

# **MOUNTAIN AVENUE BEES PROJECT LYTLE CREEK, CALIFORNIA**

## **AIR QUALITY/GREENHOUSE GAS STUDY**

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## AIR QUALITY and GREENHOUSE GAS STUDY

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Summer/Annual

# **MOUNTAIN AVENUE BEES PROJECT LYTLE CREEK, 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 construction and operation of the Mountain Avenue Bees Project in the Lytle Creek area of unincorporated San Bernardino County, California. This report has been prepared by Birdseye Planning Group (BPG) under contract to the project applicant 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 project applicant, Mountain Avenue Bee, Inc., is proposing to develop a raw honey processing, storage and distribution facility at 3112 Lytle Creek Road in unincorporated San Bernardino County, California (APN 0239-311-01, -02 and -03). In total, the project site is approximately 18 acres in size. The proposing processing facility would be developed on a portion of approximately 9.33 developed acres located in the northern portion of the property. The remainder of the site would be left in the existing condition. The site is currently developed with a single-family home constructed in 1956, a trailer, well, barn and paved driveway. The barn is an unpermitted structure currently used for similar purposes as the proposed project and would be demolished as part of the project. The single-family residence would not be affected by project improvements.

The project would be comprised of two 15,000 square-foot single-story concrete tilt-up buildings with related improvements consisting of a new septic system and leach fields for wastewater disposal, recertification of an existing well for potable water production, connection to the West Valley Water District mainline located along Lytle Creek Road as the primary source of water. Further, the project would reconstruct the existing paved driveway, provide 38 parking stalls, drive lanes, loading docks, utility connections and other required site improvements. Stormwater would be collected and conveyed to a new stormwater infiltration basin located adjacent to and south of the proposed buildings.

The project would operate seasonally from January through June and from October through December. The facility would operate from 7 a.m. to 4 p.m. daily. Approximately eight full-time and six seasonal employees would work at the facility. The project would generate approximately 72 car/light truck trips and four delivery truck trips daily for a total of 76 daily trips.

Construction is proposed to begin in mid-2023 with facility operation beginning in late 2023. The project site is shown in Figure 1. The proposed site plan is shown in Figure 2.



Figure 1 — Vicinity Map  - Project Site

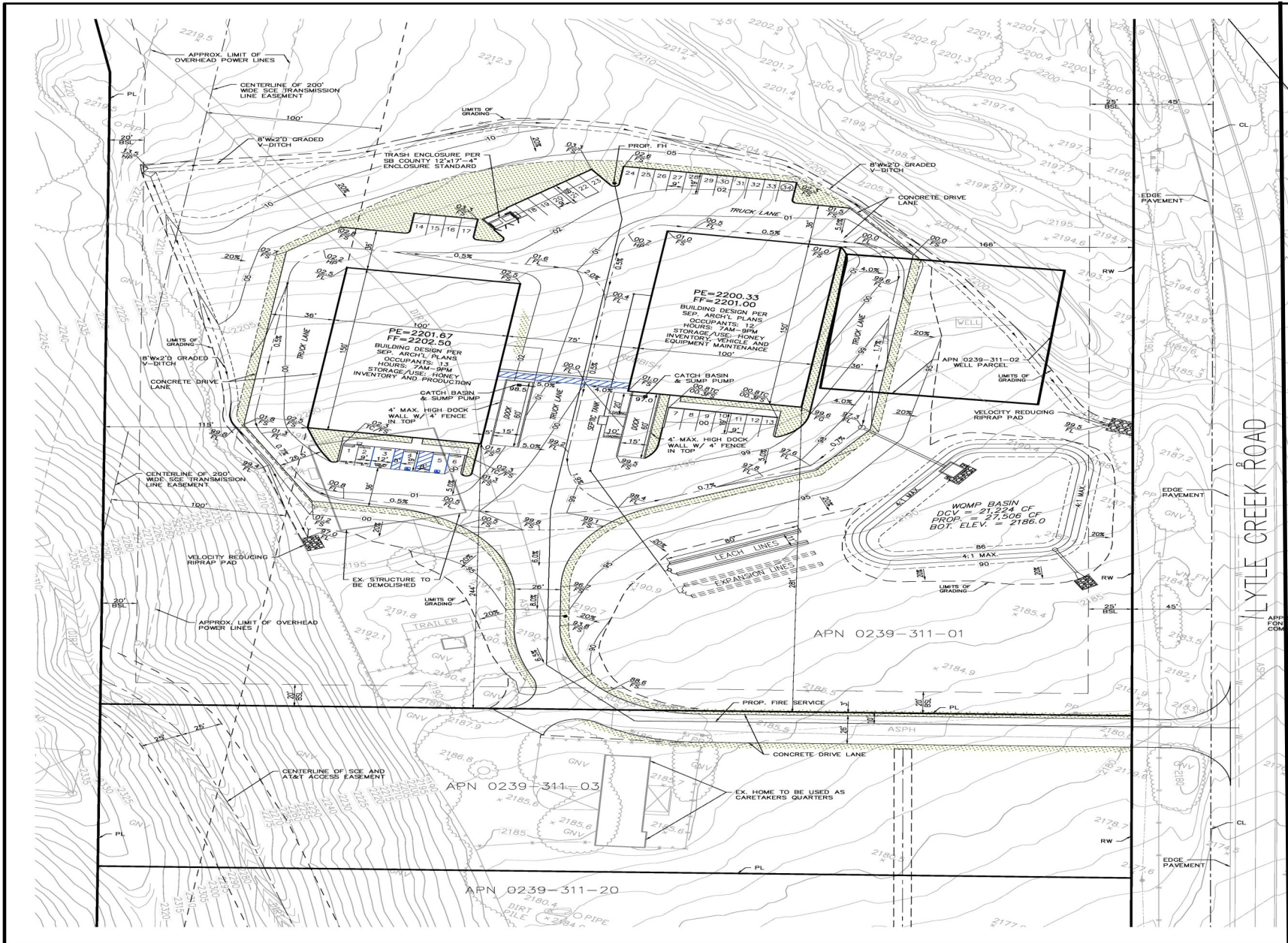


Figure 2—Site Plan

## 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<sub>3</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), particulates less than 10 and 2.5 microns in diameter (PM<sub>10</sub> and PM<sub>2.5</sub>), 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 more restrictive than federal standards for each of these pollutants except lead and the eight-hour average for CO. The federal, state and location regulations that pertain to air pollutants are summarized below.

**Table 1 Ambient Air Quality Standards**

POLLUTANT	AVERAGE TIME	CALIFORNIA STANDARDS <sup>1</sup>		NATIONAL STANDARDS <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>3,5</sup>	Secondary <sup>3,6</sup>	Method <sup>7</sup>
Ozone <sup>8</sup> (O <sub>3</sub> )	1 hour	0.09 ppm (180 µg/m <sup>3</sup> )	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 hours	0.070 ppm (137µg/m <sup>3</sup> )		0.070 ppm (137 µg/m <sup>3</sup> )		
Carbon Monoxide (CO)	8 hours	9.0 ppm (10 mg/m <sup>3</sup> )	Non-Dispersive Infrared Spectroscopy (NDIR)	9 ppm (10 mg/m <sup>3</sup> )	--	Non-Dispersive Infrared Spectroscopy (NDIR)
	1 hour	20 ppm (23 mg/m <sup>3</sup> )		35 ppm (40 mg/m <sup>3</sup> )		
Nitrogen Dioxide (NO <sub>2</sub> ) <sup>10</sup>	Annual Average	0.030 ppm (57 µg/m <sup>3</sup> )	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m <sup>3</sup> )	Same as Primary Standard	Gas Phase Chemiluminescence
	1 hour	0.18 ppm (339 µg/m <sup>3</sup> )		100 ppb (188 µg/m <sup>3</sup> )	--	
Sulfur Dioxide (SO <sub>2</sub> ) <sup>11</sup>	Annual Average	--	Ultraviolet Fluorescence	0.03 ppm (80 µg/m <sup>3</sup> )	--	Pararosaniline
	24 hours	0.04 ppm (105 µg/m <sup>3</sup> )		0.14 ppm (365 µg/m <sup>3</sup> )	--	
	3 hours	--		--	0.5 ppm (1300 µg/m <sup>3</sup> )	
	1 hour	0.25 ppm (655 µg/m <sup>3</sup> )		75 ppb (196 µg/m <sup>3</sup> )	--	

POLLUTANT	AVERAGE TIME	CALIFORNIA STANDARDS <sup>1</sup>		NATIONAL STANDARDS <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>3,5</sup>	Secondary <sup>3,6</sup>	Method <sup>7</sup>
Respirable Particulate Matter (PM <sub>10</sub> ) <sup>9</sup>	24 hours	50 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	150 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>		--	--	
Fine Particulate Matter (PM <sub>2.5</sub> ) <sup>9</sup>	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	12 µg/m <sup>3</sup>	15 µg/m <sup>3</sup>	Inertial Separation and Gravimetric Analysis
	24 hours	--		35 µg/m <sup>3</sup>	Same as Primary Standard	
Sulfates	24 hours	25 µg/m <sup>3</sup>	Ion Chromatography	--	--	--
Lead <sup>12, 13</sup> (Pb)	30-day Average	1.5 µg/m <sup>3</sup>	Atomic Absorption	--	--	High Volume Sampler and Atomic Absorption
	Calendar Quarter	--		1.5 µg/m <sup>3</sup>	Same as Primary Standard	
	3-month Rolling Average	--		0.15 µg/m <sup>3</sup>		
Hydrogen Sulfide (H <sub>2</sub> S)	1 hour	0.03 ppm (42 µg/m <sup>3</sup> )	Ultraviolet Fluorescence	--	--	--
Vinyl Chloride <sup>12</sup>	24 hours	0.010 ppm (26 µg/m <sup>3</sup> )	Gas Chromatography	--	--	--

Notes:

ppm = parts per million

µg/m<sup>3</sup> = micrograms per cubic meter

mg/m<sup>3</sup> = 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<sub>10</sub>, PM<sub>2.5</sub>, 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<sub>10</sub>, 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<sup>3</sup> is equal to or less than one. For PM<sub>2.5</sub>, 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<sub>2.5</sub> primary standard was lowered from 15 µg/ m<sup>3</sup> to 12.0 µg/ m<sup>3</sup>. The existing national 24-hour PM<sub>2.5</sub> standards (primary and secondary) were retained at 35 µg/ m<sup>3</sup>, as was the annual secondary standard of 15 µg/ m<sup>3</sup>. The existing 24-hour PM<sub>10</sub> standards (primary and secondary) of 150 µg/ m<sup>3</sup> 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<sub>2</sub> 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<sub>2</sub> 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<sup>3</sup> 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.

## **Federal Regulations**

The U.S. Environmental Protection Agency (USEPA) regulates emissions sources such as aircraft, ships, and certain locomotives. The USEPA's air quality mandates are drawn primarily from the Clean Air Act (CAA), which was first enacted in 1955 and subsequently amended; Congress's most recent major amendments were in 1990. The CAA established National

Ambient Air Quality Standards (NAAQS). These standards identify air quality levels for criteria pollutants that are considered the maximum levels of ambient (background) air pollutants considered safe (with an adequate margin of safety) to protect the public health and welfare. As part of its enforcement responsibilities, the USEPA requires each State with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that includes pollution control measures that demonstrate how the standards will be met.

The 1990 amendments to the CAA that identify specific emission reduction goals for areas not meeting the NAAQS require a demonstration of reasonable further progress toward attaining and incorporating additional sanctions for failure to attain or meet interim milestones. The CAA sections most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants O<sub>3</sub>, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, CO, PM<sub>2.5</sub>, and Pb. The NAAQS were amended in July 1997 to include an additional standard for O<sub>3</sub> and to adopt a NAAQS for PM<sub>2.5</sub>. As stated,

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<sub>2.5</sub>. The Basin is in attainment for the state and federal standards for PM<sub>10</sub>, nitrogen dioxide, and carbon monoxide.

## **State Regulations**

### *California Environmental Protection Agency*

The mission of the California Environmental Protection Agency (CalEPA) is to restore, protect, and enhance the environment, to ensure public health, environmental quality, and economic vitality. This is accomplished by developing, implementing, and enforcing environmental laws that regulate air, water, and soil quality, pesticide use, and waste recycling and reduction. Relevant to air quality, the California Environmental Protection Agency (CalEPA) consists of the California Air Resources Board (CARB) and the Office Environmental Health Hazard Assessment (OEHHA). In 2012, the Legislature passed Senate Bill (SB) 535, which targets disadvantaged communities in California for the investment of proceeds from the State's cap-and-trade program to improve public health, quality of life, and economic opportunity in California's most burdened communities, while also reducing pollution. SB 535 directed that 25% of the Greenhouse Gas Reduction Fund's proceeds go to projects that provide a benefit to disadvantaged communities. The legislation gave CalEPA responsibility for identifying those communities. In 2016, the Legislature passed Assembly Bill (AB) 1550, which now requires that 25% of proceeds from the fund be spent on projects located in disadvantaged communities. CalEPA has prepared a list of disadvantaged communities for the purpose of SB 535 and CalEnviroScreen is a general mapping tool developed by OEHHA to help identify California communities that are most affected by sources of pollution.

### *California Air Resources Board*

The California Air Resources Board (CARB), a part of the California Environmental Protection Agency (CalEPA), is responsible for ensuring implementation of the California Clean Air Act

(CCAA) (AB 2595), responding to the federal CAA, and for regulating emissions from consumer products and motor vehicles. AB 2595 mandates the achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources to attain the state ambient air quality standards by the earliest practical date. CARB established the California Ambient Air Quality Standards (CAAQS) for all pollutants for which the federal government has NAAQS and, in addition, establishes standards for SO<sub>4</sub>, visibility, hydrogen sulfide (H<sub>2</sub>S), and vinyl chloride (C<sub>2</sub>H<sub>3</sub>Cl). However, at this time, H<sub>2</sub>S and C<sub>2</sub>H<sub>3</sub>Cl are not measured at any monitoring stations in the South Coast Air Basin (SCAB) because they are not considered to be a regional air quality problem. Generally, the CAAQS are more stringent than the NAAQS (as shown in Table 4.2-1).

#### *Community Air Protection Program*

In response to AB 617 (2017), which addresses criteria air pollutants and TACs from sources other than vehicles, CARB established the Community Air Protection Program (CAPP). The CAPP's focus is to reduce exposure in communities most impacted by air pollution. This Statewide effort includes community air monitoring and community emissions reduction programs. In addition, the Legislature appropriated funding to support early actions to address localized air pollution through targeted incentive funding to deploy cleaner technologies in these communities and grants to support community participation in the CAPP process. AB 617 also includes new requirements for accelerated retrofit of pollution controls on industrial sources, increased penalty fees, and greater transparency and availability of air quality and emissions data, which will help advance air pollution control efforts throughout the State. This new effort provides an opportunity to continue to enhance air quality planning efforts and better integrate community, regional, and State level programs to provide clean air for all Californians.

#### *Title 24 Energy Efficiency Standards and California Green Building Standards*

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy-efficient technologies and methods. CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen), is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the California Building Standards Commission (CBSC). The CBSC updates the CALGreen program regularly, with the most recent approved update consisting of the 2019 California Green Building Code Standards that became effective January 1, 2020.

Energy-efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas (GHG) emissions. The 2019 Title 24 standards will result in less energy use, thereby reducing air pollutant emissions associated with energy consumption in the SCAB and across the State of California. For example, the 2019 Title 24 standards require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand-responsive technologies for residential buildings, and update indoor and outdoor lighting requirements for nonresidential

buildings. The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after the implementation of solar photovoltaic systems, homes built under the 2019 standards will use about 53% less energy than homes built under the 2016 standards. Nonresidential buildings (such as the Project) will use approximately 30% less energy due to lighting upgrade requirements.

## **Regional Regulations**

### *Southern California Association of Governments*

On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy), and the addendum to the Connect SoCal Program Environmental Impact Report.

Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern California residents within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura.

### *South Coast Air Quality Management District*

The project is in South Coast Air Basin (SCAB), where the South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for comprehensive air pollution control. As a regional agency, the SCAQMD works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments and cooperates actively with all applicable federal and State government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emissions sources, and enforces such measures through educational programs or fines when necessary. SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a sequence of air quality management plans (AQMPs).

### **SCAQMD Rules**

There are numerous requirements that development and redevelopment projects must comply with by law. They were put in place by federal, State, and local regulatory agencies to improve air quality.

SCAQMD Rule 402, Nuisance, states that a project shall not “discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

SCAQMD Rule 403, Fugitive Dust, is intended to reduce the amount of particulate matter entrained in the ambient air due to anthropogenic (human-made) fugitive dust sources by requiring actions to prevent and reduce fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust and requires best available control measures to be applied to earthmoving and grading activities.

SCAQMD Rule 1113 limits the Volatile Organic Compound (VOC) content of architectural coatings used on projects in the SCAQMD. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use on projects in the SCAQMD must comply with the current VOC standards set in this rule.

SCAQMD Rule 201 requires a “Permit to Construct” prior to the installation of any equipment “the use of which may cause the issuance of air contaminants . . .”, and Regulation II provides the requirements for the application for a Permit to Construct. Rule 203 similarly requires a Permit to Operate. Rule 219, Equipment Not Requiring a Written Permit Pursuant to Regulation II, identifies “equipment, processes, or operations that emit small amounts of contaminants that shall not require written permits . . .”

SCAQMD Rule 2202 provides employers with a menu of options to reduce mobile source emissions generated from employee commutes, to comply with federal and State CAA requirements. This Rule applies to any employer who employs 250 or more employees on a full or part-time basis at a worksite for a consecutive six-month period calculated as a monthly average, unless otherwise exempt. An employer subject to this Rule is required to annually register with the SCAQMD to implement an emission reduction program, in accordance with subdivisions (f) and (g), that will obtain emission reductions equivalent to a worksite specific emission reduction target (ERT) specified for the compliance year.

## **Local Regulations**

### *County of San Bernardino General Plan*

Local jurisdictions, such as the County of San Bernardino, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the County is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The County is also responsible for the implementation of transportation control measures as outlined in the 2016 AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals. In accordance with CEQA requirements and the CEQA review process, the County assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation.

In accordance with the CEQA requirements, the County does not, have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the County

and region will meet federal and state standards. Instead, the County relies on the expertise of the SCAQMD and Mojave Desert AQMD and utilizes the SCAQMD CEQA Handbook and MDAQMD California Environmental Quality Act (CEQA) And Federal Conformity Guidelines (depending on the location/jurisdiction of the project) as guidance documents for the environmental review of plans and development proposals within its jurisdiction.

*County of San Bernardino Development Code*

The follow development code sections address air quality requirements for projects being developed in San Bernardino County.

**83.01.040 - Air Quality.**

(a) **Equipment permit and Inspection Requirements.** Required permits shall be obtained from either the Mojave Air Pollution Management District or the South Coast Air Quality Management District depending on the location of the subject property and equipment for equipment that may cause air pollution. Before the equipment may be constructed, plans and specifications shall be submitted to the appropriate District for approval.

(b) **Permits from Air Quality Management Districts.** Permits shall be obtained from either the Mojave Air Pollution Management District or the South Coast Air Quality Management District depending on the location of the subject property and equipment. If requested by the Director, uses, activities, or processes that require Air Quality Management District approval to operate shall file a copy of the permit with the Department within 30 days of its approval.

(c) **Diesel Exhaust Emissions Control Measures.** The following emissions control measures shall apply to all discretionary land use projects approved by the County on or after January 15, 2009:

1. **On-Road Diesel Vehicles.** On-road diesel vehicles are regulated by the State of California Air Resources Board.

2. **Off-Road Diesel Vehicle/Equipment Operations.** All business establishments and contractors that use off-road diesel vehicle/equipment as part of their normal business operations shall adhere to the following measures during their operations in order to reduce diesel particulate matter emissions from diesel fueled engines:

- a. Off-road vehicles/equipment shall not be left idling on site for periods in excess of five minutes. The idling limit does not apply to:
  - i. Idling when queuing,
  - ii. Idling to verify that the vehicle is in safe operating condition,
  - iii. Idling for testing, servicing, repairing, or diagnostic purposes,

- iv. Idling necessary to accomplish work for which the vehicle was designed (such as operating a crane),
  - v. Idling required to bring the machine system to operating temperature, and
  - vi. Idling necessary to ensure safe operation of the vehicle
- b. Use reformulated ultra-low sulfur diesel fuel in equipment and use equipment certified by the U.S. Environmental Protection Agency (EPA) or that pre-dates EPA regulations.
- c. Maintain engines in good working order to reduce emissions.
- d. Signs shall be posted requiring vehicle drivers to turn off engines when parked.
- e. Any requirements or standards subsequently adopted by the South Coast Air Quality Management District, the Mojave Air Quality Management District, or the California Air Resources Board.
- f. Provide temporary traffic control during all phases of construction.
- g. Onsite electrical power connections shall be provided for electric construction tools to eliminate the need for diesel-powered electric generators, where feasible.
- h. Maintain construction equipment engines in good working order to reduce emissions. The developer shall have each contractor certify that all construction equipment is properly serviced and maintained in good operating condition.
- i. Contractors shall use ultra-low sulfur diesel fuel for stationary construction equipment as required by Air Quality Management District (AQMD) Rules 431.1 and 431.2 to reduce the release of undesirable emissions.
- j. Substitute electric and gasoline-powered equipment for diesel-powered equipment, where feasible.
2. **Project Design.** Distribution centers, warehouses, truck stops and other facilities with loading docks where diesel trucks may reside overnight or for periods in excess of three hours shall be designed to enable any vehicle using these facilities to utilize on-site electrical connections to power the heating and air conditioning of the cabs of such trucks, instead of operating the diesel engines and diesel refrigeration units of such trucks and trailers for these purposes. This requirement shall also apply to Recreational Vehicle Parks (as defined in Section 810.01.200(k) of this title) and other development projects where diesel engines may reasonably be expected to operate on other than an occasional basis.

## **Ambient Air Quality**

As stated, local air quality management control is provided by the ARB through county-level or regional (multi-county) Air Quality Management Districts (AQMDs). The ARB establishes air quality standards and is responsible for control of mobile emission sources, while the local AQMDs 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 portions of Los Angeles, Orange and Riverside Counties. Air quality conditions in the project area are under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is required to 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<sub>2.5</sub>. The Basin is in attainment for the state and federal standards for PM<sub>10</sub>, nitrogen dioxide, and carbon monoxide. 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<sub>x</sub>) and reactive organic gases (ROG)<sup>1</sup>. 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 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<sub>2</sub>) is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of

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<sup>1</sup> 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).



nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO<sub>2</sub>, creating the mixture of NO and NO<sub>2</sub> commonly called NO<sub>x</sub>. Nitrogen dioxide is an acute irritant. A relationship between NO<sub>2</sub> 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<sub>10</sub> and acid rain.

Suspended Particulates. PM<sub>10</sub> is particulate matter measuring no more than 10 microns in diameter, while PM<sub>2.5</sub> is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly dust particles, nitrates and sulfates. Both PM<sub>10</sub> and PM<sub>2.5</sub> 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<sub>2.5</sub>) 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<sub>x</sub>). Information on TAC and DPM is provided herein for reference only. While truck operation would generate DPM, the site is not located in proximity

to sensitive receptors such that the use would pose a health risk or justify further evaluation in a health risk assessment.

## **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 Fontana Arrow Highway station, located approximately 8 miles southwest of the project site. Table 2 provides a summary of monitoring data at the Fontana Arrow Highway for ozone and PM<sub>10</sub>. As referenced, the SCAB is a nonattainment area for these two pollutants.

As shown, both the federal and state ozone standards were exceeded at the Upland monitoring station during each of the last three years. The federal PM<sub>10</sub> standard was exceeded one time during the last three years. Insufficient data was available to determine whether the state standard was exceeded or whether the PM<sub>2.5</sub> standard was exceeded.

## **Air Quality Management Plan**

The NAAQS and CAAQS presented in Table 2 establish the context for the local AQMPs and for determining the significance of a project's contribution to local or regional pollutant

**Table 2  
Ambient Air Quality Data**

<b>Pollutant</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Ozone, ppm - Worst Hour	0.109	0.111	0.103
Number of days of State exceedances (>0.070 ppm)	67	89	81
Particulate Matter <10 microns, $\mu\text{g}/\text{m}^3$ Worst 24 Hours	88.8	76.8	73.8
Number of samples of State exceedances (>50 $\mu\text{g}/\text{m}^3$ )	65	*	*
Number of samples of Federal exceedances (>150 $\mu\text{g}/\text{m}^3$ )	0	*	1
Particulate Matter <2.5 microns, $\mu\text{g}/\text{m}^3$ Worst 24 Hours	81.3	57.6	55.1
Number of samples of State exceedances (>12 $\mu\text{g}/\text{m}^3$ )	3	4	2
Number of samples of Federal exceedances (>12 $\mu\text{g}/\text{m}^3$ )	*	*	*

*Fontana – 14360 Arrow Route, Fontana, Monitoring Station*

*\*Data insufficient to determine the value*

*Source: California Air Resources Board, 2019, 2020, 2021 Annual Air Quality Data Summaries available at <http://www.arb.ca.gov/adam/topfour/topfour1.php>*

concentrations. The NAAQS and CAAQS represent the level of air quality considered safe, with an adequate safety margin, to protect public health and welfare. They are designed to protect those people most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other diseases or illness, and persons engaged in strenuous work or exercise.

The SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and State air quality standards. Currently, the NAAQS and CAAQS are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of AQMPs to meet the State and federal ambient air quality standards. AQMPs are updated regularly to more effectively reduce emissions, accommodate growth, and minimize any negative fiscal impacts of air pollution control on the economy. The AQMP control measures and related emission reduction estimates are based on emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, conformance with the AQMP for development projects is determined by demonstrating compliance with local land use plans and/or population projections.

### **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. The nearest land use to the Project site that is considered a sensitive receptor for the purposes of evaluating air quality impacts, is the single-family residence located approximately 300 feet south of the project site. This receptor is used for evaluation of localized impacts of NO<sub>x</sub>, CO, PM<sub>10</sub> and PM<sub>2.5</sub>.

## **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 demolition, clearing, grading and excavation would generate diesel and dust emissions. Construction equipment that would generate criteria air pollutants includes excavators, graders, dump trucks, and loaders. It was assumed that all construction equipment used would be diesel-powered. 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 each of the construction phases. Construction emissions are analyzed using the regional thresholds established by the SCAQMD and published in the *CEQA Air Quality Handbook*.

Operational activities associated with the Project would result in emissions of VOCs, NO<sub>x</sub>, SO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. Operational emissions are generated by area, energy and mobile sources which are summarized as follows:

#### **Area Source Emissions**

**Architectural Coatings.** Over time the building constructed as part of the project would require maintenance. Emissions would be generated from the use of evaporative solvents contained in paints, varnishes, primers, and other surface coatings.

**Consumer Products.** Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants.

**Landscape Maintenance Equipment.** Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, blowers, trimmers and related equipment used to maintain the landscaping.

## Energy Source Emissions

**Natural Gas and Electricity.** Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. When combustion of natural gas occurs within a building, the building is considered a direct emission source and CalEEMod 2020.4.0 would calculate emissions of all criteria pollutants. The project is not expected to use natural gas; thus, no emissions would be generated by this source.

With respect to electricity, energy used in buildings is typically generated by off-site facilities (i.e. power plants). Because power plants are existing stationary sources, criteria pollutant emissions are generally associated with the power plants and not the individual buildings or electricity users. Project-related electricity generation is considered to take place off-site; and therefore, criteria pollutant emissions are not accounted for.

## Mobile Sources

The project related operational air quality emissions are derived primarily from vehicle trips generated by the project. These include employee trips to and from the site and truck trips associated with the proposed warehouse use. Trip generation rates and total daily and peak hour volumes were calculated and presented based on applicant information. In summary, the project would generate approximately four daily truck trips and up to 14 daily employee round trips. Default fleet mix and trip length data in CalEEMod 2020.4.0 was utilized for emission modeling purposes.

Regional Thresholds. Based on Appendix G of the *CEQA Guidelines*, 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; or*
- d) *Result in other emissions (such as those leading to odors) 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<sub>x</sub>*
- *550 pounds per day of CO*
- *150 pounds per day of SO<sub>x</sub>*
- *150 pounds per day of PM<sub>10</sub>*

- *55 pounds per day of PM<sub>2.5</sub>*

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

- *55 pounds per day of ROG*
- *55 pounds per day of NO<sub>x</sub>*
- *550 pounds per day of CO*
- *150 pounds per day of SO<sub>x</sub>*
- *150 pounds per day of PM<sub>10</sub>*
- *55 pounds per day of PM<sub>2.5</sub>*

### **Construction Emissions**

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM<sub>10</sub> and PM<sub>2.5</sub>) and exhaust emissions from heavy construction vehicles, 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, site preparation, grading, construction of the proposed buildings, paving, and architectural coating (i.e., paint) application.

This analysis assumes that graded soils would be balanced on the project site and that no soil import or export would be required. 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.

- 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 twice daily, preferably in the late morning and after work is done for the day. The analysis provided herein assumes watering would occur two times daily.
- 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, site preparation, grading, building construction, paving, and architectural coating application is based on the overall scope of the proposed development and construction phasing which is expected to begin mid-2023 and extend through the end of 2023, a duration of approximately 6 months. For dust control, it was assumed the disturbed area would be watered twice 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 pavement coatings) as required by SCAQMD Rule 1113. Table 3 summarizes the estimated maximum mitigated daily emissions of pollutants occurring during 2023.

**Table 3**  
**Estimated Maximum Mitigated Daily Construction Emissions**

Construction Phase	Maximum Emissions (lbs/day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2023 Maximum lbs/day	17.8	14.7	14.2	0.03	3.9	2.1
<i>SCAQMD Regional Thresholds</i>	75	100	550	150	150	55
<b>Threshold Exceeded 2023</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

As shown in Table 3, construction of the proposed project would not exceed the SCAQMD regional thresholds.

Localized Significance Thresholds. The SCAQMD has published a “Fact Sheet for Applying CalEEMod to Localized Significance Thresholds” (South Coast Air Quality Management District 2011). The following describes the methods used to apply the fact sheet methods to the CalEEMod output data for comparison with the Localized Significance Thresholds (LSTs). 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. 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, distance to the sensitive receptor and related factors. 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<sub>x</sub>, CO, PM<sub>10</sub> and PM<sub>2.5</sub>. LSTs are not applicable to mobile sources such as cars on a roadway (Final Localized Significance Threshold Methodology, SCAQMD, June 2003). As such, LSTs for operational emissions do not apply to the proposed development as the majority of project emissions would be generated by cars on roadways traveling to/from the facility.

LSTs have been developed for emissions within areas of one, two and five acres in size, with air pollutant modeling recommended for activity within larger areas. While emission modeling was performed for the project, an LST evaluation was also performed to conservatively address potential short-term construction impacts. The project site is located in Source Receptor Area 32 (SRA-32, Northwest San Bernardino Valley). According to the SCAQMD's publication *Final Localized Significant (LST) Thresholds Methodology*, the use of LSTs is voluntary, to be implemented at the discretion of local agencies. LSTs for construction related emissions in the SRA 32 at varying distances between the source and receiving property are shown in Table 2. The area disturbed during daily grading based on the default equipment mix generated by CalEEMod is 1.5 acres. To conservatively evaluate potential LST impacts, the thresholds for a two-acre site are shown.

As referenced, the nearest sensitive receptors to the project site are multifamily residences located approximately 300 feet (91 meters) south of the site. Consistent with SCAQMD recommendations, the 50-meter LSTs are used for a two-acre project site. As discussed, LSTs apply to on-site uses only and do not include off-site vehicle trips and emissions. As shown in Table 3, the daily emissions would not exceed the LST's shown in Table 4. No impact related to LSTs would occur. No mitigation measures are required.

**Table 4**  
**SCAQMD LSTs for Construction**

Pollutant	Allowable emissions as a function of receptor distance in meters from a two-acre site (lbs/day)				
	25	50	100	200	500
Gradual conversion of NO <sub>x</sub> to NO <sub>2</sub>	170	200	263	378	684



CO	1,232	1,877	3,218	6,778	24,768
PM <sub>10</sub>	6	19	34	66	160
PM <sub>2.5</sub>	5	8	14	36	150

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

### Construction-Related Toxic Air Contaminant Impacts

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed project and truck traffic. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of “individual cancer risk”. “Individual Cancer Risk” is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the short-term construction schedule, the proposed project would not result in a long-term (i.e., 70 years) substantial source of toxic air contaminant emissions and related individual cancer risk. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the proposed project.

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 a health risk assessment, 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<sub>x</sub>). The California Air Resources Board (CARB) Air Quality and Land Use Handbook (2005) recommends avoiding the siting of new sensitive receptors within 500 feet of an urban roadway with 100,000 vehicles daily. Traffic counts from 2017 show daily volumes on Lytle Creek Road range from 1,000 to 5,000 vehicles daily. This is less than the recommended threshold. The project is not a sensitive use, the nearest receptor is located approximately 300 feet south of the site along Lytle Creek Road and daily volumes are less than the CARB recommended threshold. Thus, project-related truck traffic would not pose a health risk or justify further evaluation in a health risk assessment.

### Construction-Related Odor Impacts

Potential sources of odor during construction activities include equipment exhaust and activities such as paving. 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 (e) referenced above.

## Long-Term Regional Impacts

### Regional Pollutant Emissions

Table 5 summarizes summer 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 architectural coating emissions as the structures are repainted over the life of the project.

As shown in Table 5, daily emissions would not exceed the SCAQMD thresholds for ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub> or PM<sub>2.5</sub>. 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**.

**Table 5  
 Estimated Operational Emissions**

	Estimated Emissions (lbs/day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<i>Proposed Project</i>						
Area	0.67	0.01	0.0	0.0	0.01	0.01
Energy	0.03	0.3	0.2	0.01	0.1	0.01
Mobile	0.3	0.5	3.6	0.01	0.8	0.2
<b>Maximum lbs/day</b>	<b>1.0</b>	<b>0.7</b>	<b>3.8</b>	<b>0.02</b>	<b>0.8</b>	<b>0.2</b>
<i>SCAQMD Thresholds</i>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

*See Appendix for CalEEMod version. 2020.4.0 computer model output for operational emissions. Summer emissions shown.*

*Note – totals may vary slightly due to rounding.*

### Operational Toxic Air Contaminant Emissions

As referenced above, 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 a health risk assessment, 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<sub>x</sub>). The California Air Resources Board (CARB) Air Quality and Land Use Handbook (2005) recommends avoiding the siting of new sensitive receptors within 500 feet of an urban roadway with 100,000

vehicles daily. As shown in Figure 2.4 of the San Bernardino Countywide Plan. Transportation Existing Conditions Report (Fehr & Peers, November 2018), Lytle Creek Road carries between 1,000 and 5,000 vehicles daily. The project would generate 72 car/light truck and four delivery truck trips daily. Daily volumes are, and would remain with the project, less than the CARB recommended threshold. Thus, project-related truck traffic would not pose a health risk or justify further evaluation in a health risk assessment.

### Objectionable Odors

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants (WWTPs), food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The project would process raw honey frames, convert the material to liquid and place into food grade barrels or totes for transport. The process would not require cooking or other methods that would create odors. Therefore, the proposed project would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people. Therefore, this impact would be less than significant per threshold (e).

### AQMP Consistency

In March 2017, the SCAQMD released the Final 2016 AQMP (2016 AQMP). The 2016 AQMP evaluates current integrated strategies and control measures to meet the NAAQS and explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, State, and local levels. Similar to the 2012 AQMP, the 2016 AQMP incorporates scientific and technological information and planning assumptions, including the *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (2016-2040 RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements.

The Project's consistency with the AQMP is determined based on the 2016 AQMP, as discussed below. Criteria for determining consistency with the AQMP are defined in Chapter 12, Sections 12.2 and Section 12.3 of the 1993 CEQA Handbook. These indicators are discussed below.

***Consistency Criterion No. 1: The proposed Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.***

The violations that Consistency Criterion No. 1 refers to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded. As discussed herein, the Project's construction activities would not exceed any of the SCAQMD daily thresholds or LSTs. Thus, construction activities would not conflict with the 2016 AQMP. Further, operational emissions would not exceed the applicable regional

thresholds; therefore, operational activities would not conflict with the 2016 AQMP. Impacts would be less than significant for this criterion.

*Consistency Criterion No. 2: The Project would not exceed the assumptions in the AQMP based on the years of Project build-out phase.*

The 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the SCAQMD are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Therefore, development consistent with the growth projections in the Countywide Plan Update (2019) is considered to be consistent with the AQMP. Further, the project would have a less than significant impact related to Vehicle Miles Traveled (VMT) as discussed in Section XVII of the *Mountain Avenue Bees Project Initial Study*. Based on these facts, the project would be consistent with the AQMP. Impacts would be **less than significant** under threshold a.

## **GREENHOUSE GAS EMISSIONS**

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<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxides (N<sub>2</sub>O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). 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<sub>2</sub> and CH<sub>4</sub> are emitted in the greatest quantities from human activities. Emissions of CO<sub>2</sub> are largely by-products of fossil fuel combustion, whereas CH<sub>4</sub> results from off-gassing associated with agricultural practices and landfills. Man-made GHGs, many of which have greater heat-absorption potential than CO<sub>2</sub>, include fluorinated gases and sulfur hexafluoride (SF<sub>6</sub>) (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<sub>2</sub>) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as “carbon dioxide equivalent” (CO<sub>2</sub>E), and is the amount of a GHG emitted multiplied by its GWP. Carbon dioxide has a GWP of one. By contrast, methane (CH<sub>4</sub>) 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).

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. California has established a GHG target of at least 40% below the 1990 level of emissions by 2030.

## **Federal Regulations**

### *Greenhouse Gases Endangerment*

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

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

### *Light-Duty Vehicle Greenhouse Gas Emission and Corporate Average Fuel Economy Standards*

Congress first passed the Corporate Average Fuel Economy (CAFE) law in 1975 to increase the fuel economy of cars and light duty trucks. The law has become more stringent over time. On April 1, 2010, the EPA, and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) announced a joint final rule establishing a national program that would reduce GHG emissions and improve fuel economy for new cars and trucks sold in the U.S. The national program's first phase applies to passenger cars, light-duty trucks, and medium-duty (MD) passenger vehicles, covering model years 2012 through 2016. The EPA and the NHTSA issued final rules on a second phase joint rulemaking establishing national standards for light-duty vehicles for model years 2017 through 2025 in August 2012. The new standards for model years 2017 through 2025 apply to passenger cars, light-duty trucks, and MD passenger vehicles. The final standards are projected to result in an average industry fleetwide level of 163 grams/mile of CO<sub>2</sub> in model year 2025, equivalent to 54.5 mpg if achieved exclusively through fuel economy improvements. The EPA and the U.S. Department of Transportation issued final rules for the first national standards to reduce GHG emissions and improve fuel efficiency of heavy-duty trucks (HDT) and buses on September 15, 2011, effective November 14, 2011 addressing model years through 2018.

On August 2, 2018, the NHTSA in conjunction with the EPA, released a notice of proposed rulemaking, the *Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule). The SAFE Vehicles Rule was proposed to amend existing CAFE and tailpipe CO<sub>2</sub> standards for passenger cars and light trucks and to

establish new standards covering model years 2021 through 2026. As of March 31, 2020, the NHTSA and EPA finalized the SAFE Vehicle Rule, which increased the stringency of CAFE and CO2 emissions standards by 1.5% each year through model year 2026.

#### *SmartWay Program*

The SmartWay Program is a public-private initiative between the EPA, large and small trucking companies, rail carriers, logistics companies, commercial manufacturers, retailers, and other federal and state agencies. Its purpose is to improve fuel efficiency and the environmental performance (reduction of both GHG emissions and air pollution) of the goods movement supply chains. Most large trucking fleets driving newer vehicles are compliant with SmartWay design requirements. Moreover, over time, all HDTs would have to comply with the California Air Resources Board (CARB) GHG Regulations designed with the SmartWay Program in mind to reduce GHG emissions by making them more fuel-efficient. Through the SmartWay Technology Program, the EPA has evaluated the fuel-saving benefits of various devices through grants, cooperative agreements, emissions and fuel economy testing, demonstration projects, and technical literature review. As a result, the EPA has determined the following types of technologies provide fuel saving and/or emission reducing benefits when appropriately used in their designed applications, and has verified certain products: idle reduction technologies, aerodynamic technologies, low rolling resistance tires, retrofit technologies, and federal excise tax exemptions.

### **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<sub>2</sub>E). 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;
2. Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets;
3. 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
4. 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<sub>2</sub>E) 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:

1. 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.
2. 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.
3. 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.
4. New amendments include guidelines for determining methods to mitigate the effects of greenhouse gas emissions in Appendix F of the CEQA Guidelines.
5. 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.”
6. 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.
7. 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. On September 3, 2020, SCAG adopted the 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), Connect SoCal. which meets the CARB emission reduction requirements. The Housing Element Update is required by the State to be completed within 18 months after RTP/SCS adoption. The Riverside County Housing Element 2021-2029 (6th Cycle) is being prepared and will include housing-related goals, policies, and programs to address the existing and projected future housing needs of the unincorporated County.

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 30% less energy than those built to the 2016 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).<sup>2</sup> 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

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<sup>2</sup> It is expected that achievement of the ZNE goal will occur through revisions to the Title 24 standards.

conditioners and room air-conditioning heat pumps; central air conditioners; spot air conditioners; vented gas space heaters; gas pool heaters; plumbing fittings and plumbing fixtures; fluorescent lamp ballasts; lamps; emergency lighting; traffic signal modules; dishwashers; 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 CO<sub>2</sub>E. 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:

1. 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.
2. 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.
3. 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.

The California Supreme Court addressed the issue of GHG emissions and the evaluation of potential impacts in CEQA documents, in the *Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming* case, (2015) 224 Cal.App.4th 1105 (CBD vs. CDFW), also known as the “Newhall Ranch” case. The justices examined one of the most common approaches to GHG analyses for development projects which was evaluating the efficiency of a project’s emissions reduction in the context of the AB 32’s 2020 reduction goal, as presented in the statewide CARB Scoping Plan, using a comparison to an unregulated, “business as usual (BAU)” emissions scenario. As discussed in the Newhall Ranch decision, determining consistency with local GHG reduction plans or Climate Action Plans that qualify under Section 15183.5 of the CEQA Guidelines may be the most effective strategy for local governments to assess the significance of GHG emissions from proposed land use developments. Qualified CAPs also provide a workable option for addressing post-2020 GHG emissions and resolving issues that arise out of project-level GHG analyses raised in the Court’s decision.

### *County of San Bernardino Greenhouse Gas Emissions Reduction Plan*

The County of San Bernardino adopted its "Greenhouse Gas Emissions Reduction Plan" in December 2011. The purpose of the GHG Reduction Plan is to reduce the County's internal and external GHG emissions by 15 percent below current (2011) levels by year 2020. The GHG Reduction Plan includes a two-tiered development review procedure to determine if a project could result in a significant impact related greenhouse gas emissions or otherwise comply with the Plan pursuant to Section 15183.5 of the state CEQA Guidelines.

The initial screening procedure is to determine if a project will emit 3,000 metric tons of carbon dioxide equivalents (MTCO<sub>2e</sub>) per year or more. Projects that do not exceed this threshold require no further climate change analysis. Projects exceeding this threshold must meet a minimum 31 percent emissions reduction in order to garner a less than significant determination. This can be met by either (1) achieving 100 points from a menu of mitigation options provided in the GHG Plan or (2) quantifying proposed reduction measures. Projects failing to meet the 31 percent reduction threshold would have a potentially significant impact related to climate change and greenhouse gas emissions.



According to the *County of San Bernardino Greenhouse Gas Emissions Reduction Plan*, "all development projects, including those otherwise determined to be exempt from CEQA will be subject to applicable Development Code provisions, including the GHG performance standards, and state requirements, such as the California Building Code requirements for energy efficiency. With the application of the GHG performance standards, projects that are exempt from CEQA and small projects that do not exceed 3,000 MTCO<sub>2</sub>e per year will be considered to be consistent with the Plan and determined to have a less than significant individual and cumulative impact for GHG emissions." The Reduction Plan also states that "a review standard of 3,000 MTCO<sub>2</sub>e per year will be used to identify projects that require the use of Screening Tables or a project-specific technical analysis to quantify and mitigate project emissions." Furthermore, "for projects exceeding 3,000 MTCO<sub>2</sub>e per year of GHG emissions, the County will use Screening Tables as a tool to assist with calculating GHG reduction measures and the determination of a significance finding. Projects that achieve 100 or greater points would not require quantification of project specific GHG emissions. The point system was devised to ensure to Project compliance with the reduction measures in the GHG Plan such that the GHG emissions from new development, when considered together with those existing development, will allow the County to meet its 2020 target and support reductions in GHG emissions beyond 2020. Consistent with the CEQA Guidelines, such projects are consistent with the Plan and therefore will be determined to have a less than significant individual and cumulative impact for GHG emissions.

### *County of San Bernardino General Plan*

The County of San Bernardino General Plan contains the following greenhouse gas related policies and programs that are applicable to the proposed project:

**CO 4.5** Reduce emissions through reduced energy consumption.

1. Implement programs to phase in energy conservation improvements through the annual budget process.

**CO 4.6** Provide incentives such as preferential parking for alternative-fuel vehicles (e.g., CNG or hydrogen).

**CO 4.10** Support the development of alternative fuel infrastructure that is publicly accessible.

**CO 4.12** Provide incentives to promote siting or use of clean air technologies (e.g., fuel cell technologies, renewable energy sources, UV coatings, and hydrogen fuel).

**CO 4.13** Reduce Greenhouse Gas (GHG) emissions within the County boundaries.

1. Emission Inventories. The County will prepare GHG emissions inventories including emissions produced by: (1) the County's operational activities, services and facilities, over which the County has direct responsibility and control, and (2) private industry and

development, that is located within the area subject to the County's discretionary land use authority. a. Establish an inventory of existing GHG emissions.

b. Establish a projected inventory for year 2020.

2. GHG Emissions Reduction Plan. The County will adopt a GHG Emissions Reduction Plan that includes:

a. Measures to reduce GHG emissions attributable to the County's operational activities, services and facilities, over which the County has direct responsibility and control; and,

b. Measures to reduce GHG emissions produced by private industry and development that is located within the area subject to the County's discretionary land use authority and ministerial building permit authority; and,

c. Implementation and monitoring procedures to provide periodic review of the plan's progress and allow for adjustments overtime to ensure fulfillment of the plan's objectives.

## **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:

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

The County of San Bernardino Reduction Plan states that a review standard of 3,000 MTCO<sub>2</sub>e per year as the screening threshold for the purposes of determining potential significant impacts per threshold a above. Projects exceeding the screening threshold will require us of Screening Tables or a project-specific technical analysis to quantify and mitigate project emissions."

## **Methodology**

The California Emission Estimator Model (CalEEMod) version 2020.4.0 was used to estimate GHG emissions during the construction and operation of the proposed project. Based on the construction schedule, types and quantities of construction equipment, and haul trucks, as well as employee trips, daily truck trips and area and energy sources associated with operation of the building, the maximum annual CO<sub>2</sub>e emissions were calculated. The GHG emissions for each construction year are compared with SCAQMD's GHG screening threshold for industrial uses summarized below.

### 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 onsite 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<sub>2</sub>, N<sub>2</sub>O and CH<sub>4</sub>. 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, May 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, May 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 provided by the applicant.

## Estimate of GHG Emissions

### Construction Emissions

Construction activity is assumed to occur over a period of approximately 6 months beginning in mid-2023 and concluding in late 2023. Based on CalEEMod results, construction activity for the project would generate an estimated 149 metric tons of carbon dioxide equivalent (CO<sub>2</sub>E), as shown in Table 6. Amortized over a 30-year period (the assumed life of the project), construction of the proposed project would generate 5 metric tons of CO<sub>2</sub>E per year.

**Table 6**  
**Estimated Construction Related Greenhouse Gas Emissions**

Year	Annual Emissions (metric tons CO <sub>2</sub> E)
2023	149
<b>Total</b>	<b>5</b>
<b>Amortized over 30 years</b>	<b>17 metric tons per year</b>

*See Appendix for CalEEMod software program output for new construction.*

### 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 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<sub>2</sub>, and to a smaller extent, N<sub>2</sub>O and CH<sub>4</sub>. 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 106 metric tons of CO<sub>2</sub>E per year.

Water Use Emissions. The CalEEMod results indicate that the project would use approximately 5.5 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 20 metric tons of CO<sub>2</sub>E per year.

Solid Waste Emissions. For solid waste generated onsite, it was assumed that the project would achieve a 75% diversion rate, as required by the California Integrated Waste Management Act of 1989 (AB 939), as amended by AB 341. The modeling results indicate that the project would

**Table 7  
 Estimated Annual Energy-Related Greenhouse Gas Emissions**

Emission Source	Annual Emissions (CO <sub>2</sub> E)
Natural Gas	52 metric tons
Electricity	54 metric tons
<b>Total</b>	<b>106 metric tons</b>

*See Appendix for CalEEMod software program output.*

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

Emission Source	Annual Emissions (CO <sub>2</sub> E)
Water	20 metric tons
Solid Waste	5 metric tons
<b>Total Water and Solid Waste</b>	<b>25 metric tons</b>

*See Appendix for CalEEMod software program output..*

result in approximately 5 metric tons of CO<sub>2</sub>E per year associated with solid waste disposed within landfills.

Transportation Emissions. Mobile source GHG emissions were estimated using the annual vehicle miles traveled (VMT) calculated by CalEEMod for the proposed project. Table 9 shows the estimated mobile emissions of GHGs for the project based on the estimated total annual VMT of 380,599. As shown in Table 9, the project would generate approximately 131 metric tons of CO<sub>2</sub>E associated with new passenger car and truck trips.

**Table 9  
 Estimated Annual Mobile Emissions of Greenhouse Gases**

Emission Source	Annual Emissions (CO <sub>2</sub> E)
<i>Proposed Project</i>	
Mobile Emissions	131 metric tons
<b>Total</b>	<b>131 metric tons</b>

*See Appendix for CalEEMod software program output.*

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 149 metric tons CO<sub>2</sub>E) are amortized over 30 years (the anticipated life of the project). The combined annual emissions would total approximately 267 metric tons per year in CO<sub>2</sub>E. The project would not exceed the 3,000 MTCO<sub>2</sub>e annual standard; thus, emissions would be less than significant per CEQA threshold a. Therefore, no measures are needed.

**Table 10  
 Combined Annual Greenhouse Gas Emissions**

<b>Emission Source</b>	<b>Annual Emissions (CO<sub>2</sub>E)</b>
<b>Construction</b>	5 metric tons
<b>Operational</b>	
Energy	106 metric tons
Solid Waste	5 metric tons
Water	20 metric tons
<b>Mobile</b>	131 metric tons
<b>Total</b>	<b>267 metric tons</b>

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

**Consistency with Plans and Policies to Reduce Greenhouse Gas Emissions**

As stated, the project would be consistent with the County of San Bernardino Reduction Plan; thus, no further discussion of project consistency is provided.

**Connect SoCal 2020-2045 RTP/SCS Consistency**

Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG emission reduction goals and federal Clean Air Act requirements. The Project would be developed within an RL-10 zone in the County of San Bernardino and utilize the existing street network. The project would not conflict with plans to integrate the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The Project would be consistent with or otherwise would not conflict with any of the goals identified in *Connect SoCal*.

**SB 32/2017 Scoping Plan Consistency**

The 2017 Scoping Plan Update reflects the 2030 target of a 40% reduction in GHG emissions below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Table 11, 2017 Scoping Plan Consistency Summary, summarizes the Project's consistency with the 2017 Scoping Plan. As stated, the Project would not conflict with any of the Scoping Plan actions.

**Table 11  
2017 Scoping Plan Consistency Summary**

Action	Responsible Parties	Consistency
<b>Implement SB 350 by 2030</b>		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	<b>No Conflict.</b> The Project would most likely use energy from Southern California Edison (SCE). SCE has committed to diversify their portfolio of energy sources by increasing energy from wind and solar sources. The Project would not interfere with or obstruct SCE energy source diversification efforts.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		<b>No Conflict.</b> The Project would be constructed in compliance with current California Building Code requirements including the 2019 Building and Energy Efficiency Standards and the 2019 California Green Building Standard requirements.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly- owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		
<b>Implement Mobile Source Strategy (Cleaner Technology and Fuels)</b>		
At least 1.5 million zero emission and plugin hybrid light-duty EVs by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies	<b>No Conflict.</b> This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2025 targets. As this is a CARB enforced standard, vehicles that access the Project must comply with the standards as applicable; and thus, would comply with the strategy.
At least 4.2 million zero emission and plugin hybrid light-duty EVs by 2030.		<b>No Conflict.</b> This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2030 targets.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		<b>No Conflict.</b> This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.
Medium- and Heavy-Duty GHG Phase 2.		<b>No Conflict.</b> This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB

		efforts to implement Medium- and Heavy-Duty GHG Phase 2.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NOX standard.		<b>Not applicable.</b> This measure is not related to the project scope.
Last Mile Delivery: New regulation that would result in the use of low NOX or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3-7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		<b>No Conflict.</b> This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve last mile delivery emissions.
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		<b>No Conflict.</b> As stated in Section XVII of the Initial Study, the Project's VMT impact would be considered less than significant based on the County's screening threshold.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	<b>No Conflict.</b> The project would not exceed SCAQMD GHG emission standards for industrial sources or otherwise conflict with GHG reduction efforts.
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GOBiz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	<b>No Conflict.</b> The project would not conflict with use of adjacent streets by pedestrians or bicycles. Further, transit services provided by Omnitrans in the greater San Bernardino area would not be affected.
By 2019, develop pricing policies to support low-GHG transportation (e.g., low emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	<b>Not applicable.</b> This measure is not related to the project scope.
<b>Implement California Sustainable Freight Action Plan</b>		
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	<b>No Conflict.</b> This measure would apply to all trucks accessing the Project site. It is presumed that these vehicles would be part of the statewide goods movement sector.



		Access to the Project site would be provided from Lytle Creek Road which is used by trucks to access the Lytle Creek community located north of the site.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near zero emission freight vehicles and equipment powered by renewable energy by 2030.		<b>Not applicable.</b> This measure is unrelated to the project scope.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	<b>No Conflict.</b> When adopted, this measure would apply to all fuel purchased for use in vehicles accessing the project site. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.
<b>Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030</b>		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, California State Water Resource Control Board (SWRCB), Local Air Districts	<b>No Conflict.</b> The Project would be required to comply with this measure and reduce any Project-source SLPS emissions accordingly. The Project would not obstruct or interfere with agency efforts to reduce SLPS emissions.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	<b>No Conflict.</b> The Project would be required to comply with any applicable Cap-and-Trade Program provisions. The Project would not obstruct or interfere agency efforts to implement the post-2020 Cap-and-Trade Program.
<b>By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink:</b>		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	<b>Not applicable.</b> The Project site is not an identified property that needs to be conserved.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity		<b>No Conflict.</b> Approximately 9 acres of the site would remain undeveloped.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments		<b>No Conflict.</b> To the extent appropriate for the proposed buildings, wood products would be used in construction, including roof structure. Additionally, the Project includes landscaping.
Establish scenario projections to serve as the foundation for the Implementation Plan		<b>Not applicable.</b> This measure is unrelated to the project scope.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	<b>Not applicable.</b> This measure is unrelated to the project scope.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	<b>Not applicable.</b> This measure is unrelated to the project scope.



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## **Appendix A**

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CalEEMod Air Quality and Greenhouse Gas Emissions Model Results -  
Summer/Annual Emissions

Mountain Avenue Bees - San Bernardino-South Coast County, Summer

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

**Mountain Avenue Bees**  
**San Bernardino-South Coast County, Summer**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Manufacturing	15.00	1000sqft	0.34	15,000.00	0
Manufacturing	15.00	1000sqft	0.34	15,000.00	0
Parking Lot	38.00	Space	0.34	15,200.00	0

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Rural	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	32
<b>Climate Zone</b>	10	<b>Operational Year</b>	2023		
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MW hr)</b>	390.98	<b>CH4 Intensity (lb/MW hr)</b>	0.033	<b>N2O Intensity (lb/MW hr)</b>	0.004

**1.3 User Entered Comments & Non-Default Data**

Project Characteristics -

Land Use -

Construction Phase - Schedule modified based on applicant information. Buildings will be prefab tilt-up rather than wood-frame construction.

Demolition -

Vehicle Trips - Trip generation modified to calculate emissions for 2.53 trips per 1,000 based on applicant provided information.

Construction Off-road Equipment Mitigation -

Area Mitigation -

Water Mitigation -

Waste Mitigation -

Mountain Avenue Bees - San Bernardino-South Coast County, Summer

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

Table Name	Column Name	Default Value	New Value
tblAreaMitigation	UseLowVOCPaintParkingCheck	False	True
tblConstructionPhase	NumDays	10.00	16.00
tblConstructionPhase	NumDays	200.00	100.00
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblVehicleTrips	ST_TR	6.42	2.53
tblVehicleTrips	SU_TR	5.09	2.53
tblVehicleTrips	WD_TR	3.93	2.53

**2.0 Emissions Summary**

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Mountain Avenue Bees - San Bernardino-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	0.6774	6.0000e-005	6.9400e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0149	0.0149	4.0000e-005		0.0159
Energy	0.0287	0.2605	0.2188	1.5600e-003		0.0198	0.0198		0.0198	0.0198		312.6189	312.6189	5.9900e-003	5.7300e-003	314.4766
Mobile	0.3143	0.4706	3.6196	8.1700e-003	0.8037	6.1200e-003	0.8098	0.2144	5.7300e-003	0.2201		833.2038	833.2038	0.0403	0.0364	845.0639
<b>Total</b>	<b>1.0203</b>	<b>0.7311</b>	<b>3.8454</b>	<b>9.7300e-003</b>	<b>0.8037</b>	<b>0.0259</b>	<b>0.8296</b>	<b>0.2144</b>	<b>0.0256</b>	<b>0.2399</b>		<b>1,145.8375</b>	<b>1,145.8375</b>	<b>0.0463</b>	<b>0.0422</b>	<b>1,159.5564</b>

**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	0.6774	6.0000e-005	6.9400e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0149	0.0149	4.0000e-005		0.0159
Energy	0.0287	0.2605	0.2188	1.5600e-003		0.0198	0.0198		0.0198	0.0198		312.6189	312.6189	5.9900e-003	5.7300e-003	314.4766
Mobile	0.3143	0.4706	3.6196	8.1700e-003	0.8037	6.1200e-003	0.8098	0.2144	5.7300e-003	0.2201		833.2038	833.2038	0.0403	0.0364	845.0639
<b>Total</b>	<b>1.0203</b>	<b>0.7311</b>	<b>3.8454</b>	<b>9.7300e-003</b>	<b>0.8037</b>	<b>0.0259</b>	<b>0.8296</b>	<b>0.2144</b>	<b>0.0256</b>	<b>0.2399</b>		<b>1,145.8375</b>	<b>1,145.8375</b>	<b>0.0463</b>	<b>0.0422</b>	<b>1,159.5564</b>

Mountain Avenue Bees - San Bernardino-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
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	6/1/2023	6/28/2023	5	20	
2	Site Preparation	Site Preparation	6/29/2023	6/30/2023	5	2	
3	Grading	Grading	7/1/2023	7/6/2023	5	4	
4	Building Construction	Building Construction	7/7/2023	11/23/2023	5	100	
5	Paving	Paving	11/24/2023	12/7/2023	5	10	
6	Architectural Coating	Architectural Coating	12/8/2023	12/31/2023	5	16	

**Acres of Grading (Site Preparation Phase): 1.88**

**Acres of Grading (Grading Phase): 4**

**Acres of Paving: 0.34**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 45,000; Non-Residential Outdoor: 15,000; Striped Parking Area: 912 (Architectural Coating – sqft)**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40

Mountain Avenue Bees - San Bernardino-South Coast County, Summer

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

Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Paving	Pavers	1	6.00	130	0.42
Paving	Paving Equipment	1	8.00	132	0.36
Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

**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	5	13.00	0.00	68.00	19.80	7.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	19.80	7.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	0.00	19.80	7.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	19.00	7.00	0.00	19.80	7.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	19.80	7.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	4.00	0.00	0.00	19.80	7.90	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**

Water Exposed Area

Mountain Avenue Bees - San Bernardino-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 - 2023**

**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					0.7383	0.0000	0.7383	0.1118	0.0000	0.1118			0.0000			0.0000
Off-Road	1.4725	14.3184	13.4577	0.0241		0.6766	0.6766		0.6328	0.6328		2,324.3959	2,324.3959	0.5893		2,339.1278
<b>Total</b>	<b>1.4725</b>	<b>14.3184</b>	<b>13.4577</b>	<b>0.0241</b>	<b>0.7383</b>	<b>0.6766</b>	<b>1.4149</b>	<b>0.1118</b>	<b>0.6328</b>	<b>0.7446</b>		<b>2,324.3959</b>	<b>2,324.3959</b>	<b>0.5893</b>		<b>2,339.1278</b>

**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	8.1900e-003	0.3739	0.1139	1.9100e-003	0.0595	3.9300e-003	0.0635	0.0163	3.7600e-003	0.0201		208.1384	208.1384	8.8800e-003	0.0330	218.1918
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	0.0608	0.0391	0.6386	1.7400e-003	0.1957	9.4000e-004	0.1966	0.0519	8.7000e-004	0.0528		175.7981	175.7981	3.7600e-003	3.9400e-003	177.0657
<b>Total</b>	<b>0.0690</b>	<b>0.4131</b>	<b>0.7525</b>	<b>3.6500e-003</b>	<b>0.2552</b>	<b>4.8700e-003</b>	<b>0.2601</b>	<b>0.0682</b>	<b>4.6300e-003</b>	<b>0.0729</b>		<b>383.9365</b>	<b>383.9365</b>	<b>0.0126</b>	<b>0.0369</b>	<b>395.2575</b>

Mountain Avenue Bees - San Bernardino-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 - 2023**

**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					0.3322	0.0000	0.3322	0.0503	0.0000	0.0503			0.0000			0.0000
Off-Road	1.4725	14.3184	13.4577	0.0241		0.6766	0.6766		0.6328	0.6328	0.0000	2,324.3959	2,324.3959	0.5893		2,339.1278
<b>Total</b>	<b>1.4725</b>	<b>14.3184</b>	<b>13.4577</b>	<b>0.0241</b>	<b>0.3322</b>	<b>0.6766</b>	<b>1.0089</b>	<b>0.0503</b>	<b>0.6328</b>	<b>0.6831</b>	<b>0.0000</b>	<b>2,324.3959</b>	<b>2,324.3959</b>	<b>0.5893</b>		<b>2,339.1278</b>

**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	8.1900e-003	0.3739	0.1139	1.9100e-003	0.0595	3.9300e-003	0.0635	0.0163	3.7600e-003	0.0201		208.1384	208.1384	8.8800e-003	0.0330	218.1918
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	0.0608	0.0391	0.6386	1.7400e-003	0.1957	9.4000e-004	0.1966	0.0519	8.7000e-004	0.0528		175.7981	175.7981	3.7600e-003	3.9400e-003	177.0657
<b>Total</b>	<b>0.0690</b>	<b>0.4131</b>	<b>0.7525</b>	<b>3.6500e-003</b>	<b>0.2552</b>	<b>4.8700e-003</b>	<b>0.2601</b>	<b>0.0682</b>	<b>4.6300e-003</b>	<b>0.0729</b>		<b>383.9365</b>	<b>383.9365</b>	<b>0.0126</b>	<b>0.0369</b>	<b>395.2575</b>

Mountain Avenue Bees - San Bernardino-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 Site Preparation - 2023**

**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					6.2662	0.0000	6.2662	3.0041	0.0000	3.0041			0.0000			0.0000
Off-Road	1.1339	12.4250	6.6420	0.0172		0.5074	0.5074		0.4668	0.4668		1,666.0573	1,666.0573	0.5388		1,679.5282
<b>Total</b>	<b>1.1339</b>	<b>12.4250</b>	<b>6.6420</b>	<b>0.0172</b>	<b>6.2662</b>	<b>0.5074</b>	<b>6.7736</b>	<b>3.0041</b>	<b>0.4668</b>	<b>3.4709</b>		<b>1,666.0573</b>	<b>1,666.0573</b>	<b>0.5388</b>		<b>1,679.5282</b>

**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	0.0374	0.0241	0.3930	1.0700e-003	0.1204	5.8000e-004	0.1210	0.0319	5.3000e-004	0.0325		108.1834	108.1834	2.3200e-003	2.4200e-003	108.9635
<b>Total</b>	<b>0.0374</b>	<b>0.0241</b>	<b>0.3930</b>	<b>1.0700e-003</b>	<b>0.1204</b>	<b>5.8000e-004</b>	<b>0.1210</b>	<b>0.0319</b>	<b>5.3000e-004</b>	<b>0.0325</b>		<b>108.1834</b>	<b>108.1834</b>	<b>2.3200e-003</b>	<b>2.4200e-003</b>	<b>108.9635</b>

Mountain Avenue Bees - San Bernardino-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 Site Preparation - 2023**

**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					2.8198	0.0000	2.8198	1.3518	0.0000	1.3518			0.0000			0.0000
Off-Road	1.1339	12.4250	6.6420	0.0172		0.5074	0.5074		0.4668	0.4668	0.0000	1,666.057 3	1,666.057 3	0.5388		1,679.528 2
<b>Total</b>	<b>1.1339</b>	<b>12.4250</b>	<b>6.6420</b>	<b>0.0172</b>	<b>2.8198</b>	<b>0.5074</b>	<b>3.3272</b>	<b>1.3518</b>	<b>0.4668</b>	<b>1.8186</b>	<b>0.0000</b>	<b>1,666.057 3</b>	<b>1,666.057 3</b>	<b>0.5388</b>		<b>1,679.528 2</b>

**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	0.0374	0.0241	0.3930	1.0700e-003	0.1204	5.8000e-004	0.1210	0.0319	5.3000e-004	0.0325		108.1834	108.1834	2.3200e-003	2.4200e-003	108.9635
<b>Total</b>	<b>0.0374</b>	<b>0.0241</b>	<b>0.3930</b>	<b>1.0700e-003</b>	<b>0.1204</b>	<b>5.8000e-004</b>	<b>0.1210</b>	<b>0.0319</b>	<b>5.3000e-004</b>	<b>0.0325</b>		<b>108.1834</b>	<b>108.1834</b>	<b>2.3200e-003</b>	<b>2.4200e-003</b>	<b>108.9635</b>

Mountain Avenue Bees - San Bernardino-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 Grading - 2023**

**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					7.0826	0.0000	7.0826	3.4247	0.0000	3.4247			0.0000			0.0000
Off-Road	1.3330	14.4676	8.7038	0.0206		0.6044	0.6044		0.5560	0.5560		1,995.6147	1,995.6147	0.6454		2,011.7503
<b>Total</b>	<b>1.3330</b>	<b>14.4676</b>	<b>8.7038</b>	<b>0.0206</b>	<b>7.0826</b>	<b>0.6044</b>	<b>7.6869</b>	<b>3.4247</b>	<b>0.5560</b>	<b>3.9807</b>		<b>1,995.6147</b>	<b>1,995.6147</b>	<b>0.6454</b>		<b>2,011.7503</b>

**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	0.0467	0.0301	0.4912	1.3400e-003	0.1505	7.2000e-004	0.1513	0.0399	6.7000e-004	0.0406		135.2293	135.2293	2.8900e-003	3.0300e-003	136.2044
<b>Total</b>	<b>0.0467</b>	<b>0.0301</b>	<b>0.4912</b>	<b>1.3400e-003</b>	<b>0.1505</b>	<b>7.2000e-004</b>	<b>0.1513</b>	<b>0.0399</b>	<b>6.7000e-004</b>	<b>0.0406</b>		<b>135.2293</b>	<b>135.2293</b>	<b>2.8900e-003</b>	<b>3.0300e-003</b>	<b>136.2044</b>



Mountain Avenue Bees - San Bernardino-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 Grading - 2023**

**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					3.1872	0.0000	3.1872	1.5411	0.0000	1.5411			0.0000			0.0000
Off-Road	1.3330	14.4676	8.7038	0.0206		0.6044	0.6044		0.5560	0.5560	0.0000	1,995.6147	1,995.6147	0.6454		2,011.7503
<b>Total</b>	<b>1.3330</b>	<b>14.4676</b>	<b>8.7038</b>	<b>0.0206</b>	<b>3.1872</b>	<b>0.6044</b>	<b>3.7915</b>	<b>1.5411</b>	<b>0.5560</b>	<b>2.0971</b>	<b>0.0000</b>	<b>1,995.6147</b>	<b>1,995.6147</b>	<b>0.6454</b>		<b>2,011.7503</b>

**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	0.0467	0.0301	0.4912	1.3400e-003	0.1505	7.2000e-004	0.1513	0.0399	6.7000e-004	0.0406		135.2293	135.2293	2.8900e-003	3.0300e-003	136.2044
<b>Total</b>	<b>0.0467</b>	<b>0.0301</b>	<b>0.4912</b>	<b>1.3400e-003</b>	<b>0.1505</b>	<b>7.2000e-004</b>	<b>0.1513</b>	<b>0.0399</b>	<b>6.7000e-004</b>	<b>0.0406</b>		<b>135.2293</b>	<b>135.2293</b>	<b>2.8900e-003</b>	<b>3.0300e-003</b>	<b>136.2044</b>

Mountain Avenue Bees - San Bernardino-South Coast County, Summer

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

**3.5 Building Construction - 2023**

**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	1.5233	11.7104	12.6111	0.0221		0.5145	0.5145		0.4968	0.4968		2,001.7877	2,001.7877	0.3399		2,010.2858
<b>Total</b>	<b>1.5233</b>	<b>11.7104</b>	<b>12.6111</b>	<b>0.0221</b>		<b>0.5145</b>	<b>0.5145</b>		<b>0.4968</b>	<b>0.4968</b>		<b>2,001.7877</b>	<b>2,001.7877</b>	<b>0.3399</b>		<b>2,010.2858</b>

**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	8.5900e-003	0.2683	0.1070	1.4200e-003	0.0513	2.1100e-003	0.0534	0.0148	2.0100e-003	0.0168		151.9022	151.9022	3.9600e-003	0.0224	158.6798
Worker	0.0888	0.0572	0.9333	2.5400e-003	0.2860	1.3800e-003	0.2874	0.0758	1.2700e-003	0.0771		256.9356	256.9356	5.5000e-003	5.7600e-003	258.7883
<b>Total</b>	<b>0.0974</b>	<b>0.3254</b>	<b>1.0403</b>	<b>3.9600e-003</b>	<b>0.3373</b>	<b>3.4900e-003</b>	<b>0.3408</b>	<b>0.0906</b>	<b>3.2800e-003</b>	<b>0.0939</b>		<b>408.8379</b>	<b>408.8379</b>	<b>9.4600e-003</b>	<b>0.0282</b>	<b>417.4681</b>

Mountain Avenue Bees - San Bernardino-South Coast County, Summer

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

**3.5 Building Construction - 2023**

**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	1.5233	11.7104	12.6111	0.0221		0.5145	0.5145		0.4968	0.4968	0.0000	2,001.7877	2,001.7877	0.3399		2,010.2858
<b>Total</b>	<b>1.5233</b>	<b>11.7104</b>	<b>12.6111</b>	<b>0.0221</b>		<b>0.5145</b>	<b>0.5145</b>		<b>0.4968</b>	<b>0.4968</b>	<b>0.0000</b>	<b>2,001.7877</b>	<b>2,001.7877</b>	<b>0.3399</b>		<b>2,010.2858</b>

**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	8.5900e-003	0.2683	0.1070	1.4200e-003	0.0513	2.1100e-003	0.0534	0.0148	2.0100e-003	0.0168		151.9022	151.9022	3.9600e-003	0.0224	158.6798
Worker	0.0888	0.0572	0.9333	2.5400e-003	0.2860	1.3800e-003	0.2874	0.0758	1.2700e-003	0.0771		256.9356	256.9356	5.5000e-003	5.7600e-003	258.7883
<b>Total</b>	<b>0.0974</b>	<b>0.3254</b>	<b>1.0403</b>	<b>3.9600e-003</b>	<b>0.3373</b>	<b>3.4900e-003</b>	<b>0.3408</b>	<b>0.0906</b>	<b>3.2800e-003</b>	<b>0.0939</b>		<b>408.8379</b>	<b>408.8379</b>	<b>9.4600e-003</b>	<b>0.0282</b>	<b>417.4681</b>

Mountain Avenue Bees - San Bernardino-South Coast County, Summer

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

**3.6 Paving - 2023**

**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	0.6446	6.2357	8.8024	0.0136		0.3084	0.3084		0.2846	0.2846		1,297.6880	1,297.6880	0.4114		1,307.9725
Paving	0.0891					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>0.7337</b>	<b>6.2357</b>	<b>8.8024</b>	<b>0.0136</b>		<b>0.3084</b>	<b>0.3084</b>		<b>0.2846</b>	<b>0.2846</b>		<b>1,297.6880</b>	<b>1,297.6880</b>	<b>0.4114</b>		<b>1,307.9725</b>

**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	0.0608	0.0391	0.6386	1.7400e-003	0.1957	9.4000e-004	0.1966	0.0519	8.7000e-004	0.0528		175.7981	175.7981	3.7600e-003	3.9400e-003	177.0657
<b>Total</b>	<b>0.0608</b>	<b>0.0391</b>	<b>0.6386</b>	<b>1.7400e-003</b>	<b>0.1957</b>	<b>9.4000e-004</b>	<b>0.1966</b>	<b>0.0519</b>	<b>8.7000e-004</b>	<b>0.0528</b>		<b>175.7981</b>	<b>175.7981</b>	<b>3.7600e-003</b>	<b>3.9400e-003</b>	<b>177.0657</b>

Mountain Avenue Bees - San Bernardino-South Coast County, Summer

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

**3.6 Paving - 2023**

**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	0.6446	6.2357	8.8024	0.0136		0.3084	0.3084		0.2846	0.2846	0.0000	1,297.6880	1,297.6880	0.4114		1,307.9725
Paving	0.0891					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
<b>Total</b>	<b>0.7337</b>	<b>6.2357</b>	<b>8.8024</b>	<b>0.0136</b>		<b>0.3084</b>	<b>0.3084</b>		<b>0.2846</b>	<b>0.2846</b>	<b>0.0000</b>	<b>1,297.6880</b>	<b>1,297.6880</b>	<b>0.4114</b>		<b>1,307.9725</b>

**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	0.0608	0.0391	0.6386	1.7400e-003	0.1957	9.4000e-004	0.1966	0.0519	8.7000e-004	0.0528		175.7981	175.7981	3.7600e-003	3.9400e-003	177.0657
<b>Total</b>	<b>0.0608</b>	<b>0.0391</b>	<b>0.6386</b>	<b>1.7400e-003</b>	<b>0.1957</b>	<b>9.4000e-004</b>	<b>0.1966</b>	<b>0.0519</b>	<b>8.7000e-004</b>	<b>0.0528</b>		<b>175.7981</b>	<b>175.7981</b>	<b>3.7600e-003</b>	<b>3.9400e-003</b>	<b>177.0657</b>

Mountain Avenue Bees - San Bernardino-South Coast County, Summer

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

**3.7 Architectural Coating - 2023**

**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	17.6455					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708		281.4481	281.4481	0.0168		281.8690
<b>Total</b>	<b>17.8371</b>	<b>1.3030</b>	<b>1.8111</b>	<b>2.9700e-003</b>		<b>0.0708</b>	<b>0.0708</b>		<b>0.0708</b>	<b>0.0708</b>		<b>281.4481</b>	<b>281.4481</b>	<b>0.0168</b>		<b>281.8690</b>

**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	0.0187	0.0120	0.1965	5.4000e-004	0.0602	2.9000e-004	0.0605	0.0160	2.7000e-004	0.0162		54.0917	54.0917	1.1600e-003	1.2100e-003	54.4818
<b>Total</b>	<b>0.0187</b>	<b>0.0120</b>	<b>0.1965</b>	<b>5.4000e-004</b>	<b>0.0602</b>	<b>2.9000e-004</b>	<b>0.0605</b>	<b>0.0160</b>	<b>2.7000e-004</b>	<b>0.0162</b>		<b>54.0917</b>	<b>54.0917</b>	<b>1.1600e-003</b>	<b>1.2100e-003</b>	<b>54.4818</b>

Mountain Avenue Bees - San Bernardino-South Coast County, Summer

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

**3.7 Architectural Coating - 2023**

**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	17.6455					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1917	1.3030	1.8111	2.9700e-003		0.0708	0.0708		0.0708	0.0708	0.0000	281.4481	281.4481	0.0168		281.8690
<b>Total</b>	<b>17.8371</b>	<b>1.3030</b>	<b>1.8111</b>	<b>2.9700e-003</b>		<b>0.0708</b>	<b>0.0708</b>		<b>0.0708</b>	<b>0.0708</b>	<b>0.0000</b>	<b>281.4481</b>	<b>281.4481</b>	<b>0.0168</b>		<b>281.8690</b>

**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	0.0187	0.0120	0.1965	5.4000e-004	0.0602	2.9000e-004	0.0605	0.0160	2.7000e-004	0.0162		54.0917	54.0917	1.1600e-003	1.2100e-003	54.4818
<b>Total</b>	<b>0.0187</b>	<b>0.0120</b>	<b>0.1965</b>	<b>5.4000e-004</b>	<b>0.0602</b>	<b>2.9000e-004</b>	<b>0.0605</b>	<b>0.0160</b>	<b>2.7000e-004</b>	<b>0.0162</b>		<b>54.0917</b>	<b>54.0917</b>	<b>1.1600e-003</b>	<b>1.2100e-003</b>	<b>54.4818</b>

Mountain Avenue Bees - San Bernardino-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	0.3143	0.4706	3.6196	8.1700e-003	0.8037	6.1200e-003	0.8098	0.2144	5.7300e-003	0.2201		833.2038	833.2038	0.0403	0.0364	845.0639
Unmitigated	0.3143	0.4706	3.6196	8.1700e-003	0.8037	6.1200e-003	0.8098	0.2144	5.7300e-003	0.2201		833.2038	833.2038	0.0403	0.0364	845.0639

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Manufacturing	37.95	37.95	37.95	190,299	190,299
Manufacturing	37.95	37.95	37.95	190,299	190,299
Parking Lot	0.00	0.00	0.00		
Total	75.90	75.90	75.90	380,599	380,599

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	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
Manufacturing	18.50	10.10	7.90	59.00	28.00	13.00	92	5	3
Manufacturing	18.50	10.10	7.90	59.00	28.00	13.00	92	5	3
Parking Lot	18.50	10.10	7.90	0.00	0.00	0.00	0	0	0



Mountain Avenue Bees - San Bernardino-South Coast County, Summer

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

**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Manufacturing	0.537785	0.055838	0.172353	0.139003	0.027005	0.007196	0.011392	0.017285	0.000559	0.000254	0.025303	0.000954	0.005071
Parking Lot	0.537785	0.055838	0.172353	0.139003	0.027005	0.007196	0.011392	0.017285	0.000559	0.000254	0.025303	0.000954	0.005071

**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	0.0287	0.2605	0.2188	1.5600e-003		0.0198	0.0198		0.0198	0.0198		312.6189	312.6189	5.9900e-003	5.7300e-003	314.4766
NaturalGas Unmitigated	0.0287	0.2605	0.2188	1.5600e-003		0.0198	0.0198		0.0198	0.0198		312.6189	312.6189	5.9900e-003	5.7300e-003	314.4766

Mountain Avenue Bees - San Bernardino-South Coast County, Summer

**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	lb/day										lb/day					
Manufacturing	1328.63	0.0287	0.2605	0.2188	1.5600e-003		0.0198	0.0198		0.0198	0.0198		312.6189	312.6189	5.9900e-003	5.7300e-003	314.4766
Parking Lot	0	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
<b>Total</b>		<b>0.0287</b>	<b>0.2605</b>	<b>0.2188</b>	<b>1.5600e-003</b>		<b>0.0198</b>	<b>0.0198</b>		<b>0.0198</b>	<b>0.0198</b>		<b>312.6189</b>	<b>312.6189</b>	<b>5.9900e-003</b>	<b>5.7300e-003</b>	<b>314.4766</b>

**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					
Manufacturing	1.32863	0.0287	0.2605	0.2188	1.5600e-003		0.0198	0.0198		0.0198	0.0198		312.6189	312.6189	5.9900e-003	5.7300e-003	314.4766
Parking Lot	0	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
<b>Total</b>		<b>0.0287</b>	<b>0.2605</b>	<b>0.2188</b>	<b>1.5600e-003</b>		<b>0.0198</b>	<b>0.0198</b>		<b>0.0198</b>	<b>0.0198</b>		<b>312.6189</b>	<b>312.6189</b>	<b>5.9900e-003</b>	<b>5.7300e-003</b>	<b>314.4766</b>

**6.0 Area Detail**

Mountain Avenue Bees - San Bernardino-South Coast County, Summer

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

**6.1 Mitigation Measures Area**

Use Low VOC Paint - Non-Residential Interior

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	lb/day										lb/day					
Mitigated	0.6774	6.0000e-005	6.9400e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0149	0.0149	4.0000e-005		0.0159
Unmitigated	0.6774	6.0000e-005	6.9400e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0149	0.0149	4.0000e-005		0.0159

Mountain Avenue Bees - San Bernardino-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**

**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	0.0774					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.5994					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	6.4000e-004	6.0000e-005	6.9400e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0149	0.0149	4.0000e-005		0.0159
<b>Total</b>	<b>0.6774</b>	<b>6.0000e-005</b>	<b>6.9400e-003</b>	<b>0.0000</b>		<b>2.0000e-005</b>	<b>2.0000e-005</b>		<b>2.0000e-005</b>	<b>2.0000e-005</b>		<b>0.0149</b>	<b>0.0149</b>	<b>4.0000e-005</b>		<b>0.0159</b>

Mountain Avenue Bees - San Bernardino-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	0.0774					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.5994					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	6.4000e-004	6.0000e-005	6.9400e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005		0.0149	0.0149	4.0000e-005		0.0159
<b>Total</b>	<b>0.6774</b>	<b>6.0000e-005</b>	<b>6.9400e-003</b>	<b>0.0000</b>		<b>2.0000e-005</b>	<b>2.0000e-005</b>		<b>2.0000e-005</b>	<b>2.0000e-005</b>		<b>0.0149</b>	<b>0.0149</b>	<b>4.0000e-005</b>		<b>0.0159</b>

**7.0 Water Detail**

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**7.1 Mitigation Measures Water**

Apply Water Conservation Strategy

Mountain Avenue Bees - San Bernardino-South Coast County, Summer

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

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

Institute Recycling and Composting Services

**9.0 Operational Offroad**

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

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**Fire Pumps and Emergency Generators**

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

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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

**Mountain Avenue Bees**  
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**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Manufacturing	15.00	1000sqft	0.34	15,000.00	0
Manufacturing	15.00	1000sqft	0.34	15,000.00	0
Parking Lot	38.00	Space	0.34	15,200.00	0

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Rural	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	32
<b>Climate Zone</b>	10	<b>Operational Year</b>	2023		
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MWhr)</b>	390.98	<b>CH4 Intensity (lb/MWhr)</b>	0.033	<b>N2O Intensity (lb/MWhr)</b>	0.004

**1.3 User Entered Comments & Non-Default Data**

Project Characteristics -

Land Use -

Construction Phase - Schedule modified based on applicant information. Buildings will be prefab tilt-up rather than wood-frame construction.

Demolition -

Vehicle Trips - Trip generation modified to calculate emissions for 2.53 trips per 1,000 based on applicant provided information.

Construction Off-road Equipment Mitigation -

Area Mitigation -

Water Mitigation -

Waste Mitigation -

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

Table Name	Column Name	Default Value	New Value
tblAreaMitigation	UseLowVOCPaintParkingCheck	False	True
tblConstructionPhase	NumDays	10.00	16.00
tblConstructionPhase	NumDays	200.00	100.00
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblVehicleTrips	ST_TR	6.42	2.53
tblVehicleTrips	SU_TR	5.09	2.53
tblVehicleTrips	WD_TR	3.93	2.53

**2.0 Emissions Summary**

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**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	6-1-2023	8-31-2023	0.4796	0.4796
2	9-1-2023	9-30-2023	0.1463	0.1463
		Highest	0.4796	0.4796

**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	0.1236	1.0000e-005	8.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.6900e-003	1.6900e-003	0.0000	0.0000	1.8000e-003
Energy	5.2300e-003	0.0475	0.0399	2.9000e-004		3.6100e-003	3.6100e-003		3.6100e-003	3.6100e-003	0.0000	105.4791	105.4791	5.5300e-003	1.5000e-003	106.0638
Mobile	0.0508	0.0930	0.6038	1.4000e-003	0.1435	1.1100e-003	0.1446	0.0383	1.0400e-003	0.0394	0.0000	129.3117	129.3117	6.7900e-003	6.2500e-003	131.3448
Waste						0.0000	0.0000		0.0000	0.0000	7.5513	0.0000	7.5513	0.4463	0.0000	18.7079
Water						0.0000	0.0000		0.0000	0.0000	2.2010	16.0202	18.2211	0.2274	5.5000e-003	25.5459
<b>Total</b>	<b>0.1796</b>	<b>0.1406</b>	<b>0.6446</b>	<b>1.6900e-003</b>	<b>0.1435</b>	<b>4.7200e-003</b>	<b>0.1482</b>	<b>0.0383</b>	<b>4.6500e-003</b>	<b>0.0430</b>	<b>9.7522</b>	<b>250.8127</b>	<b>260.5649</b>	<b>0.6860</b>	<b>0.0133</b>	<b>281.6642</b>

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**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	0.1236	1.0000e-005	8.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.6900e-003	1.6900e-003	0.0000	0.0000	1.8000e-003
Energy	5.2300e-003	0.0475	0.0399	2.9000e-004		3.6100e-003	3.6100e-003		3.6100e-003	3.6100e-003	0.0000	105.4791	105.4791	5.5300e-003	1.5000e-003	106.0638
Mobile	0.0508	0.0930	0.6038	1.4000e-003	0.1435	1.1100e-003	0.1446	0.0383	1.0400e-003	0.0394	0.0000	129.3117	129.3117	6.7900e-003	6.2500e-003	131.3448
Waste						0.0000	0.0000		0.0000	0.0000	1.8878	0.0000	1.8878	0.1116	0.0000	4.6770
Water						0.0000	0.0000		0.0000	0.0000	1.7608	12.8162	14.5769	0.1819	4.4000e-003	20.4367
<b>Total</b>	<b>0.1796</b>	<b>0.1406</b>	<b>0.6446</b>	<b>1.6900e-003</b>	<b>0.1435</b>	<b>4.7200e-003</b>	<b>0.1482</b>	<b>0.0383</b>	<b>4.6500e-003</b>	<b>0.0430</b>	<b>3.6486</b>	<b>247.6086</b>	<b>251.2572</b>	<b>0.3058</b>	<b>0.0122</b>	<b>262.5240</b>

	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
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>62.59</b>	<b>1.28</b>	<b>3.57</b>	<b>55.42</b>	<b>8.30</b>	<b>6.80</b>

**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	6/1/2023	6/28/2023	5	20	
2	Site Preparation	Site Preparation	6/29/2023	6/30/2023	5	2	
3	Grading	Grading	7/1/2023	7/6/2023	5	4	

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

4	Building Construction	Building Construction	7/7/2023	11/23/2023	5	100
5	Paving	Paving	11/24/2023	12/7/2023	5	10
6	Architectural Coating	Architectural Coating	12/8/2023	12/31/2023	5	16

**Acres of Grading (Site Preparation Phase): 1.88**

**Acres of Grading (Grading Phase): 4**

**Acres of Paving: 0.34**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 45,000; Non-Residential Outdoor: 15,000; Striped Parking Area: 912 (Architectural Coating – sqft)**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Paving	Pavers	1	6.00	130	0.42
Paving	Paving Equipment	1	8.00	132	0.36

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

Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

**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	5	13.00	0.00	68.00	19.80	7.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	19.80	7.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	0.00	19.80	7.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	19.00	7.00	0.00	19.80	7.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	19.80	7.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	4.00	0.00	0.00	19.80	7.90	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**

Water Exposed Area

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

**3.2 Demolition - 2023**

**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					7.3800e-003	0.0000	7.3800e-003	1.1200e-003	0.0000	1.1200e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0147	0.1432	0.1346	2.4000e-004		6.7700e-003	6.7700e-003		6.3300e-003	6.3300e-003	0.0000	21.0866	21.0866	5.3500e-003	0.0000	21.2202
<b>Total</b>	<b>0.0147</b>	<b>0.1432</b>	<b>0.1346</b>	<b>2.4000e-004</b>	<b>7.3800e-003</b>	<b>6.7700e-003</b>	<b>0.0142</b>	<b>1.1200e-003</b>	<b>6.3300e-003</b>	<b>7.4500e-003</b>	<b>0.0000</b>	<b>21.0866</b>	<b>21.0866</b>	<b>5.3500e-003</b>	<b>0.0000</b>	<b>21.2202</b>

**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	8.0000e-005	3.9500e-003	1.1500e-003	2.0000e-005	5.9000e-004	4.0000e-005	6.2000e-004	1.6000e-004	4.0000e-005	2.0000e-004	0.0000	1.8894	1.8894	8.0000e-005	3.0000e-004	1.9807
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	5.5000e-004	4.3000e-004	5.4500e-003	2.0000e-005	1.9200e-003	1.0000e-005	1.9300e-003	5.1000e-004	1.0000e-005	5.2000e-004	0.0000	1.4731	1.4731	3.0000e-005	4.0000e-005	1.4853
<b>Total</b>	<b>6.3000e-004</b>	<b>4.3800e-003</b>	<b>6.6000e-003</b>	<b>4.0000e-005</b>	<b>2.5100e-003</b>	<b>5.0000e-005</b>	<b>2.5500e-003</b>	<b>6.7000e-004</b>	<b>5.0000e-005</b>	<b>7.2000e-004</b>	<b>0.0000</b>	<b>3.3625</b>	<b>3.3625</b>	<b>1.1000e-004</b>	<b>3.4000e-004</b>	<b>3.4659</b>

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

**3.2 Demolition - 2023**

**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					3.3200e-003	0.0000	3.3200e-003	5.0000e-004	0.0000	5.0000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0147	0.1432	0.1346	2.4000e-004		6.7700e-003	6.7700e-003		6.3300e-003	6.3300e-003	0.0000	21.0865	21.0865	5.3500e-003	0.0000	21.2202
<b>Total</b>	<b>0.0147</b>	<b>0.1432</b>	<b>0.1346</b>	<b>2.4000e-004</b>	<b>3.3200e-003</b>	<b>6.7700e-003</b>	<b>0.0101</b>	<b>5.0000e-004</b>	<b>6.3300e-003</b>	<b>6.8300e-003</b>	<b>0.0000</b>	<b>21.0865</b>	<b>21.0865</b>	<b>5.3500e-003</b>	<b>0.0000</b>	<b>21.2202</b>

**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	8.0000e-005	3.9500e-003	1.1500e-003	2.0000e-005	5.9000e-004	4.0000e-005	6.2000e-004	1.6000e-004	4.0000e-005	2.0000e-004	0.0000	1.8894	1.8894	8.0000e-005	3.0000e-004	1.9807
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	5.5000e-004	4.3000e-004	5.4500e-003	2.0000e-005	1.9200e-003	1.0000e-005	1.9300e-003	5.1000e-004	1.0000e-005	5.2000e-004	0.0000	1.4731	1.4731	3.0000e-005	4.0000e-005	1.4853
<b>Total</b>	<b>6.3000e-004</b>	<b>4.3800e-003</b>	<b>6.6000e-003</b>	<b>4.0000e-005</b>	<b>2.5100e-003</b>	<b>5.0000e-005</b>	<b>2.5500e-003</b>	<b>6.7000e-004</b>	<b>5.0000e-005</b>	<b>7.2000e-004</b>	<b>0.0000</b>	<b>3.3625</b>	<b>3.3625</b>	<b>1.1000e-004</b>	<b>3.4000e-004</b>	<b>3.4659</b>

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

**3.3 Site Preparation - 2023**

**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					6.2700e-003	0.0000	6.2700e-003	3.0000e-003	0.0000	3.0000e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.1300e-003	0.0124	6.6400e-003	2.0000e-005		5.1000e-004	5.1000e-004		4.7000e-004	4.7000e-004	0.0000	1.5114	1.5114	4.9000e-004	0.0000	1.5236
<b>Total</b>	<b>1.1300e-003</b>	<b>0.0124</b>	<b>6.6400e-003</b>	<b>2.0000e-005</b>	<b>6.2700e-003</b>	<b>5.1000e-004</b>	<b>6.7800e-003</b>	<b>3.0000e-003</b>	<b>4.7000e-004</b>	<b>3.4700e-003</b>	<b>0.0000</b>	<b>1.5114</b>	<b>1.5114</b>	<b>4.9000e-004</b>	<b>0.0000</b>	<b>1.5236</b>

**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	3.0000e-005	3.0000e-005	3.4000e-004	0.0000	1.2000e-004	0.0000	1.2000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0907	0.0907	0.0000	0.0000	0.0914
<b>Total</b>	<b>3.0000e-005</b>	<b>3.0000e-005</b>	<b>3.4000e-004</b>	<b>0.0000</b>	<b>1.2000e-004</b>	<b>0.0000</b>	<b>1.2000e-004</b>	<b>3.0000e-005</b>	<b>0.0000</b>	<b>3.0000e-005</b>	<b>0.0000</b>	<b>0.0907</b>	<b>0.0907</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0914</b>



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

**3.3 Site Preparation - 2023**

**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					2.8200e-003	0.0000	2.8200e-003	1.3500e-003	0.0000	1.3500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.1300e-003	0.0124	6.6400e-003	2.0000e-005		5.1000e-004	5.1000e-004		4.7000e-004	4.7000e-004	0.0000	1.5114	1.5114	4.9000e-004	0.0000	1.5236
<b>Total</b>	<b>1.1300e-003</b>	<b>0.0124</b>	<b>6.6400e-003</b>	<b>2.0000e-005</b>	<b>2.8200e-003</b>	<b>5.1000e-004</b>	<b>3.3300e-003</b>	<b>1.3500e-003</b>	<b>4.7000e-004</b>	<b>1.8200e-003</b>	<b>0.0000</b>	<b>1.5114</b>	<b>1.5114</b>	<b>4.9000e-004</b>	<b>0.0000</b>	<b>1.5236</b>

**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	3.0000e-005	3.0000e-005	3.4000e-004	0.0000	1.2000e-004	0.0000	1.2000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0907	0.0907	0.0000	0.0000	0.0914
<b>Total</b>	<b>3.0000e-005</b>	<b>3.0000e-005</b>	<b>3.4000e-004</b>	<b>0.0000</b>	<b>1.2000e-004</b>	<b>0.0000</b>	<b>1.2000e-004</b>	<b>3.0000e-005</b>	<b>0.0000</b>	<b>3.0000e-005</b>	<b>0.0000</b>	<b>0.0907</b>	<b>0.0907</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0914</b>

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

**3.4 Grading - 2023**

**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					0.0142	0.0000	0.0142	6.8500e-003	0.0000	6.8500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.6700e-003	0.0289	0.0174	4.0000e-005		1.2100e-003	1.2100e-003		1.1100e-003	1.1100e-003	0.0000	3.6208	3.6208	1.1700e-003	0.0000	3.6501
<b>Total</b>	<b>2.6700e-003</b>	<b>0.0289</b>	<b>0.0174</b>	<b>4.0000e-005</b>	<b>0.0142</b>	<b>1.2100e-003</b>	<b>0.0154</b>	<b>6.8500e-003</b>	<b>1.1100e-003</b>	<b>7.9600e-003</b>	<b>0.0000</b>	<b>3.6208</b>	<b>3.6208</b>	<b>1.1700e-003</b>	<b>0.0000</b>	<b>3.6501</b>

**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	8.0000e-005	7.0000e-005	8.4000e-004	0.0000	3.0000e-004	0.0000	3.0000e-004	8.0000e-005	0.0000	8.0000e-005	0.0000	0.2266	0.2266	1.0000e-005	1.0000e-005	0.2285
<b>Total</b>	<b>8.0000e-005</b>	<b>7.0000e-005</b>	<b>8.4000e-004</b>	<b>0.0000</b>	<b>3.0000e-004</b>	<b>0.0000</b>	<b>3.0000e-004</b>	<b>8.0000e-005</b>	<b>0.0000</b>	<b>8.0000e-005</b>	<b>0.0000</b>	<b>0.2266</b>	<b>0.2266</b>	<b>1.0000e-005</b>	<b>1.0000e-005</b>	<b>0.2285</b>

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

**3.4 Grading - 2023**

**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					6.3700e-003	0.0000	6.3700e-003	3.0800e-003	0.0000	3.0800e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.6700e-003	0.0289	0.0174	4.0000e-005		1.2100e-003	1.2100e-003		1.1100e-003	1.1100e-003	0.0000	3.6208	3.6208	1.1700e-003	0.0000	3.6501
<b>Total</b>	<b>2.6700e-003</b>	<b>0.0289</b>	<b>0.0174</b>	<b>4.0000e-005</b>	<b>6.3700e-003</b>	<b>1.2100e-003</b>	<b>7.5800e-003</b>	<b>3.0800e-003</b>	<b>1.1100e-003</b>	<b>4.1900e-003</b>	<b>0.0000</b>	<b>3.6208</b>	<b>3.6208</b>	<b>1.1700e-003</b>	<b>0.0000</b>	<b>3.6501</b>

**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	8.0000e-005	7.0000e-005	8.4000e-004	0.0000	3.0000e-004	0.0000	3.0000e-004	8.0000e-005	0.0000	8.0000e-005	0.0000	0.2266	0.2266	1.0000e-005	1.0000e-005	0.2285
<b>Total</b>	<b>8.0000e-005</b>	<b>7.0000e-005</b>	<b>8.4000e-004</b>	<b>0.0000</b>	<b>3.0000e-004</b>	<b>0.0000</b>	<b>3.0000e-004</b>	<b>8.0000e-005</b>	<b>0.0000</b>	<b>8.0000e-005</b>	<b>0.0000</b>	<b>0.2266</b>	<b>0.2266</b>	<b>1.0000e-005</b>	<b>1.0000e-005</b>	<b>0.2285</b>

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

**3.5 Building Construction - 2023**

**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	0.0762	0.5855	0.6306	1.1000e-003		0.0257	0.0257		0.0248	0.0248	0.0000	90.7996	90.7996	0.0154	0.0000	91.1850
<b>Total</b>	<b>0.0762</b>	<b>0.5855</b>	<b>0.6306</b>	<b>1.1000e-003</b>		<b>0.0257</b>	<b>0.0257</b>		<b>0.0248</b>	<b>0.0248</b>	<b>0.0000</b>	<b>90.7996</b>	<b>90.7996</b>	<b>0.0154</b>	<b>0.0000</b>	<b>91.1850</b>

**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	4.1000e-004	0.0141	5.4300e-003	7.0000e-005	2.5300e-003	1.1000e-004	2.6300e-003	7.3000e-004	1.0000e-004	8.3000e-004	0.0000	6.8964	6.8964	1.8000e-004	1.0200e-003	7.2043
Worker	4.0200e-003	3.1600e-003	0.0398	1.2000e-004	0.0140	7.0000e-005	0.0141	3.7200e-003	6.0000e-005	3.7900e-003	0.0000	10.7648	10.7648	2.5000e-004	2.8000e-004	10.8540
<b>Total</b>	<b>4.4300e-003</b>	<b>0.0173</b>	<b>0.0452</b>	<b>1.9000e-004</b>	<b>0.0166</b>	<b>1.8000e-004</b>	<b>0.0167</b>	<b>4.4500e-003</b>	<b>1.6000e-004</b>	<b>4.6200e-003</b>	<b>0.0000</b>	<b>17.6612</b>	<b>17.6612</b>	<b>4.3000e-004</b>	<b>1.3000e-003</b>	<b>18.0583</b>

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

**3.5 Building Construction - 2023**

**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	0.0762	0.5855	0.6306	1.1000e-003		0.0257	0.0257		0.0248	0.0248	0.0000	90.7995	90.7995	0.0154	0.0000	91.1849
<b>Total</b>	<b>0.0762</b>	<b>0.5855</b>	<b>0.6306</b>	<b>1.1000e-003</b>		<b>0.0257</b>	<b>0.0257</b>		<b>0.0248</b>	<b>0.0248</b>	<b>0.0000</b>	<b>90.7995</b>	<b>90.7995</b>	<b>0.0154</b>	<b>0.0000</b>	<b>91.1849</b>

**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	4.1000e-004	0.0141	5.4300e-003	7.0000e-005	2.5300e-003	1.1000e-004	2.6300e-003	7.3000e-004	1.0000e-004	8.3000e-004	0.0000	6.8964	6.8964	1.8000e-004	1.0200e-003	7.2043
Worker	4.0200e-003	3.1600e-003	0.0398	1.2000e-004	0.0140	7.0000e-005	0.0141	3.7200e-003	6.0000e-005	3.7900e-003	0.0000	10.7648	10.7648	2.5000e-004	2.8000e-004	10.8540
<b>Total</b>	<b>4.4300e-003</b>	<b>0.0173</b>	<b>0.0452</b>	<b>1.9000e-004</b>	<b>0.0166</b>	<b>1.8000e-004</b>	<b>0.0167</b>	<b>4.4500e-003</b>	<b>1.6000e-004</b>	<b>4.6200e-003</b>	<b>0.0000</b>	<b>17.6612</b>	<b>17.6612</b>	<b>4.3000e-004</b>	<b>1.3000e-003</b>	<b>18.0583</b>

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

**3.6 Paving - 2023**

**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	3.2200e-003	0.0312	0.0440	7.0000e-005		1.5400e-003	1.5400e-003		1.4200e-003	1.4200e-003	0.0000	5.8862	5.8862	1.8700e-003	0.0000	5.9329
Paving	4.5000e-004					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>3.6700e-003</b>	<b>0.0312</b>	<b>0.0440</b>	<b>7.0000e-005</b>		<b>1.5400e-003</b>	<b>1.5400e-003</b>		<b>1.4200e-003</b>	<b>1.4200e-003</b>	<b>0.0000</b>	<b>5.8862</b>	<b>5.8862</b>	<b>1.8700e-003</b>	<b>0.0000</b>	<b>5.9329</b>

**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	2.7000e-004	2.2000e-004	2.7200e-003	1.0000e-005	9.6000e-004	0.0000	9.6000e-004	2.5000e-004	0.0000	2.6000e-004	0.0000	0.7365	0.7365	2.0000e-005	2.0000e-005	0.7426
<b>Total</b>	<b>2.7000e-004</b>	<b>2.2000e-004</b>	<b>2.7200e-003</b>	<b>1.0000e-005</b>	<b>9.6000e-004</b>	<b>0.0000</b>	<b>9.6000e-004</b>	<b>2.5000e-004</b>	<b>0.0000</b>	<b>2.6000e-004</b>	<b>0.0000</b>	<b>0.7365</b>	<b>0.7365</b>	<b>2.0000e-005</b>	<b>2.0000e-005</b>	<b>0.7426</b>

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**3.6 Paving - 2023**

**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	3.2200e-003	0.0312	0.0440	7.0000e-005		1.5400e-003	1.5400e-003		1.4200e-003	1.4200e-003	0.0000	5.8862	5.8862	1.8700e-003	0.0000	5.9329
Paving	4.5000e-004					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>3.6700e-003</b>	<b>0.0312</b>	<b>0.0440</b>	<b>7.0000e-005</b>		<b>1.5400e-003</b>	<b>1.5400e-003</b>		<b>1.4200e-003</b>	<b>1.4200e-003</b>	<b>0.0000</b>	<b>5.8862</b>	<b>5.8862</b>	<b>1.8700e-003</b>	<b>0.0000</b>	<b>5.9329</b>

**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	2.7000e-004	2.2000e-004	2.7200e-003	1.0000e-005	9.6000e-004	0.0000	9.6000e-004	2.5000e-004	0.0000	2.6000e-004	0.0000	0.7365	0.7365	2.0000e-005	2.0000e-005	0.7426
<b>Total</b>	<b>2.7000e-004</b>	<b>2.2000e-004</b>	<b>2.7200e-003</b>	<b>1.0000e-005</b>	<b>9.6000e-004</b>	<b>0.0000</b>	<b>9.6000e-004</b>	<b>2.5000e-004</b>	<b>0.0000</b>	<b>2.6000e-004</b>	<b>0.0000</b>	<b>0.7365</b>	<b>0.7365</b>	<b>2.0000e-005</b>	<b>2.0000e-005</b>	<b>0.7426</b>

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

**3.7 Architectural Coating - 2023**

**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	0.1412					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.5300e-003	0.0104	0.0145	2.0000e-005		5.7000e-004	5.7000e-004		5.7000e-004	5.7000e-004	0.0000	2.0426	2.0426	1.2000e-004	0.0000	2.0457
<b>Total</b>	<b>0.1427</b>	<b>0.0104</b>	<b>0.0145</b>	<b>2.0000e-005</b>		<b>5.7000e-004</b>	<b>5.7000e-004</b>		<b>5.7000e-004</b>	<b>5.7000e-004</b>	<b>0.0000</b>	<b>2.0426</b>	<b>2.0426</b>	<b>1.2000e-004</b>	<b>0.0000</b>	<b>2.0457</b>

**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	1.4000e-004	1.1000e-004	1.3400e-003	0.0000	4.7000e-004	0.0000	4.7000e-004	1.3000e-004	0.0000	1.3000e-004	0.0000	0.3626	0.3626	1.0000e-005	1.0000e-005	0.3656
<b>Total</b>	<b>1.4000e-004</b>	<b>1.1000e-004</b>	<b>1.3400e-003</b>	<b>0.0000</b>	<b>4.7000e-004</b>	<b>0.0000</b>	<b>4.7000e-004</b>	<b>1.3000e-004</b>	<b>0.0000</b>	<b>1.3000e-004</b>	<b>0.0000</b>	<b>0.3626</b>	<b>0.3626</b>	<b>1.0000e-005</b>	<b>1.0000e-005</b>	<b>0.3656</b>



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**3.7 Architectural Coating - 2023**

**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	0.1412					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.5300e-003	0.0104	0.0145	2.0000e-005		5.7000e-004	5.7000e-004		5.7000e-004	5.7000e-004	0.0000	2.0426	2.0426	1.2000e-004	0.0000	2.0457
<b>Total</b>	<b>0.1427</b>	<b>0.0104</b>	<b>0.0145</b>	<b>2.0000e-005</b>		<b>5.7000e-004</b>	<b>5.7000e-004</b>		<b>5.7000e-004</b>	<b>5.7000e-004</b>	<b>0.0000</b>	<b>2.0426</b>	<b>2.0426</b>	<b>1.2000e-004</b>	<b>0.0000</b>	<b>2.0457</b>

**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	1.4000e-004	1.1000e-004	1.3400e-003	0.0000	4.7000e-004	0.0000	4.7000e-004	1.3000e-004	0.0000	1.3000e-004	0.0000	0.3626	0.3626	1.0000e-005	1.0000e-005	0.3656
<b>Total</b>	<b>1.4000e-004</b>	<b>1.1000e-004</b>	<b>1.3400e-003</b>	<b>0.0000</b>	<b>4.7000e-004</b>	<b>0.0000</b>	<b>4.7000e-004</b>	<b>1.3000e-004</b>	<b>0.0000</b>	<b>1.3000e-004</b>	<b>0.0000</b>	<b>0.3626</b>	<b>0.3626</b>	<b>1.0000e-005</b>	<b>1.0000e-005</b>	<b>0.3656</b>

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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	0.0508	0.0930	0.6038	1.4000e-003	0.1435	1.1100e-003	0.1446	0.0383	1.0400e-003	0.0394	0.0000	129.3117	129.3117	6.7900e-003	6.2500e-003	131.3448
Unmitigated	0.0508	0.0930	0.6038	1.4000e-003	0.1435	1.1100e-003	0.1446	0.0383	1.0400e-003	0.0394	0.0000	129.3117	129.3117	6.7900e-003	6.2500e-003	131.3448

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Manufacturing	37.95	37.95	37.95	190,299	190,299
Manufacturing	37.95	37.95	37.95	190,299	190,299
Parking Lot	0.00	0.00	0.00		
Total	75.90	75.90	75.90	380,599	380,599

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	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
Manufacturing	18.50	10.10	7.90	59.00	28.00	13.00	92	5	3
Manufacturing	18.50	10.10	7.90	59.00	28.00	13.00	92	5	3
Parking Lot	18.50	10.10	7.90	0.00	0.00	0.00	0	0	0

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**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Manufacturing	0.537785	0.055838	0.172353	0.139003	0.027005	0.007196	0.011392	0.017285	0.000559	0.000254	0.025303	0.000954	0.005071
Parking Lot	0.537785	0.055838	0.172353	0.139003	0.027005	0.007196	0.011392	0.017285	0.000559	0.000254	0.025303	0.000954	0.005071

**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	53.7215	53.7215	4.5300e-003	5.5000e-004	53.9987
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	53.7215	53.7215	4.5300e-003	5.5000e-004	53.9987
NaturalGas Mitigated	5.2300e-003	0.0475	0.0399	2.9000e-004		3.6100e-003	3.6100e-003		3.6100e-003	3.6100e-003	0.0000	51.7576	51.7576	9.9000e-004	9.5000e-004	52.0651
NaturalGas Unmitigated	5.2300e-003	0.0475	0.0399	2.9000e-004		3.6100e-003	3.6100e-003		3.6100e-003	3.6100e-003	0.0000	51.7576	51.7576	9.9000e-004	9.5000e-004	52.0651

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**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					
Manufacturing	484950	5.2300e-003	0.0475	0.0399	2.9000e-004		3.6100e-003	3.6100e-003		3.6100e-003	3.6100e-003	0.0000	51.7576	51.7576	9.9000e-004	9.5000e-004	52.0651
Parking Lot	0	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
<b>Total</b>		<b>5.2300e-003</b>	<b>0.0475</b>	<b>0.0399</b>	<b>2.9000e-004</b>		<b>3.6100e-003</b>	<b>3.6100e-003</b>		<b>3.6100e-003</b>	<b>3.6100e-003</b>	<b>0.0000</b>	<b>51.7576</b>	<b>51.7576</b>	<b>9.9000e-004</b>	<b>9.5000e-004</b>	<b>52.0651</b>

**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					
Manufacturing	484950	5.2300e-003	0.0475	0.0399	2.9000e-004		3.6100e-003	3.6100e-003		3.6100e-003	3.6100e-003	0.0000	51.7576	51.7576	9.9000e-004	9.5000e-004	52.0651
Parking Lot	0	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
<b>Total</b>		<b>5.2300e-003</b>	<b>0.0475</b>	<b>0.0399</b>	<b>2.9000e-004</b>		<b>3.6100e-003</b>	<b>3.6100e-003</b>		<b>3.6100e-003</b>	<b>3.6100e-003</b>	<b>0.0000</b>	<b>51.7576</b>	<b>51.7576</b>	<b>9.9000e-004</b>	<b>9.5000e-004</b>	<b>52.0651</b>

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**5.3 Energy by Land Use - Electricity**

**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Manufacturing	148800	52.7780	4.4500e-003	5.4000e-004	53.0503
Parking Lot	5320	0.9435	8.0000e-005	1.0000e-005	0.9484
<b>Total</b>		<b>53.7215</b>	<b>4.5300e-003</b>	<b>5.5000e-004</b>	<b>53.9987</b>

**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Manufacturing	148800	52.7780	4.4500e-003	5.4000e-004	53.0503
Parking Lot	5320	0.9435	8.0000e-005	1.0000e-005	0.9484
<b>Total</b>		<b>53.7215</b>	<b>4.5300e-003</b>	<b>5.5000e-004</b>	<b>53.9987</b>

**6.0 Area Detail**

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**6.1 Mitigation Measures Area**

Use Low VOC Paint - Non-Residential Interior

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	0.1236	1.0000e-005	8.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.6900e-003	1.6900e-003	0.0000	0.0000	1.8000e-003
Unmitigated	0.1236	1.0000e-005	8.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.6900e-003	1.6900e-003	0.0000	0.0000	1.8000e-003

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**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	0.0141					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.1094					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	8.0000e-005	1.0000e-005	8.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.6900e-003	1.6900e-003	0.0000	0.0000	1.8000e-003
<b>Total</b>	<b>0.1236</b>	<b>1.0000e-005</b>	<b>8.7000e-004</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>1.6900e-003</b>	<b>1.6900e-003</b>	<b>0.0000</b>	<b>0.0000</b>	<b>1.8000e-003</b>

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**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	0.0141					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.1094					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	8.0000e-005	1.0000e-005	8.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.6900e-003	1.6900e-003	0.0000	0.0000	1.8000e-003
<b>Total</b>	<b>0.1236</b>	<b>1.0000e-005</b>	<b>8.7000e-004</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>1.6900e-003</b>	<b>1.6900e-003</b>	<b>0.0000</b>	<b>0.0000</b>	<b>1.8000e-003</b>

**7.0 Water Detail**

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**7.1 Mitigation Measures Water**

Apply Water Conservation Strategy



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	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	14.5769	0.1819	4.4000e-003	20.4367
Unmitigated	18.2211	0.2274	5.5000e-003	25.5459

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Manufacturing	6.9375 / 0	18.2211	0.2274	5.5000e-003	25.5459
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>18.2211</b>	<b>0.2274</b>	<b>5.5000e-003</b>	<b>25.5459</b>

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**7.2 Water by Land Use**

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Manufacturing	5.55 / 0	14.5769	0.1819	4.4000e-003	20.4367
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>14.5769</b>	<b>0.1819</b>	<b>4.4000e-003</b>	<b>20.4367</b>

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

Institute Recycling and Composting Services

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Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	1.8878	0.1116	0.0000	4.6770
Unmitigated	7.5513	0.4463	0.0000	18.7079

**8.2 Waste by Land Use**

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Manufacturing	37.2	7.5513	0.4463	0.0000	18.7079
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>7.5513</b>	<b>0.4463</b>	<b>0.0000</b>	<b>18.7079</b>

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**8.2 Waste by Land Use**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Manufacturing	9.3	1.8878	0.1116	0.0000	4.6770
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>1.8878</b>	<b>0.1116</b>	<b>0.0000</b>	<b>4.6770</b>

**9.0 Operational Offroad**

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

Fire Pumps and Emergency Generators

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

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

Equipment Type	Number
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**11.0 Vegetation**

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

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