TENTATIVE TRACT MAP 17168 PHASES 3 TO 8

GREENHOUSE GAS ANALYSIS

Prepared By:

Haseeb Qureshi | hqureshi@urbanxroads.com
Alyssa Barnett | abarnett@urbanxroads.com

Reference Number	Agency	Date
16894-02 GHG Report	City of Twentynine Palms	January 20, 2026

TABLE OF CONTENTS

EXECUTIVE SUMMARY **8**
ES.1 Summary of Findings 8
ES.2 Regulatory Requirements 8
1 INTRODUCTION **10**
1.1 Site Location 10
1.2 Project Description 10
2 CLIMATE CHANGE SETTING **11**
2.1 Introduction to Global Climate Change (GCC) 13
2.2 Global Climate Change Defined 13
2.3 GHGs 13
2.4 Global Warming Potential (GWP) 20
2.5 GHG Emissions Inventories 21
2.6 Effects of Climate Change in California 22
2.7 Regulatory Setting 24
3 PROJECT GHG IMPACT **43**
3.1 Introduction 43
3.2 Standards of Significance 43
3.3 Models Employed To Greenhouse Gases 44
3.4 Construction Emissions 44
3.5 Operational Emissions 46
3.6 GHG Emissions Findings and Recommendations 49
4 REFERENCES **51**
5 CERTIFICATION **54**

APPENDICES

APPENDIX 3.1: CALEEMOD PROJECT EMISSIONS MODEL OUTPUTS

LIST OF EXHIBITS

EXHIBIT 1-A: LOCATION MAP **10**
EXHIBIT 1-B: SITE PLAN ..... **12**.
EXHIBIT 2-A: SUMMARY OF PROJECTED GLOBAL WARMING IMPACT, 2070-2099 (AS COMPARED WITH 1961-1990) 20

LIST OF TABLES

TABLE ES-1: SUMMARY OF CEQA SIGNIFICANCE FINDINGS 8
TABLE 2-1: GHGS (1 OF 6) 14
TABLE 2-1: GHGS (2 OF 6) 15
TABLE 2-1: GHGS (3 OF 6) 16
TABLE 2-1: GHGS (4 OF 6) 17
TABLE 2-1: GHGS (5 OF 6) 18
TABLE 2-1: GHGS (6 OF 6) 19
TABLE 2-2: GWP AND ATMOSPHERIC LIFETIME OF SELECT GHGS 21
TABLE 2-3: TOP GHG PRODUCING COUNTRIES AND THE EUROPEAN UNION 22
TABLE 3-1: CONSTRUCTION DURATION 45
TABLE 3-2: CONSTRUCTION EQUIPMENT ASSUMPTIONS ..... 46.
TABLE 3-3: AMORTIZED ANNUAL CONSTRUCTION EMISSIONS 46
TABLE 3-4: PROJECT GHG EMISSIONS 48

LIST OF ABBREVIATED TERMS

%	Percent
°C	Degrees Celsius
°F	Degrees Fahrenheit
(1)	Reference
2017 Scoping Plan	*Final 2017 Scoping Plan Update*
AB	Assembly Bill
AB 32	Global Warming Solutions Act of 2006
AB 1493	Pavley Fuel Efficiency Standards
AB 1881	California Water Conservation Landscaping Act of 2006
Annex I	Industrialized Nations
AQIA	*Tentative Tract Map 17168 Phases 3 to 8 Air Quality Impact Analysis*
BAU	Business as Usual
C_2F_6	Hexafluoroethane
C_2H_6	Ethane
$C_2H_2F_4$	Tetrafluroethane
$C_2H_4F_2$	Ethylidene Fluoride
CAA	Federal Clean Air Act
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGAPS	California LBNL GHG Analysis of Policies Spreadsheet
CALGreen	California Green Building Standards Code
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resource Board
CEC	California Energy Commission
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CEQA Guidelines	*CEQA Statute and Guidelines*
CDFA	California Department of Food and Agriculture
CF_4	Tetrafluoromethane
CFC	Chlorofluorocarbons
CFC-113	Trichlorotrifluoroethane
CH_4	Methane
CNRA	California Natural Resources Agency
CNRA 2009	*2009 California Climate Adaptation Strategy*
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
Convention	United Nation's Framework Convention on Climate Change
COP	Conference of the Parties
County	City of Twentynine Palms
CPUC	California Public Utilities Commission

DWR	Department of Water Resources
EMFAC	Emission Factor Model
EPA	Environmental Protection Agency
EV	Electric Vehicle
GCC	Global Climate Change
Gg	Gigagram
GHGA	Greenhouse Gas Analysis
gpd	Gallons Per Day
gpm	Gallons Per Minute
GWP	Global Warming Potential
H_2O	Water
HFC	Hydrofluorocarbons
HFC-23	Fluoroform
HFC-134a	1,1,1,2-tetrafluoroethane
HFC-152a	1,1-difluoroethane
hp	Horsepower
IPCC	Intergovernmental Panel on Climate Change
ISO	Independent System Operator
ITE	Institute of Transportation Engineers
kWh	Kilowatt Hours
lbs	Pounds
LBNL	Lawrence Berkeley National Laboratory
LCD	Liquid Crystal Display
LCFS	Low Carbon Fuel Standard or Executive Order S-01-07
LEV III	Low-Emission Vehicle
LULUCF	Land-Use, Land-Use Change and Forestry
MCY	Motorcycles
MDAB	Mojave Desert Air Basin
MDAQMD	Mojave Desert Air Quality Management District
mpg	Miles Per Gallon
MPOs	Metropolitan Planning Organizations
$MMTCO_2e/yr$	Million Metric Ton of Carbon Dioxide Equivalent Per Year
MT/yr	Metric Tons Per Year
$MTCO_2e$	Metric Ton of Carbon Dioxide Equivalent
$MTCO_2e/yr$	Metric Ton of Carbon Dioxide Equivalent Per Year
MW	Megawatts
MWh	Megawatts Per Hour
MWELO	California Department of Water Resources' Model Water Efficient Landscape Ordinance
N_2O	Nitrous Oxide
NDC	Nationally Determined Contributions
NF_3	Nitrogen Trifluoride
NHTSA	National Highway Traffic Safety Administration
NIOSH	National Institute for Occupational Safety and Health

NO_X	Nitrogen Oxides
Non-Annex I	Developing Nations
OAL	Office of Administrative Law
OPR	Office of Planning and Research
PFC	Perfluorocarbons
ppb	Parts Per Billion
ppm	Parts Per Million
ppt	Parts Per Trillion
Project	Tentative Tract Map 17168 Phases 3 to 8
RTP	Regional Transportation Plan
SAFE	Safer Affordable Fuel-Efficient Vehicles Rule
SB	Senate Bill
SB 32	California Global Warming Solutions Act of 2006
SB 375	Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies
SB 1078	Renewable Portfolio Standards
SB 1368	Statewide Retail Provider Emissions Performance Standards
SCAG	Southern California Association of Governments
Scoping Plan	California Air Resources Board Climate Change Scoping Plan
SCS	Sustainable Communities Strategy
sf	Square Feet
SF_6	Sulfur Hexaflouride
SLPS	Short-Lived Climate Pollutant Strategy
SP	Service Population
TDM	Transportation Demand Measures
Title 20	Appliance Energy Efficiency Standards
Title 24	California Building Code
U.N.	United Nations
U.S.	United States
UNFCCC	United Nations' Framework Convention on Climate Change
VMT	Vehicle Miles Traveled
WCI	Western Climate Initiative
WRI	World Resources Institute
ZE/NZE	Zero and Near-Zero Emissions
ZEV	Zero-Emissions Vehicles

EXECUTIVE SUMMARY

ES.1 SUMMARY OF FINDINGS

The results of this Tentative Tract Map 17168 Phases 3 to 8 Greenhouse Gas Analysis (GHGA) are summarized below based on the significance criteria in Section 3 of this report consistent with Appendix G of the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines) (1). Table ES-1 shows the findings of significance for potential greenhouse gas (GHG) impacts under the California Environmental Quality Act (CEQA).

TABLE ES-1: SUMMARY OF CEQA SIGNIFICANCE FINDINGS

Analysis	Report Section	Significance Findings	
		Unmitigated	Mitigated
GHG Impact #1: Would the Project generate GHG emissions either directly or indirectly, that may have a significant impact on the environment?	3.6	*Less Than Significant*	*n/a*
GHG Impact #2: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	3.6	*Less Than Significant*	*n/a*

ES.2 REGULATORY REQUIREMENTS

The Project would be required to comply with regulations imposed by the State of California, the Mojave Desert Air Quality Management District (MDAQMD), and the City of Twentynine Palms aimed at the reduction of air pollutant emissions. Those that are directly and indirectly applicable to the Project and that would assist in the reduction of GHG emissions include.

- Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32) (2).
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (Senate Bill [SB] 375) (3).
- Pavley Fuel Efficiency Standards (AB 1493). Establishes fuel efficiency ratings for new vehicles (4).
- California Building Code (Title 24 California Code of Regulations [CCR]). Establishes energy efficiency requirements for new construction (5).
- Appliance Energy Efficiency Standards (Title 20 CCR). Establishes energy efficiency requirements for appliances (6).
- Low Carbon Fuel Standard (LCFS). Requires carbon content of fuel sold in California to be 10 percent (%) less by 2020 (7).
- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions (8).
- Renewable Portfolio Standards (RPS). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20% by 2010 and 33% by

2020. SB 350 mandated a 50% RPS by 2030. SB 100 increased the RPS requirements to 60% by 2030 with new interim targets of 44% by 2024 and 52% by 2027 (9).

- California Global Warming Solutions Act of 2006 (SB 32). Requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15 (10).

Promulgated regulations that would affect the Project's emissions are accounted for in the Project's GHG calculations provided in this report. In particular, AB 1493, LCFS, and RPS are accounted for in the Project's emission calculations.

1 INTRODUCTION

This report presents the results of the GHGA prepared by Urban Crossroads, Inc., for the proposed Tentative Tract Map 17168 Phases 3 to 8 Project (Project). The purpose of this GHGA is to evaluate Project-related construction and operational emissions and determine the level of GHG impacts as a result of constructing and operating the Project.

1.1 SITE LOCATION

The Project site located is located at south of the future extension of Samarkand Drive, between Desert Knoll Avenue and Utah Trail in the City of Twentynine Palms, as shown in Exhibit 1-A. The area surrounding the Project Site includes vacant land to the north and east, residential dwellings to the west and south, and the Twentynine Palms Elementary School and UHS Schools to the south.

1.2 PROJECT DESCRIPTION

The Project consists of 137 dwelling units within phases 3 to 8 of the approved Tentative Tract Map 17168. A preliminary site plan for the proposed Project is shown in Exhibit 1-B. For analysis purposes, the Project is anticipated to have an Opening Year of 2027.

EXHIBIT 1-A: LOCATION MAP

EXHIBIT 1-B: SITE PLAN

N

2 CLIMATE CHANGE SETTING

2.1 INTRODUCTION TO GLOBAL CLIMATE CHANGE (GCC)

GCC is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years.

An individual project, like the Project evaluated in this GHGA, cannot generate enough GHG emissions to affect a discernible change in global climate. However, the Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. Because these changes may have serious environmental consequences, Section 3 will evaluate the potential for the Project to have a significant effect upon the environment as a result of its potential contribution to the greenhouse effect.

2.2 GLOBAL CLIMATE CHANGE DEFINED

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation, and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO_2, N_2O, CH_4, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radiative heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages.

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

2.3 GHGS

2.3.1 GHGs and Health Effects

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. Many gases demonstrate these properties as discussed in Table 2-1. For the purposes of this analysis, emissions of CO_2, CH_4, and N_2O were evaluated (see Table 3-4 later in this report) because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases.

TABLE 2-1: GHGS (1 OF 6)

GHGs	Description	Sources	Health Effects
Water	Water is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere, it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. Climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to 'hold' more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the earth, thus	The main source of water vapor is evaporation from the oceans (approximately 85%). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves.	There are no known direct health effects related to water vapor at this time. It should be noted however that when some pollutants react with water vapor, the reaction forms a transport mechanism for some of these pollutants to enter the human body through water vapor.

TABLE 2-1: GHGS (2 OF 6)

GHGs	Description	Sources	Health Effects
Water (Continued)	further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop would continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it would eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the earth's surface and heat it up) (11).		
CO_2	CO_2 is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO_2 concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30%. Left unchecked, the concentration of CO_2 in the atmosphere is projected to increase to a minimum of 540	CO_2 is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil, natural gas, and wood. CO_2 is naturally removed from the air by photosynthesis, dissolution into	Outdoor levels of CO_2 are not high enough to result in negative health effects. According to the National Institute for Occupational Safety and Health (NIOSH) high concentrations of CO_2 can result in health effects such as: headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. It should be noted that current concentrations of CO_2 in the earth's atmosphere are estimated to be approximately 370 ppm, the actual reference

TABLE 2-1: GHGS (3 OF 6)

GHGs	Description	Sources	Health Effects
CO_2 (Continued)	ppm by 2100 as a direct result of anthropogenic sources (12).	ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks (13).	exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour workweek and short-term reference exposure levels of 30,000 ppm averaged over a 15-minute period (14).
CH_4	CH_4 is an extremely effective absorber of radiation, although its atmospheric concentration is less than CO_2 and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs.	CH_4 in the atmosphere is generated by many different sources, such as fossil fuel production, transport and use, from the decay of organic matter in wetlands, and as a byproduct of digestion by ruminant animals such as cows. Determining which specific sources are responsible for variations in annual increases of CH_4 is complex, but scientists estimate that fossil fuel production and use contributes roughly 30% of the total CH_4 emissions. These industrial sources of CH_4 are relatively simple to pinpoint and control using current technology (15).	CH_4 is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to elevated levels of CH_4 can cause asphyxiation, loss of consciousness, headache and dizziness, nausea and vomiting, weakness, loss of coordination, and an increased breathing rate.

TABLE 2-1: GHGS (4 OF 6)

GHGs	Description	Sources	Health Effects
N_2O	N_2O, also known as laughing gas, is a colorless GHG. Concentrations of N_2O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb).	N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant, i.e., in whipped cream bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. N_2O can be transported into the stratosphere, be deposited on the earth's surface, and be converted to other compounds by chemical reaction (16).	N_2O can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage) (16).
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine	CFCs have no natural source. They are found in aerosol	In confined indoor locations, working with CFC-113 or other CFCs is

TABLE 2-1: GHGS (5 OF 6)

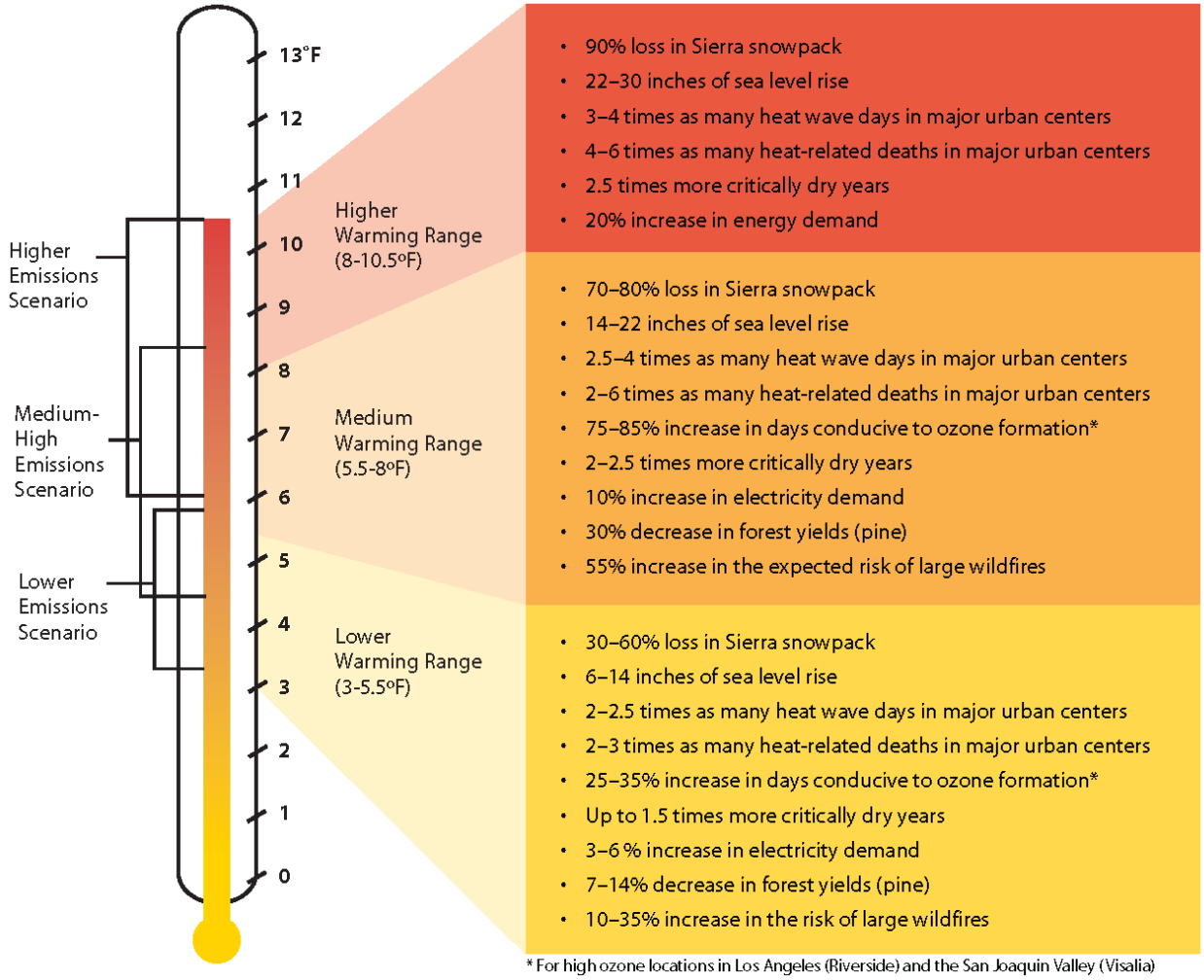
GHGs	Description	Sources	Health Effects
Chlorofluorocarbons (CFCs) (Continued)	and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the earth's surface).	sprays, blowing agents for foams and packing materials, as solvents, and as refrigerants. (17).	thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.
HFCs	HFCs are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential (GWP). The HFCs with the largest measured atmospheric abundances are (in order), Fluoroform (HFC-23), 1,1,1,2-tetrafluoroethane (HFC-134a), and 1,1-difluoroethane (HFC-152a). Prior to 1990, the only significant emissions were of HFC-23. HCF-134a emissions are increasing due to its use as a refrigerant.	HFCs are manmade for applications such as automobile air conditioners and refrigerants.	No health effects are known to result from exposure to HFCs.
PFCs	PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above earth's surface, are able to destroy the compounds. Because of this, PFCs have exceptionally long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). The EPA estimates that concentrations of CF_4 in the	The two main sources of PFCs are primary aluminum production and semiconductor manufacture.	No health effects are known to result from exposure to PFCs.

TABLE 2-1: GHGS (6 OF 6)

GHGs	Description	Sources	Health Effects
PFCs (Continued)	atmosphere are over 70 parts per trillion (ppt).		
SF_6	SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900) (18). The EPA indicates that concentrations in the 1990s were about 4 ppt.	SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.	In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.
Nitrogen Trifluoride (NF_3)	NF_3 is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that NF_3 has a 100-year GWP of 17,200 (19).	NF_3 is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display (LCD) panels, types of solar panels, and chemical lasers.	Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis (20).

The potential health effects related directly to the emissions of CO_2, CH_4, and N_2O as they relate to development projects, such as the Project, are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Exhibit 2-A presents the potential impacts of global warming (21).

EXHIBIT 2-A: SUMMARY OF PROJECTED GLOBAL WARMING IMPACT, 2070-2099 (AS COMPARED WITH 1961-1990)



Source: Barbara H. Allen-Diaz. "Climate change affects us all." *University of California, Agriculture and Natural Resources*, 2009.

2.4 GLOBAL WARMING POTENTIAL (GWP)

GHGs have varying GWP values. GWP of a GHG indicates the amount of warming a gas cause over a given period of time and represents the potential of a gas to trap heat in the atmosphere. CO_2 is utilized as the reference gas for GWP, and thus has a GWP of 1. CO_2 equivalent (CO_2e) is a term used for describing the different GHGs in a common unit. CO_2e signifies the amount of CO_2 which would have the equivalent GWP.

The Intergovernmental Panel on Climate Change (IPCC) is the international body for assessing the science related to climate change. IPCC Assessment Reports cover the full scientific, technical and socio-economic assessment of climate change. The atmospheric lifetime and GWP of selected GHGs are summarized at Table 2-2. As shown in the table below, GWP for the 2nd Assessment Report range from 1 for CO_2 to 23,900 for SF_6 and GWP for the 6th Assessment Report range from 1 for CO_2 to 25,200 for SF_6 (22).

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

Gas	Atmospheric Lifetime (years)	GWP (100-year time horizon)	
		2nd Assessment Report	6th Assessment Report
CO_2	Multiple	1	1
CH_4	11.8	21	28
N_2O	109	310	273
HFC-23	228	11,700	14,600
HFC-134a	14	1,300	1,526
HFC-152a	1.6	140	164
SF_6	3,200	23,900	25,200

Source: IPCC Second Assessment Report, 1995 and IPCC Sixth Assessment Report, 2023

2.5 GHG EMISSIONS INVENTORIES

2.5.1 Global

Worldwide anthropogenic GHG emissions are tracked by the IPCC for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2021. Based on the latest available data, the sum of these emissions totaled approximately 28,272,940 gigagram (Gg) CO_2e[1] (23) (24) as summarized on Table 2-3.

2.5.2 United States

As noted in Table 2-3, the United States, as a single country, was the number two producer of GHG emissions in 2021.

2.5.3 State of California

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the United States (U.S.) emissions inventory total (16). The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2024 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2022 GHG emissions period, California emitted an average 371.1 million metric tons of CO_2e per year ($MMTCO_2e$/yr) or 371,100 Gg CO_2e (5.85% of the total United States GHG emissions) (25). Based on data published by the U.S. Energy Information Administration, California's per capita (9.12 metric tons) GHG emissions are much less than the nationwide per capita (15.8 metric ton) average (26).

[1] The global emissions are the sum of Annex I and non-Annex I countries, without counting Land-Use, Land-Use Change and Forestry (LULUCF). For countries without 2021 data, the United Nations' Framework Convention on Climate Change (UNFCCC) data for the most recent year were used U.N. Framework Convention on Climate Change, "Annex I Parties – GHG total without LULUCF," The most recent GHG emissions for China and India are from 2014 and 2016, respectively.

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

Emitting Countries	GHG Emissions (Gg CO_2e)
China	12,300,200
United States	6,340,228
European Union (27-member countries)	3,468,394
India	2,839,425
Russian Federation	2,156,599
Japan	1,168,094
Total	28,272,940

2.6 EFFECTS OF CLIMATE CHANGE IN CALIFORNIA

2.6.1 Public Health

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35% under the lower warming range to 75 to 85% under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. Based on *Our Changing Climate Assessing the Risks to California by the California Climate Change Center*, large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced (27).

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a significant increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat.

2.6.2 Water Resources

A vast network of man-made reservoirs and aqueducts captures and transports water throughout the state from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages.

If temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90%. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to

water managers and hamper hydropower generation. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding.

The State's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta – a major fresh water supply.

2.6.3 Agriculture

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. First, California farmers could possibly lose as much as 25% of the water supply needed. Although higher CO_2 levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth.

Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a threshold. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures could worsen the quantity and quality of yield for a number of California's agricultural products. Products likely to be most affected include wine grapes, fruits, and nuts.

In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion could occur in many species while range contractions may be less likely in rapidly evolving species with significant populations already established. Should range contractions occur, new or different weed species could fill the emerging gaps. Continued GCC could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates.

2.6.4 Forests and Landscapes

GCC has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55%, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks would not be uniform throughout the state. In contrast, wildfires in northern California could increase by up to 90% due to decreased precipitation.

Moreover, continued GCC has the potential to alter natural ecosystems and biological diversity within the state. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80% by the end of the century as a result of increasing temperatures. The productivity of the state's forests has the potential to decrease as a result of GCC.

2.6.5 Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the state's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12-14 inches.

2.7 REGULATORY SETTING

2.7.1 International

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

IPCC

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

United Nation's Framework Convention on Climate Change (UNFCCC)

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

International Climate Change Treaties

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

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

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

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

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

- Reaffirm the goal of limiting global temperature increase well below 2°C, while urging efforts to limit the increase to 1.5 degrees;
- Establish binding commitments by all parties to make "nationally determined contributions" (NDCs), and to pursue domestic measures aimed at achieving them;
- Commit all countries to report regularly on their emissions and "progress made in implementing and achieving" their NDCs, and to undergo international review;
- Commit all countries to submit new NDCs every five years, with the clear expectation that they would "represent a progression" beyond previous ones;
- Reaffirm the binding obligations of developed countries under the UNFCCC to support the efforts of developing countries, while for the first time encouraging voluntary contributions by developing countries too;
- Extend the current goal of mobilizing $100 billion a year in support by 2020 through 2025, with a new, higher goal to be set for the period after 2025;
- Extend a mechanism to address "loss and damage" resulting from climate change, which explicitly would not "involve or provide a basis for any liability or compensation;"
- Require parties engaging in international emissions trading to avoid "double counting;" and
- Call for a new mechanism, similar to the Clean Development Mechanism under the Kyoto Protocol, enabling emission reductions in one country to be counted toward another country's NDC (C2ES 2015a) (28).

Following President Biden's day one executive order, the United States officially rejoined the landmark Paris Agreement on February 19, 2021, positioning the country to once again be part of the global climate solution. Meanwhile, city, state, business, and civic leaders across the country and around the world have been ramping up efforts to drive the clean energy advances needed to meet the goals of the agreement and put the brakes on dangerous climate change.

2.7.2 National

Prior to the last decade, there have been no concrete federal regulations of GHGs or major planning for climate change adaptation. The following are actions regarding the federal government, GHGs, and fuel efficiency.

GHG Endangerment

In *Massachusetts v. Environmental Protection Agency* 549 U.S. 497 (2007), decided on April 2, 2007, the United States Supreme Court (Supreme Court) found that four GHGs, including CO_2, are air pollutants subject to regulation under Section 202(a)(1) of the Clean Air Act (CAA). The Supreme Court held that the EPA Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the CAA:

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs— CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6—in the atmosphere threaten the public health and welfare of current and future generations.
- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles, as discussed in the section "Clean Vehicles" below. After a lengthy legal challenge, the Supreme Court declined to review an Appeals Court ruling that upheld the EPA Administrator's findings (29).

Clean Vehicles

Congress first passed the Corporate Average Fuel Economy law in 1975 to increase the fuel economy of cars and light duty trucks. The law has become more stringent over time. On May 19, 2009, President Obama put in motion a new national policy to increase fuel economy for all new cars and trucks sold in the U.S. On April 1, 2010, the EPA, and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) announced a joint final rule establishing a national program that would reduce GHG emissions and improve fuel economy for new cars and trucks sold in the U.S.

The first phase of the national program applies to passenger cars, light-duty trucks, and medium-duty (MD) passenger vehicles, covering model years 2012 through 2016. They require these vehicles to meet an estimated combined average emissions level of 250 grams of CO_2 per mile, equivalent to 35.5 miles per gallon (mpg) if the automobile industry were to meet this CO_2 level solely through fuel economy improvements. Together, these standards would cut CO_2 emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012–2016). In August 2012, the EPA and the NHTSA issued final rules on a second-phase joint rulemaking establishing national standards for light-duty vehicles for model years 2017 through 2025. The new standards apply to passenger cars, light-duty trucks, and MD passenger vehicles. The final standards are projected to result in an average industry fleetwide level

of 163 grams/mile of CO_2 in model year 2025, which is equivalent to 54.5 mpg if achieved exclusively through fuel economy improvements.

The EPA and the U.S. Department of Transportation issued final rules for the first national standards to reduce GHG emissions and improve fuel efficiency of heavy-duty trucks (HDT) and buses on September 15, 2011, effective November 14, 2011. For combination tractors, the agencies are proposing engine and vehicle standards that begin in the 2014 model year and achieve up to a 20% reduction in CO_2 emissions and fuel consumption by the 2018 model year. For HDT and vans, the agencies are proposing separate gasoline and diesel truck standards, which phase in starting in the 2014 model year and achieve up to a 10% reduction for gasoline vehicles and a 15% reduction for diesel vehicles by the 2018 model year (12 and 17%, respectively if accounting for air conditioning leakage). Lastly, for vocational vehicles, the engine and vehicle standards would achieve up to a 10% reduction in fuel consumption and CO_2 emissions from the 2014 to 2018 model years.

On April 2, 2018, the EPA signed the Mid-term Evaluation Final Determination, which declared that the MY 2022-2025 GHG standards are not appropriate and should be revised (30). This Final Determination serves to initiate a notice to further consider appropriate standards for MY 2022-2025 light-duty vehicles. On August 2, 2018, the NHTSA in conjunction with the EPA, released a notice of proposed rulemaking, the *Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule). The SAFE Vehicles Rule was proposed to amend existing Corporate Average Fuel Economy (CAFE) and tailpipe CO_2 standards for passenger cars and light trucks and to establish new standards covering model years 2021 through 2026. As of March 31, 2020, the NHTSA and EPA finalized the SAFE Vehicle Rule which increased stringency of CAFE and CO_2 emissions standards by 1.5% each year through model year 2026 (31). On December 21, 2021, after reviewing all the public comments submitted on NHTSA's April 2021 Notice of Proposed Rulemaking, NHTSA finalizes the CAFE Preemption rulemaking to withdraw its portions of the so-called SAFE I Rule. The final rule concludes that the SAFE I Rule overstepped the agency's legal authority and established overly broad prohibitions that did not account for a variety of important state and local interests. The final rule ensures that the SAFE I Rule will no longer form an improper barrier to states exploring creative solutions to address their local communities' environmental and public health challenges (32).

On March 31, 2022, NHTSA finalized CAFE standards for MY 2024-2026. The standards for passenger cars and light trucks for MYs 2024-2025 were increased at a rate of 8% per year and then increased at a rate of 10% per year for MY 2026 vehicles. NHTSA currently projects that the revised standards would require an industry fleet-wide average of roughly 49 mpg in MY 2026 and would reduce average fuel outlays over the lifetimes of affected vehicles that provide consumers hundreds of dollars in net savings. These standards are directly responsive to the agency's statutory mandate to improve energy conservation and reduce the nation's energy dependence on foreign sources (33).

Mandatory Reporting of GHGs

The Consolidated Appropriations Act of 2008, passed in December 2007, requires the establishment of mandatory GHG reporting requirements. On September 22, 2009, the EPA issued the Final Mandatory Reporting of GHGs Rule, which became effective January 1, 2010. The rule requires reporting of GHG emissions from large sources and suppliers in the U.S. and is intended to collect accurate and timely emissions data to inform future policy decisions. Under the rule, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000

metric tons per year (MT/yr) or more of GHG emissions are required to submit annual reports to the EPA.

New Source Review

The EPA issued a final rule on May 13, 2010, that establishes thresholds for GHGs that define when permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities. This final rule "tailors" the requirements of these CAA permitting programs to limit which facilities would be required to obtain Prevention of Significant Deterioration and Title V permits. In the preamble to the revisions to the Federal Code of Regulations, the EPA states:

> *"This rulemaking is necessary because without it the Prevention of Significant Deterioration and Title V requirements would apply, as of January 2, 2011, at the 100 or 250 tons per year levels provided under the CAA, greatly increasing the number of required permits, imposing undue costs on small sources, overwhelming the resources of permitting authorities, and severely impairing the functioning of the programs. EPA is relieving these resource burdens by phasing in the applicability of these programs to GHG sources, starting with the largest GHG emitters. This rule establishes two initial steps of the phase-in. The rule also commits the agency to take certain actions on future steps addressing smaller sources but excludes certain smaller sources from Prevention of Significant Deterioration and Title V permitting for GHG emissions until at least April 30, 2016."*

The EPA estimates that facilities responsible for nearly 70% of the national GHG emissions from stationary sources would be subject to permitting requirements under this rule. This includes the nation's largest GHG emitters—power plants, refineries, and cement production facilities.

Standards of Performance for GHG Emissions for New Stationary Sources: Electric Utility Generating Units

As required by a settlement agreement, the EPA proposed new performance standards for emissions of CO_2 for new, affected, fossil fuel-fired electric utility generating units on March 27, 2012. New sources greater than 25 megawatts (MW) would be required to meet an output-based standard of 1,000 pounds (lbs) of CO_2 per MW-hour (MWh), based on the performance of widely used natural gas combined cycle technology. It should be noted that on February 9, 2016, the Supreme Court issued a stay of this regulation pending litigation. Additionally, the current EPA Administrator has also signed a measure to repeal the Clean Power Plan, including the CO_2 standards. The Clean Power Plan was officially repealed on June 19, 2019, when the EPA issued the final Affordable Clean Energy rule (ACE). Under ACE, new state-specific emission guidelines were established that provided existing coal-fired electric utility generating units with achievable standards.

On January 19, 2021, the D.C. Circuit Court of Appeals ruled that the EPA's ACE Rule for GHG emissions from power plants rested on an erroneous interpretation of the CAA that barred EPA from considering measures beyond those that apply at and to an individual source. The court therefore vacated and remanded the ACE Rule and adopted a replacement rule which regulates CO_2 emissions from existing power plants, potentially again considering generation shifting and other measures to more aggressively target power sector emissions.

Cap-and-Trade

Cap-and-trade refers to a policy tool where emissions are limited to a certain amount and can be traded or provides flexibility on how the emitter can comply. Successful examples in the U.S. include the Acid Rain Program and the N_2O Budget Trading Program and Clean Air Interstate Rule in the northeast. There is no federal GHG cap-and-trade program currently; however, some states have joined to create initiatives to provide a mechanism for cap-and-trade.

The Regional GHG Initiative is an effort to reduce GHGs among the states of Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont. Each state caps CO_2 emissions from power plants, auctions CO_2 emission allowances, and invests the proceeds in strategic energy programs that further reduce emissions, save consumers money, create jobs, and build a clean energy economy. The Initiative began in 2008 and has retained all participating states as of 2020.

The Western Climate Initiative (WCI) partner jurisdictions have developed a comprehensive initiative to reduce regional GHG emissions to 15% below 2005 levels by 2020. The partners were originally California, British Columbia, Manitoba, Ontario, and Quebec. However, Manitoba and Ontario are not currently participating. California linked with Quebec's cap-and-trade system January 1, 2014, and joint offset auctions took place in 2015. While the WCI has yet to publish whether it has successfully reached the 2020 emissions goal initiative set in 2007, SB 32 requires that California, a major partner in the WCI, adopt the goal of reducing statewide GHG emissions to 40% below the 1990 level by 2030.

Executive Order 13990

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

2.7.3 California

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California's energy consumption relatively flat even with rapid population growth.

2.7.3.1 Legislative Actions to Reduce GHGs

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation, such as the landmark AB 32, was specifically enacted to address GHG emissions. Other legislation, such as Title 24 and Title 20 energy standards, were originally adopted for other purposes such as energy and water conservation but also provided GHG reductions. This section describes the major provisions of the legislation.

AB 1881

The Water Conservation in Landscaping Act of 2006 requires local agencies to adopt the updated DWR model ordinance or equivalent. AB 1881 also requires the CEC to consult with the DWR to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.

SB 1368

California SB 1368 adds Sections 8340 and 8341 to the Public Utilities Code (effective January 1, 2007) with the intent "to prevent long-term investments in power plants with GHG emissions in excess of those produced by a combined-cycle natural gas power plant" with the aim of "reducing emissions of GHGs from the state's electricity consumption, not just the state's electricity production." SB 1368 provides a mechanism for reducing the GHG emissions of electricity providers, both in-state and out-of-state, thereby assisting CARB in meeting its mandate under AB 32, the Global Warming Solutions Act of 2006.

AB 32

The California State Legislature enacted AB 32, which required that GHGs emitted in California be reduced to 1990 levels by the year 2020 (this goal has been met[2]). GHGs, as defined under AB 32, include CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6. Since AB 32 was enacted, a seventh chemical, NF_3, has also been added to the list of GHGs. CARB is the state agency charged with monitoring and regulating sources of GHGs. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 states the following:

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

SB 375

On September 30, 2008, SB 375 was signed by Governor Schwarzenegger. According to SB 375, the transportation sector is the largest contributor of GHG emissions, which emits over 40% of the total GHG emissions in California. SB 375 states, "Without improved land use and transportation policy, California would not be able to achieve the goals of AB 32." SB 375 does the following: it (1) requires metropolitan planning organizations (MPOs) to include sustainable community strategies in their regional transportation plans for reducing GHG emissions; (2) aligns planning for transportation and housing; and (3) creates specified incentives for the implementation of the strategies.

---

[2] Based upon the 2024 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2022 GHG emissions period, California emitted an average 371.1 $MMTCO_2e$) (25). This is less than the 2020 emissions target of 431 $MMTCO_2e$. This is less than the 2020 emissions target of 431 $MMTCO_2e$.

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

Concerning CEQA, SB 375, as codified in Public Resources Code Section 21159.28, states that CEQA findings for certain projects are not required to reference, describe, or discuss (1) growth inducing impacts, or (2) any project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network, if the project:

1. Is in an area with an approved sustainable communities strategy or an alternative planning strategy that CARB accepts as achieving the GHG emission reduction targets.
2. Is consistent with that strategy (in designation, density, building intensity, and applicable policies).
3. Incorporates the MMs required by an applicable prior environmental document.

AB 1493 - Pavley Fuel Efficiency Standards

The second phase of the implementation for the Pavley bill was incorporated into Amendments to the Low-Emission Vehicle Program (LEV III) or the Advanced Clean Cars (ACC) program. The ACC program combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for MY 2017 through 2025. The regulation will reduce GHGs from new cars by 34% from 2016 levels by 2025. The new rules will clean up gasoline and diesel-powered cars, and deliver increasing numbers of zero-emission technologies, such as full battery electric cars, newly emerging plug-in hybrid EV and hydrogen fuel cell cars. The package will also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California. On March 9, EPA reinstated California's authority under the Clean Air Act to implement its own GHG emission standards for cars and light trucks, which other states can also adopt and enforce. With this authority restored, EPA will continue partnering with states to advance the next generation of clean vehicle technologies.

Clean Energy and Pollution Reduction Act of 2015 (SB 350)

In October 2015, the legislature approved, and Governor Jerry Brown signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for EV charging stations. Provisions for a 50% reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40% by 2024, and 45% by 2027.
- Double the energy efficiency in existing buildings by 2030. This target would be achieved through the California Public Utilities Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.

- Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which would facilitate the growth of renewable energy markets in the western United States.

SB 32

On September 8, 2016, Governor Brown signed SB 32 and its companion bill, AB 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80% below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature (10).

2017 CARB Scoping Plan

In November 2017, CARB released the *Final 2017 Scoping Plan Update* (*2017 Scoping Plan*), which identifies the State's post-2020 reduction strategy. The *2017 Scoping Plan* reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the LCFS, and much cleaner cars, trucks, and freight movement, utilizing cleaner, renewable energy, and strategies to reduce CH_4 emissions from agricultural and other wastes.

The *2017 Scoping Plan* establishes a new emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030 (34).

California's climate strategy would require contributions from all sectors of the economy, including the land base, and would include enhanced focus on zero and near-zero emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (CH_4, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries would further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the *2017 Scoping Plan* framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing zero-emission vehicles (ZEV) buses and trucks.
- LCFS, with an increased stringency (18% by 2030).
- Implementing SB 350, which expands the RPS to 50% RPS and doubles energy efficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing CH4 and HCF emissions by 40% and anthropogenic black carbon emissions by 50% by year 2030.
- Continued implementation of SB 375.

- Post-2020 Cap-and-Trade Program that includes declining caps.
- 20% reduction in GHG emissions from refineries by 2030.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Note, however, that the *2017 Scoping Plan* acknowledges that:

> *"[a]chieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA."*

In addition to the statewide strategies listed above, the *2017 Scoping Plan* also identifies local governments as essential partners in achieving the State's long-term GHG reduction goals and identifies local actions to reduce GHG emissions. As part of the recommended actions, CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 metric tons of CO_2e ($MTCO_2e$) or less per capita by 2030 and 2 $MTCO_2e$ or less per capita by 2050. For CEQA projects, CARB states that lead agencies may develop evidence-based bright-line numeric thresholds—consistent with the *2017 Scoping Plan* and the State's long-term GHG goals—and projects with emissions over that amount may be required to incorporate on-site design features and MMs that avoid or minimize project emissions to the degree feasible; or a performance-based metric using a CAP or other plan to reduce GHG emissions is appropriate.

According to research conducted by the Lawrence Berkeley National Laboratory (LBNL) and supported by CARB, California, under its existing and proposed GHG reduction policies, could achieve the 2030 goals under SB 32. The research utilized a new, validated model known as the California LBNL GHG Analysis of Policies Spreadsheet (CALGAPS), which simulates GHG and criteria pollutant emissions in California from 2010 to 2050 in accordance to existing and future GHG-reducing policies. The CALGAPS model showed that by 2030, emissions could range from 211 to 428 $MTCO_2e$ per year ($MTCO_2e$/yr), indicating that "even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40% below the 1990 level [of SB 32]." CALGAPS analyzed emissions through 2050 even though it did not generally account for policies that might be put in place after 2030. Although the research indicated that the emissions would not meet the State's 80% reduction goal by 2050, various combinations of policies could allow California's cumulative emissions to remain very low through 2050 (35) (36).

Cap-and-Trade Program

The *2017 Scoping Plan* identifies a Cap-and-Trade Program as one of the key strategies for California to reduce GHG emissions. According to CARB, a cap-and-trade program would help put California on the path to meet its goal of achieving a 40% reduction in GHG emissions from 1990 levels by 2030. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap would be able to trade permits to emit GHGs within the overall limit.

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from regulated entities by more than 16% between 2013 and 2020, and by an additional 40% by 2030. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production)

commenced in 2013 and would decline over time, achieving GHG emission reductions throughout the program's duration.

Covered entities that emit more than 25,000 $MTCO_2e$/yr must comply with the Cap-and-Trade Program. Triggering of the 25,000 $MTCO_2e$/yr "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of GHG Emissions (Mandatory Reporting Rule or "MRR").

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender "compliance instruments" for each $MTCO_2e$ of GHG they emit. There also are requirements to surrender compliance instruments covering 30% of the prior year's compliance obligation by November of each year (37).

The Cap-and-Trade Program provides a firm cap, which provides the highest certainty of achieving the 2030 target. An inherent feature of the Cap-and-Trade program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. As summarized by CARB in the *First Update to the Climate Change Scoping Plan*:

> *"The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced. In other words, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program if there is a reduction in GHG emissions from other covered entities. Such a focus on aggregate GHG emissions is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative."* (38)

The Cap-and-Trade Program covers approximately 80% of California's GHG emissions (34). The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported.

2022 CARB Scoping Plan

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) (39). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce

GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with *CEQA Guidelines* section 15183.5.

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

> *"The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on and accelerating carbon reduction programs that have been in place for a decade and a half. That means rapidly moving to zero-emission transportation; electrifying the cars, buses, trains, and trucks that now constitute California's single largest source of planet-warming pollution."*
>
> *"[A]pproval of this plan catalyzes a number of efforts, including the development of new regulations as well as amendments to strengthen regulations and programs already in place, not just at CARB but across state agencies."*

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

- Reimagine roadway projects that increase VMT in a way that meets community needs and reduces the need to drive.
- Double local transit capacity and service frequencies by 2030.
- Complete the High-Speed Rail (HSR) System and other elements of the intercity rail network by 2040.
- Expand and complete planned networks of high-quality active transportation infrastructure.
- Increase availability and affordability of bikes, e-bikes, scooters, and other alternatives to light-duty vehicles, prioritizing needs of underserved communities.
- Shift revenue generation for transportation projects away from the gas tax into more durable sources by 2030.
- Authorize and implement roadway pricing strategies and reallocate revenues to equitably improve transit, bicycling, and other sustainable transportation choices.
- Prioritize addressing key transit bottlenecks and other infrastructure investments to improve transit operational efficiency over investments that increase VMT.
- Develop and implement a statewide transportation demand management (TDM) framework with VMT mitigation requirements for large employers and large developments.
- Prevent uncontrolled growth of autonomous vehicle (AV) VMT, particularly zero-passenger miles.
- Channel new mobility services towards pooled use models, transit complementarity, and lower VMT outcomes.
- Establish an integrated statewide system for trip planning, booking, payment, and user accounts that enables efficient and equitable multimodal systems.

- Provide financial support for low-income and disadvantaged Californians' use of transit and new mobility services.
- Expand universal design features for new mobility services.
- Accelerate infill development in existing transportation-efficient places and deploy strategic resources to create more transportation-efficient locations.
- Encourage alignment in land use, housing, transportation, and conservation planning in adopted regional plans (RTP/SCS and RHNA) and local plans (e.g., general plans, zoning, and local transportation plans).
- Accelerate production of affordable housing in forms and locations that reduce VMT and affirmatively further fair housing policy objectives.
- Reduce or eliminate parking requirements (and/or enact parking maximums, as appropriate) and promote redevelopment of excess parking, especially in infill locations.
- Preserve and protect existing affordable housing stock and protect existing residents and businesses from displacement and climate risk.

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

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

2.7.3.2 Executive Orders Related to GHG Emissions

California's Executive Branch has taken several actions to reduce GHGs through the use of Executive Orders. Although not regulatory, they set the tone for the state and guide the actions of state agencies.

Executive Order S-3-05

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

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

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

Executive Order S-01-07 (LCFS)

Governor Schwarzenegger signed Executive Order S-01-07 on January 18, 2007. The order mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10% by 2020. CARB adopted the LCFS on April 23, 2009.

After a series of legal changes, in order to address the Court ruling, CARB was required to bring a new LCFS regulation to the Board for consideration in February 2015. The proposed LCFS regulation was required to contain revisions to the 2010 LCFS as well as new provisions designed to foster investments in the production of the low-carbon intensity fuels, offer additional flexibility to regulated parties, update critical technical information, simplify and streamline program operations, and enhance enforcement. On November 16, 2015, the Office of Administrative Law (OAL) approved the Final Rulemaking Package. The new LCFS regulation became effective on January 1, 2016.

In 2018, CARB approved amendments to the regulation, which included strengthening the carbon intensity benchmarks through 2030 in compliance with the SB 32 GHG emissions reduction target for 2030. The amendments included crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector (40).

Executive Order S-13-08

Executive Order S-13-08 states that "climate change in California during the next century is expected to shift precipitation patterns, accelerate sea level rise and increase temperatures, thereby posing a serious threat to California's economy, to the health and welfare of its population and to its natural resources." Pursuant to the requirements in the Order, the *2009 California Climate Adaptation Strategy* (*CNRA 2009*) was adopted, which is the "...first statewide, multi-sector, region-specific, and information-based climate change adaptation strategy in the United States." Objectives include analyzing risks of climate change in California, identifying, and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order B-30-15

On April 29, 2015, Governor Brown issued an executive order to establish a California GHG reduction target of 40% below 1990 levels by 2030. The Governor's executive order aligned California's GHG reduction targets with those of leading international governments ahead of the U.N. Climate Change Conference in Paris late 2015. The Order sets a new interim statewide GHG emission reduction target to reduce GHG emissions to 40% below 1990 levels by 2030 in order to ensure California meets its target of reducing GHG emissions to 80% below 1990 levels by 2050 and directs CARB to update the *2017 Scoping Plan* to express the 2030 target in terms of $MMTCO_2e$. The Order also requires the state's climate adaptation plan to be updated every three years, and for the State to continue its climate change research program, among other provisions. As with Executive Order S-3-05, this Order is not legally enforceable to local governments and the private sector. Legislation that would update AB 32 to make post 2020 targets and requirements a mandate is in process in the State Legislature.

Executive Order B-55-18 and SB 100

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

2.7.3.3 California Regulations and Building Codes

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California's energy consumption relatively flat even with rapid population growth.

Title 20 CCR Sections 1601 et seq. – Appliance Efficiency Regulations

The Appliance Efficiency Regulations regulate the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. Twenty-three categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles (RV) or other mobile equipment (CEC 2012).

Title 24 Energy Efficiency Standards and California Green Building Standards

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

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

CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2025 California Green Building Code Standards that go into effect on January 1, 2026. The Project would be required to comply with the applicable standards in place at the time plan check submittals

are made. The Project would be required to comply with the applicable standards in place at the time plan check submittals are made. These require, among other items (41):

Residential Mandatory Measures

- Electric vehicle (EV) charging for new construction. New construction shall comply with Section 4.106.4.1, or 4.106.4.2. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the *California Electrical Code*.
    - 4.106.4.1 New one- and two-family dwellings and townhouses with attached private garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or subpanel shall provide capacity to install a 40-ampere 208/240-vole minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device.
    - 4.106.4.2. New multifamily dwellings, hotels and motels and new residential parking facilities. When parking is provided, parking spaces for new multifamily dwellings, hotels and motels shall meet the requirements of Section 4.106.4.2.2. Calculations for spaces shall be rounded up to the nearest whole number. A parking space served by electric vehicle supply equipment or designed as an EV charging space shall count as at least one standard automobile parking space only for the purpose of complying with any applicable minimum parking space requirements established by a local jurisdiction. See Vehicle Code Section 22511.2 for further details.
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with Sections 4.303.1.1, 4.303.1.2, 4.303.1.3, and 4.303.1.4.
- Outdoor potable water use in landscape areas. Residential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent.
- Operation and maintenance manual. At the time of final inspection, a manual, compact disc, web-based reference or other media acceptable to the enforcing agency which includes all of the following shall be placed in the building:
    - Directions to the owner or occupant that the manual shall remain with the building throughout the life cycle of the structure.
    - Operations and maintenance instructions for the following:
        - Equipment and appliances, including water-saving devices and systems, HVAC systems, photovoltaic systems, EV chargers, water-heating systems and other major appliances and equipment.
        - Roof and yard drainage, including gutter and downspouts.
        - Space conditioning systems, including condensers and air filters.
        - Landscape irrigation systems.
        - Water reuse systems.

- Information from local utility, water and waste recovery providers on methods to further reduce future resource consumption, including recycling programs and locations.
- Public transportation and/or carpool options available in the area.
- Educational material on the positive impacts of an interior relative humidity between 30-60% and what methods occupants may use to maintain the relative humidity level in that range.
- Information about water-conserving landscape and irrigation design and controllers which conserve water.
- Instructions for maintaining gutters and downspouts and the importance of diverting water at least 5 feet away from the foundation.
- Information on required routine maintenance measures, including, but not limited to, caulking, painting, grading around the building, etc.
- Information about state solar energy and incentive programs available.
- A copy of all special inspection verifications required by the enforcing agency or this code.
- Information from the Department of Forestry and Fire Protection on maintenance of defensible space around residential structures.
- Information and/or drawings identifying the location of grab bar reinforcements.

- Any installed gas fireplace shall be direct-vent sealed-combustion type. Any installed woodstove or pellet stove shall comply with U.S. EPA New Source Performance Standards (NSPS) emission limits as applicable, and shall have a permanent label indicating they are certified to meet the emission limits. Woodstoves, pellet stoves and fireplaces shall also comply with applicable local ordinances.
- Paints and coatings. Architectural paints and coatings shall comply with VOC limits in Table 1 of the CARB Architectural Suggested Control Measure, as shown in Table 4.504.3, unless more stringent local limits apply. The VOC content limit for coatings that do not meet the definitions for the specialty coatings categories listed in Table 4.504.3 shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat-high Gloss coating, based on its glass, as defined in subsections 4.21, 4.36, and 4.37 of the 2007 CARB, Suggested Control Measure, and the corresponding Flat, Nonflat, Nonflat-high Gloss VOC limit in Table 4.504.3 shall apply.

CARB Refrigerant Management Program

CARB adopted a regulation in 2009 to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is set forth in sections 95380 to 95398 of Title 17, CCR. The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with refrigeration systems with more than 50 pounds of a high GWP refrigerant. The refrigerant management program is designed to (1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and (3) verify GHG emission reductions.

SB 97 and the CEQA Guidelines Update

Passed in August 2007, SB 97 added Section 21083.05 to the Public Resources Code. The code states "(a) On or before July 1, 2009, the Office of Planning and Research (OPR) shall prepare, develop, and transmit to the Resources Agency guidelines for the mitigation of GHG emissions or the effects of GHG emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption. (b) On or before January 1, 2010, the Resources Agency shall certify and adopt guidelines prepared and developed by the OPR pursuant to subdivision (a)."

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

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

On December 28, 2018, the Natural Resources Agency announced the OAL approved the amendments to the *CEQA Guidelines* for implementing CEQA. The CEQA Amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents. The CEQA Amendments fit within the existing CEQA framework by amending existing *CEQA Guidelines* to reference climate change.

Section 15064.4 was added to the *CEQA Guidelines* and states that in determining the significance of a project's GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively insignificant compared to statewide, national, or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. Additionally, a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use (42).

2.7.4 Regional

San Bernardino County

The County of San Bernardino adopted a GHG Emissions Reduction Plan in September 2011. The Reduction Plan contains further guidance on the County of San Bernardino's GHG Inventory reduction goals, policies, guidelines, and implementation programs. The purpose of the Reduction Plan is to provide guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County of San Bernardino (43). The Reduction Plan provided the GHG emissions inventory for the year 2007, and target for reducing GHG emissions 15% below 2007 levels by 2020. The County has implemented strategies to reduce its

GHG emissions identified in the 2011 Reduction Plan, which has helped the County meet its 2020 GHG reduction targets.

In September 2021, the County published the County of San Bernardino's GHG Emissions Reduction Plan Update (Reduction Plan Update) which set more ambitious targets, aligning with state regulations that require a 40% reduction in GHG emissions below 1990 levels by 2030. The update introduced enhanced strategies for renewable energy, energy efficiency, and transportation improvements while also emphasizing climate resilience and adaptation. It ensured consistency with state and regional goals, increased public engagement, and established robust monitoring and reporting mechanisms to track progress. This comprehensive update reflects a strengthened commitment to addressing climate change through more rigorous goals and effective implementation measures (44).

As part of the Reduction Plan Update, the County of San Bernardino published a GHG Development Review Process that specifies a two-step approach in quantifying GHG emissions. First, a screening threshold of 3,000 $MTCO_2e/yr$ is used to determine if additional analysis is required. Projects that exceed the 3,000 $MTCO_2e/yr$ are required to either achieve a minimum 100 points per the Screening Tables or a 31% reduction over 2007 emissions levels. Consistent with CEQA guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions (45).

.

3 PROJECT GHG IMPACT

3.1 INTRODUCTION

The Project has been evaluated to determine if it will result in a significant GHG impact. The significance of these potential impacts is described in the following sections.

3.2 STANDARDS OF SIGNIFICANCE

The criteria used to determine the significance of potential Project-related GHG impacts are taken from the Initial Study Checklist in Appendix G of the State *CEQA Guidelines* (14 California Code of Regulations §§15000, et seq.). Based on these thresholds, a project would result in a significant impact related to GHG if it would (46):

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

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

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

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

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

3.2.1 Thresholds of Significance

According to §15064.7(b) of the CEQA Guidelines, for a threshold of significance to be used as part of a legal agency's environmental review process, it must be adopted by ordinance, resolution, rule, or regulation. As the Project is located within the County of San Bernardino portion of the MDAQMD and since the MDAQMD threshold for GHG emissions has not been formally adopted, Project impacts will be assessed against GHG thresholds from both the MDAQMD and the County of San Bernardino.

The MDAQMD's CEQA and Federal Conformity Guidelines considers a project as significant if it triggers or exceeds the most appropriate evaluation criteria. The MDAQMD states that in general, for GHG emissions, the significance emission threshold of 100,000 Tons CO_2e per year (90,718.5 $MTCO_2e/yr$[3]) is sufficient (47). A significant project must incorporate mitigation sufficient to reduce its impact to a level that is not significant. A project that cannot be mitigated to a level that is not significant must incorporate all feasible mitigation.

The County of San Bernardino adopted the GHG Reduction Plan Update in June 2021. The GHG Reduction Plan Update provides guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County of San Bernardino (48) . The County includes a GHG Development Review Process (DRP) that specifies a two-step approach in quantifying GHG emissions (48). First, a screening threshold of 3,000 $MTCO_2e/yr$ is used to determine if additional analysis is required. Projects that exceed the 3,000 $MTCO_2e/yr$ will be required to either achieve a minimum 100 points per the Screening Tables or a 31% reduction over 2007 emissions levels. Consistent with CEQA guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions.

3.3 Models Employed To Greenhouse Gases

3.3.1 California Emissions Estimator Model (CalEEMod)

The California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including MDAQMD, released CalEEMod 2022 in May 2022. CalEEMod periodically releases updates, as such the latest version available at the time of this report has been utilized in this analysis. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures (49). Accordingly, the latest version of CalEEMod has been used for this Project to determine GHG emissions. Output from the model runs for construction and operational activity for the Project is provided in Appendix 3.1. CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water, and refrigerants sources.

3.4 Construction Emissions

Project construction activities would generate CO_2 and CH_4 emissions. The *Tentative Tract Map 17168 Phases 3 to 8 Air Quality Impact Analysis* (AQIA) report contains detailed information regarding

[3] The threshold was converted from tons to metric tons (MT) to ensure a consistent, apples-to-apples comparison with the Project's GHG emissions which CalEEMod reports in MT. This conversion ensures that the GHG emissions from the Project can be directly compared to the threshold, allowing for a more accurate and consistent evaluation.

Project construction activities (50). As discussed in the AQIA, construction-related emissions are expected from the following activities.

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

3.4.1 Construction Duration

The proposed Project is anticipated to begin construction in June 2026 and would be implemented in six (6) construction phases. It is anticipated that approximately 29 dwelling units would be constructed per phase with each phase having an approximately duration of eight (8) months. Phase 1 is expected to commence in June 2026, while phases 5 and 6 would occur with overlapping construction activities and are anticipated to be completed in April 2029. This construction schedule reflects the phased development of the Project. Overall development could take up to three (3) years for the for the Project to be completely built out.

For purposes of analysis, however, construction is conservatively assumed to begin in June 2026 and would last through December 2027. This timeframe suggests a more rapid and intense construction period than is anticipated to occur, likely resulting in higher emissions over a short period of time for analytical purposes. Given the probable extended timeline discussed above, this assumption overestimates the intensity of air quality impacts. The construction schedule utilized in the analysis, shown in Table 3-1, represents a "conservative" analysis scenario. That is, should construction occur any time after the assumed dates, construction emissions would be reduced when compared to the levels presented here. This is due to the decrease in emission factors for construction equipment over time, and increasing stringency in emissions regulations.[4] The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per the *CEQA Guidelines* (51).

TABLE 3-1: CONSTRUCTION DURATION

Construction Activity	Start Date	End Date	Days
Site Preparation	06/01/2026	07/24/2026	40
Grading	07/25/2026	11/13/2026	80
Building Construction	11/14/2026	12/10/2027	280
Paving	08/29/2027	12/10/2027	75
Architectural Coating	05/15/2027	12/10/2027	150

3.4.2 Construction Equipment

Site specific construction fleet may vary due to specific project needs at the time of construction. The associated construction equipment was generally based on CalEEMod defaults. Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 3-2 is

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

assumed to operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed.

TABLE 3-2: CONSTRUCTION EQUIPMENT ASSUMPTIONS

Construction Activity	Equipment	Quantity	Hours
Site Preparation	Rubber Tired Dozers	3	8
	Crawler Tractors	4	8
Grading	Excavators	3	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	3	8
	Crawler Tractors	3	8
Building Construction	Cranes	2	8
	Forklifts	6	8
	Generator Sets	2	8
	Tractors/Loaders/Backhoes	6	8
	Welders	2	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

3.4.3 Construction Emissions Summary

For construction phase emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the MDAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions (52). As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 4-3.

TABLE 3-3: AMORTIZED ANNUAL CONSTRUCTION EMISSIONS

Year	CO_2T	CH_4	N_2O	R	Total CO_2e
2027	287.00	0.01	< 0.005	0.01	288.00
2028	255.80	<0.01	<0.01	<0.01	256.90
Total	208.00	0.01	< 0.005	0.02	210.00
Amortized	750.80	0.02	0.00	0.03	754.90

3.5 OPERATIONAL EMISSIONS

Operational activities associated with the Project would result in emissions of CO_2, CH_4, N_2O, and Refrigerant emissions from the following primary sources:

- Mobile Source Emissions;
- Area Source Emissions;

- Energy Source Emissions;
- Water Supply, Treatment, and Distribution;
- Solid Waste; and
- Refrigeration

3.5.1 Mobile Source Emissions

The Project related operational air quality emissions derived primarily from vehicle trips generated by the Project. Trip characteristics available from the *Tentative Tract Map 17168 Phases 3 to 8 Traffic Analysis Scope and VMT Screening* were utilized in this analysis (53).

3.5.2 Area Source Emissions

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that on October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by January 1, 2024, which is now in effect. However, for purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod, and do not incorporate the emissions reductions that would be realized from implementation of AB 1346.

3.5.3 Energy Source Emissions

Combustion Emissions Associated with Electricity and Natural Gas

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building; the building energy use emissions do not include street lighting.[5] GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Natural gas and electricity usage associated with the Project was calculated by CalEEMod using default parameters. It should be noted that although the Project is planned as an all-electric development, the analysis assumes electricity in order to provide a conservative evaluation of the Project's impacts.

3.5.4 Water Supply, Treatment, and Distribution

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. Unless otherwise noted, CalEEMod default parameters were used.

[5] The CalEEMod emissions inventory model does not include indirect emission related to street lighting. Indirect emissions related to street lighting are expected to be negligible and cannot be accurately quantified at this time as there is insufficient information as to the number and type of street lighting that would occur.

3.5.5 Solid Waste

The proposed land uses would result in the generation and disposal of solid waste. A percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the Project were calculated by CalEEMod using default parameters.

3.5.6 Refrigerants

Air conditioning (A/C) and refrigeration equipment associated with the buildings are anticipated to generate GHG emissions. CalEEMod automatically generates a default A/C and refrigeration equipment inventory for each project land use subtype based on industry data from the USEPA (2016b). CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. Note that CalEEMod does not quantify emissions from the disposal of refrigeration and A/C equipment at the end of its lifetime. Per 17 CCR 95371, new facilities with refrigeration equipment containing more than 50 pounds of refrigerant are prohibited from utilizing refrigerants with a GWP of 150 or greater as of January 1, 2022. Additionally, beginning January 1, 2025, all new air conditioning equipment may not use refrigerants with a GWP of 750 or greater. GHG emissions associated with refrigerants were calculated by CalEEMod using default parameters.

3.5.8 GHG Emissions Summary

The estimated Project-related GHG emissions are summarized in Table 3-4. Detailed operation model outputs for the Project are presented in Appendix 3.1. As shown in Table 3-4, construction and operation of the Project would generate approximately 2,849.95 $MTCO_2e$/yr.

TABLE 3-4: PROJECT GHG EMISSIONS

Source	Emissions (MT/yr)				
	CO_2T	CH_4	N_2O	R	Total CO_2e
Annual construction emissions amortized over 30 years	45.40	1.67E-03	6.67E-04	7.00E-03	45.63
Mobile	2,184.00	0.08	0.10	3.20	2,219.00
Area	109.00	0.00	0.00	0.00	109.00
Energy	391.00	0.04	0.00	0.00	393.00
Water	36.00	0.19	0.00	0.00	42.00
Waste	12.00	1.20	0.00	0.00	41.00
Refrigeration	0.00	0.00	0.00	0.32	0.32
Total CO_2e (All Sources)	2,849.95				

3.6 GHG Emissions Findings and Recommendations

3.6.1 GHG Impact 1

Potential to generate direct or indirect GHG emissions that would result in a significant impact on the environment.

As previously stated, since the Project is located within the County of San Bernardino portion of the MDAQMD and since the MDAQMD threshold for GHG emissions has not been formally adopted, Project impacts will be assessed against GHG thresholds from both the MDAQMD and the County of San Bernardino.

As previously shown in Table 3-4, the Project will result in approximately 2,849.95 $MTCO_2e$/yr, which would not exceed the MDAQMD's screening threshold of 90,718.5 $MTCO_2e$/yr or the County's screening threshold of 3,000 $MTCO_2e$/yr. This would be considered a less than significant impact.

3.6.2 GHG Impact 2

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

As previously stated, pursuant to 15604.4 of the *CEQA Guidelines*, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions (54). As such, the Project's consistency with the 2022 Scoping Plan, is discussed below. It should be noted that the Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 and 2017 Scoping Plan is not necessary, since both of these plans have been superseded by the 2022 Scoping Plan.

2022 Scoping Plan Consistency

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the Project will comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, Off-Road Zero-Emission Targeted Manufacturer Rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. As such, the Project would be consistent with the 2022 Scoping Plan.

Consistency with County of San Bernardino Greenhouse Gas Emissions Reduction Plan and GHG Development Review Process

The County of San Bernardino adopted the Reduction Plan in September 2011 (updated June 2021), which provides guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County of San Bernardino (55).

The County includes a GHG Development Review Process (DRP) that specifies a two-step approach in quantifying GHG emissions (56). First, a screening threshold of 3,000 $MTCO_2e$/yr is used to

determine if additional analysis is required. Projects that exceed the 3,000 $MTCO_2e/yr$ will be required to either achieve a minimum 100 points per the Screening Tables or a 31% reduction over 2007 emissions levels. Consistent with CEQA guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions.

As previously shown in Table 3-4, the Project will result in approximately 2,849.95 $MTCO_2e/yr$; the proposed Project would not exceed the screening threshold of 3,000 $MTCO_2e/yr$. This would be considered a less than significant impact.

Since the County's Reduction Plan was developed in response to SBCTA's Regional Greenhouse Gas Reduction Plan, and because the Project consistent with the County's Reduction Plan, it is also consistent with the goals outlined in SBCTA's Regional Greenhouse Gas Reduction Plan.

4 REFERENCES

1. **California Natural Resources Agency.** *2023 California Environmental Quality Act (CEQA) Statute and Guidelines.* s.l. : Association of Environmental Professionals, 2023.
2. **California Air Resources Board.** Assembly Bill 32: Global Warming Solutions Act. [Online] 2006. https://ww2.arb.ca.gov/resources/fact-sheets/ab-32-global-warming-solutions-act-2006.
3. **Air Resources Board.** Sustainable Communities. [Online] 2008. https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program/about.
4. —. Clean Car Standards - Pavley, Assembly Bill 1493. [Online] September 24, 2009. http://www.arb.ca.gov/cc/ccms/ccms.htm.
5. **California Building Standards Commission.** California Building Standards Code (Title 24, California Code of Regulations). [Online] http://www.bsc.ca.gov/codes.aspx.
6. **California Energy Commission.** California Code of Regulations, TITLE 20, Division 2. [Online] September 3, 2013. https://www.energy.ca.gov/sites/default/files/2021-07/Title%2020%20Updated%20July%2023%2C%202021.pdf.
7. **California Air Resources Board.** Title 17 - California Code of Regulation. [Online] 2010. https://ww2.arb.ca.gov/sites/default/files/2020-09/basics-notes.pdf.
8. **California Energy Commission.** SB 1368 Emission Performance Standards. [Online] September 29, 2006. http://www.energy.ca.gov/emission_standards/.
9. —. Renewables Portfolio Standard (RPS). [Online] 2002. http://www.energy.ca.gov/portfolio/.
10. **California Legislative Information.** Senate Bill No. 32. [Online] September 8, 2016. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB32.
11. **National Environmental Education Foundation.** The Principal Greenhouse Gases and Their Sources. *National Environmental Education Foundation.* [Online] https://www.neefusa.org/weather-and-climate/climate-change/principal-greenhouse-gases-and-their-sources#WaterVapor.
12. *Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report.* **International Panel on Climate Change.** 4, 2007.
13. *The Carbon Cycle and Climate Change.* **Bennington, Bret J.** 1, s.l. : Brooks/Cole. ISBN 1 3: 978-0-495-73855-8.
14. **The National Institute for Occupational Safety and Health.** Carbon Dioxide. *Centers for Disease Control and Prevention.* [Online] https://www.cdc.gov/niosh/npg/npgd0103.html.
15. **National Oceanic and Atmospheric Administration.** Increase in atmospheric methane set another record during 2021. *National Oceanic and Atmospheric Administration.* [Online] https://www.noaa.gov/news-release/increase-in-atmospheric-methane-set-another-record-during-2021#:~:text=NOAA's%20preliminary%20analysis%20showed%20the,during%202020%20was%2015.3%20ppb..
16. **World Resources Institute.** Climate Analysis Indicator Tool (CAIT). [Online] http://cait.wri.org.
17. **National Oceanic and Atmospheric Administration.** CFCs and their substitutes in stratospheric ozone depletion. *National Oceanic and Atmospheric Administration.* [Online] https://gml.noaa.gov/hats/about/cfc.html.
18. **United States Environmental Protection Agency.** Regulation for Reducting Sulfur Hexafluoride Emissions from Gas Insulated Switchgear. *Environmental Protection Agency.* [Online] May 7, 2014. https://www.epa.gov/sites/production/files/2016-02/documents/mehl-arb-presentation-2014-wkshp.pdf.

19. **World Resources Institute.** Nitrogen Trifluoride Now Required in GHG Protocol Greenhouse Gas Emissions Inventory. [Online] May 22, 2013. https://www.wri.org/blog/2013/05/nitrogen-trifluoride-now-required-ghg-protocol-greenhouse-gas-emissions-inventories.

20. **National Center for Biotechnology Information.** Nitrogen Trifluoride. *PubChem Compound Database.* [Online] https://pubchem.ncbi.nlm.nih.gov/compound/24553 .

21. **Barbara H. Allen-Diaz.** Climate change affects us all. *University of California Agriculture and Natural Resources.* [Online] April 1, 2009. http://calag.ucanr.edu/Archive/?article=ca.v063n02p51.

22. **Intergovernmental Panel on Climate Change.** Climate Change 2021 The Physical Science Basis. *Climate Change 2021 The Physical Science Basis.* [Online] https://www.ipcc.ch/report/sixth-assessment-report-working-group-i/.

23. **United Nations.** Annex 1. [Online] 2023. https://di.unfccc.int/time_series.

24. —. GHG Profiles - Non-Annex I. [Online] 2023. http://di.unfccc.int/ghg_profile_non_annex1.

25. **California Air Resources Board.** 2024 GHG Inventory. *California Greenhouse Gas Emission Inventory 2000-2022 Edition.* [Online] https://ww2.arb.ca.gov/ghg-inventory-data.

26. **Energy Information Administration .** [Online] https://www.eia.gov/state/data.php?sid=US.

27. **California Energy Commission.** *Our Changing Climate Assessing the Risks to California.* 2006.

28. **Center for Climate and Energy Solutions (C2ES).** Outcomes of the U.N. Climate Change Conference. *Center for Climate and Energy Solutions (C2ES).* [Online] 2015. http://www.c2es.org/international/negotiations/cop21-paris/summary.

29. **Agency, United States Environmental Protection.** Endangerment and Cause or Contribute Findings for Greenhouse Gases under the Section 202(a) of the Clean Air Act. *United States Environmental Protection Agency.* [Online] 2020. https://www.epa.gov/climate-change/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a.

30. **Federal Register.** Mid-Term Evaluation of Greenhouse Gas Emissions Standards for Model Year 2022-2025 Light-Duty Vehicles. [Online] 2018. https://www.federalregister.gov/documents/2018/04/13/2018-07364/mid-term-evaluation-of-greenhouse-gas-emissions-standards-for-model-year-2022-2025-light-duty.

31. **Administration, National Highway Traffic Safety.** SAFE: The Safer Affordable Fuel-Efficient 'SAFE' Vehicle Rule. *National Highway Traffic Safety Administration.* [Online] 2020. https://www.nhtsa.gov/corporate-average-fuel-economy/safe.

32. **National Highway Traffic Safety Administration.** Corporate Average Fuel Economy. [Online] https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy.

33. **United States Department of Transportation.** Corporate Average Fuel Economy Standards for Model Years 2024-2026 Passenger Cars and Light Trucks. [Online] https://www.nhtsa.gov/sites/nhtsa.gov/files/2022-04/Final-Rule-Preamble_CAFE-MY-2024-2026.pdf.

34. **California Air Resources Board.** California's 2017 Climate Change Scoping Plan . [Online] 2017. https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017_es.pdf.

35. **Lawrence Berkeley National Laboratory.** California's Policies Can Significantly Cut Greenhouse Gas Emissions through 2030. *Lawrence Berkeley National Laboratory.* [Online] January 22, 2015. http://newscenter.lbl.gov/2015/01/22/californias-policies-can-significantly-cut-greenhouse-gas-emissions-2030/.

36. **Ernest Orlando Lawrence Berkeley National Laboratory.** Modeling California policy impacts on greenhouse gas emissions. [Online] 2015. https://eaei.lbl.gov/sites/all/files/lbnl-7008e.pdf.

37. **California Air Resources Board.** Legal Disclaimer & User's Notice. [Online] April 2019. https://ww3.arb.ca.gov/cc/capandtrade/capandtrade/ct_reg_unofficial.pdf.

38. —. Climate Change Scoping Plan. [Online] 2014. https://ww3.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

39. —. *2022 Scoping Plan for Achieving Carbon Neutrality.*

40. —. Low Carbon Fuel Standard. [Online] December 2019. https://ww3.arb.ca.gov/fuels/lcfs/lcfs.htm.

41. **California Department of General Services.** 2025 California Green Building Standards Code, Title 24, Part 11. *CALGreen.* [Online] https://codes.iccsafe.org/content/CAGBC2025P1.

42. **California Natural Resources Agency.** *2023 California Environmental Quality Act (CEQA) Statute and Guidelines.* s.l. : Association of Environmental Professionals, 2023.

43. **County of San Bernardino.** Greenhouse Gas Emissions Reduction Plan. [Online] June 2021. http://www.sbcounty.gov/uploads/LUS/GreenhouseGas/GHG_2021/GHG%20Reduction%20Plan%20Update-Greenhouse%20Gas%20Reduction%20Plan%20Update%20-%20Adopted%209-21-2021.pdf.

44. —. County of San Bernardino Greenhouse Gas Reduction Plan Update. [Online] 2021. https://www.sbcounty.gov/uploads/LUS/GreenhouseGas/GHG_2021/GHG%20Reduction%20Plan%20Update-Greenhouse%20Gas%20Reduction%20Plan%20Update%20-%20Adopted%209-21-2021.pdf.

45. —. Greenhouse Gas Emissions Development Review Processes. [Online] September 2021. https://www.sbcounty.gov/uploads/LUS/GreenhouseGas/GHG_2021/GHG%20Reduction%20Plan%20Update-Greenhouse%20Gas%20Reduction%20Plan%20Update%20-%20Adopted%209-21-2021.pdf.

46. **State of California.** *2024 CEQA California Environmental Quality Act.* 2024.

47. **Mojve Desert Air Quality Management District.** *MDAQMD CEQA Guidelines.* 2016.

48. **County of San Bernardino.** Greenhouse Gas Reduction Plan Update. [Online] 2021. http://www.sbcounty.gov/uploads/LUS/GreenhouseGas/GHG_2021/GHG%20Reduction%20Plan%20Update-Greenhouse%20Gas%20Reduction%20Plan%20Update%20-%20Adopted%209-21-2021.pdf.

49. **California Air Pollution Control Officers Association (CAPCOA).** California Emissions Estimator Model (CalEEMod). [Online] May 2022. www.caleemod.com.

50. **Urban Crossroads, Inc.** *Tentative Tract Map 17168 Phases 3 to 8 Air Quality Impact Analysis.* 2026.

51. **State of California.** *2020 CEQA California Environmental Quality Act.* 2020.

52. **South Coast Air Quality Management District.** *Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group #13.* [Powerpoint] Diamond Bar : s.n., 2009.

53. **Urban Crossroads, Inc.** *Tentative Tract Map 17168 Phases 3 to 8 Traffic Analysis Scope and VMT Screening.* 2026.

54. **Association of Environmental Professionals.** *2024 CEQA California Environmental Quality Act.* 2024.

55. **County of San Bernardino.** Greenhouse Gas Emissions Reduction Plan Update. [Online] June 2021. http://www.sbcounty.gov/uploads/LUS/GreenhouseGas/GHG_2021/GHG%20Reduction%20Plan%20Update-Greenhouse%20Gas%20Reduction%20Plan%20Update%20-%20Adopted%209-21-2021.pdf.

56. —. Greenhouse Gas Emissions Development Review Processes. [Online] March 2015. http://www.sbcounty.gov/Uploads/lus/GreenhouseGas/FinalGHGUpdate.pdf.

57. **Mojave Desert Air Quality Management District.** California Environmental Quality Act (CEQA) and Federal Conformity Guidelines. [Online] February 2020. https://www.mdaqmd.ca.gov/home/showpublisheddocument/8510/638126583450270000.

5 CERTIFICATION

The contents of this GHG study report represent an accurate depiction of the GHG impacts associated with the proposed Tentative Tract Map 17168 Phases 3 to 8 Project. The information contained in this GHG report is based on the best available data at the time of preparation. If you have any questions, please contact me directly at hqureshi@urbanxroads.com.

Haseeb Qureshi
Principal
URBAN CROSSROADS, INC.
1133 Camelback #8329
Newport Beach, CA 92658
hqureshi@urbanxroads.com

Education

Master of Science in Environmental Studies
California State University, Fullerton • May, 2010
Bachelor of Arts in Environmental Analysis and Design
University of California, Irvine • June, 2006

Professional Affiliations

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

Professional Certifications

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

APPENDIX 3.1:

CALEEMOD PROJECT EMISSIONS MODEL OUTPUTS

TTM 17168 Phases 3 to 8 Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

1.2. Land Use Types

1.3. User-Selected Emission Reduction Measures by Emissions Sector

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

2.2. Construction Emissions by Year, Unmitigated

2.4. Operations Emissions Compared Against Thresholds

2.5. Operations Emissions by Sector, Unmitigated

3. Construction Emissions Details

3.1. Site Preparation (2026) - Unmitigated

3.3. Grading (2026) - Unmitigated

3.5. Building Construction (2026) - Unmitigated

3.7. Building Construction (2027) - Unmitigated

3.9. Paving (2027) - Unmitigated

3.11. Architectural Coating (2027) - Unmitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

8.1. Justifications

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	TTM 17168 Phases 3 to 8
Construction Start Date	6/1/2026
Operational Year	2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.6
Precipitation (days)	12
Location	34.155114372857724, -116.042124076493
County	San Bernardino-Mojave Desert
City	Twentynine Palms
Air District	Mojave Desert AQMD
Air Basin	Mojave Desert
TAZ	5147
EDFZ	10
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.35

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
Single Family Housing	137	Dwelling Unit	44	267,150	1,604,661	—	453	—

Other Asphalt Surfaces	11	Acre	11	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	17	16	40	47	0.08	1.8	5.9	7.7	1.7	2.7	4.4	—	9,594	9,594	0.39	0.14	4.0	9,635
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	17	16	40	45	0.08	1.8	3.5	5.3	1.7	1.1	2.8	—	9,548	9,548	0.37	0.14	0.10	9,587
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7.5	7.1	17	25	0.04	0.68	1.5	2.2	0.62	0.56	1.2	—	4,875	4,875	0.18	0.08	0.98	4,905
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.4	1.3	3.2	4.6	0.01	0.12	0.27	0.39	0.11	0.10	0.22	—	807	807	0.03	0.01	0.16	812

2.2. Construction Emissions by Year, Unmitigated

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

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

Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	5.5	4.6	40	40	0.08	1.8	5.9	7.7	1.7	2.7	4.4	—	9,594	9,594	0.39	0.10	1.6	9,635
2027	17	16	31	47	0.07	1.1	1.1	2.2	1.0	0.25	1.3	—	8,636	8,636	0.31	0.14	4.0	8,689
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	5.4	4.6	40	39	0.08	1.8	3.5	5.3	1.7	1.1	2.8	—	9,548	9,548	0.37	0.12	0.08	9,587
2027	17	16	31	45	0.07	1.1	1.1	2.2	1.0	0.25	1.3	—	8,517	8,517	0.31	0.14	0.10	8,567
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.0	1.7	15	15	0.03	0.68	1.5	2.2	0.62	0.56	1.2	—	3,349	3,349	0.13	0.04	0.33	3,365
2027	7.5	7.1	17	25	0.04	0.61	0.58	1.2	0.56	0.14	0.70	—	4,875	4,875	0.18	0.08	0.98	4,905
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.37	0.31	2.7	2.8	0.01	0.12	0.27	0.39	0.11	0.10	0.22	—	555	555	0.02	0.01	0.05	557
2027	1.4	1.3	3.2	4.6	0.01	0.11	0.11	0.22	0.10	0.03	0.13	—	807	807	0.03	0.01	0.16	812

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	14	13	9.5	67	0.16	0.38	12	13	0.38	3.1	3.4	82	19,790	19,873	9.0	0.63	47	20,332
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	13	12	9.9	46	0.15	0.38	12	13	0.37	3.1	3.4	82	18,510	18,592	9.0	0.65	3.1	19,014
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	13	12	8.3	52	0.14	0.24	12	12	0.23	3.0	3.2	82	16,420	16,502	9.0	0.65	21	16,941
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.3	2.2	1.5	9.5	0.03	0.04	2.2	2.2	0.04	0.55	0.59	14	2,719	2,732	1.5	0.11	3.5	2,805

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.6	6.1	6.1	58	0.14	0.11	12	12	0.10	3.1	3.2	—	14,317	14,317	0.44	0.58	45	14,546
Area	7.2	7.1	2.3	8.7	0.01	0.19	—	0.19	0.19	—	0.19	0.00	2,905	2,905	0.06	0.01	—	2,908
Energy	0.13	0.06	1.1	0.46	0.01	0.09	—	0.09	0.09	—	0.09	—	2,363	2,363	0.22	0.01	—	2,372
Water	—	—	—	—	—	—	—	—	—	—	—	11	206	217	1.1	0.03	—	254
Waste	—	—	—	—	—	—	—	—	—	—	—	71	0.00	71	7.1	0.00	—	249
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.9	1.9
Total	14	13	9.5	67	0.16	0.38	12	13	0.38	3.1	3.4	82	19,790	19,873	9.0	0.63	47	20,332
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.9	5.4	6.6	44	0.13	0.11	12	12	0.10	3.1	3.2	—	13,057	13,057	0.46	0.60	1.2	13,249
Area	6.5	6.4	2.3	0.97	0.01	0.18	—	0.18	0.18	—	0.18	0.00	2,885	2,885	0.05	0.01	—	2,888
Energy	0.13	0.06	1.1	0.46	0.01	0.09	—	0.09	0.09	—	0.09	—	2,363	2,363	0.22	0.01	—	2,372
Water	—	—	—	—	—	—	—	—	—	—	—	11	206	217	1.1	0.03	—	254
Waste	—	—	—	—	—	—	—	—	—	—	—	71	0.00	71	7.1	0.00	—	249
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.9	1.9
Total	13	12	9.9	46	0.15	0.38	12	13	0.37	3.1	3.4	82	18,510	18,592	9.0	0.65	3.1	19,014
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Mobile	5.9	5.4	6.7	47	0.13	0.11	12	12	0.10	3.0	3.1	—	13,193	13,193	0.46	0.61	19	13,405
Area	6.7	6.6	0.55	4.1	< 0.005	0.04	—	0.04	0.04	—	0.04	0.00	658	658	0.01	< 0.005	—	659
Energy	0.13	0.06	1.1	0.46	0.01	0.09	—	0.09	0.09	—	0.09	—	2,363	2,363	0.22	0.01	—	2,372
Water	—	—	—	—	—	—	—	—	—	—	—	11	206	217	1.1	0.03	—	254
Waste	—	—	—	—	—	—	—	—	—	—	—	71	0.00	71	7.1	0.00	—	249
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.9	1.9
Total	13	12	8.3	52	0.14	0.24	12	12	0.23	3.0	3.2	82	16,420	16,502	9.0	0.65	21	16,941
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.1	0.99	1.2	8.6	0.02	0.02	2.2	2.2	0.02	0.55	0.57	—	2,184	2,184	0.08	0.10	3.2	2,219
Area	1.2	1.2	0.10	0.74	< 0.005	0.01	—	0.01	0.01	—	0.01	0.00	109	109	< 0.005	< 0.005	—	109
Energy	0.02	0.01	0.20	0.08	< 0.005	0.02	—	0.02	0.02	—	0.02	—	391	391	0.04	< 0.005	—	393
Water	—	—	—	—	—	—	—	—	—	—	—	1.8	34	36	0.19	< 0.005	—	42
Waste	—	—	—	—	—	—	—	—	—	—	—	12	0.00	12	1.2	0.00	—	41
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.32	0.32
Total	2.3	2.2	1.5	9.5	0.03	0.04	2.2	2.2	0.04	0.55	0.59	14	2,719	2,732	1.5	0.11	3.5	2,805

3. Construction Emissions Details

3.1. Site Preparation (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.6	3.8	35	31	0.05	1.8	—	1.8	1.6	—	1.6	—	5,532	5,532	0.22	0.04	—	5,551

Dust From Material Movement	—	—	—	—	—	—	5.7	5.7	—	2.7	2.7	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.50	0.42	3.8	3.4	0.01	0.19	—	0.19	0.18	—	0.18	—	606	606	0.02	< 0.005	—	608
Dust From Material Movement	—	—	—	—	—	—	0.62	0.62	—	0.29	0.29	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.08	0.69	0.62	< 0.005	0.04	—	0.04	0.03	—	0.03	—	100	100	< 0.005	< 0.005	—	101
Dust From Material Movement	—	—	—	—	—	—	0.11	0.11	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.08	1.4	0.00	0.00	0.24	0.24	0.00	0.06	0.06	—	257	257	0.01	0.01	0.87	261

Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	62	62	< 0.005	0.01	0.16	65
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	26	26	< 0.005	< 0.005	0.04	26
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.8	6.8	< 0.005	< 0.005	0.01	7.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.3	4.3	< 0.005	< 0.005	0.01	4.3
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.1	1.1	< 0.005	< 0.005	< 0.005	1.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	5.3	4.5	39	38	0.08	1.8	—	1.8	1.7	—	1.7	—	9,100	9,100	0.37	0.07	—	9,131
Dust From Material Movement	—	—	—	—	—	—	3.1	3.1	—	1.0	1.0	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	5.3	4.5	39	38	0.08	1.8	—	1.8	1.7	—	1.7	—	9,100	9,100	0.37	0.07	—	9,131
Dust From Material Movement	—	—	—	—	—	—	3.1	3.1	—	1.0	1.0	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	0.98	8.6	8.3	0.02	0.40	—	0.40	0.37	—	0.37	—	1,994	1,994	0.08	0.02	—	2,001
Dust From Material Movement	—	—	—	—	—	—	0.68	0.68	—	0.22	0.22	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	0.18	1.6	1.5	< 0.005	0.07	—	0.07	0.07	—	0.07	—	330	330	0.01	< 0.005	—	331
Dust From Material Movement	—	—	—	—	—	—	0.12	0.12	—	0.04	0.04	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.15	0.13	0.12	2.2	0.00	0.00	0.37	0.37	0.00	0.09	0.09	—	400	400	0.02	0.01	1.4	406
Vendor	< 0.005	< 0.005	0.09	0.04	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	94	94	< 0.005	0.01	0.24	98
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.13	0.12	0.14	1.4	0.00	0.00	0.37	0.37	0.00	0.09	0.09	—	354	354	0.01	0.01	0.04	359
Vendor	< 0.005	< 0.005	0.10	0.04	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	94	94	< 0.005	0.01	0.01	98
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.36	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	80	80	< 0.005	< 0.005	0.13	81
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	21	21	< 0.005	< 0.005	0.02	21
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	0.01	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	13	13	< 0.005	< 0.005	0.02	13
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.4	3.4	< 0.005	< 0.005	< 0.005	3.5
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2026) - Unmitigated

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

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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.1	2.6	23	30	0.06	0.89	—	0.89	0.81	—	0.81	—	5,571	5,571	0.23	0.05	—	5,590
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.29	0.24	2.2	2.8	0.01	0.08	—	0.08	0.08	—	0.08	—	523	523	0.02	< 0.005	—	525
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.40	0.52	< 0.005	0.02	—	0.02	0.01	—	0.01	—	87	87	< 0.005	< 0.005	—	87
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.23	0.21	0.24	2.5	0.00	0.00	0.64	0.64	0.00	0.15	0.15	—	620	620	0.01	0.02	0.06	628
Vendor	0.01	0.01	0.36	0.15	< 0.005	< 0.005	0.09	0.10	< 0.005	0.03	0.03	—	344	344	< 0.005	0.05	0.02	358
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.02	0.02	0.02	0.27	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	60	60	< 0.005	< 0.005	0.10	61
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	32	32	< 0.005	< 0.005	0.04	34
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.9	9.9	< 0.005	< 0.005	0.02	10
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.3	5.3	< 0.005	< 0.005	0.01	5.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.0	2.5	22	30	0.06	0.79	—	0.79	0.73	—	0.73	—	5,571	5,571	0.23	0.05	—	5,590
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.0	2.5	22	30	0.06	0.79	—	0.79	0.73	—	0.73	—	5,571	5,571	0.23	0.05	—	5,590
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	2.0	1.7	15	20	0.04	0.53	—	0.53	0.49	—	0.49	—	3,750	3,750	0.15	0.03	—	3,763
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.36	0.30	2.8	3.7	0.01	0.10	—	0.10	0.09	—	0.09	—	621	621	0.03	0.01	—	623
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.25	0.22	0.19	3.5	0.00	0.00	0.64	0.64	0.00	0.15	0.15	—	689	689	0.01	0.02	2.1	698
Vendor	0.01	0.01	0.33	0.14	< 0.005	< 0.005	0.09	0.10	< 0.005	0.03	0.03	—	336	336	< 0.005	0.04	0.77	350
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.20	0.22	2.3	0.00	0.00	0.64	0.64	0.00	0.15	0.15	—	610	610	0.01	0.02	0.06	617
Vendor	0.01	0.01	0.35	0.14	< 0.005	< 0.005	0.09	0.10	< 0.005	0.03	0.03	—	336	336	< 0.005	0.04	0.02	350
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.15	0.13	0.16	1.8	0.00	0.00	0.43	0.43	0.00	0.10	0.10	—	423	423	0.01	0.02	0.62	428
Vendor	0.01	0.01	0.24	0.10	< 0.005	< 0.005	0.06	0.07	< 0.005	0.02	0.02	—	226	226	< 0.005	0.03	0.23	235
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.03	0.32	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	70	70	< 0.005	< 0.005	0.10	71
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	37	37	< 0.005	< 0.005	0.04	39

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.9	10.0	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.39	0.39	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.9	10.0	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.39	0.39	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	1.4	2.0	< 0.005	0.06	—	0.06	0.06	—	0.06	—	311	311	0.01	< 0.005	—	312
Paving	0.08	0.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.26	0.37	< 0.005	0.01	—	0.01	0.01	—	0.01	—	51	51	< 0.005	< 0.005	—	52
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.06	1.1	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	211	211	< 0.005	0.01	0.66	214
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.07	0.72	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	187	187	< 0.005	0.01	0.02	189
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.17	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	39	39	< 0.005	< 0.005	0.06	40
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.5	6.5	< 0.005	< 0.005	0.01	6.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	1.1	1.5	< 0.005	0.03	—	0.03	0.02	—	0.02	—	178	178	0.01	< 0.005	—	179
Architectural Coatings	12	12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	1.1	1.5	< 0.005	0.03	—	0.03	0.02	—	0.02	—	178	178	0.01	< 0.005	—	179
Architectural Coatings	12	12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.06	0.46	0.62	< 0.005	0.01	—	0.01	0.01	—	0.01	—	73	73	< 0.005	< 0.005	—	73

Architect Coatings	5.0	5.0	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.08	0.11	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12	12	< 0.005	< 0.005	—	12
Architectural Coatings	0.90	0.90	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.71	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	141	141	< 0.005	< 0.005	0.44	142
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.04	0.48	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	124	124	< 0.005	< 0.005	0.01	126
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.22	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	53	53	< 0.005	< 0.005	0.08	53
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.7	8.7	< 0.005	< 0.005	0.01	8.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	6.6	6.1	6.1	58	0.14	0.11	12	12	0.10	3.1	3.2	—	14,317	14,317	0.44	0.58	45	14,546
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	6.6	6.1	6.1	58	0.14	0.11	12	12	0.10	3.1	3.2	—	14,317	14,317	0.44	0.58	45	14,546
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	5.9	5.4	6.6	44	0.13	0.11	12	12	0.10	3.1	3.2	—	13,057	13,057	0.46	0.60	1.2	13,249
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	5.9	5.4	6.6	44	0.13	0.11	12	12	0.10	3.1	3.2	—	13,057	13,057	0.46	0.60	1.2	13,249
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	1.1	0.99	1.2	8.6	0.02	0.02	2.2	2.2	0.02	0.55	0.57	—	2,184	2,184	0.08	0.10	3.2	2,219
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.1	0.99	1.2	8.6	0.02	0.02	2.2	2.2	0.02	0.55	0.57	—	2,184	2,184	0.08	0.10	3.2	2,219

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	989	989	0.09	0.01	—	995
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	989	989	0.09	0.01	—	995
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	989	989	0.09	0.01	—	995
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	989	989	0.09	0.01	—	995
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	164	164	0.02	< 0.005	—	165
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	164	164	0.02	< 0.005	—	165

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.13	0.06	1.1	0.46	0.01	0.09	—	0.09	0.09	—	0.09	—	1,374	1,374	0.12	< 0.005	—	1,378
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.13	0.06	1.1	0.46	0.01	0.09	—	0.09	0.09	—	0.09	—	1,374	1,374	0.12	< 0.005	—	1,378
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.13	0.06	1.1	0.46	0.01	0.09	—	0.09	0.09	—	0.09	—	1,374	1,374	0.12	< 0.005	—	1,378
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.13	0.06	1.1	0.46	0.01	0.09	—	0.09	0.09	—	0.09	—	1,374	1,374	0.12	< 0.005	—	1,378
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	0.02	0.01	0.20	0.08	< 0.005	0.02	—	0.02	0.02	—	0.02	—	227	227	0.02	< 0.005	—	228
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.02	0.01	0.20	0.08	< 0.005	0.02	—	0.02	0.02	—	0.02	—	227	227	0.02	< 0.005	—	228

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.27	0.13	2.3	0.97	0.01	0.18	—	0.18	0.18	—	0.18	0.00	2,885	2,885	0.05	0.01	—	2,888
Consumer Products	5.8	5.8	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.50	0.50	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.72	0.68	0.07	7.8	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	21	21	< 0.005	< 0.005	—	21
Total	7.2	7.1	2.3	8.7	0.01	0.19	—	0.19	0.19	—	0.19	0.00	2,905	2,905	0.06	0.01	—	2,908
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.27	0.13	2.3	0.97	0.01	0.18	—	0.18	0.18	—	0.18	0.00	2,885	2,885	0.05	0.01	—	2,888

Consumer	5.8	5.8	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.50	0.50	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	6.5	6.4	2.3	0.97	0.01	0.18	—	0.18	0.18	—	0.18	0.00	2,885	2,885	0.05	0.01	—	2,888
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.01	0.01	0.09	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01	0.00	107	107	< 0.005	< 0.005	—	107
Consumer Products	1.1	1.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.09	0.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.06	0.06	0.01	0.70	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.7	1.7	< 0.005	< 0.005	—	1.7
Total	1.2	1.2	0.10	0.74	< 0.005	0.01	—	0.01	0.01	—	0.01	0.00	109	109	< 0.005	< 0.005	—	109

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	11	206	217	1.1	0.03	—	254

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	11	206	217	1.1	0.03	—	254
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	11	206	217	1.1	0.03	—	254
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	11	206	217	1.1	0.03	—	254
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1.8	34	36	0.19	< 0.005	—	42
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	1.8	34	36	0.19	< 0.005	—	42

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	71	0.00	71	7.1	0.00	—	249

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	71	0.00	71	7.1	0.00	—	249
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	71	0.00	71	7.1	0.00	—	249
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	71	0.00	71	7.1	0.00	—	249
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	12	0.00	12	1.2	0.00	—	41
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	12	0.00	12	1.2	0.00	—	41

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.9	1.9

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.9	1.9
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.9	1.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.9	1.9
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.32	0.32
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.32	0.32

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	6/1/2026	7/24/2026	5.0	40	—
Grading	Grading	7/25/2026	11/13/2026	5.0	80	—
Building Construction	Building Construction	11/14/2026	12/10/2027	5.0	280	—
Paving	Paving	8/29/2027	12/10/2027	5.0	75	—
Architectural Coating	Architectural Coating	5/17/2027	12/10/2027	5.0	150	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.0	8.0	367	0.40
Site Preparation	Crawler Tractors	Diesel	Average	4.0	8.0	87	0.43
Grading	Excavators	Diesel	Average	3.0	8.0	36	0.38
Grading	Graders	Diesel	Average	1.00	8.0	148	0.41

Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.0	367	0.40
Grading	Scrapers	Diesel	Average	3.0	8.0	423	0.48
Grading	Crawler Tractors	Diesel	Average	3.0	8.0	87	0.43
Building Construction	Cranes	Diesel	Average	2.0	8.0	367	0.29
Building Construction	Forklifts	Diesel	Average	6.0	8.0	82	0.20
Building Construction	Generator Sets	Diesel	Average	3.0	8.0	14	0.74
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	6.0	8.0	84	0.37
Building Construction	Welders	Diesel	Average	3.0	8.0	46	0.45
Paving	Pavers	Diesel	Average	2.0	8.0	81	0.42
Paving	Paving Equipment	Diesel	Average	2.0	8.0	89	0.36
Paving	Rollers	Diesel	Average	2.0	8.0	36	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	8.0	37	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	Worker	18	19	LDA,LDT1,LDT2
Site Preparation	Vendor	2.0	10	HHDT,MHDT
Site Preparation	Hauling	0.00	20	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	28	19	LDA,LDT1,LDT2
Grading	Vendor	3.0	10	HHDT,MHDT
Grading	Hauling	0.00	20	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	49	19	LDA,LDT1,LDT2
Building Construction	Vendor	11	10	HHDT,MHDT
Building Construction	Hauling	0.00	20	HHDT

Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	15	19	LDA,LDT1,LDT2
Paving	Vendor	—	10	HHDT,MHDT
Paving	Hauling	0.00	20	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	10.0	19	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10	HHDT,MHDT
Architectural Coating	Hauling	0.00	20	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	540,979	180,326	0.00	0.00	29,142

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	—	—	140	0.00	0.00
Grading	—	—	440	0.00	0.00
Paving	0.00	0.00	0.00	0.00	13

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

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Single Family Housing	1.5	0%
Paving	Other Asphalt Surfaces	11	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

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

5.9. 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
Single Family Housing	1,245	1,237	1,155	449,331	17,197	17,088	15,952	6,206,403
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Single Family Housing	Wood Fireplaces	0	0

Single Family Housing	Gas Fireplaces	137	137
Single Family Housing	Propane Fireplaces	0	0
Single Family Housing	Electric Fireplaces	0	0
Single Family Housing	No Fireplaces	0	0
Single Family Housing	Conventional Wood Stoves	0	0
Single Family Housing	Catalytic Wood Stoves	0	0
Single Family Housing	Non-Catalytic Wood Stoves	0	0
Single Family Housing	Pellet Wood Stoves	0	0
Other Asphalt Surfaces	Wood Fireplaces	0	0
Other Asphalt Surfaces	Gas Fireplaces	0	0
Other Asphalt Surfaces	Propane Fireplaces	0	0
Other Asphalt Surfaces	Electric Fireplaces	0	0
Other Asphalt Surfaces	No Fireplaces	0	0
Other Asphalt Surfaces	Conventional Wood Stoves	0	0
Other Asphalt Surfaces	Catalytic Wood Stoves	0	0
Other Asphalt Surfaces	Non-Catalytic Wood Stoves	0	0
Other Asphalt Surfaces	Pellet Wood Stoves	0	0

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)
undefined	540,979	180,326	0.00	0.00	29,142

5.10.3. Landscape Equipment

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

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	1,042,518	346	0.0330	0.0040	4,286,691
Other Asphalt Surfaces	0.00	346	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	5,710,321	43,419,257
Other Asphalt Surfaces	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	132	0.00
Other Asphalt Surfaces	0.00	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

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

Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.5	2.5	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

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	32	annual days of extreme heat
Extreme Precipitation	0.05	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	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	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A

Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

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

6.3. Adjusted Climate Risk Scores

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

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

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	91
AQ-PM	6.1
AQ-DPM	4.0
Drinking Water	59
Lead Risk Housing	56
Pesticides	0.00
Toxic Releases	9.6
Traffic	4.3
Effect Indicators	—
CleanUp Sites	0.00
Groundwater	32
Haz Waste Facilities/Generators	0.00
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	36
Cardio-vascular	100
Low Birth Weights	5.3
Socioeconomic Factor Indicators	—
Education	48
Housing	—
Linguistic	—
Poverty	81
Unemployment	82

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	54.1511613
Employed	5.774412935
Median HI	42.80764789
Education	—
Bachelor's or higher	51.84139612
High school enrollment	100
Preschool enrollment	40.80585141
Transportation	—
Auto Access	50.17323239
Active commuting	66.77787758
Social	—
2-parent households	26.39548313
Voting	64.64776081
Neighborhood	—
Alcohol availability	79.64840241
Park access	7.840369562
Retail density	8.084178109
Supermarket access	19.26087514
Tree canopy	0.179648402
Housing	—
Homeownership	43.62889773
Housing habitability	83.01039394
Low-inc homeowner severe housing cost burden	39.70229693
Low-inc renter severe housing cost burden	93.51982548

Uncrowded housing	96.93314513
Health Outcomes	—
Insured adults	66.05928397
Arthritis	0.0
Asthma ER Admissions	60.0
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	23.0
Cognitively Disabled	76.7
Physically Disabled	55.6
Heart Attack ER Admissions	5.6
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0

Children	16.3
Elderly	32.8
English Speaking	84.8
Foreign-born	9.0
Outdoor Workers	12.8
Climate Change Adaptive Capacity	—
Impervious Surface Cover	95.7
Traffic Density	10.4
Traffic Access	23.0
Other Indices	—
Hardship	41.6
Other Decision Support	—
2016 Voting	58.5

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	28
Healthy Places Index Score for Project Location (b)	41
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

8.1. Justifications

Screen	Justification
Construction: Construction Phases	Construction schedule based on a 2027 opening year
Construction: Off-Road Equipment	Quantity of equipment adjusted based on changes made to the construction schedule
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Site Preparation, Grading, and Building Construction
Operations: Vehicle Data	Trip rates based on ITE 12th Edition LU Code 210
Operations: Hearths	Rule 445

This page intentionally left blank