 0.005	0.56	0.06	10.1	< 0.005	< 0.005	< 0.005	10.6
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.33	2.98	3.02	0.01	0.12	0.11	723	0.03	0.01	—	726
Dust From Material Movement	—	—	—	—	0.26	0.10	—	—	—	—	—
Onsite truck	< 0.005	0.01	< 0.005	< 0.005	0.06	0.01	1.10	< 0.005	< 0.005	< 0.005	1.16
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.54	0.55	< 0.005	0.02	0.02	120	< 0.005	< 0.005	—	120
Dust From Material Movement	—	—	—	—	0.05	0.02	—	—	—	—	—

Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	0.01	< 0.005	0.18	< 0.005	< 0.005	< 0.005	0.19
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.09	1.10	0.00	0.26	0.06	257	0.01	0.01	0.02	260
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.09	7.42	2.84	0.04	1.69	0.52	5,934	0.33	0.95	0.35	6,225
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.13	0.00	0.03	0.01	28.6	< 0.005	< 0.005	0.04	29.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.82	0.31	< 0.005	0.18	0.06	650	0.04	0.10	0.63	683
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.01	< 0.005	4.73	< 0.005	< 0.005	0.01	4.79
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.15	0.06	< 0.005	0.03	0.01	108	0.01	0.02	0.10	113

3.5. Gravel & Cleanup (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.94	8.17	14.4	0.02	0.36	0.33	2,231	0.09	0.02	—	2,239
Dust From Material Movement	—	—	—	—	0.14	0.02	—	—	—	—	—

Onsite truck	< 0.005	0.05	0.03	< 0.005	0.56	0.06	10.1	< 0.005	< 0.005	< 0.005	10.6
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.45	0.79	< 0.005	0.02	0.02	122	< 0.005	< 0.005	—	123
Dust From Material Movement	—	—	—	—	0.01	< 0.005	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	0.03	< 0.005	0.55	< 0.005	< 0.005	< 0.005	0.58
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.08	0.14	< 0.005	< 0.005	< 0.005	20.2	< 0.005	< 0.005	—	20.3
Dust From Material Movement	—	—	—	—	< 0.005	< 0.005	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	0.01	< 0.005	0.09	< 0.005	< 0.005	< 0.005	0.10
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.07	0.83	0.00	0.20	0.05	193	0.01	0.01	0.02	195
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.81	0.31	< 0.005	0.19	0.06	650	0.04	0.10	0.04	682
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.05	0.00	0.01	< 0.005	10.7	< 0.005	< 0.005	0.02	10.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.05	0.02	< 0.005	0.01	< 0.005	35.6	< 0.005	0.01	0.03	37.4
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	< 0.005	< 0.005	1.77	< 0.005	< 0.005	< 0.005	1.80
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	5.89	< 0.005	< 0.005	0.01	6.19

3.7. PV System & Switch Stations Installation (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	11.0	14.5	0.03	0.41	0.38	2,575	0.10	0.02	—	2,584
Onsite truck	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	1.23	11.0	14.5	0.03	0.41	0.38	2,575	0.10	0.02	—	2,584
Onsite truck	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	0.49	4.37	5.75	0.01	0.16	0.15	1,023	0.04	0.01	—	1,027
Onsite truck	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	0.09	0.80	1.05	< 0.005	0.03	0.03	169	0.01	< 0.005	—	170
Onsite truck	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	0.37	0.39	6.46	0.00	1.31	0.31	1,355	0.06	0.05	4.58	1,375
Vendor	0.05	1.72	0.83	0.01	0.45	0.13	1,559	0.06	0.22	4.21	1,631
Hauling	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	0.37	0.44	5.51	0.00	1.31	0.31	1,284	0.06	0.05	0.12	1,300

Vendor	0.04	1.80	0.85	0.01	0.45	0.13	1,560	0.06	0.22	0.11	1,628
Hauling	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	0.14	0.19	2.29	0.00	0.51	0.12	518	0.02	0.02	0.79	525
Vendor	0.02	0.72	0.33	< 0.005	0.18	0.05	619	0.03	0.09	0.72	647
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.42	0.00	0.09	0.02	85.7	< 0.005	< 0.005	0.13	86.9
Vendor	< 0.005	0.13	0.06	< 0.005	0.03	0.01	103	< 0.005	0.01	0.12	107
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Electrical Infrastructure (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.89	7.90	13.3	0.02	0.29	0.26	2,050	0.08	0.02	—	2,057
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.89	7.90	13.3	0.02	0.29	0.26	2,050	0.08	0.02	—	2,057
Onsite truck	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	0.10	0.87	1.46	< 0.005	0.03	0.03	225	0.01	< 0.005	—	225
Onsite truck	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	0.16	0.27	< 0.005	0.01	0.01	37.2	< 0.005	< 0.005	—	37.3
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.08	1.29	0.00	0.26	0.06	271	0.01	0.01	0.92	275
Vendor	0.01	0.21	0.10	< 0.005	0.05	0.02	187	0.01	0.03	0.51	196
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.09	1.10	0.00	0.26	0.06	257	0.01	0.01	0.02	260
Vendor	0.01	0.22	0.10	< 0.005	0.05	0.02	187	0.01	0.03	0.01	195
Hauling	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	0.01	0.01	0.13	0.00	0.03	0.01	28.6	< 0.005	< 0.005	0.04	29.0
Vendor	< 0.005	0.02	0.01	< 0.005	0.01	< 0.005	20.5	< 0.005	< 0.005	0.02	21.4
Hauling	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	0.02	0.00	0.01	< 0.005	4.73	< 0.005	< 0.005	0.01	4.79
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	3.39	< 0.005	< 0.005	< 0.005	3.55
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	0.01	< 0.005	0.06	< 0.005	0.01	< 0.005	13.7	< 0.005	< 0.005	0.04	13.9
Total	0.01	< 0.005	0.06	< 0.005	0.01	< 0.005	13.7	< 0.005	< 0.005	0.04	13.9
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	0.01	0.01	0.05	< 0.005	0.01	< 0.005	13.1	< 0.005	< 0.005	< 0.005	13.3
Total	0.01	0.01	0.05	< 0.005	0.01	< 0.005	13.1	< 0.005	< 0.005	< 0.005	13.3
Annual	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	2.20	< 0.005	< 0.005	< 0.005	2.23
Total	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	2.20	< 0.005	< 0.005	< 0.005	2.23

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—

Other Non-Asphalt Surfaces	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.08	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.04	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.02	< 0.005	0.10	< 0.005	< 0.005	< 0.005	0.39	< 0.005	< 0.005	—	0.39
Total	0.14	< 0.005	0.10	< 0.005	< 0.005	< 0.005	0.39	< 0.005	< 0.005	—	0.39
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—

Consumer Products	0.08	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.04	—	—	—	—	—	—	—	—	—	—
Total	0.13	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.02	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	0.04	< 0.005	< 0.005	—	0.04
Total	0.03	< 0.005	0.01	< 0.005	< 0.005	< 0.005	0.04	< 0.005	< 0.005	—	0.04

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	1.69	< 0.005	< 0.005	—	1.70
User Defined Industrial	—	—	—	—	—	—	0.09	< 0.005	< 0.005	—	0.09
Total	—	—	—	—	—	—	1.79	< 0.005	< 0.005	—	1.80
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	1.69	< 0.005	< 0.005	—	1.70

User Defined Industrial	—	—	—	—	—	—	0.09	< 0.005	< 0.005	—	0.09
Total	—	—	—	—	—	—	1.79	< 0.005	< 0.005	—	1.80
Annual	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	0.28	< 0.005	< 0.005	—	0.28
User Defined Industrial	—	—	—	—	—	—	0.02	< 0.005	< 0.005	—	0.02
Total	—	—	—	—	—	—	0.30	< 0.005	< 0.005	—	0.30

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—

Other Non-Asphalt Surfaces	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
User Defined Industrial	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

Equipment Type	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

Equipment Type	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

Equipment Type	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

Vegetation	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

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

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

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

Species	ROG	NOx	CO	SO2	PM10T	PM2.5T	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
Site Preparation & Access Road	Site Preparation	1/5/2026	1/16/2026	5.00	10.0	—
Grading	Grading	1/19/2026	3/13/2026	5.00	40.0	—
Gravel & Cleanup	Grading	11/30/2026	12/25/2026	5.00	20.0	—
PV System & Switch Stations Installation	Building Construction	5/11/2026	11/27/2026	5.00	145	—
Electrical Infrastructure	Trenching	3/16/2026	5/8/2026	5.00	40.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation & Access Road	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation & Access Road	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Site Preparation & Access Road	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48

Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Gravel & Cleanup	Graders	Diesel	Average	1.00	8.00	148	0.41
Gravel & Cleanup	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Gravel & Cleanup	Rubber Tired Loaders	Diesel	Average	1.00	8.00	150	0.36
PV System & Switch Stations Installation	Cranes	Diesel	Average	1.00	7.00	367	0.29
PV System & Switch Stations Installation	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
PV System & Switch Stations Installation	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
PV System & Switch Stations Installation	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
PV System & Switch Stations Installation	Welders	Diesel	Average	1.00	8.00	46.0	0.45
PV System & Switch Stations Installation	Air Compressors	Diesel	Average	1.00	8.00	37.0	0.48
Electrical Infrastructure	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Electrical Infrastructure	Rubber Tired Loaders	Diesel	Average	1.00	8.00	150	0.36
Electrical Infrastructure	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Electrical Infrastructure	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation & Access Road	—	—	—	—
Site Preparation & Access Road	Worker	20.0	18.5	LDA,LDT1,LDT2

Site Preparation & Access Road	Vendor	—	10.2	HHDT,MHDT
Site Preparation & Access Road	Hauling	0.00	20.0	HHDT
Site Preparation & Access Road	Onsite truck	3.00	0.50	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	87.2	20.0	HHDT
Grading	Onsite truck	3.00	0.50	HHDT
PV System & Switch Stations Installation	—	—	—	—
PV System & Switch Stations Installation	Worker	100	18.5	LDA,LDT1,LDT2
PV System & Switch Stations Installation	Vendor	50.0	10.2	HHDT,MHDT
PV System & Switch Stations Installation	Hauling	0.00	20.0	HHDT
PV System & Switch Stations Installation	Onsite truck	—	—	HHDT
Gravel & Cleanup	—	—	—	—
Gravel & Cleanup	Worker	15.0	18.5	LDA,LDT1,LDT2
Gravel & Cleanup	Vendor	—	10.2	HHDT,MHDT
Gravel & Cleanup	Hauling	9.55	20.0	HHDT
Gravel & Cleanup	Onsite truck	3.00	0.50	HHDT
Electrical Infrastructure	—	—	—	—
Electrical Infrastructure	Worker	20.0	18.5	LDA,LDT1,LDT2
Electrical Infrastructure	Vendor	6.00	10.2	HHDT,MHDT
Electrical Infrastructure	Hauling	0.00	20.0	HHDT
Electrical Infrastructure	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%
Sweep paved roads once per month	9%	9%

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)

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation & Access Road	—	—	20.0	0.00	—
Grading	—	27,900	120	0.00	—
Gravel & Cleanup	1,525	—	10.0	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
Other Non-Asphalt Surfaces	11.0	0%
User Defined Industrial	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

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

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	2.19	2.19	2.19	801	17.7	17.7	17.7	6,452

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	3,293	1,098	28,750

5.10.3. Landscape Equipment

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

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Other Non-Asphalt Surfaces	0.00	346	0.0330	0.0040	0.00
User Defined Industrial	0.00	346	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Other Non-Asphalt Surfaces	0.00	335,987
User Defined Industrial	0.00	18,687

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Other Non-Asphalt Surfaces	0.00	—
User Defined Industrial	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

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

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	18.2	annual days of extreme heat
Extreme Precipitation	6.10	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	2.73	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	2	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A

Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

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

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	2	1	1	3
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

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

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	69.3
AQ-PM	90.4
AQ-DPM	61.6
Drinking Water	87.1
Lead Risk Housing	13.9
Pesticides	0.00
Toxic Releases	73.7
Traffic	97.3
Effect Indicators	—
CleanUp Sites	0.00
Groundwater	14.3
Haz Waste Facilities/Generators	16.6
Impaired Water Bodies	0.00
Solid Waste	9.67
Sensitive Population	—
Asthma	17.3
Cardio-vascular	20.1
Low Birth Weights	50.7
Socioeconomic Factor Indicators	—
Education	31.4
Housing	29.2
Linguistic	73.4
Poverty	27.9
Unemployment	84.6

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	84.75554985
Employed	65.58449891
Median HI	81.7400231
Education	—
Bachelor's or higher	76.63287566
High school enrollment	100
Preschool enrollment	81.22674195
Transportation	—
Auto Access	63.41588605
Active commuting	19.70999615
Social	—
2-parent households	43.01296035
Voting	35.55755165
Neighborhood	—
Alcohol availability	75.27268061
Park access	8.674451431
Retail density	50.10907224
Supermarket access	41.76825356
Tree canopy	70.10137303
Housing	—
Homeownership	79.23777749
Housing habitability	91.46670089
Low-inc homeowner severe housing cost burden	73.93814962
Low-inc renter severe housing cost burden	86.15424099

Uncrowded housing	67.80443988
Health Outcomes	—
Insured adults	63.64686257
Arthritis	67.1
Asthma ER Admissions	86.1
High Blood Pressure	59.0
Cancer (excluding skin)	36.4
Asthma	86.2
Coronary Heart Disease	81.5
Chronic Obstructive Pulmonary Disease	84.0
Diagnosed Diabetes	67.4
Life Expectancy at Birth	63.1
Cognitively Disabled	56.3
Physically Disabled	73.0
Heart Attack ER Admissions	68.3
Mental Health Not Good	82.3
Chronic Kidney Disease	79.8
Obesity	81.6
Pedestrian Injuries	45.2
Physical Health Not Good	82.3
Stroke	80.6
Health Risk Behaviors	—
Binge Drinking	66.7
Current Smoker	82.0
No Leisure Time for Physical Activity	77.8
Climate Change Exposures	—
Wildfire Risk	0.7
SLR Inundation Area	0.0

Children	27.6
Elderly	36.8
English Speaking	33.4
Foreign-born	64.2
Outdoor Workers	84.4
Climate Change Adaptive Capacity	—
Impervious Surface Cover	84.1
Traffic Density	94.6
Traffic Access	56.8
Other Indices	—
Hardship	34.0
Other Decision Support	—
2016 Voting	37.9

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	42.0
Healthy Places Index Score for Project Location (b)	72.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	11.35 acres disturbed. 5% landscaped
Construction: Construction Phases	Construction Phases provided by applicant
Construction: Off-Road Equipment	Estimated Equipment provided by applicant
Construction: Trips and VMT	Construction Trips estimated by applicant
Operations: Vehicle Data	2 operational trips per day
Operations: Water and Waste Water	8,000 gallons of water added to account for once per year cleaning of solar panels.

APPENDIX B

EMFAC2021 Model Printouts

Source: EMFAC2021 (v1.0.2) Emissions Inventory
Region Type: Sub-Area
Region: Los Angeles (SC)
Calendar Year: 2026
Season: Annual
Vehicle Classification: EMFAC202x Categories
Units: miles/day for CVMT and EVMT, trips/day for Trips, kWh/day for Energy Consumption, tons/day for Emissions, 1000 gallons/day for Fuel Consumption

Region	Calendar	Vehicle Category	Model Yea	Speed	Fuel	Population	Total VMT	Trips	Fuel Consumption
Los Angeles (	2026	LDA	Aggregate	Aggregate	Gasoline	3219653	125598332	14941929	4157.0
Los Angeles (	2026	LDT1	Aggregate	Aggregate	Gasoline	303122	10988219	1336831	436.9
Los Angeles (	2026	LDT2	Aggregate	Aggregate	Gasoline	1632991	66847122	7689351	2677.3
Los Angeles (	2026	MCY	Aggregate	Aggregate	Gasoline	153887	1005181	307775	24.2
Los Angeles (	2026	MDV	Aggregate	Aggregate	Gasoline	964399	36646219	4482010	1803.3
Los Angeles (	2026	T6 Instate Delive	Aggregate	Aggregate	Diesel	3908	130759	55761	14.6
Los Angeles (	2026	T6 Instate Delive	Aggregate	Aggregate	Diesel	4046	136053	57736	15.3
Los Angeles (	2026	T6 Instate Delive	Aggregate	Aggregate	Diesel	12398	415983	176917	46.7
Los Angeles (	2026	T6 Instate Delive	Aggregate	Aggregate	Diesel	3129	168114	44650	18.5
Los Angeles (	2026	T6 Instate Other	Aggregate	Aggregate	Diesel	4842	198676	55977	22.3
Los Angeles (	2026	T6 Instate Other	Aggregate	Aggregate	Diesel	10973	465082	126849	52.4
Los Angeles (	2026	T6 Instate Other	Aggregate	Aggregate	Diesel	9812	411849	113424	46.2
Los Angeles (	2026	T6 Instate Other	Aggregate	Aggregate	Diesel	4629	207055	53515	22.9
Los Angeles (	2026	T6 Instate Tracto	Aggregate	Aggregate	Diesel	137	6923	1578	0.8
Los Angeles (	2026	T6 Instate Tracto	Aggregate	Aggregate	Diesel	1762	100865	20368	10.5
Los Angeles (	2026	T6 Public Class 5	Aggregate	Aggregate	Diesel	469	16560	2408	1.9
Los Angeles (	2026	T7 Single Concre	Aggregate	Aggregate	Diesel	712	48248	6702	7.8
Los Angeles (	2026	T7 Single Dump C	Aggregate	Aggregate	Diesel	2043	112757	19245	18.7
Los Angeles (	2026	T7 SWCV Class 8	Aggregate	Aggregate	Diesel	922	59858	4242	22.9
Los Angeles (	2026	T7 Tractor Class 8	Aggregate	Aggregate	Diesel	15882	1133317	230766	181.6

Autos (gasoline) vehicle miles per day	241,085,074	9,099	1,000 gall per day
Autos Avg Miles per gallon	**26.5**	9,098,780	gallons per day
Diesel Truck vehicle miles per day	3,612,098	483	1,000 gall per day
Diesel Truck Fleet Avg Miles per gallon	**7.5**	482,983	gallons per day