Appendix B
Air Quality / Greenhouse Gas Analysis

SAN MARINO CENTER IMPROVEMENT PROJECT

AIR QUALITY/GREENHOUSE GAS STUDY

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SAN MARINO CENTER IMPROVEMENT PROJECT
SAN MARINO, CALIFORNIA

AIR QUALITY and GREENHOUSE GAS STUDY

Table of Contents

Page

Cover Letter

PROJECT DESCRIPTION 1

SETTING 2
- Air Pollution Regulation 2
- Regional Climate and Local Air Quality 9
- Air Quality Management Plan 10
- Sensitive Receptors 11

AIR QUALITY IMPACT ANALYSIS 11
- Methodology and Significance Thresholds 11
- Construction Emissions 12
- Long-Term Regional Impacts 16

GREENHOUSE GAS EMISSION DISCUSSION 20

CLIMATE CHANGE IMPACT ANALYSIS 30
- Estimate of GHG Emissions 32

REFERENCES 36

List of Figures

Figure 1 Vicinity Map 3
Figure 2 Site Plan 4

List of Tables

Table 1 Current Federal and State Ambient Air Quality Standards 5
Table 2 Ambient Air Quality Data 10
Table 3 Estimated Maximum Daily Construction Emissions 14
Table 4 SCAQMD LSTs for Construction 15
Table 5 Estimated Operational Emissions 17
Table 6 Estimated Construction Related Greenhouse Gas Emissions 32
Table 7 Estimated Annual Energy-Related Greenhouse Gas Emissions 33
Table 8 Existing and Proposed Estimated Annual Solid Waste and Water Use Greenhouse Gas Emissions 33
Table 9 Estimated Annual Mobile Emissions of Greenhouse Gases 34

Table 10 Combined Annual Greenhouse Gas Emissions.....34

Appendices

Appendix A CalEEMod Air Quality and Greenhouse Gas Emissions Model Results – Summer/Annual Emissions

SAN MARINO COMMUNITY CENTER IMPROVEMENT PROJECT
SAN MARINO, CALIFORNIA

AIR QUALITY and GREENHOUSE GAS STUDY

This report is an analysis of the potential air quality and greenhouse gas impacts associated with the proposed San Marino Community Center Improvement project in the City of San Marino, California located in Los Angeles County. This report has been prepared by Birdseye Planning Group (BPG) under contract to ELMT Consulting, Inc., to support preparation of the environmental documentation pursuant to the California Environmental Quality Act (CEQA). This study analyzes the potential for temporary impacts associated with construction activity and long-term impacts associated with operation of the proposed project.

PROJECT DESCRIPTION

The San Marino Center Improvement Project (Project) is located at 1800 Huntington Drive, San Marino, which is the south side of Huntington Drive, adjacent and east of the Huntington Middle School and west and adjacent to the Crowell Public Library, identified by Los Angeles County Assessor's Parcel Number (APNs) 5334-024-903.The site currently supports an existing community center. The Project proposes to change the San Marino Center (SMC) building façade from a Modern Colonial Revival to a Spanish Mediterranean architectural style which is similar to adjacent buildings. Other upgrades include rehabilitation of the building interior to include additional offices to accommodate six City Recreation Department staff, optimize the interior public gathering space, and repair/replace the heating/air conditioning, plumbing and electrical systems and light fixtures to current building code standards.

The proposed interior space reconfiguration will allow for an occupancy rating of 1,083. Access to the site is via two driveways – one fronting Huntington Drive and the other along West Street east of the site. Access would not be changed with implementation of the project.

Exterior improvements include the following are comprised of the following:

- Replace the decorative wrought iron posts with stucco columns;
- Replace the wood shingled roof with the terra cotta tile;
- Replace doors and windows to match existing rectangular and square shapes but with grid patterns similar to the library windows as appropriate;
- Add wood accents where appropriate and complimentary such as around windows and the entry door;
- Add an open patio area at the back of the building that will have a stucco wall and a wood trellis ceiling similar to the open space areas at the library;
- Remove canopies that were added to the building after its original construction will be removed.
- New paint and stucco repair that will match the color of the library.

Exterior features that will remain intact or will not be impacted by the proposed improvements include the following:

- The cornerstone of the building inscribed with "San Marino Women's Club" near the building entry;
- Concrete walkway and concrete front patio; and
- Landscaping, including the large oak tree adjacent to the front entry, grassy areas and urban landscaping around the west and south of the building.

The project would not require ground disturbances associated with or grading. Minor demolition would be required. The majority of the work would be completed with hand tools or small pieces of equipment.

Adjacent land uses are vacant land to the Crowell Library to the east, a parking lot to the west; San Marino Unified School District offices to the south and Huntington Drive to the north. The proposed project is expected to be begin construction in early 2022 and be completed within 6-8 months. The project site is shown in Figure 1. The proposed floor plans is shown in Figure 2.

SETTING

Air Pollution Regulation

The federal and state governments have been empowered by the federal and state Clean Air Acts to regulate emissions of airborne pollutants and have established ambient air quality standards for the protection of public health. The EPA is the federal agency designated to administer air quality regulation, while the California Air Resources Board (ARB) is the state equivalent in California. Federal and state standards have been established for six criteria pollutants, including ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulates less than 10 and 2.5 microns in diameter (PM_{10} and $PM_{2.5}$), and lead (Pb). California has also set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. Table 1 lists the current federal and state standards for each of these pollutants. Standards have been set at levels intended to be protective of public health. California standards are generally more restrictive than federal standards for each of these pollutants except lead and the eight-hour average for CO.

Local control in air quality management is provided by the ARB through county-level or regional (multi-county) Air Pollution Control Districts (APCDs). The ARB establishes air quality standards and is responsible for control of mobile emission sources, while the local APCDs are responsible for enforcing standards and regulating stationary sources. The ARB has established 15 air basins statewide. The project site is located within the South Coast Air Basin (Basin), which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality conditions in the Basin are under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is required to

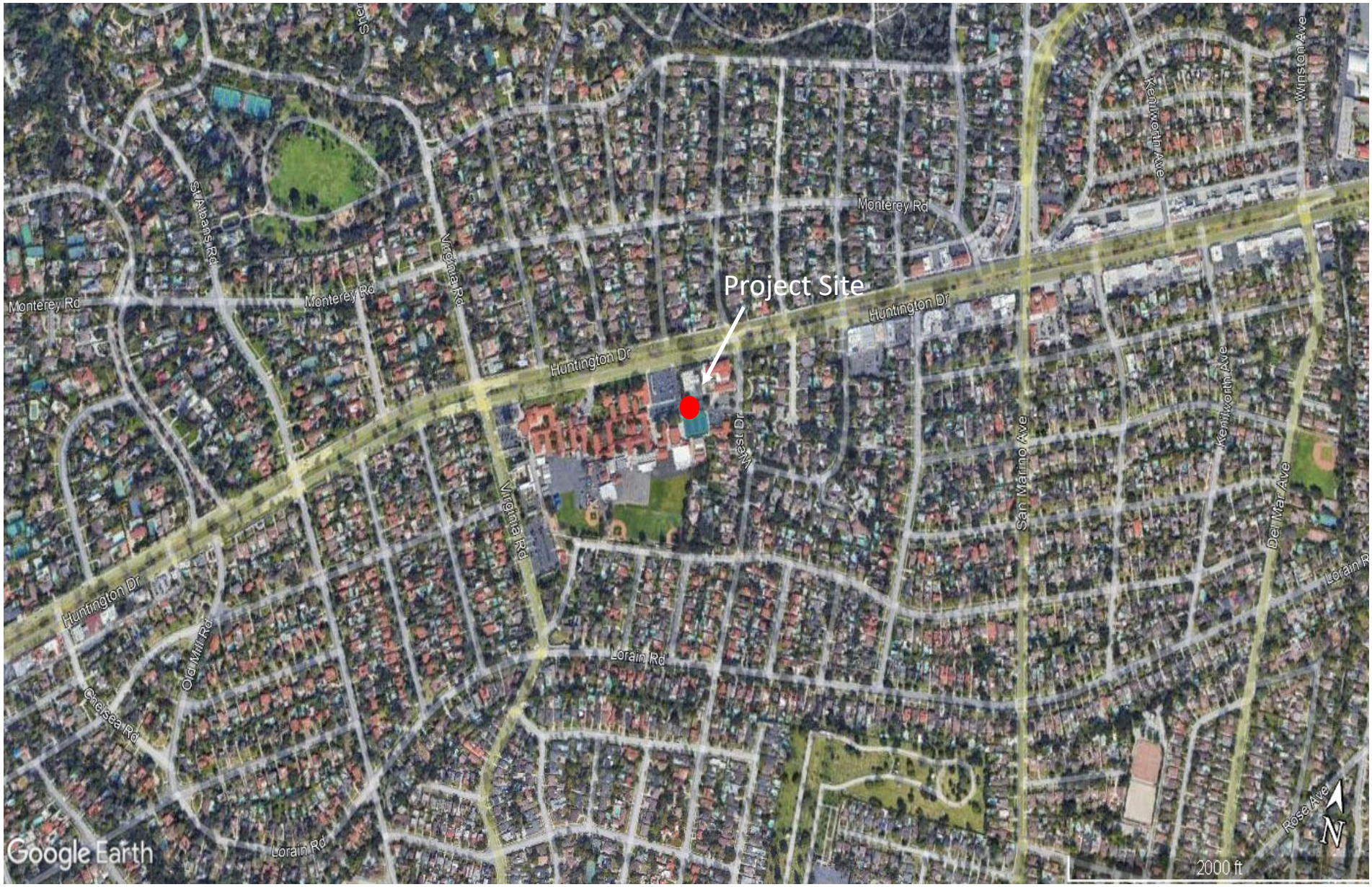

Figure 1—Vicinity Map

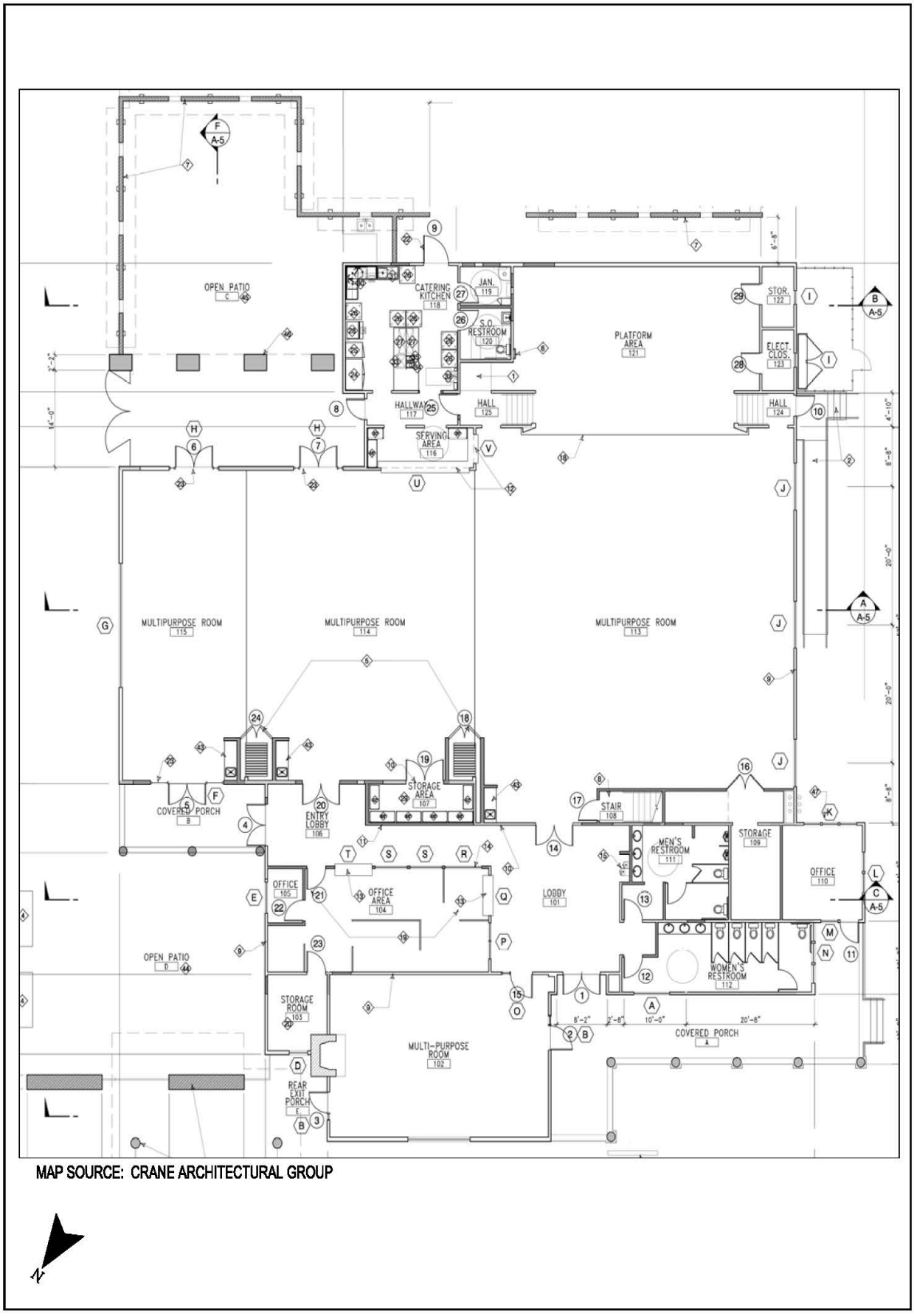

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Figure 2—Site Plan

Table 1
State and Federal Ambient Air Quality Standards

POLLUTANT	AVERAGE TIME	CALIFORNIA STANDARDS[1]		NATIONAL STANDARDS[2]		
		Concentration[3]	Method[4]	Primary[3, 5]	Secondary[3, 6]	Method[7]
Ozone[8] (O_3)	1 hour	0.09 ppm (180 µg/m³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 hours	0.070 ppm (137µg/m³)		0.070 ppm (137 µg/m³)		
Carbon Monoxide (CO)	8 hours	9.0 ppm (10 mg/m³)	Non-Dispersive Infrared Spectroscopy (NDIR)	9 ppm (10 mg/m³)	--	Non-Dispersive Infrared Spectroscopy (NDIR)
	1 hour	20 ppm (23 mg/m³)		35 ppm (40 mg/m³)		
Nitrogen Dioxide (NO_2)[10]	Annual Average	0.030 ppm (57 µg/m³)	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m³)	Same as Primary Standard	Gas Phase Chemiluminescence
	1 hour	0.18 ppm (339 µg/m³)		100 ppb (188 µg/m³)	--	
Sulfur Dioxide (SO_2)[11]	Annual Average	--	Ultraviolet Fluorescence	0.03 ppm (80 µg/m³)	--	Pararosaniline
	24 hours	0.04 ppm (105 µg/m³)		0.14 ppm (365 µg/m³)	--	
	3 hours	--		--	0.5 ppm (1300 µg/m³)	
	1 hour	0.25 ppm (655 µg/m³)		75 ppb (196 µg/m³)	--	
Respirable Particulate Matter (PM_{10})[9]	24 hours	50 µg/m³	Gravimetric or Beta Attenuation	150 µg/m³	150 µg/m³	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m³		--	--	
Fine Particulate Matter ($PM_{2.5}$)[9]	Annual Arithmetic Mean	12 µg/m³	Gravimetric or Beta Attenuation	12 µg/m³	15 µg/m³	Inertial Separation and Gravimetric Analysis
	24 hours	--		35 µg/m³	Same as Primary Standard	
Sulfates	24 hours	25 µg/m³	Ion Chromatography	--	--	--
Lead[12, 13] (Pb)	30-day Average	1.5 µg/m³	Atomic Absorption	--	--	High Volume Sampler and Atomic Absorption
	Calendar Quarter	--		1.5 µg/m³		

	3-month Rolling Average	--		0.15 μg/m^3	Same as Primary Standard	
Hydrogen Sulfide (H_2S)	1 hour	0.03 ppm (42 μg/m^3)	Ultraviolet Fluorescence	--	--	--
Vinyl Chloride[12]	24 hours	0.010 ppm (26 μg/m^3)	Gas Chromatography	--	--	--

Notes:

ppm = parts per million
μg/m^3 = micrograms per cubic meter
mg/m^3 = milligrams per cubic meter
Source: California Air Resources Board 2017

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 μg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the CARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
9. On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 μg/ m^3 to 12.0 μg/ m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 μg/ m^3, as was the annual secondary standard of 15 μg/ m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 μg/ m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units

of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

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

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

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

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

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

monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in "attainment" or "non-attainment." The Basin, in which the project area is located, is a non-attainment area for both the federal and state standards for ozone and $PM_{2.5}$. The Basin is designated nonattainment for state standards and a maintenance area for federal PM_{10} standards. For nitrogen oxide and carbon monoxide, the Basin is designated attainment for state standards and unclassified/attainment for federal standards. Characteristics of ozone, carbon monoxide, nitrogen dioxide, and suspended particulates are described below.

Ozone. Ozone is produced by a photochemical reaction (triggered by sunlight) between nitrogen oxides (NO_X) and reactive organic gases (ROG)[1]. Nitrogen oxides are formed during the combustion of fuels, while reactive organic compounds are formed during combustion and evaporation of organic solvents. Because ozone requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to ozone include

[1] Organic compound precursors of ozone are routinely described by a number of variations of three terms: hydrocarbons (HC), organic gases (OG), and organic compounds (OC). These terms are often modified by adjectives such as total, reactive, or volatile, and result in a rather confusing array of acronyms: HC, THC (total hydrocarbons), RHC (reactive hydrocarbons), TOG (total organic gases), ROG (reactive organic gases), TOC (total organic compounds), ROC (reactive organic compounds), and VOC (volatile organic compounds). While most of these differ in some significant way from a chemical perspective, from an air quality perspective two groups are important: non-photochemically reactive in the lower atmosphere, or photochemically reactive in the lower atmosphere (HC, RHC, ROG, ROC, and VOC).

children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide. Carbon monoxide is a local pollutant that is found in high concentrations only near the source. The major source of carbon monoxide, a colorless, odorless, poisonous gas, is automobile traffic. Elevated concentrations, therefore, are usually only found near areas of high traffic volumes. Carbon monoxide's health effects are related to its affinity for hemoglobin in the blood. At high concentrations, carbon monoxide reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduced lung capacity and impaired mental abilities.

Nitrogen Dioxide. Nitrogen dioxide (NO_2) is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. Nitrogen dioxide is an acute irritant. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light and causes a reddish-brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of PM_{10} and acid rain.

Suspended Particulates. PM_{10} is particulate matter measuring no more than 10 microns in diameter, while $PM_{2.5}$ is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly dust particles, nitrates and sulfates. Both PM_{10} and $PM_{2.5}$ are by-products of fuel combustion and wind erosion of soil and unpaved roads and are directly emitted into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with the small particulates (those between 2.5 and 10 microns in diameter) and fine particulates ($PM_{2.5}$) can be very different. The small particulates generally come from windblown dust and dust kicked up from mobile sources. The fine particulates are generally associated with combustion processes as well as being formed in the atmosphere as a secondary pollutant through chemical reactions. Fine particulate matter is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

Toxic Air Contaminants/Diesel Particulate Matter. Hazardous air pollutants, also known as toxic air pollutants (TACs) or air toxics, are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. Examples of toxic air pollutants include:

- benzene, which is found in gasoline;
- perchloroethylene, which is emitted from some dry-cleaning facilities; and
- methylene chloride, which is used as a solvent.

Transportation related emissions are focused on particulate matter constituents within diesel exhaust and TAC constituents that comprise a portion of total organic gas (TOG) emissions from both diesel and gasoline fueled vehicles. Diesel engine emissions are comprised of exhaust particulate matter and TOGs which are collectively defined for the purpose of an HRA, as Diesel Particulate Matter (DPM). DPM and TOG emissions from both diesel and gasoline fueled vehicles is typically composed of carbon particles and carcinogenic substances including polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. Diesel exhaust also contains gaseous pollutants, including volatile organic compounds and oxides of nitrogen (NO_x). Information on TAC and DPM is provided herein for reference only. The project would not be a sensitive air emission receptor. Temporary construction emissions would be limited to contractor vehicles, material deliveries and equipment use. While diesel fueled vehicles would generate DPM and TACs, the quantities would not justify further evaluation.

Regional Climate and Local Air Quality

South Coast Air Basin. The combination of topography, low mean mixing height, abundant sunshine, and emissions from the second largest urban area in the United States gives the SCAB the worst air pollution problem in the nation. Climate in the SCAB is determined by its terrain and geographical location. The SCAB consists of a coastal plain with connecting broad valleys and low hills. The Pacific Ocean forms the southwestern border, and high mountains surround the rest of the SCAB. The SCAB lies in the semi-permanent high-pressure zone of the eastern Pacific. The resulting climate is mild and is tempered by cool ocean breezes. This climatological pattern is rarely interrupted. However, periods of extremely hot weather, winter storms or easterly Santa Ana wind conditions can occur.

Annual average temperatures vary little throughout the SCAB, ranging from the low-to-middle 60s, measured in degrees Fahrenheit. With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. The majority of annual rainfall in the SCAB occurs between October and March. Summer rainfall is minimal and generally limited to scattered thundershowers in coastal regions and slightly heavier showers in the eastern portion of the SCAB and along the coastal side of the mountains. Average temperatures in winter months in the project area range from a low of 34 degrees F to a high of 68 degrees F. In the summer, average temperatures range from a low of 59 degrees F to a high of 98 degrees F. During an average year, the greatest amount of precipitation, 2.86 inches, occurs in February.

The SCAQMD operates a network of 38 ambient air monitoring stations throughout the South Coast Air Basin. The purpose of the monitoring stations is to measure ambient concentrations of the pollutants and determine whether the ambient air quality meets the California and federal standards. The air quality monitoring station located nearest to the project site is the Pasadena station, located approximately 1.3 miles northwest of the project site at 725 South Wilson Avenue. As referenced in Table 2, PM_{10} data were obtained from the Los Angles 1630 North Main Street monitoring station located approximately 8 miles southwest of the project site.

Table 2
Ambient Air Quality Data

Pollutant	2018	2019	2020
Ozone, ppm – First High 8-Hour Average (2015 Standard)	0.090	0.098	0.115
Number of days of above 2015 standard (>0.070 ppm)	19	24	60
Nitrogen Dioxide, ppm – First High National	68.2	59.1	61.2
Nitrogen Dioxide, ppm – First High State	68	59	61
Days above the State standard (>0.18 ppm)	0	0	0
Days above the national standard (>100 ppb)	0	0	0
Particulate Matter <10 microns, $\mu g/m^3$ First High Federal	68.2	62.4	83.7
Particulate Matter <10 microns, $\mu g/m^3$ First High State	81.2	93.9	185.2
Estimated number of days greater than national 24-hour standard (>150 $\mu g/m^3$)	0	*	0
Estimated number of days greater than state standard (>50 $\mu g/m^3$)	31	15	34
Particulate Matter <2.5 microns, $\mu g/m^3$ First High	32.5	41.8	67.7
Annual average (exceedances of 12 $\mu g/m^3$ standard not reported)	*	*	*
Number of samples of Federal exceedances (>12 $\mu g/m^3$)	0	1	2

Pasadena – 725 South Wilson Street Monitoring Station
Los Angeles – 1630 North Main Street
Note – Ozone, Nitrogen Dioxide and PM2.5 data from Pasadena Station; PM_{10} data from Los Angeles Station
**Data insufficient to determine the value*
Source: California Air Resources Board, 2018, 2019, 2020 Annual Air Quality Data Summaries available at https://www.arb.ca.gov/adam/topfour/topfour1.php

Table 2 provides a summary of monitoring data from the Pasadena station for ozone and nitrogen oxide and $PM_{2.5}$ and PM_{10} data from the Los Angeles monitoring station.

As shown, both the federal and state ozone standards were exceeded at the Pasadena monitoring station during each of the last three years. The federal PM_{10} standard was not exceeded during the last three years. Insufficient data was available to determine whether the state standard was exceeded.

Air Quality Management Plan

Under state law, the SCAQMD is required to prepare a plan for air quality improvement for pollutants for which the District is in non-compliance. The SCAQMD updates the plan every three years. Each iteration of the SCAQMD's Air Quality Management Plan (AQMP) is an update of the previous plan and has a 20-year horizon. SCAQMD adopted the 2016 AQMP in March 2017. The 2016 AQMP incorporates new scientific data and notable regulatory actions that have occurred since adoption of the 2012 AQMP.

The 2016 AQMP was prepared to ensure continued progress towards clean air and comply with state and federal requirements. This AQMP builds upon the approaches taken in the 2012 AQMP for the South Coast Air Basin for the attainment of State and federal ozone air quality standards. The 2016 AQMP incorporates the 2016 Regional Transportation Plan/Sustainable Communities Strategy and updated emission inventory methodologies for applicable source

categories. The 2016 AQMP also includes the new and changing federal requirements, implementation of new technology measures, and the continued development of economically sound, flexible compliance approaches. The 2016 AQMP is available to download at http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp.

Sensitive Receptors

Sensitive receptors include, but are not limited to, hospitals, schools, daycare facilities, elderly housing and convalescent facilities. These are areas where the occupants are more susceptible to the adverse effects of exposure to air pollutants. Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare as well that segment of the public most susceptible to respiratory distress, such as children under 14; the elderly over 65; persons engaged in strenuous work or exercise; and people with cardiovascular and chronic respiratory diseases. Nearby sensitive receptors are the Valentine Elementary School and Huntington Middle School located adjacent to and south/southwest and single-family residences located across Huntington Drive approximately 200 feet north/northwest and northeast of the site and adjacent to the site on the east side of West Drive.

AIR QUALITY IMPACT ANALYSIS

Methodology and Significance Thresholds

This air quality analysis conforms to the methodologies recommended in the SCAQMD's *CEQA Air Quality Handbook* (1993). The handbook includes thresholds for emissions associated with both construction and operation of proposed projects. All emissions were calculated using the California Emissions Estimator Model (CalEEMod) software version 2020.4.0.

Construction activities such as clearing, grading and excavation are common sources of diesel and dust emissions. Construction equipment that would generate criteria air pollutants includes excavators, graders, dump trucks, and loaders. The proposed project would not require grading or exterior ground disturbance. Improvements would primarily be limited to the building interior. Exterior improvements would consist of concrete demolition/removal, concrete work, landscaping and painting. Construction emissions associated with development of the proposed project by estimating the types of equipment (including the number) that would be used on-site during the demolition, building construction and painting phases. Construction emissions are analyzed using the regional thresholds established by the SCAQMD and published in the *CEQA Air Quality Handbook.*

Operational emissions include mobile source emissions, energy emissions, and area source emissions. Mobile source emissions are generated by motor vehicle trips associated with operation of the project. Emissions attributed to energy use include electricity and natural gas consumption for space and water heating. Area source emissions are generated by landscape maintenance equipment, consumer products and architectural coatings (i.e., paints).

To determine whether a regional air quality impact would occur, the increase in emissions are compared with the SCAQMD's recommended regional thresholds for operational emissions.

Regional Thresholds. Based on Appendix G of the *CEQA Guidelines (2021)*, a project would have a significant air quality impact if it would:

a) Conflict with or obstruct implementation of the applicable air quality plan;

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard;

c) Expose sensitive receptors to substantial pollutant concentrations;

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

The SCAQMD has developed specific quantitative thresholds that apply to projects within the SCAB. The following significance thresholds apply to short-term construction activities:

- *75 pounds per day of ROG*
- *100 pounds per day of NO_X*
- *550 pounds per day of CO*
- *150 pounds per day of SOx*
- *150 pounds per day of PM_{10}*
- *55 pounds per day of $PM_{2.5}$*

The following significance thresholds apply to long-term operational emissions:

- *55 pounds per day of ROG*
- *55 pounds per day of NO_X*
- *550 pounds per day of CO*
- *150 pounds per day of SO_X*
- *150 pounds per day of PM_{10}*
- *55 pounds per day of $PM_{2.5}$*

Construction Emissions

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from construction vehicles, work crew vehicle trips in addition to ROG that would be released during the drying

phase upon application of paint and other architectural coatings. Construction would generally consist of demolition, construction of the proposed building improvements and architectural coating (i.e., paint) application.

This analysis assumes the project would be required to comply with SCAQMD Rule 403, which identifies measures to reduce fugitive dust and is required to be implemented at all construction sites located within the South Coast Air Basin. Therefore, the following conditions, which are required to reduce fugitive dust in compliance with SCAQMD Rule 403, were included in CalEEMod for site preparation and grading phases of construction. It is assumed that only those applicable to the scope of construction activities would be implemented if needed.

1. **Minimization of Disturbance.** Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.
2. **Soil Treatment.** Construction contractors should treat all graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least three times daily, preferably in the late morning and after work is done for the day.
3. **Soil Stabilization.** Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials, shall be applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area shall be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.
4. **No Grading During High Winds.** Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).
5. **Street Sweeping.** Construction contractors should sweep all on-site driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

Construction emissions modeling for demolition, building construction and architectural coating application is based on the overall scope of the proposed development and construction phasing which is expected to begin mid-2022 and extend through late 2022. The total area

disturbed as a result of the project would be limited to the building interior and exterior landscape and hardscape. For modeling purposes, it was assumed the site would be watered two times daily. In addition to SCAQMD Rule 403 requirements, emissions modeling also accounts for the use of low-VOC paint (50 g/L for non-flat coatings) and 100 g/L for parking lot coating as required by SCAQMD Rule 1113. Table 3 summarizes the estimated maximum mitigated daily emissions of pollutants occurring during construction.

Table 3
Estimated Maximum Mitigated Daily Construction Emissions

Construction Phase		Maximum Emissions (lbs/day)				
	ROG	NO_x	CO	SOx	PM_{10}	$PM_{2.5}$
2022 Maximum lbs/day	20.2	7.1	7.8	0.01	0.45	0.36
SCAQMD Regional Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded 2022	**No**	**No**	**No**	**No**	**No**	**No**

As shown in Table 3, construction of the proposed project would not exceed the SCAQMD regional thresholds. No mitigation in addition to compliance with SCAQMD Rule 403 and Rule 1113 would be required to reduce construction emissions to less than significant.

Localized Significance Thresholds. The SCAQMD has published a "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds" (South Coast Air Quality Management District 2011). CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily disturbance activity possible for each piece of equipment. Construction-related emissions reported by CalEEMod are compared to the localized significance threshold lookup tables. In this case, the project does not require the use of heavy equipment for site preparation or grading work. However, some activities occurring on-site would generate dust; thus, the LST analysis is included herein to satisfy common methodology requirements for project in the SCAB. The CalEEMod output in Appendix A shows the equipment assumed for this analysis.

LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), project size and distance to the sensitive receptor. However, LSTs only apply to emissions within a fixed stationary location, including idling emissions during both project construction and operation. LSTs have been developed for NO_x, CO, PM_{10} and $PM_{2.5}$. LSTs are not applicable to mobile sources such as cars on a roadway (Final Localized Significance Threshold Methodology, SCAQMD, June 2003). However, according to SCAQMD LST methodology, LSTs would apply to the operational phase of a project, if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site; such as restaurants with drive thru windows

and warehouse/transfer facilities. The proposed project does not include such uses. Therefore, because there would be no stationary source emissions or on-site mobile equipment, no long-term LST analysis is needed.

LSTs have been developed for emissions within areas up to five acres in size, with air pollutant modeling recommended for activity within larger areas. The SCAQMD provides lookup tables for project sites that measure one, two, or five acres. Based the mix of construction used on-site, less than one acre would be disturbed during demolition, building construction and painting. site preparation and grading. To provide a conservative evaluation of project consistency with the LSTs, look up table values for a one acre were used. The project site is located in Source Receptor Area 11 (SRA-11, South San Gabriel Valley). LSTs for construction related emissions in the SRA 11 at varying distances between the source and receiving property are shown in Table 4.

Table 4
SCAQMD LSTs for Construction

Pollutant	Allowable emissions as a function of receptor distance in meters from a one-acre site (lbs/day)				
	25	50	100	200	500
Gradual conversion of NO_x to NO_2	83	84	96	123	193
CO	673	760	1,113	2,110	6,884
PM_{10}	5	13	29	60	153
$PM_{2.5}$	4	5	9	20	83

Source: http://www.aqmd.gov/CEQA/handbook/LST/appC.pdf, October 2009.

As referenced, the nearest sensitive receptors to the project site are the Valentine Elementary School and Huntington Middle School located adjacent to and southwest of the site. To provide a conservative evaluation of construction emissions relative to LST thresholds, allowable emissions for 25 meters were used. As shown in Table 3, total emissions of NOx, CO, PM_{10} and $PM_{2.5}$ would not exceed the LST thresholds shown in Table 4 for 25 meters.

Construction-Related Toxic Air Contaminant Impacts

The greatest potential for toxic air contaminant emissions is related to diesel particulate emissions associated with heavy equipment operations during project construction. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk". The California Office of Environmental Health Hazard Assessment (OEHHA) health risk guidance states that a residential receptor should be evaluated based on a 30-year exposure period. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the short-term construction schedule and the fact that no site preparation or grading activities would be

required, the proposed project would not result in a long-term (i.e., 30 or 70 year) exposure to a substantial source of toxic air contaminant emissions; and thus, would not be exposed to the related individual cancer risk. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the proposed project.

Construction-Related Odor Impacts

Potential sources of odor during construction activities include equipment exhaust. The objectionable odors that may be produced during the construction process would occur periodically and end when construction is completed. No significant impact related to odors would occur during construction of the proposed project per threshold (d) referenced above.

Long-Term Regional Impacts

Regional Pollutant Emissions

Table 5 summarizes emissions associated with operation of the proposed project. Operational emissions include emissions from electricity consumption (energy sources), vehicle trips (mobile sources), and area sources including landscape equipment and architectural coating emissions as the structures are repainted over the life of the project. The majority of operational emissions are associated with vehicle trips to and from the project site. Trip volumes are based on the trip generation rates in the Traffic Impact Assessment prepared for the proposed project by Linscott, Law and Greenspan, Inc. (September 2021).

Area source emissions from the project include stationary combustion emissions of natural gas used for space and water heating (shown in a separate row as energy), yard and landscape maintenance, consumer use of solvents and personal care products, and an average building square footage to be repainted each year. As shown in Table 5, daily unmitigated emissions would not exceed the SCAQMD thresholds for ROG, NO_X, CO, SO_X, PM_{10} or $PM_{2.5}$. Therefore, the project's regional air quality impacts (including impacts related to criteria pollutants, sensitive receptors and violations of air quality standards) would be less than significant per threshold b. Further, the project would not contribute to a cumulatively considerable impact. Impacts relative to threshold c would be less than significant.

Objectionable Odors

The proposed project would not have any components that would generate odors. No odor impacts would occur per threshold (d).

AQMP Consistency

A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. The 2016

Table 5
Estimated Operational Emissions

	Estimated Emissions (lbs/day)					
	ROG	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Proposed Project						
Area	0.2	0.01	0.01	0.0	0.0	0.0
Energy	0.01	0.06	0.4	0.01	0.01	0.01
Mobile	0.7	0.6	6.5	0.01	1.3	0.3
Maximum lbs/day	**1.0**	**0.7**	**6.5**	**0.01**	**1.3**	**0.3**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

See Appendix for CalEEMod version. 2020.4.0 computer model output - summer emissions shown.

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AQMP, the most recent AQMP adopted by the SCAQMD, incorporates local city General Plans and the Southern California Association of Government's (SCAG) Regional Transportation Plan socioeconomic forecast projections of regional population, housing and employment growth.

The proposed project involves remodeling the existing San Marino Center building. Vehicle trips associated with the project would be consistent with similar community center uses; and as discussed herein, project-related emissions would not exceed thresholds recommended by the SCAQMD. Thus, the project would be consistent with the AQMP and not cause an adverse impact under threshold (a).

Friant Ranch Case Overview and Project Applicability

In response to the California Supreme Court decision on December 24, 2018, Sierra Club v. County of Fresno (Friant Ranch), this section provides a discussion on the potential for identifiable health impacts to result from air pollutants analyzed in environmental documents prepared pursuant to the California Environmental Quality Act (CEQA). The discussion focuses on significant impacts and the feasibility of directly relating any identified significant adverse air quality impact to likely health consequences. The Supreme Court opinion in Friant Ranch requires projects with significant air quality impacts to relate the expected adverse air quality impacts to likely health consequences or explain why it is not feasible at the time of drafting to provide such an analysis, so that the public may make informed decisions regarding the costs and benefits of the project.

The purpose of CEQA is to inform the public as to the potential for a proposed project to result in one or more significant adverse effects on the environment (including health effects). This includes the potential for a project to result in a considerable contribution towards one or more significant cumulative impacts. CEQA does not require detailed analysis of impacts that are found to be less than significant or less than a considerable contribution to a significant cumulative impact. In accordance with CEQA requirements and the CEQA review process, air

quality impacts associated with proposed local plans and development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation. The State CEQA Guidelines Section 15064.7 states that the significance criteria established by the applicable air quality management district or air pollution control district, when available, may be relied upon to make determinations of significance.

As stated, the project is located within the SCAB under the jurisdiction of the SCAQMD. Riverside County defers to threshold guidance established by the SCAQMD and utilizes the SCAQMD's CEQA Air Quality Handbook (approved by the AQMD Governing Board in 1993) and subsequent guidance provided on the SCAQMD website. Note the SCAQMD is currently in the process of developing an Air Quality Analysis Guidance Handbook to replace the 1993 Handbook. In addition, when considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within proximity to land uses that emit TACs. CARB has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective (2005), which considers impacts to sensitive receptors from facilities that emit TAC emissions. CARB has also published Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory, a supplement to the handbook that is intended to provide scientifically based strategies to reduce exposure to traffic emissions near high-volume roadways to protect public health and promote equity and environmental justice. The SCAQMD has also adopted land use planning guidelines in the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005). Together, the documents introduce land use-related policies and strategies that rely on design and distance parameters to minimize emissions and lower potential health risks.

Federal and state ambient air quality standards are designed to prevent the harmful effects of air pollution. These standards are continually updated based on evolving research, including research which relates air quality impacts with health effects. At the regional level, plans such as the SCAQMD's AQMP and SCAG's RTP/SCS work to ensure that the South Coast Air Basin reaches and maintains attainment with these federal and state standards. At the local level, environmental documents evaluate a plan or project's consistency with applicable policies identified in the SCAQMD's AQMP and SCAG's RTP/SCS as well as regulatory compliance measures which work to limit risk and exposure to TACs. In addition, in evaluating air quality impacts at the project-level, the City of San Marino utilizes thresholds guidance and air quality models established by the SCAQMD, which have been developed to implement these regional plans for attainment and protection of public health. For local projects that exceed any identified SCAQMD air quality threshold, CEQA documents typically identify and disclose generalized health effects of certain air pollutants but are currently unable to establish a reliable connection between any local plan or project and a particular health effect. In addition, no expert agency has yet to approve a quantitative method to reliably and meaningfully do so. Many factors contribute to this uncertainty, including the regional scope of air quality monitoring and planning, technological limitations for modeling at a local plan- or project-level, and the intrinsically complex nature between air pollutants and health effects in conjunction with local environmental variables. Therefore, at the time, it is infeasible for CEQA documents

to directly link a project's significant air quality impacts with a specific health effect. However, as air quality modeling and research on health effects advances over time, the City will continue to seek the latest guidance from local air quality agencies and experts and refine its approach based on future information as it becomes available.

As stated herein, the proposed project will not exceed the daily emission thresholds established by the SCAQMD nor will operation expose nearby sensitive properties to levels of TACs that would cause or contribute to a health risk. Thus, for the purpose of this evaluation, potential project impacts have been adequately evaluated with respect to the Friant Ranch case and related findings.

GREENHOUSE GAS EMISSION DISCUSSION

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Man-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and sulfur hexafluoride (SF_6) (California Environmental Protection Agency [CalEPA], 2006). Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2E), and is the amount of a GHG emitted multiplied by its GWP. Carbon dioxide has a GWP of one. By contrast, methane (CH_4) has a GWP of 28, meaning its global warming effect is 28 times greater than carbon dioxide on a molecule per molecule basis (IPCC, 2014).

Total U.S. GHG emissions were 6,577 MMT CO_2E in 2019 (U.S. EPA, February 2021). Total U.S. emissions decreased from 2018 to 2019 by 1.8 percent primarily as a result of less fossil fuel combustion. Total U.S. emissions have increased by 2.0 percent from 1990 to 2019, down from a high of 15.7 percent above 1990 levels in 2007. Emissions decreased from 2018 to 2019 by 1.7 percent (116.0 MMT CO2e). Net emissions (including sinks) were 5,788 MMT CO2e. Overall, net emissions decreased 1.8 percent from 2018 to 2019 and decreased 12.9 percent from 2005 levels. The decline reflects many long-term trends, including population, economic growth, energy market trends, technological changes including energy efficiency and carbon intensity of energy

fuel choices. Between 2018 and 2019, the decrease in total greenhouse gas emissions was largely driven by the decrease in CO2 emissions from fossil fuel combustion. The decrease in CO2 emissions from fossil fuel combustion was a result of a 1.3 percent decrease in total energy use and reflects a continued shift from coal to less carbon intensive natural gas and renewables. (U.S. EPA, February 2021).

In 2018, statewide emissions from GHG emitting activities statewide were 425 million metric tons of carbon dioxide equivalent (MMTCO2e), 0.8 MMTCO2e higher than 2017 levels and 6 MMTCO2e below the 2020 GHG Limit of 431 MMTCO2e. California statewide GHG emissions dropped below the 2020 GHG Limit in 2016 and have remained below the 2020 GHG Limit since then. Transportation emissions decreased in 2018 compared to the previous year, which is the first year over year decrease since 2013. Since 2008, California's electricity sector has followed an overall downward trend in emissions. In 2018, solar power generation has continued to grow. Emissions from high-GWP gases increased 2.3 percent in 2018 (2000-2018 average year-over year increase is 6.8 percent), continuing the increasing trend as Ozone Depleting Substances (ODS) are phased out under the 1987 Montreal Protocol.

The largest source of GHG in California is transportation, contributing 39.9 percent of the state's total GHG emissions. The industrial sector is the second largest source, contributing 21 percent of the state's GHG emissions. California emissions result in part to its geographic size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions, as compared to other states, is its relatively mild climate. In July 2017, California's state legislature passed Assembly Bill (AB) 398 to reauthorize and extend until 2030 the state's economy-wide greenhouse gas (GHG) reduction program. The bill sets a new GHG target of at least 40% below the 1990 level of emissions by 2030.

California Regulations

In 2005, former Governor Schwarzenegger issued Executive Order (EO) S-3-05, establishing statewide GHG emissions reduction targets. EO S-3-05 states that by 2020, emissions shall be reduced to 1990 levels; and by 2050, emissions shall be reduced to 80 percent of 1990 levels (CalEPA, 2006). In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report") (CalEPA, 2006). The 2006 CAT Report recommended various strategies that the state could pursue to reduce GHG emissions. These strategies could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture.

Assembly Bill 32 and CARB's Scoping Plan

To further the goals established in EO S-3-05, the Legislature passed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG

emissions to 1990 levels by 2020. Under AB 32, CARB is responsible for and is recognized as having the expertise to carry out and develop the programs and requirements necessary to achieve the GHG emissions reduction mandate of AB 32. Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions from specified sources. This program is used to monitor and enforce compliance with established standards. CARB also is required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 authorized CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

In 2007, CARB approved a limit on the statewide GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 MMT CO_2E). CARB's adoption of this limit is in accordance with Health and Safety Code, Section 38550.

Further, in 2008, CARB adopted the Scoping Plan in accordance with Health and Safety Code, Section 38561. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions for various emission sources/sectors to 1990 levels by 2020. The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction features by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program. The key elements of the Scoping Plan include the following (CARB 2008):

1. Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards;
2. Achieving a statewide renewable energy mix of 33%;
3. Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions;
4. Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets;
5. Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard; and
6. Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

In the Scoping Plan (CARB 2008), CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of approximately 28.5% from the otherwise projected 2020 emissions level (i.e., those emissions that would occur in 2020) absent GHG reducing laws and regulations (referred to as Business-As-Usual (BAU)). To calculate this percentage reduction, CARB assumed that all new electricity generation would be supplied by

natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards.

In the 2011 Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (CARB 2011a), CARB revised its estimates of the projected 2020 emissions level in light of the economic recession and the availability of updated information about GHG reduction regulations. Based on the new economic data, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 21.7% (down from 28.5%) from the BAU conditions. When the 2020 emissions level projection was updated to account for newly implemented regulatory measures, including Pavley I (model years 2009–2016) and the Renewables Portfolio Standard (RPS) (12% to 20%), CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of 16% (down from 28.5%) from the BAU conditions.

In 2014, CARB adopted the First Update to the Climate Change Scoping Plan: Building on the Framework (First Update; CARB 2014). The stated purpose of the First Update is to "highlight California's success to date in reducing its GHG emissions and lay the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80% below 1990 levels by 2050" (CARB 2014). The First Update found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels needed to stay on track to reduce emissions to 80% below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.

In conjunction with the First Update, CARB identified "six key focus areas comprising major components of the state's economy to evaluate and describe the larger transformative actions that will be needed to meet the state's more expansive emission reduction needs by 2050" (CARB 2014). Those six areas are (1) energy, (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure), (3) agriculture, (4) water, (5) waste management, and (6) natural and working lands. The First Update identifies key recommended actions for each sector that will facilitate achievement of EO S-3-05's 2050 reduction goal (CARB 2014).

Based on CARB's research efforts presented in the First Update, it has a "strong sense of the mix of technologies needed to reduce emissions through 2050" (CARB 2014). Those technologies include energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies. As part of the First Update, CARB recalculated the state's 1990 emissions level using more recent GWPs identified by the IPCC. Using the recalculated 1990 emissions level (431 MMT CO_2E) and the revised 2020-emissions-level projection identified in the 2011 Final Supplement, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of approximately 15% (instead of 28.5% or 16%) from the BAU conditions (CARB 2014).

In January 2017, CARB released, *The 2017 Climate Change Scoping Plan Update (*Second Update; CARB 2017b), for public review and comment. This update proposes CARB's strategy for achieving the state's 2030 GHG target as established in Senate Bill (SB) 32 (discussed below), including continuing the Cap-and-Trade Program through 2030, and includes a new approach to reduce GHGs from refineries by 20%. The Second Update incorporates approaches to cutting short-lived climate pollutants (SLCPs) under the Short-Lived Climate Pollutant Reduction Strategy (a planning document that was adopted by CARB in March 2017), acknowledges the need for reducing emissions in agriculture, and highlights the work underway to ensure that California's natural and working lands increasingly sequester carbon. During development of the Second Update, CARB held a number of public workshops in the Natural and Working Lands, Agriculture, Energy, and Transportation sectors to inform development of the 2030 Scoping Plan Update (CARB 2016). The Second Update has not been considered by CARB's Governing Board at the time this analysis was prepared.

Executive Order S-01-07 was enacted on January 18, 2007. The order mandates that a Low Carbon Fuel Standard ("LCFS") for transportation fuels be established for California to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020.

Other regulations affecting state and local GHG planning and policy development are summarized as follows:

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

Senate Bill 1368
Senate Bill 1368 (SB 1368) is the companion Bill of AB 32 and was adopted September, 2006. SB 1368 required the California Public Utilities Commission (CPUC) to establish a performance standard for baseload generation of GHG emissions by investor-owned utilities by February 1, 2007 and for local publicly owned utilities by June 30, 2007. These standards could not exceed the GHG emissions rate from a baseload combined-cycle, natural gas-fired plant. Furthermore, the legislation states that all electricity provided to the State, including imported electricity, must be generated by plants that meet the standards set by California Public Utilities Commission (CPUC) and California Energy Commission (CEC).

Senate Bill 97
Senate Bill 97 (SB 97) was adopted August 2007 and acknowledges that climate change is an environmental issue that requires analysis under CEQA. SB 97 directed the Governor's Office of Planning and Research (OPR), which is part of the State Natural Resources Agency, to prepare, develop, and transmit to CARB guidelines for the feasible mitigation of GHG emissions or the

effects of GHG emissions, as required by CEQA, by July 1, 2009. The Natural Resources Agency was required to certify and adopt those guidelines by January 1, 2010. Pursuant to the requirements of SB 97 as stated above, on December 30, 2009 the Natural Resources Agency adopted amendments to the state CEQA guidelines that address GHG emissions. The CEQA Guidelines Amendments changed sections of the CEQA Guidelines and incorporated GHG language throughout the Guidelines. However, no GHG emissions thresholds of significance were provided and no specific mitigation measures were identified. The GHG emission reduction amendments went into effect on March 18, 2010 and are summarized below:

- Climate action plans and other greenhouse gas reduction plans can be used to determine whether a project has significant impacts, based upon its compliance with the plan.

- Local governments are encouraged to quantify the greenhouse gas emissions of proposed projects, noting that they have the freedom to select the models and methodologies that best meet their needs and circumstances. The section also recommends consideration of several qualitative factors that may be used in the determination of significance, such as the extent to which the given project complies with state, regional, or local GHG reduction plans and policies. OPR does not set or dictate specific thresholds of significance. Consistent with existing CEQA Guidelines, OPR encourages local governments to develop and publish their own thresholds of significance for GHG impacts assessment.
- When creating their own thresholds of significance, local governments may consider the thresholds of significance adopted or recommended by other public agencies, or recommended by experts.

- New amendments include guidelines for determining methods to mitigate the effects of greenhouse gas emissions in Appendix F of the CEQA Guidelines.

- OPR is clear to state that "to qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project; general compliance with a plan, by itself, is not mitigation."

- OPR's emphasizes the advantages of analyzing GHG impacts on an institutional, programmatic level. OPR therefore approves tiering of environmental analyses and highlights some benefits of such an approach.

- Environmental impact reports (EIRs) must specifically consider a project's energy use and energy efficiency potential.

Senate Bills 1078, 107, and X1-2 and Executive Orders S-14-08 and S-21-09
Senate Bill 1078 (SB 1078) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. Senate Bill 107 (SB 107) changed the target date to 2010. Executive

Order S-14-08 was signed on November 2008 and expands the State's Renewable Energy Standard to 33 percent renewable energy by 2020. Executive Order S-21-09 directed CARB to adopt regulations by July 31, 2010 to enforce S-14-08. Senate Bill X1-2 codifies the 33 percent renewable energy requirement by 2020.

California Code of Regulations (CCR) Title 24, Part 6
CCR Title 24, Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24) were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Although it was not originally intended to reduce GHG emissions, electricity production by fossil fuels results in GHG emissions and energy efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions.

The Energy Commission adopted 2008 Standards on April 23, 2008 and Building Standards Commission approved them for publication on September 11, 2008. These updates became effective on August 1, 2009. All buildings for which an application for a building permit is submitted on or after July 1, 2014 must follow the 2013 standards. The 2013 commercial standards are estimated to be 30 percent more efficient than the 2008 standards; 2013 residential standards are at least 25 percent more efficient. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas emissions.

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

The proposed project is located within the Southern California Association of Governments (SCAG) jurisdiction, which has authority to develop the SCS or APS. For the SCAG region, beginning October 2018, the targets set by CARB are at eight percent below 2005 per capita GHG emissions levels by 2020 and 19 percent below 2005 per capita GHG emissions levels by 2035. In April 2016, SCAG adopted the 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), which meets the CARB emission reduction requirements.

City and County land use policies, including General Plans, are not required to be consistent with the RTP and associated SCS or APS. However, CEQA incentivizes, through streamlining

and other provisions, qualified projects that are consistent with an approved SCS or APS and categorized as "transit priority projects."

Senate Bill X7-7

Senate Bill X7-7 (SB X7-7), enacted on November 9, 2009, mandates water conservation targets and efficiency improvements for urban and agricultural water suppliers. SB X7-7 requires the Department of Water Resources (DWR) to develop a task force and technical panel to develop alternative best management practices for the water sector. Additionally, SB X7-7 required the DWR to develop criteria for baseline uses for residential, commercial, and industrial uses for both indoor and landscaped area uses. The DWR was also required to develop targets and regulations that achieve a statewide 20 percent reduction in water usage.

California Green Building Standards

Title 24, Part 6. Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically establishes Building Energy Efficiency Standards that are designed to ensure new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and the California Energy Commission (CEC) (and revised if necessary) (California Public Resources Code, Section 25402(b)(1)). The regulations receive input from members of industry, as well as the public, with the goal of "reducing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (California Public Resources Code, Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (California Public Resources Code, Section 25402(d)) and cost effectiveness (California Public Resources Code, Sections 25402(b)(2) and (b)(3)). These standards are updated to consider and incorporate new energy efficient technologies and construction methods. As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The 2019 Title 24 building energy efficiency standards and became effective on January 1, 2020. In general, single-family homes built to the 2019 standards are anticipated to use approximately 7% less energy for lighting, heating, cooling, ventilation, and water heating than those built to the 2016 standards, and nonresidential buildings built to the 2019 standards will use an estimated 5% less energy than those built to the 2013 standards (CEC 2015a).

Title 24, Part 11. In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as "CALGreen," and establishes minimum mandatory standards and voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. The CALGreen standards took effect in January 2011 and instituted mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-

rise residential, and state-owned buildings and schools and hospitals. The CALGreen 2019 standards became effective on January 1, 2020. The mandatory standards require the following (24 CCR Part 11):

- Mandatory reduction in indoor water use through compliance with specified flow rates for plumbing fixtures and fittings;
- Mandatory reduction in outdoor water use through compliance with a local water efficient landscaping ordinance or the California Department of Water Resources' Model Water Efficient Landscape Ordinance;
- Diversion of 65% of construction and demolition waste from landfills;
- Mandatory inspections of energy systems to ensure optimal working efficiency;
- Inclusion of electric vehicle charging stations or designated spaces capable of supporting future charging stations; and
- Low-pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring, and particle board.

The CALGreen standards also include voluntary efficiency measures that are provided at two separate tiers and implemented at the discretion of local agencies and applicants. CALGreen's Tier 1 standards call for a 15% improvement in energy requirements, stricter water conservation, 65% diversion of construction and demolition waste, 10% recycled content in building materials, 20% permeable paving, 20% cement reduction, and cool/solar-reflective roofs. CALGreen's more rigorous Tier 2 standards call for a 30% improvement in energy requirements, stricter water conservation, 75% diversion of construction and demolition waste, 15% recycled content in building materials, 30% permeable paving, 25% cement reduction, and cool/solar-reflective roofs (24 CCR Part 11).

The California Public Utilities Commission, CEC, and CARB also have a shared, established goal of achieving zero net energy (ZNE) for new construction in California. The key policy timelines include the following: (1) all new residential construction in California will be ZNE by 2020, and (2) all new commercial construction in California will be ZNE by 2030 (CPUC 2013).[2] As most recently defined by the CEC in its 2015 Integrated Energy Policy Report (CEC 2015b), a ZNE code building is "one where the value of the energy produced by on-site renewable energy resources is equal to the value of the energy consumed annually by the building" using the CEC's Time Dependent Valuation metric.

Title 20. Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. Performance of appliances must be certified through the CEC to demonstrate compliance with standards. New appliances regulated under Title 20 include refrigerators, refrigerator-freezers, and freezers; room air conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing

[2] It is expected that achievement of the ZNE goal will occur through revisions to the Title 24 standards.

fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwaters; clothes washers and dryers; cooking products; electric motors; low voltage dry-type distribution transformers; power supplies; televisions and consumer audio and video equipment; and battery charger systems. Title 20 presents protocols for testing for each type of appliance covered under the regulations and appliances must meet the standards for energy performance, energy design, water performance, and water design. Title 20 contains three types of standards for appliances: federal and state standards for federally regulated appliances, state standards for federally regulated appliances, and state standards for non-federally regulated appliances.

Executive Order B-30-15

EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing statewide GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing statewide GHG emissions to 80% below 1990 levels by 2050 as set forth in EO S-3-05. To facilitate achievement of this goal, EO B-30-15 calls for an update to CARB's Scoping Plan to express the 2030 target in terms of MMT CO2E. EO B-30-15 also calls for state agencies to continue to develop and implement GHG emission reduction programs in support of the reduction targets. EO B-30-15 does not require local agencies to take any action to meet the new interim GHG reduction target.

Senate Bill 32 and Assembly Bill 197

SB 32 and AB 197 (enacted in 2016) are companion bills that set new statewide GHG reduction targets, make changes to CARB's membership, increase legislative oversight of CARB's climate change–based activities, and expand dissemination of GHG and other air quality–related emissions data to enhance transparency and accountability. More specifically, SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, in order to provide ongoing oversight over implementation of the state's climate policies. AB 197 added two members of the Legislature to CARB as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and toxic air contaminants from reporting facilities; and requires CARB to identify specific information for GHG emissions reduction measures when updating the Scoping Plan.

SB 350— Clean Energy and Pollution Reduction Act of 2015

In October 2015, the legislature approved and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Provisions for a 50 percent 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 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.

- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility 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 will facilitate the growth of renewable energy markets in the western United States (California Leginfo 2015).

SB 100

On September 10, 2018, Governor Brown signed SB 100, which raises California's RPS requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under the bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Executive Order B-55-18

On September 10, 2018, Governor Brown signed Executive Order B-55-2018 which established a new statewide goal to achieve carbon neutrality as soon as possible and no later than 2045. The executive order also states that California will achieve and maintain net negative emissions thereafter.

AB 2127

AB 2127 promotes better planning for EV infrastructure build-out across all vehicle classes. AB 2127 would help the state meet the goal of 5 million zero-emission vehicles (ZEV) on the road by 2030.

Local Regulations and CEQA Requirements

As referenced, pursuant to the requirements of SB 97, the Resources Agency has adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted CEQA Guidelines provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, but contain no suggested thresholds of significance for GHG emissions. Instead, lead agencies are given the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. The general approach to developing a Threshold of Significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG

emissions needed to move the state towards climate stabilization. If a project would generate GHG emissions above the threshold level, its contribution to cumulative impacts would be considered significant. To date, the Bay Area Air Quality Management District (BAAQMD), the South Coast Air Quality Management District (SCAQMD), and the San Joaquin Air Pollution Control District (SJVAPCD) have adopted quantitative significance thresholds for GHGs. However, in March 2013 the Bay Area's thresholds were overruled by the Alameda County Superior Court (*California Building Industry Association v. Bay Area Air Quality Management District*), on the basis that adoption of the thresholds constitutes a "project" under CEQA, but did not receive the appropriate environmental review. As a result, BAAQMD has elected to not recommend specific GHG thresholds for use in CEQA documents.

The SCAQMD threshold, which was adopted in December 2008, considers emissions of over 10,000 metric tons CO2E /year to be significant. However, the SCAQMD's threshold applies only to stationary sources and is expressly intended to apply only when the SCAQMD is the CEQA lead agency. Although not formally adopted, the SCAQMD has developed a draft quantitative threshold for all land use types of 3,000 metric tons CO_2E /year (SCAQMD, September 2010). Note that lead agencies retain the responsibility to determine significance on a case-by-case basis for each specific project.

CLIMATE CHANGE IMPACT ANALYSIS

Thresholds of Significance

Pursuant to the requirements of SB 97, the Resources Agency adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions in March 2010. These guidelines are used in evaluating the cumulative significance of GHG emissions from the proposed project. According to the adopted CEQA Guidelines, impacts related to GHG emissions from the proposed project would be significant if the project would:

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

The vast majority of individual projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence to climate change; therefore, the issue of climate change typically involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15355).

For future projects, the significance of GHG emissions may be evaluated based on locally adopted quantitative thresholds, or consistency with a regional GHG reduction plan (such as a

Climate Action Plan). The City of San Marino does not have an approved CAP; thus, for the purpose of evaluating potential project related impacts, the SCAQMD threshold of 3,000 annual metric tons is used herein.

Methodology

GHG emissions associated with construction and operation of the proposed project have been estimated using California Emissions Estimator Model (CalEEMod) version 2020.4.0.

Construction Emissions

Construction of the proposed project would generate temporary GHG emissions primarily associated with the operation of construction equipment and truck trips. Site preparation and grading typically generate the greatest emission quantities because the use of heavy equipment is greatest during this phase of construction. Emissions associated with the construction period were estimated based on the projected maximum amount of equipment that would be used on-site at one time. Air districts such as the SCAQMD have recommended amortizing construction-related emissions over a 30-year period to calculate annual emissions. Complete CalEEMod results and assumptions can be viewed in the Appendix.

Operational Emissions

Default values used in CalEEMod version 2020.4.0 are based on the California Energy Commission (CEC) sponsored California Commercial End Use Survey (CEUS) and Residential Appliance Saturation Survey (RASS) studies. CalEEMod provides operational emissions of CO_2, N_2O and CH_4. This methodology has been subjected to peer review by numerous public and private stakeholders, and in particular by the CEC; and therefore, is considered reasonable and reliable for use in GHG impact analysis pursuant to CEQA. It is also recommended by CAPCOA (January 2008).

Emissions associated with area sources (i.e., consumer products, landscape maintenance, and architectural coating) were calculated in CalEEMod based on standard emission rates from CARB, USEPA, and district supplied emission factor values (CalEEMod User Guide, 2021). Emissions from waste generation were also calculated in CalEEMod and are based on the IPCC's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste (CalEEMod User Guide, 2021). Waste disposal rates by land use and overall composition of municipal solid waste in California was primarily based on data provided by the California Department of Resources Recycling and Recovery (CalRecycle).

Emissions from water and wastewater usage calculated in CalEEMod were based on the default electricity intensity from the CEC's 2006 Refining Estimates of Water-Related Energy Use in California using the average values for Northern and Southern California. Emissions from mobile sources were quantified based on trip generation estimates included in CalEEMod version 2016.3.2 for commercial projects.

Estimate of GHG Emissions

Construction Emissions

Construction activity is assumed to occur over a period of approximately 12 months beginning in mid-2022 and concluding in late 2022. Based on CalEEMod results, construction activity for the project would generate an estimated 61 metric tons of carbon dioxide equivalent (CO_2E), as shown in Table 6. Amortized over a 30-year period (the assumed life of the project), construction of the proposed project would generate 2 metric tons of CO_2E per year.

Table 6
Estimated Construction Related Greenhouse Gas Emissions

Year	Annual Emissions (metric tons CO_2E)
2022	61
Total	**61**
Amortized over 30 years	**2 metric tons per year**

See Appendix for CalEEMod software program output

Operational Indirect and Stationary Direct Emissions

Long-term emissions relate to energy use, solid waste, water use, and transportation. Each source is discussed below and includes the emissions associated with existing development and the anticipated emissions that would result from the proposed project.

Energy Use. Operation of onsite development would consume both electricity and natural gas (see Appendix for CalEEMod results). The generation of electricity through combustion of fossil fuels typically yields CO_2, and to a smaller extent, N_2O and CH_4. Natural gas emissions can be calculated using default values from the CEC sponsored CEUS and RASS studies which are built into CalEEMod. As shown in Table 7, the overall net increase in energy use at the project site would result in approximately 31 metric tons of CO_2E per year.

Water Use Emissions**.** The CalEEMod results indicate that the project would use approximately 1.0 million gallons of water per year. Based on the amount of electricity generated to supply and convey this amount of water, as shown in Table 8, the project would generate approximately 3 metric tons of CO_2E per year.

Solid Waste Emissions. Implementation of a municipal recycling program that would achieve a 75% diversion rate statewide is required for residential uses per the California Integrated Waste Management Act of 1989 (AB 939). However, no requirements exist for community centers. The CalEEMod results indicate that the project would result in

approximately 31 metric tons of CO_2E per year associated with solid waste disposed within landfills.

Table 7
Estimated Annual Energy-Related Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Proposed Project	
Electricity	21 metric tons
Natural Gas	10 metric tons
Total	**31 metric tons**

See Appendix for CalEEMod software program output.

Table 8
Estimated Annual
Solid Waste and Water Use Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Water	3 metric tons
Solid Waste	31 metric tons
Total Water and Solid Waste	**34 metric tons**

See Appendix for CalEEMod software program output.

Transportation Emissions. Mobile source GHG emissions were estimated using the trip generation rates provided in the Traffic Impact Assessment (Linscott, Law and Greenspan, Inc., September 2021). Table 9 shows the estimated mobile emissions of GHGs for the project based on the estimated annual VMT of 636,607. As shown in Table 9, the project would generate approximately 221 metric tons of CO_2E associated with new vehicle trips.

Combined Construction, Stationary and Mobile Source Emissions

Table 10 combines the net new construction, operational, and mobile GHG emissions associated with the proposed project. As discussed above, temporary emissions associated with construction activity (approximately 2 metric tons CO_2E) are amortized over 30 years (the anticipated life of the project).

For the proposed project, the combined annual emissions would total approximately 288 metric tons per year in CO_2E. The majority (77%) of the project's GHG emissions are associated with motor vehicular travel. The proposed project is evaluated based on the threshold of 3,000 MT CO_2E annually. Project-related annual GHG emissions would not exceed the threshold of 3,000 metric tons per year; therefore, impacts from GHG emissions would be less than significant per threshold a.

Table 9
Estimated Annual Mobile Emissions of Greenhouse Gases

Emission Source	Annual Emissions (CO_2E)
Proposed Project	
Mobile Emissions (CO_2 & CH_4)	221 metric tons
Total	**221 metric tons**

See Appendix for CalEEMod software program output.

Table 10
Combined Annual Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Construction	2 metric tons
Operational	
Energy	31 metric tons
Solid Waste	31 metric tons
Water	3 metric tons
Mobile	221 metric tons
Total	**288 metric tons**

See Appendix for CalEEMod software program output (demolition and new construction).

GHG Cumulative Significance. As referenced, the proposed project would be designed consistent with Title 24 requirements that include those addressing energy and water use reduction, promotion of green building measures, waste reduction, and reduction in vehicle miles traveled. The proposed project would also be required to implement all mandatory green building measures for new commercial development under the CALGreen Code. This would require the project be designed to reduce water consumption, increase building system efficiencies, divert construction waste from landfills, and install low pollutant emitting finish materials. Implementation of these building and appliance standards would result in water, energy, and construction waste reductions for the proposed project. This would result in a less than significant impact under threshold b.

Consistency with EO S-3-05 and SB 32

EO S-3-05. This EO establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050.

SB 32. This bill establishes for a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-

effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030.

The proposed project would not exceed the 3,000 MT CO2e annual screening threshold recommended by the SCAQMD; and thus, is not considered a cumulatively considerable source of GHG emissions. As stated, the project would be required to implement efficiency strategies intended to reduce overall energy and water demand and related GHG emissions associated with generating and conveying energy to the site as well the energy required to treat and convey potable water to the project site.

CARB has indicated that statewide, California is on track to achieving both the 2030 and 2050 goals. CARB stated in the First Update to the Climate Change Scoping Plan that "California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014, p. ES2).This is confirmed in the 2017 Scoping Plan, which states that the Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies to ensure that California meets its GHG reduction targets. As stated, the project would not generate enough GHG emissions to cumulatively contribute to global climate change; and thus, would not adversely impact the attainment of statewide reductions in GHG emissions referenced above. The project would be consistent with EO S-3-05, SB 32 as well as the initial GHG reduction goals established by AB 32.

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Appendix A

CalEEMod Air Quality and Greenhouse Gas Emissions Model Results – Summer/Annual, and N_2O from Mobile Emissions Sources

San Marino Center Rehabilitation - Los Angeles-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

San Marino Center Rehabilitation

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Racquet Club	10.83	1000sqft	0.25	10,832.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2023
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Construction Phase -

Demolition -

Vehicle Trips - Trip rate modified to match Traffic Impact Analysis

Construction Off-road Equipment Mitigation -

Area Mitigation -

Water Mitigation -

Waste Mitigation -

Table Name	Column Name	Default Value	New Value
tblAreaMitigation	UseLowVOCPaintParkingCheck	False	True

San Marino Center Rehabilitation - Los Angeles-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblConstructionPhase	PhaseEndDate	11/18/2022	11/11/2022
tblConstructionPhase	PhaseStartDate	11/12/2022	11/5/2022
tblVehicleTrips	ST_TR	21.35	28.82
tblVehicleTrips	SU_TR	17.40	28.82
tblVehicleTrips	WD_TR	14.03	28.82

2.0 Emissions Summary

San Marino Center Rehabilitation - Los Angeles-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2022	20.2905	7.1364	7.8629	0.0130	0.1161	0.3732	0.4543	0.0303	0.3434	0.3619	0.0000	1,251.2467	1,251.2467	0.3599	7.3200e-003	1,257.3604
Maximum	**20.2905**	**7.1364**	**7.8629**	**0.0130**	**0.1161**	**0.3732**	**0.4543**	**0.0303**	**0.3434**	**0.3619**	**0.0000**	**1,251.2467**	**1,251.2467**	**0.3599**	**7.3200e-003**	**1,257.3604**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2022	20.2905	7.1364	7.8629	0.0130	0.1137	0.3732	0.4519	0.0299	0.3434	0.3619	0.0000	1,251.2467	1,251.2467	0.3599	7.3200e-003	1,257.3604
Maximum	**20.2905**	**7.1364**	**7.8629**	**0.0130**	**0.1137**	**0.3732**	**0.4519**	**0.0299**	**0.3434**	**0.3619**	**0.0000**	**1,251.2467**	**1,251.2467**	**0.3599**	**7.3200e-003**	**1,257.3604**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**2.02**	**0.00**	**0.52**	**1.19**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.2421	1.0000e-005	1.1100e-003	0.0000		0.0000	0.0000		0.0000	0.0000		2.3700e-003	2.3700e-003	1.0000e-005		2.5300e-003
Energy	5.7500e-003	0.0523	0.0439	3.1000e-004		3.9700e-003	3.9700e-003		3.9700e-003	3.9700e-003		62.7052	62.7052	1.2000e-003	1.1500e-003	63.0778
Mobile	0.7649	0.6812	6.5851	0.0134	1.3402	9.8900e-003	1.3500	0.3570	9.1700e-003	0.3661		1,360.6696	1,360.6696	0.1014	0.0613	1,381.4685
Total	**1.0128**	**0.7335**	**6.6301**	**0.0137**	**1.3402**	**0.0139**	**1.3540**	**0.3570**	**0.0131**	**0.3701**		**1,423.3771**	**1,423.3771**	**0.1026**	**0.0624**	**1,444.5488**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.2421	1.0000e-005	1.1100e-003	0.0000		0.0000	0.0000		0.0000	0.0000		2.3700e-003	2.3700e-003	1.0000e-005		2.5300e-003
Energy	5.7500e-003	0.0523	0.0439	3.1000e-004		3.9700e-003	3.9700e-003		3.9700e-003	3.9700e-003		62.7052	62.7052	1.2000e-003	1.1500e-003	63.0778
Mobile	0.7649	0.6812	6.5851	0.0134	1.3402	9.8900e-003	1.3500	0.3570	9.1700e-003	0.3661		1,360.6696	1,360.6696	0.1014	0.0613	1,381.4685
Total	**1.0128**	**0.7335**	**6.6301**	**0.0137**	**1.3402**	**0.0139**	**1.3540**	**0.3570**	**0.0131**	**0.3701**		**1,423.3771**	**1,423.3771**	**0.1026**	**0.0624**	**1,444.5488**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	6/1/2022	6/14/2022	5	10	
2	Building Construction	Building Construction	6/18/2022	11/4/2022	5	100	
3	Architectural Coating	Architectural Coating	11/5/2022	11/11/2022	5	5	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 16,248; Non-Residential Outdoor: 5,416; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20
Demolition	Rubber Tired Dozers	1	1.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37

Trips and VMT

San Marino Center Rehabilitation - Los Angeles-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	4	10.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	5.00	2.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	1.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Demolition - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.2800e-003	0.0000	4.2800e-003	6.5000e-004	0.0000	6.5000e-004			0.0000			0.0000
Off-Road	0.7094	6.4138	7.4693	0.0120		0.3375	0.3375		0.3225	0.3225		1,147.9025	1,147.9025	0.2119		1,153.2001
Total	**0.7094**	**6.4138**	**7.4693**	**0.0120**	**4.2800e-003**	**0.3375**	**0.3418**	**6.5000e-004**	**0.3225**	**0.3232**		**1,147.9025**	**1,147.9025**	**0.2119**		**1,153.2001**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0346	0.0253	0.3936	1.0200e-003	0.1118	7.2000e-004	0.1125	0.0296	6.6000e-004	0.0303		103.3442	103.3442	2.8200e-003	2.5000e-003	104.1603
Total	**0.0346**	**0.0253**	**0.3936**	**1.0200e-003**	**0.1118**	**7.2000e-004**	**0.1125**	**0.0296**	**6.6000e-004**	**0.0303**		**103.3442**	**103.3442**	**2.8200e-003**	**2.5000e-003**	**104.1603**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					1.9300e-003	0.0000	1.9300e-003	2.9000e-004	0.0000	2.9000e-004			0.0000			0.0000
Off-Road	0.7094	6.4138	7.4693	0.0120		0.3375	0.3375		0.3225	0.3225	0.0000	1,147.9025	1,147.9025	0.2119		1,153.2001
Total	**0.7094**	**6.4138**	**7.4693**	**0.0120**	**1.9300e-003**	**0.3375**	**0.3395**	**2.9000e-004**	**0.3225**	**0.3228**	**0.0000**	**1,147.9025**	**1,147.9025**	**0.2119**		**1,153.2001**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0346	0.0253	0.3936	1.0200e-003	0.1118	7.2000e-004	0.1125	0.0296	6.6000e-004	0.0303		103.3442	103.3442	2.8200e-003	2.5000e-003	104.1603
Total	**0.0346**	**0.0253**	**0.3936**	**1.0200e-003**	**0.1118**	**7.2000e-004**	**0.1125**	**0.0296**	**6.6000e-004**	**0.0303**		**103.3442**	**103.3442**	**2.8200e-003**	**2.5000e-003**	**104.1603**

3.3 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6863	7.0258	7.1527	0.0114		0.3719	0.3719		0.3422	0.3422		1,103.9393	1,103.9393	0.3570		1,112.8652
Total	**0.6863**	**7.0258**	**7.1527**	**0.0114**		**0.3719**	**0.3719**		**0.3422**	**0.3422**		**1,103.9393**	**1,103.9393**	**0.3570**		**1,112.8652**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.9400e-003	0.0980	0.0336	3.9000e-004	0.0128	9.3000e-004	0.0137	3.6900e-003	8.9000e-004	4.5800e-003		42.0923	42.0923	1.4100e-003	6.0700e-003	43.9350
Worker	0.0173	0.0126	0.1968	5.1000e-004	0.0559	3.6000e-004	0.0563	0.0148	3.3000e-004	0.0152		51.6721	51.6721	1.4100e-003	1.2500e-003	52.0801
Total	**0.0212**	**0.1106**	**0.2304**	**9.0000e-004**	**0.0687**	**1.2900e-003**	**0.0700**	**0.0185**	**1.2200e-003**	**0.0197**		**93.7644**	**93.7644**	**2.8200e-003**	**7.3200e-003**	**96.0152**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.6863	7.0258	7.1527	0.0114		0.3719	0.3719		0.3422	0.3422	0.0000	1,103.9393	1,103.9393	0.3570		1,112.8652
Total	**0.6863**	**7.0258**	**7.1527**	**0.0114**		**0.3719**	**0.3719**		**0.3422**	**0.3422**	**0.0000**	**1,103.9393**	**1,103.9393**	**0.3570**		**1,112.8652**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	3.9400e-003	0.0980	0.0336	3.9000e-004	0.0128	9.3000e-004	0.0137	3.6900e-003	8.9000e-004	4.5800e-003		42.0923	42.0923	1.4100e-003	6.0700e-003	43.9350
Worker	0.0173	0.0126	0.1968	5.1000e-004	0.0559	3.6000e-004	0.0563	0.0148	3.3000e-004	0.0152		51.6721	51.6721	1.4100e-003	1.2500e-003	52.0801
Total	**0.0212**	**0.1106**	**0.2304**	**9.0000e-004**	**0.0687**	**1.2900e-003**	**0.0700**	**0.0185**	**1.2200e-003**	**0.0197**		**93.7644**	**93.7644**	**2.8200e-003**	**7.3200e-003**	**96.0152**

3.4 Architectural Coating - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	20.0825					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2045	1.4085	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817		281.4481	281.4481	0.0183		281.9062
Total	**20.2871**	**1.4085**	**1.8136**	**2.9700e-003**		**0.0817**	**0.0817**		**0.0817**	**0.0817**		**281.4481**	**281.4481**	**0.0183**		**281.9062**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Architectural Coating - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.4600e-003	2.5300e-003	0.0394	1.0000e-004	0.0112	7.0000e-005	0.0113	2.9600e-003	7.0000e-005	3.0300e-003		10.3344	10.3344	2.8000e-004	2.5000e-004	10.4160
Total	**3.4600e-003**	**2.5300e-003**	**0.0394**	**1.0000e-004**	**0.0112**	**7.0000e-005**	**0.0113**	**2.9600e-003**	**7.0000e-005**	**3.0300e-003**		**10.3344**	**10.3344**	**2.8000e-004**	**2.5000e-004**	**10.4160**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	20.0825					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2045	1.4085	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817	0.0000	281.4481	281.4481	0.0183		281.9062
Total	**20.2871**	**1.4085**	**1.8136**	**2.9700e-003**		**0.0817**	**0.0817**		**0.0817**	**0.0817**	**0.0000**	**281.4481**	**281.4481**	**0.0183**		**281.9062**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Architectural Coating - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.4600e-003	2.5300e-003	0.0394	1.0000e-004	0.0112	7.0000e-005	0.0113	2.9600e-003	7.0000e-005	3.0300e-003		10.3344	10.3344	2.8000e-004	2.5000e-004	10.4160
Total	**3.4600e-003**	**2.5300e-003**	**0.0394**	**1.0000e-004**	**0.0112**	**7.0000e-005**	**0.0113**	**2.9600e-003**	**7.0000e-005**	**3.0300e-003**		**10.3344**	**10.3344**	**2.8000e-004**	**2.5000e-004**	**10.4160**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.7649	0.6812	6.5851	0.0134	1.3402	9.8900e-003	1.3500	0.3570	9.1700e-003	0.3661		1,360.6696	1,360.6696	0.1014	0.0613	1,381.4685
Unmitigated	0.7649	0.6812	6.5851	0.0134	1.3402	9.8900e-003	1.3500	0.3570	9.1700e-003	0.3661		1,360.6696	1,360.6696	0.1014	0.0613	1,381.4685

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Racquet Club	312.18	312.18	312.18	636,607	636,607
Total	312.18	312.18	312.18	636,607	636,607

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Racquet Club	16.60	8.40	6.90	11.50	69.50	19.00	52	39	9

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Racquet Club	0.544785	0.062844	0.187478	0.127235	0.023089	0.006083	0.010475	0.008012	0.000925	0.000611	0.024394	0.000698	0.003374

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	5.7500e-003	0.0523	0.0439	3.1000e-004		3.9700e-003	3.9700e-003		3.9700e-003	3.9700e-003		62.7052	62.7052	1.2000e-003	1.1500e-003	63.0778
NaturalGas Unmitigated	5.7500e-003	0.0523	0.0439	3.1000e-004		3.9700e-003	3.9700e-003		3.9700e-003	3.9700e-003		62.7052	62.7052	1.2000e-003	1.1500e-003	63.0778

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Racquet Club	532.994	5.7500e-003	0.0523	0.0439	3.1000e-004		3.9700e-003	3.9700e-003		3.9700e-003	3.9700e-003		62.7052	62.7052	1.2000e-003	1.1500e-003	63.0778
Total		**5.7500e-003**	**0.0523**	**0.0439**	**3.1000e-004**		**3.9700e-003**	**3.9700e-003**		**3.9700e-003**	**3.9700e-003**		**62.7052**	**62.7052**	**1.2000e-003**	**1.1500e-003**	**63.0778**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Racquet Club	0.532994	5.7500e-003	0.0523	0.0439	3.1000e-004		3.9700e-003	3.9700e-003		3.9700e-003	3.9700e-003		62.7052	62.7052	1.2000e-003	1.1500e-003	63.0778
Total		**5.7500e-003**	**0.0523**	**0.0439**	**3.1000e-004**		**3.9700e-003**	**3.9700e-003**		**3.9700e-003**	**3.9700e-003**		**62.7052**	**62.7052**	**1.2000e-003**	**1.1500e-003**	**63.0778**

6.0 Area Detail

6.1 Mitigation Measures Area

Use Low VOC Paint - Non-Residential Interior

Use Low VOC Paint - Non-Residential Exterior

San Marino Center Rehabilitation - Los Angeles-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.2421	1.0000e-005	1.1100e-003	0.0000		0.0000	0.0000		0.0000	0.0000		2.3700e-003	2.3700e-003	1.0000e-005		2.5300e-003
Unmitigated	0.2421	1.0000e-005	1.1100e-003	0.0000		0.0000	0.0000		0.0000	0.0000		2.3700e-003	2.3700e-003	1.0000e-005		2.5300e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0275					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.2145					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-004	1.0000e-005	1.1100e-003	0.0000		0.0000	0.0000		0.0000	0.0000		2.3700e-003	2.3700e-003	1.0000e-005		2.5300e-003
Total	**0.2421**	**1.0000e-005**	**1.1100e-003**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**2.3700e-003**	**2.3700e-003**	**1.0000e-005**		**2.5300e-003**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0275					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.2145					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-004	1.0000e-005	1.1100e-003	0.0000		0.0000	0.0000		0.0000	0.0000		2.3700e-003	2.3700e-003	1.0000e-005		2.5300e-003
Total	**0.2421**	**1.0000e-005**	**1.1100e-003**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**		**2.3700e-003**	**2.3700e-003**	**1.0000e-005**		**2.5300e-003**

7.0 Water Detail

7.1 Mitigation Measures Water

Apply Water Conservation Strategy

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

San Marino Center Rehabilitation - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

San Marino Center Rehabilitation

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Racquet Club	10.83	1000sqft	0.25	10,832.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2023
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Construction Phase -

Demolition -

Vehicle Trips - Trip rate modified to match Traffic Impact Analysis

Construction Off-road Equipment Mitigation -

Area Mitigation -

Water Mitigation -

Waste Mitigation -

Table Name	Column Name	Default Value	New Value
tblAreaMitigation	UseLowVOCPaintParkingCheck	False	True

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblConstructionPhase	PhaseEndDate	11/18/2022	11/11/2022
tblConstructionPhase	PhaseStartDate	11/12/2022	11/5/2022
tblVehicleTrips	ST_TR	21.35	28.82
tblVehicleTrips	SU_TR	17.40	28.82
tblVehicleTrips	WD_TR	14.03	28.82

2.0 Emissions Summary

San Marino Center Rehabilitation - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2022	0.0898	0.3929	0.4124	6.9000e-004	3.9700e-003	0.0206	0.0245	1.0700e-003	0.0190	0.0201	0.0000	60.5548	60.5548	0.0173	3.5000e-004	61.0926
Maximum	**0.0898**	**0.3929**	**0.4124**	**6.9000e-004**	**3.9700e-003**	**0.0206**	**0.0245**	**1.0700e-003**	**0.0190**	**0.0201**	**0.0000**	**60.5548**	**60.5548**	**0.0173**	**3.5000e-004**	**61.0926**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2022	0.0898	0.3929	0.4124	6.9000e-004	3.9500e-003	0.0206	0.0245	1.0600e-003	0.0190	0.0201	0.0000	60.5547	60.5547	0.0173	3.5000e-004	61.0925
Maximum	**0.0898**	**0.3929**	**0.4124**	**6.9000e-004**	**3.9500e-003**	**0.0206**	**0.0245**	**1.0600e-003**	**0.0190**	**0.0201**	**0.0000**	**60.5547**	**60.5547**	**0.0173**	**3.5000e-004**	**61.0925**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.50**	**0.00**	**0.04**	**0.93**	**0.00**	**0.05**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	6-1-2022	8-31-2022	0.2460	0.2460
2	9-1-2022	9-30-2022	0.0840	0.0840
		Highest	0.2460	0.2460

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0442	0.0000	1.4000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.7000e-004	2.7000e-004	0.0000	0.0000	2.9000e-004
Energy	1.0500e-003	9.5400e-003	8.0100e-003	6.0000e-005		7.2000e-004	7.2000e-004		7.2000e-004	7.2000e-004	0.0000	31.2437	31.2437	1.9600e-003	4.0000e-004	31.4130
Mobile	0.1329	0.1354	1.1986	2.3500e-003	0.2392	1.8000e-003	0.2410	0.0638	1.6700e-003	0.0655	0.0000	217.5097	217.5097	0.0173	0.0106	221.1109
Waste						0.0000	0.0000		0.0000	0.0000	12.5306	0.0000	12.5306	0.7405	0.0000	31.0441
Water						0.0000	0.0000		0.0000	0.0000	0.2032	2.2526	2.4558	0.0211	5.2000e-004	3.1361
Total	**0.1781**	**0.1450**	**1.2067**	**2.4100e-003**	**0.2392**	**2.5200e-003**	**0.2417**	**0.0638**	**2.3900e-003**	**0.0662**	**12.7338**	**251.0062**	**263.7400**	**0.7809**	**0.0116**	**286.7044**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0442	0.0000	1.4000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.7000e-004	2.7000e-004	0.0000	0.0000	2.9000e-004
Energy	1.0500e-003	9.5400e-003	8.0100e-003	6.0000e-005		7.2000e-004	7.2000e-004		7.2000e-004	7.2000e-004	0.0000	31.2437	31.2437	1.9600e-003	4.0000e-004	31.4130
Mobile	0.1329	0.1354	1.1986	2.3500e-003	0.2392	1.8000e-003	0.2410	0.0638	1.6700e-003	0.0655	0.0000	217.5097	217.5097	0.0173	0.0106	221.1109
Waste						0.0000	0.0000		0.0000	0.0000	3.1327	0.0000	3.1327	0.1851	0.0000	7.7610
Water						0.0000	0.0000		0.0000	0.0000	0.1626	1.8021	1.9646	0.0169	4.1000e-004	2.5089
Total	**0.1781**	**0.1450**	**1.2067**	**2.4100e-003**	**0.2392**	**2.5200e-003**	**0.2417**	**0.0638**	**2.3900e-003**	**0.0662**	**3.2952**	**250.5557**	**253.8509**	**0.2213**	**0.0114**	**262.7941**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**74.12**	**0.18**	**3.75**	**71.66**	**0.95**	**8.34**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	6/1/2022	6/14/2022	5	10	
2	Building Construction	Building Construction	6/18/2022	11/4/2022	5	100	
3	Architectural Coating	Architectural Coating	11/5/2022	11/11/2022	5	5	

San Marino Center Rehabilitation - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 16,248; Non-Residential Outdoor: 5,416; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20
Demolition	Rubber Tired Dozers	1	1.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	4	10.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	5.00	2.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	1.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

San Marino Center Rehabilitation - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.0000e-005	0.0000	2.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.5500e-003	0.0321	0.0374	6.0000e-005		1.6900e-003	1.6900e-003		1.6100e-003	1.6100e-003	0.0000	5.2068	5.2068	9.6000e-004	0.0000	5.2308
Total	**3.5500e-003**	**0.0321**	**0.0374**	**6.0000e-005**	**2.0000e-005**	**1.6900e-003**	**1.7100e-003**	**0.0000**	**1.6100e-003**	**1.6100e-003**	**0.0000**	**5.2068**	**5.2068**	**9.6000e-004**	**0.0000**	**5.2308**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7000e-004	1.4000e-004	1.8500e-003	0.0000	5.5000e-004	0.0000	5.5000e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.4506	0.4506	1.0000e-005	1.0000e-005	0.4546
Total	**1.7000e-004**	**1.4000e-004**	**1.8500e-003**	**0.0000**	**5.5000e-004**	**0.0000**	**5.5000e-004**	**1.5000e-004**	**0.0000**	**1.5000e-004**	**0.0000**	**0.4506**	**0.4506**	**1.0000e-005**	**1.0000e-005**	**0.4546**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Demolition - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.5500e-003	0.0321	0.0374	6.0000e-005		1.6900e-003	1.6900e-003		1.6100e-003	1.6100e-003	0.0000	5.2068	5.2068	9.6000e-004	0.0000	5.2308
Total	**3.5500e-003**	**0.0321**	**0.0374**	**6.0000e-005**	**1.0000e-005**	**1.6900e-003**	**1.7000e-003**	**0.0000**	**1.6100e-003**	**1.6100e-003**	**0.0000**	**5.2068**	**5.2068**	**9.6000e-004**	**0.0000**	**5.2308**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7000e-004	1.4000e-004	1.8500e-003	0.0000	5.5000e-004	0.0000	5.5000e-004	1.5000e-004	0.0000	1.5000e-004	0.0000	0.4506	0.4506	1.0000e-005	1.0000e-005	0.4546
Total	**1.7000e-004**	**1.4000e-004**	**1.8500e-003**	**0.0000**	**5.5000e-004**	**0.0000**	**5.5000e-004**	**1.5000e-004**	**0.0000**	**1.5000e-004**	**0.0000**	**0.4506**	**0.4506**	**1.0000e-005**	**1.0000e-005**	**0.4546**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0343	0.3513	0.3576	5.7000e-004		0.0186	0.0186		0.0171	0.0171	0.0000	50.0739	50.0739	0.0162	0.0000	50.4787
Total	**0.0343**	**0.3513**	**0.3576**	**5.7000e-004**		**0.0186**	**0.0186**		**0.0171**	**0.0171**	**0.0000**	**50.0739**	**50.0739**	**0.0162**	**0.0000**	**50.4787**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.0000e-004	5.1400e-003	1.7100e-003	2.0000e-005	6.3000e-004	5.0000e-005	6.8000e-004	1.8000e-004	4.0000e-005	2.3000e-004	0.0000	1.9096	1.9096	6.0000e-005	2.8000e-004	1.9933
Worker	8.6000e-004	7.1000e-004	9.2700e-003	2.0000e-005	2.7400e-003	2.0000e-005	2.7600e-003	7.3000e-004	2.0000e-005	7.4000e-004	0.0000	2.2531	2.2531	6.0000e-005	6.0000e-005	2.2731
Total	**1.0600e-003**	**5.8500e-003**	**0.0110**	**4.0000e-005**	**3.3700e-003**	**7.0000e-005**	**3.4400e-003**	**9.1000e-004**	**6.0000e-005**	**9.7000e-004**	**0.0000**	**4.1627**	**4.1627**	**1.2000e-004**	**3.4000e-004**	**4.2663**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Building Construction - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0343	0.3513	0.3576	5.7000e-004		0.0186	0.0186		0.0171	0.0171	0.0000	50.0738	50.0738	0.0162	0.0000	50.4787
Total	**0.0343**	**0.3513**	**0.3576**	**5.7000e-004**		**0.0186**	**0.0186**		**0.0171**	**0.0171**	**0.0000**	**50.0738**	**50.0738**	**0.0162**	**0.0000**	**50.4787**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.0000e-004	5.1400e-003	1.7100e-003	2.0000e-005	6.3000e-004	5.0000e-005	6.8000e-004	1.8000e-004	4.0000e-005	2.3000e-004	0.0000	1.9096	1.9096	6.0000e-005	2.8000e-004	1.9933
Worker	8.6000e-004	7.1000e-004	9.2700e-003	2.0000e-005	2.7400e-003	2.0000e-005	2.7600e-003	7.3000e-004	2.0000e-005	7.4000e-004	0.0000	2.2531	2.2531	6.0000e-005	6.0000e-005	2.2731
Total	**1.0600e-003**	**5.8500e-003**	**0.0110**	**4.0000e-005**	**3.3700e-003**	**7.0000e-005**	**3.4400e-003**	**9.1000e-004**	**6.0000e-005**	**9.7000e-004**	**0.0000**	**4.1627**	**4.1627**	**1.2000e-004**	**3.4000e-004**	**4.2663**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Architectural Coating - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0502					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	5.1000e-004	3.5200e-003	4.5300e-003	1.0000e-005		2.0000e-004	2.0000e-004		2.0000e-004	2.0000e-004	0.0000	0.6383	0.6383	4.0000e-005	0.0000	0.6394
Total	**0.0507**	**3.5200e-003**	**4.5300e-003**	**1.0000e-005**		**2.0000e-004**	**2.0000e-004**		**2.0000e-004**	**2.0000e-004**	**0.0000**	**0.6383**	**0.6383**	**4.0000e-005**	**0.0000**	**0.6394**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0000e-005	1.0000e-005	9.0000e-005	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0225	0.0225	0.0000	0.0000	0.0227
Total	**1.0000e-005**	**1.0000e-005**	**9.0000e-005**	**0.0000**	**3.0000e-005**	**0.0000**	**3.0000e-005**	**1.0000e-005**	**0.0000**	**1.0000e-005**	**0.0000**	**0.0225**	**0.0225**	**0.0000**	**0.0000**	**0.0227**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Architectural Coating - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0502					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	5.1000e-004	3.5200e-003	4.5300e-003	1.0000e-005		2.0000e-004	2.0000e-004		2.0000e-004	2.0000e-004	0.0000	0.6383	0.6383	4.0000e-005	0.0000	0.6394
Total	**0.0507**	**3.5200e-003**	**4.5300e-003**	**1.0000e-005**		**2.0000e-004**	**2.0000e-004**		**2.0000e-004**	**2.0000e-004**	**0.0000**	**0.6383**	**0.6383**	**4.0000e-005**	**0.0000**	**0.6394**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0000e-005	1.0000e-005	9.0000e-005	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0225	0.0225	0.0000	0.0000	0.0227
Total	**1.0000e-005**	**1.0000e-005**	**9.0000e-005**	**0.0000**	**3.0000e-005**	**0.0000**	**3.0000e-005**	**1.0000e-005**	**0.0000**	**1.0000e-005**	**0.0000**	**0.0225**	**0.0225**	**0.0000**	**0.0000**	**0.0227**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.1329	0.1354	1.1986	2.3500e-003	0.2392	1.8000e-003	0.2410	0.0638	1.6700e-003	0.0655	0.0000	217.5097	217.5097	0.0173	0.0106	221.1109
Unmitigated	0.1329	0.1354	1.1986	2.3500e-003	0.2392	1.8000e-003	0.2410	0.0638	1.6700e-003	0.0655	0.0000	217.5097	217.5097	0.0173	0.0106	221.1109

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Racquet Club	312.18	312.18	312.18	636,607	636,607
Total	312.18	312.18	312.18	636,607	636,607

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Racquet Club	16.60	8.40	6.90	11.50	69.50	19.00	52	39	9

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Racquet Club	0.544785	0.062844	0.187478	0.127235	0.023089	0.006083	0.010475	0.008012	0.000925	0.000611	0.024394	0.000698	0.003374

San Marino Center Rehabilitation - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	20.8621	20.8621	1.7600e-003	2.1000e-004	20.9698
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	20.8621	20.8621	1.7600e-003	2.1000e-004	20.9698
NaturalGas Mitigated	1.0500e-003	9.5400e-003	8.0100e-003	6.0000e-005		7.2000e-004	7.2000e-004		7.2000e-004	7.2000e-004	0.0000	10.3815	10.3815	2.0000e-004	1.9000e-004	10.4432
NaturalGas Unmitigated	1.0500e-003	9.5400e-003	8.0100e-003	6.0000e-005		7.2000e-004	7.2000e-004		7.2000e-004	7.2000e-004	0.0000	10.3815	10.3815	2.0000e-004	1.9000e-004	10.4432

San Marino Center Rehabilitation - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Racquet Club	194543	1.0500e-003	9.5400e-003	8.0100e-003	6.0000e-005		7.2000e-004	7.2000e-004		7.2000e-004	7.2000e-004	0.0000	10.3815	10.3815	2.0000e-004	1.9000e-004	10.4432
Total		**1.0500e-003**	**9.5400e-003**	**8.0100e-003**	**6.0000e-005**		**7.2000e-004**	**7.2000e-004**		**7.2000e-004**	**7.2000e-004**	**0.0000**	**10.3815**	**10.3815**	**2.0000e-004**	**1.9000e-004**	**10.4432**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Racquet Club	194543	1.0500e-003	9.5400e-003	8.0100e-003	6.0000e-005		7.2000e-004	7.2000e-004		7.2000e-004	7.2000e-004	0.0000	10.3815	10.3815	2.0000e-004	1.9000e-004	10.4432
Total		**1.0500e-003**	**9.5400e-003**	**8.0100e-003**	**6.0000e-005**		**7.2000e-004**	**7.2000e-004**		**7.2000e-004**	**7.2000e-004**	**0.0000**	**10.3815**	**10.3815**	**2.0000e-004**	**1.9000e-004**	**10.4432**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Racquet Club	117636	20.8621	1.7600e-003	2.1000e-004	20.9698
Total		**20.8621**	**1.7600e-003**	**2.1000e-004**	**20.9698**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Racquet Club	117636	20.8621	1.7600e-003	2.1000e-004	20.9698
Total		**20.8621**	**1.7600e-003**	**2.1000e-004**	**20.9698**

6.0 Area Detail

6.1 Mitigation Measures Area

Use Low VOC Paint - Non-Residential Interior

San Marino Center Rehabilitation - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Use Low VOC Paint - Non-Residential Exterior

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0442	0.0000	1.4000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.7000e-004	2.7000e-004	0.0000	0.0000	2.9000e-004
Unmitigated	0.0442	0.0000	1.4000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.7000e-004	2.7000e-004	0.0000	0.0000	2.9000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	5.0200e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0391					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.0000e-005	0.0000	1.4000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.7000e-004	2.7000e-004	0.0000	0.0000	2.9000e-004
Total	**0.0442**	**0.0000**	**1.4000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**2.7000e-004**	**2.7000e-004**	**0.0000**	**0.0000**	**2.9000e-004**

San Marino Center Rehabilitation - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	5.0200e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0391					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.0000e-005	0.0000	1.4000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.7000e-004	2.7000e-004	0.0000	0.0000	2.9000e-004
Total	**0.0442**	**0.0000**	**1.4000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**2.7000e-004**	**2.7000e-004**	**0.0000**	**0.0000**	**2.9000e-004**

7.0 Water Detail

7.1 Mitigation Measures Water

Apply Water Conservation Strategy

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	1.9646	0.0169	4.1000e-004	2.5089
Unmitigated	2.4558	0.0211	5.2000e-004	3.1361

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Racquet Club	0.64052 / 0.392577	2.4558	0.0211	5.2000e-004	3.1361
Total		**2.4558**	**0.0211**	**5.2000e-004**	**3.1361**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Racquet Club	0.512416 / 0.314062	1.9646	0.0169	4.1000e-004	2.5089
Total		**1.9646**	**0.0169**	**4.1000e-004**	**2.5089**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	3.1327	0.1851	0.0000	7.7610
Unmitigated	12.5306	0.7405	0.0000	31.0441

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Racquet Club	61.73	12.5306	0.7405	0.0000	31.0441
Total		**12.5306**	**0.7405**	**0.0000**	**31.0441**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Racquet Club	15.4325	3.1327	0.1851	0.0000	7.7610
Total		**3.1327**	**0.1851**	**0.0000**	**7.7610**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation