

Appendix L

Greenhouse Gas Analysis



**OLC3 (DRP22-00006, TPM22-
05048, SPA22-05047)
GREENHOUSE GAS ANALYSIS
CITY OF PERRIS**

PREPARED BY:

Haseeb Qureshi
hqureshi@urbanxroads.com

Michael Tirohn
mtirohn@urbanxroads.com

JUNE 21, 2023

TABLE OF CONTENTS

TABLE OF CONTENTS	I
APPENDICES II	
LIST OF EXHIBITS	II
LIST OF TABLES	II
LIST OF ABBREVIATED TERMS	III
EXECUTIVE SUMMARY	1
ES.1 Summary of Findings.....	1
ES.2 Regulatory Requirements.....	1
ES.3 Perris Valley Commerce Center Specific Plan (PVCCSP) Environmental Impact Report (PVCCSP EIR) Mitigation Measures.....	2
ES.4 Additional Mitigation Measures.....	5
1 INTRODUCTION	11
1.1 Site Location.....	11
1.2 Project Description.....	11
2 CLIMATE CHANGE SETTING	15
2.1 Introduction to Global Climate Change (GCC).....	15
2.2 Global Climate Change Defined.....	15
2.3 GHGs.....	15
2.4 Global Warming Potential.....	22
2.5 GHG Emissions Inventories.....	22
2.6 Effects of Climate Change in California.....	23
2.7 Regulatory Setting.....	25
3 PROJECT GHG IMPACT	50
3.1 Introduction.....	50
3.2 Standards of Significance.....	50
3.3 Models Employed To Analyze GHGs.....	50
3.4 Life-Cycle Analysis Not Required.....	51
3.5 Construction Emissions.....	51
3.6 Operational Emissions.....	53
3.7 GHG Emissions Findings and Recommendations.....	57
4 REFERENCES	60
5 CERTIFICATIONS	64

APPENDICES

APPENDIX 3.1: CALEEMOD EMISSIONS MODEL OUTPUTS

LIST OF EXHIBITS

EXHIBIT 1-A: LOCATION MAP.....	12
EXHIBIT 1-B: SITE PLAN.....	13
EXHIBIT 2-A: SUMMARY OF PROJECTED GLOBAL WARMING IMPACT, 2070-2099 (AS COMPARED WITH 1961-1990).....	21

LIST OF TABLES

TABLE ES-1: SUMMARY OF CEQA SIGNIFICANCE FINDINGS	1
TABLE 2-1: GHGS	16
TABLE 2-2: GWP AND ATMOSPHERIC LIFETIME OF SELECT GHGS	22
TABLE 2-3: TOP GHG PRODUCING COUNTRIES AND THE EUROPEAN UNION	23
TABLE 3-2: CONSTRUCTION DURATION.....	52
TABLE 3-3: CONSTRUCTION EQUIPMENT ASSUMPTIONS	52
TABLE 3-4: AMORTIZED ANNUAL CONSTRUCTION EMISSIONS.....	53
TABLE 3-5: PASSENGER CAR FLEET MIX	54
TABLE 3-6: TRUCK FLEET MIX	55
TABLE 3-7: PROJECT GHG EMISSIONS.....	56

LIST OF ABBREVIATED TERMS

%	Percent
°C	Degrees Celsius
°F	Degrees Fahrenheit
(1)	Reference
2017 Scoping Plan	Final 2017 Scoping Plan Update
AB	Assembly Bill
AB 32	Global Warming Solutions Act of 2006
AB 1493	Pavley Fuel Efficiency Standards
AB 1881	California Water Conservation Landscaping Act of 2006
Annex I	Industrialized Nations
APA	Administrative Procedure Act
AQIA	<i>OLC3 Air Quality Impact Analysis</i>
BAU	Business as Usual
C ₂ F ₆	Hexafluoroethane
C ₂ H ₆	Ethane
C ₂ H ₂ F ₄	Tetrafluoroethane
C ₂ H ₄ F ₂	Ethylidene Fluoride
CAA	Federal Clean Air Act
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGAPS	California LBNL GHG Analysis of Policies Spreadsheet
CALGreen	California Green Building Standards Code
CalSTA	California State Transportation Agency
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resource Board
CBSC	California Building Standards Commission
CEC	California Energy Commission
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
<i>CEQA Guidelines</i>	<i>Guidelines for Implementation of the California Environmental Quality Act</i>
CDFA	California Department of Food and Agriculture
CF ₄	Tetrafluoromethane

CFC	Chlorofluorocarbons
CFC-113	Trichlorotrifluoroethane
CH ₄	Methane
City	City of Perris
CNRA	California Natural Resources Agency
<i>CNRA 2009</i>	<i>2009 California Climate Adaptation Strategy</i>
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
Convention	United Nation’s Framework Convention on Climate Change
COP	Conference of the Parties
CPUC	California Public Utilities Commission
CTC	California Transportation Commission
DOF	Department of Finance
DWR	Department of Water Resources
EMFAC	Emission Factor Model
EPA	Environmental Protection Agency
EV	Electric Vehicle
FED	Functional Equivalent Document
GCC	Global Climate Change
Gg	Gigagram
GHGA	Greenhouse Gas Analysis
GO-Biz	Governor’s Office of Business and Economic Development
gpd	Gallons Per Day
gpm	Gallons Per Minute
GWP	Global Warming Potential
H ₂ O	Water
HFC	Hydrofluorocarbons
HDT	Heavy-Duty Trucks
HFC-23	Fluoroform
HFC-134a	1,1,1,2-tetrafluoroethane
HFC-152a	1,1-difluoroethane
HHDT	Heavy-Heavy-Duty Trucks
hp	Horsepower
IBANK	California Infrastructure and Economic Development Bank
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Resource Planning
ISO	Independent System Operator
ITE	Institute of Transportation Engineers

kWh	Kilowatt Hours
lbs	Pounds
LBNL	Lawrence Berkeley National Laboratory
LCA	Life-Cycle Analysis
LCD	Liquid Crystal Display
LCFS	Low Carbon Fuel Standard or Executive Order S-01-07
LDA	Light-Duty Auto
LDT1/LDT2	Light-Duty Trucks
LEV III	Low-Emission Vehicle
LHDT1/LHDT2	Light-Heavy-Duty Trucks
LULUCF	Land-Use, Land-Use Change and Forestry
MARB/IPA	March Air Reserve Base/Inland Port Airport
MCY	Motorcycles
MD	Medium Duty
MDT	Medium-Duty Trucks
MDV	Medium-Duty Vehicles
MHDT	Medium-Heavy-Duty Trucks
MM	Mitigation Measures
MMR	Mandatory Reporting Rule
MMTCO _{2e}	Million Metric Ton of Carbon Dioxide Equivalent
mpg	Miles Per Gallon
MPOs	Metropolitan Planning Organizations
MMTCO _{2e} /yr	Million Metric Ton of Carbon Dioxide Equivalent Per Year
MT/yr	Metric Tons Per Year
MTCO _{2e}	Metric Ton of Carbon Dioxide Equivalent
MTCO _{2e} /yr	Metric Ton of Carbon Dioxide Equivalent Per Year
MW	Megawatts
MWh	Megawatts Per Hour
MWEL0	California Department of Water Resources' Model Water Efficient
N ₂ O	Nitrous Oxide
NDC	Nationally Determined Contributions
NF ₃	Nitrogen Trifluoride
NHTSA	National Highway Traffic Safety Administration
NIOSH	National Institute for Occupational Safety and Health
NO _x	Nitrogen Oxides
Non-Annex I	Developing Nations
OAL	Office of Administrative Law

OPR	Office of Planning and Research
PFC	Perfluorocarbons
ppb	Parts Per Billion
ppm	Parts Per Million
ppt	Parts Per Trillion
Project	OLC3
PVCCSP	Perris Valley Commerce Center Specific Plan
PVCCSP EIR	<i>Perris Valley Commerce Center Specific Plan Environmental Impact Report SCH No. 2009081086</i>
RMC	Riverside Municipal Code
RTP	Regional Transportation Plan
SAFE	Safer Affordable Fuel-Efficient Vehicles Rule
SB	Senate Bill
SB 32	California Global Warming Solutions Act of 2006
SB 375	Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies
SB 1078	Renewable Portfolio Standards
SB 1368	Statewide Retail Provider Emissions Performance Standards
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
Scoping Plan	California Air Resources Board Climate Change Scoping Plan
SCS	Sustainable Communities Strategy
sf	Square Feet
SF ₆	Sulfur Hexafluoride
SGC	Strategic Growth Council
SHGC	Solar Heat Gain Coefficient
SLPS	Short-Lived Climate Pollutant Strategy
SP	Service Population
SWCRB	State Water Resources Control Board
TA	<i>OLC3 (DPR20-00004) Traffic Analysis</i>
TDM	Transportation Demand Measures
Title 20	Appliance Energy Efficiency Standards
Title 24	California Building Code
U.N.	United Nations
U.S.	United States

UNFCCC	United Nations' Framework Convention on Climate Change
URBEMIS	Urban Emissions
UTR	Utility Tractors
VFP	Vehicle Fueling Positions
VMT	Vehicle Miles Traveled
WCI	Western Climate Initiative
WRCOG	Western Riverside Council of Governments
WRI	World Resources Institute
ZE/NZE	Zero and Near-Zero Emissions
ZEV	Zero-Emissions Vehicles

This page intentionally left blank

EXECUTIVE SUMMARY

ES.1 SUMMARY OF FINDINGS

The results of this *OLC3 Greenhouse Gas Analysis* (GHGA) is summarized below based on the significance criteria in Section 3 of this report consistent with Appendix G of the *Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines)* (1). Table ES-1 shows the findings of significance for potential greenhouse gas (GHG) impacts under CEQA.

TABLE ES-1: SUMMARY OF CEQA SIGNIFICANCE FINDINGS

Analysis	Report Section	Significance Findings	
		Unmitigated	Mitigated
GHG Impact #1: Would the Project generate GHG emissions either directly or indirectly, that may have a significant impact on the environment?	3.7	<i>Potentially Significant</i>	<i>Significant and Unavoidable</i>
GHG Impact #2: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	3.7	<i>Less Than Significant</i>	<i>n/a</i>

ES.2 REGULATORY REQUIREMENTS

The Project would be required to comply with regulations imposed by the State of California and the South Coast Air Quality Management District (SCAQMD) aimed at the reduction of air pollutant emissions. Those that are directly and indirectly applicable to the Project and that would assist in the reduction of GHG emissions include:

- Global Warming Solutions Act of 2006 (Assembly Bill (AB) 32) (2).
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (Senate Bill (SB) 375) (3).
- Pavley Fuel Efficiency Standards (AB 1493). Establishes fuel efficiency ratings for new vehicles (4).
- California Building Code (Title 24 California Code of Regulations (CCR)) and CALGreen standards. Establishes energy efficiency requirements for new construction (5).
- Appliance Energy Efficiency Standards (Title 20 CCR). Establishes energy efficiency requirements for appliances (6).
- Low Carbon Fuel Standard (LCFS). Requires carbon content of fuel sold in California to be 10 percent (%) less by 2020 (7).
- California Water Conservation in Landscaping Act of 2006 (AB 1881). Requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or

equivalent by January 1, 2010, to ensure efficient landscapes in new development and reduced water waste in existing landscapes (8).

- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions (9).
- Renewable Portfolio Standards (SB 1078 – also referred to as RPS). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20% by 2010 and 33% by 2020 (10).
- California Global Warming Solutions Act of 2006 (SB 32). Requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15 (11).
- City of Perris Climate Action Plan (CAP) was completed in February 2016. The CAP was developed to reduce GHG emissions at the community level consistent with California’s Mandated statewide reduction targets set forth by AB32.

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

ES.3 PERRIS VALLEY COMMERCE CENTER SPECIFIC PLAN (PVCCSP) ENVIRONMENTAL IMPACT REPORT (PVCCSP EIR) MITIGATION MEASURES

The Project site is located within the PVCCSP planning area. As such, and unless otherwise noted, the Project is required to comply with the following applicable *Perris Valley Commerce Center Specific Plan Environmental Impact Report SCH No. 2009081086* mitigation measures (MMs) (12). The applicable PVCCSP EIR mitigation measures for air quality are shown below and are required for the Project. Additionally, these select measures, as disclosed in the EIR, would also reduce GHG emissions. As a conservative measure, to provide a worst-case disclosure of the Project’s impacts, no reduction in emissions has been assumed from the following PVCCSP EIR mitigation measures.

MM Air 4

Building and grading permits shall include a restriction that limits idling of construction equipment on site to no more than five minutes.

MM Air 5

Electricity from power poles shall be used instead of temporary diesel or gasoline-powered generators to reduce the associated emissions. Approval will be required by the City of Perris’ Building Division prior to issuance of grading permits.

MM Air 6

The developer of each implementing development project shall require, by contract specifications, the use of alternative fueled off-road construction equipment, the use of construction equipment that demonstrates early compliance with off-road equipment with the

California Air Resources Board (CARB) in-use off-road diesel vehicle regulation (SCAQMD Rule 2449) and/or meets or exceeds Tier 3 standards with available CARB verified or Environmental Protection Agency (EPA) certified technologies. Diesel equipment shall use water emulsified diesel fuel such as PuriNO_x unless it is unavailable in Riverside County at the time of project construction activities. Contract specifications shall be included in project construction documents, which shall be reviewed by the City of Perris’ Building Division prior to issuance of a grading permit.

MM Air 7

During construction, ozone (O₃) precursor emissions from mobile construction equipment shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturers’ specifications to the satisfaction of the City of Perris’ Building Division. Equipment maintenance records and equipment design specification data sheets shall be kept on-site during construction. Compliance with this measure shall be subject to periodic inspections by the City of Perris’ Building Division.

MM Air 11

Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of five minutes.

For purposes of analysis, the GHG emissions estimates presented in this GHGA do not reflect emission reductions that would result from implementation of this PVCCSP EIR mitigation measure.

MM Air 12

Where transport refrigeration units (TRUs) are in use, electrical hookups will be installed at all loading and unloading stalls in order to allow TRUs with electric standby capabilities to use them.

For purposes of analysis, the GHG emissions estimates presented in this GHGA do not reflect emission reductions that would result from implementation of this PVCCSP EIR mitigation measure.

MM Air 13

In order to promote alternative fuels, and help support “clean” truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD’s Carl Moyer Program, or other state programs that restrict operations to “clean” trucks, such as 2007 or newer model year or 2010 compliant vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year would be used at a facility with three or more dock-high doors, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP [On-road Heavy Duty Voucher Incentive Program], HVIP [Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project], and SOON [Surplus

Off-Road Opt-in for Nitrogen Oxides (NO_x)] funding programs, as identified on SCAQMD's website (<http://www.aqmd.gov>). Tenants would be required to use those funds, if awarded.

For purposes of analysis, the GHG emissions estimates presented in this GHGA do not reflect emissions reductions that would result from implementation of this PVCCSP EIR mitigation measure.

MM Air 14

Each implementing development project shall designate parking spaces for high-occupancy vehicles and provide larger parking spaces to accommodate vans used for ride sharing. Proof of compliance would be required prior to the issuance of occupancy permits.

For purposes of analysis, the GHG emissions estimates presented in this GHGA do not reflect emissions reductions that would result from implementation of this PVCCSP EIR mitigation measure.

MM Air 18

Prior to the approval of each implementing development project, the Riverside Transit Agency (RTA) shall be contacted to determine if the RTA has plans for the future provision of bus routing within any street that is adjacent to the implementing development project that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that will serve the implementing development project, road improvements adjacent to the Project sites shall be designed to accommodate future bus turnouts at locations established through consultation with the RTA. RTA shall be responsible for the construction and maintenance of the bus stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalks and curb and gutter at bus stops and the use of Americans with Disabilities Act (ADA)-compliant paths to the major building entrances in the project.

For purposes of analysis, the estimated Project-generated emissions presented in this GHGA do not reflect emission reductions that would occur with implementation of this PVCCSP EIR mitigation measure since emissions reductions from this measure are not readily quantifiable.

MM Air 19

In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g., electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the Project sites. These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris' Building Division) prior to conveyance of applicable streets.

For purposes of analysis, the GHG emissions estimates presented in this GHGA do not reflect emissions reductions that would result from implementation of this MM.

MM Air 20

Each implementing development project shall be encouraged to implement, at a minimum, an increase in each building's energy efficiency 15% beyond Title 24, and reduce indoor water use

by 25%. All reductions would be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.

For purposes of analysis, the GHG emissions estimates presented in this GHGA do not reflect emissions reductions that would result from implementation of this MM.

ES.4 ADDITIONAL MITIGATION MEASURES

The following Project-specific mitigation measures (MM AQ-1 through MM AQ-13) were identified in the *OLC3 Air Quality Impact Analysis Report (AQIA)* (Urban Crossroads, Inc.) (13). These measures are designed to reduce Project operational-source emissions. However, it should be noted that there is no way to quantify these reductions in the California Emissions Estimator Model (CalEEMod), and therefore, to provide a conservative disclosure of Project emissions, no reductions in emissions are assumed to occur even with implementation of the below measures. Notwithstanding the foregoing, it is likely that all of the below measures will decrease Project emissions somewhat.

MM AQ-1

Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas of the warehouse portion of the Project that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than five (5) minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and 3) telephone numbers of the building facilities manager and the CARB to report violations. Prior to the issuance of an occupancy permit, the City shall conduct a site inspection to ensure that the signs are in place.

MM AQ-2

Prior to the issuing of each building permit, the project proponent and its contractors shall provide plans and specifications to the City of Perris Building Department that demonstrate that each project building is designed for passive heating and cooling and is designed to include natural light. Features designed to achieve this shall include the proper placement of windows, overhangs, and skylights.

MM AQ-3

Prior to the issuing of each building permit, the project proponent and its contractors shall provide plans and specifications to the City of Perris Building Department that demonstrate that electrical service is provided to each of the areas in the vicinity of the building that are to be landscaped in order that electrical equipment may be used for landscape maintenance.

MM AQ-4

Once constructed, the project proponent shall ensure that all building tenants in the warehouse portion of the Project shall utilize electric equipment for landscape maintenance to the extent feasible, through requirements in the lease agreements.

MM AQ-5

Once constructed, the project proponent shall ensure that all building tenants shall utilize only electric or natural gas service yard trucks (hostlers), pallet jacks and forklifts, and other onsite equipment, through requirements in the lease agreements. Electric-powered service yard trucks (hostlers), pallet jacks and forklifts, and other onsite equipment shall also be required instead of diesel-powered equipment, if technically feasible. Yard trucks may be diesel fueled in lieu of electrically or natural gas fueled provided such yard trucks are at least compliant with California Air Resources Board (CARB) 2010 standards for on-road vehicles or CARB Tier 4 compliant for off-road vehicles.

MM AQ-6

Upon occupancy, the facility operator for the warehouse portion of the Project shall require tenants that do not already operate 2010 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, SmartWay Finance, or other similar funds. If awarded, the tenant shall be required to accept and use the funding. Tenants shall be encouraged to consider the use of alternative fueled trucks as well as new or retrofitted diesel trucks. Tenants shall also be encouraged to become SmartWay Partners, if eligible. This measure shall not apply to trucks that are not owned or operated by the facility operator or facility tenants since it would be infeasible to prohibit access to the site by any truck that is otherwise legal to operate on California roads and highways. The facility operator shall provide an annual report to the City of Perris Planning Division. The report shall: one, list each engine design; two, describe the effort made by each tenant to obtain funding to upgrade their fleet and the results of that effort; and three, describe the change in each fleet composition from the prior year.

MM AQ-7

Tenants who employ 250 or more employees on a full- or part-time basis shall comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. The purpose of this rule is to provide employees with a menu of options to reduce employee commute vehicle emissions. Tenants with less than 250 employees or tenants with 250 or more employees who are exempt from SCAQMD Rule 2202 (as stated in the Rule) shall either (a) join with a tenant who is implementing a program in accordance with Rule 2202 or (b) implement an emission reduction program similar to Rule 2202 with annual reporting of actions and results to the City of Perris. The tenant-implemented program would include, but not be limited to the following:

- Appoint a Transportation Demand Management (TDM) coordinator who would promote the TDM program, activities and features to all employees.
- Create and maintain a “commuter club” to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work.
- Inform employees of public transit and commuting services available to them (e.g., social media, signage).

- Provide on-site transit pass sales and discounted transit passes.
- Guarantee a ride home.
- Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted.
- Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.”

Related to this measure, the Ramona Gateway Vehicle Miles Traveled (VMT) Analysis (Urban Crossroads, 2022) includes the following TDM strategies:

- Implementation of pedestrian network improvements that would provide a pedestrian access network to link areas of the Project site that would encourage people to walk instead of drive. This mode shift results in people driving less and thus a reduction in VMT. The project will provide a pedestrian access network that internally links all uses and connects to existing pedestrian facilities contiguous with the project site. The project will minimize barriers to pedestrian access and interconnectivity. There is existing sidewalk east of the Project along Webster Avenue. The Project would provide pedestrian connections on-site that would connect to the existing sidewalk along Webster Avenue. Notably a sidewalk would be provided along the south side of Ramona Expressway adjacent to the Project site, which would connect to the sidewalk along the west side of Webster Avenue. The proposed Ramona Expressway sidewalk would also connect to the sidewalk to be constructed along the east side of Nevada Avenue, adjacent to the Project site.
- The Project would further reduce its VMT impact through the implementation of a voluntary commute trip reduction (CTR) program that would discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, transit usage, walking and biking. The CTR program will provide employees assistance in using alternative modes of travel and provide incentives to encourage employee usage. CTR program would be a multi-strategy program that could include the following individual measures:
 - Carpooling encouragement
 - Ride-matching assistance
 - Preferential carpool parking
 - Flexible work schedules for carpools
 - Half-time transportation coordinator
 - New employee orientation of trip reduction and alternative travel mode options
 - Vanpool assistance
 - Bicycle end-trip facilities (parking and lockers)

MM AQ-8

Prior to the issuance of a building permit, the project proponent shall provide evidence to the City that loading docks are designed to be compatible with SmartWay trucks.

MM AQ-9

Upon occupancy and annually thereafter, the facility operator shall provide information to all tenants, with instructions that the information shall be provided to employees and truck drivers as appropriate, regarding:

- Building energy efficiency, solid waste reduction, recycling, and water conservation.
- Vehicle GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting.
- Participation in the Voluntary Interindustry Commerce Solutions (VICS) “Empty Miles” program to improve goods trucking efficiencies.
- Health effects of diesel particulates, State regulations limiting truck idling time, and the benefits of minimized idling.
- The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity.

MM AQ-10

Prior to issuance of a building permit, the project proponent shall provide the City with an onsite signage program that clearly identifies the required onsite circulation system. This shall be accomplished through posted signs and painting on driveways and internal roadways.

MM AQ-11

Prior to issuance of an occupancy permit, the City shall confirm that signs clearly identifying approved truck routes have been installed along the truck routes to and from the Project sites.

MM AQ-12

Prior to issuance of an occupancy permit, the project proponent shall install a sign on the property with telephone, email, and regular mail contact information for a designated representative of the tenant who would receive complaints about excessive noise, dust, fumes, or odors. The sign shall also identify contact data for the City for perceived Code violations. The tenant’s representative shall keep records of any complaints received and actions taken to communicate with the complainant and resolve the complaint. The tenant’s representative shall endeavor to resolve complaints within 24 hours.

MM AQ-13

Prior to issuance of a building permit, the project proponent shall provide the City with project specifications, drawings, and calculations that demonstrate that main electrical supply lines and panels have been sized to support heavy truck charging facilities when these trucks become available. The calculations shall be based on reasonable predictions from currently available truck manufacturer’s data. Electrical system upgrades that exceed reasonable costs shall not be required.

This page intentionally left blank

1 INTRODUCTION

This report presents the results of the GHGA prepared by Urban Crossroads, Inc., for the proposed OLC3 (Project). The purpose of this GHGA is to evaluate Project-related construction and operational emissions and determine the level of GHG impacts as a result of constructing and operating the Project.

1.1 SITE LOCATION

The proposed OLC3 site is located on the southeast corner of Perris Boulevard and Perry Street within the City of Perris' *Perris Valley Commerce Center Specific Plan (PVCCSP)* planning area as shown on Exhibit 1-A. March Air Reserve Base/Inland Port Airport (MARB/IPA) is located approximately 1.5 miles northwest of the Project site boundary.

The Project site is currently undeveloped. According to the PVCCSP, the Project site is designated for Commercial uses. The Commercial designation provides for retail, professional office, and service-oriented business activities which serve the entire City, as well as the surrounding neighborhoods. This zone combines the General Plan Land Use designation of Community Commercial and Commercial Neighborhood (14).

1.2 PROJECT DESCRIPTION

The Project is to consist of 774,419 square feet of non-refrigerated High-Cube Fulfillment Center Warehouse use and up to 70,000 square feet of Retail and Restaurant uses (comprised of 30,825 square feet of Strip Retail Plaza use, 5,000 square feet of High Turnover (Sit-Down) Restaurant use, 23,775 square feet of Fast-Food Restaurant Without Drive-Through Window use in-line with the retail use, and 10,400 square feet of Fast-Food Restaurant With Drive-Through Window use). The Project is anticipated to be constructed in a single phase by the year 2024. A preliminary site plan is shown on Exhibit 1-B.

It should be noted, the Project description for the retail portion of the site has been updated since the time this study has been prepared. The updated Project description for the retail portion now consists of 39,825 square feet of retail use and 14,775 square feet of Fast-food Restaurant with Drive-Through Window use. The land uses evaluated within this study generate more trips, and consequently more emissions compared to the updated Project description. Therefore, the analysis provided in this report presents a conservative analysis of anticipated impacts.

EXHIBIT 1-A: LOCATION MAP



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS

LEGEND:
 N
 Site Boundary

EXHIBIT 1-B: SITE PLAN



This page intentionally left blank

2 CLIMATE CHANGE SETTING

2.1 INTRODUCTION TO GLOBAL CLIMATE CHANGE (GCC)

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

An individual project like the proposed Project evaluated in this GHGA cannot generate enough GHG emissions to affect a discernible change in global climate. However, the proposed Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC. Because these changes may have serious environmental consequences, Section 3.0 will evaluate the potential for the proposed Project to have a significant effect upon the environment as a result of its potential contribution to the greenhouse effect.

2.2 GLOBAL CLIMATE CHANGE DEFINED

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

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

2.3 GHGs

2.3.1 GHGs AND HEALTH EFFECTS

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. Many gases demonstrate these properties and as discussed in Table 2-1. For the purposes of this analysis, emissions of CO₂, CH₄, and N₂O were evaluated (see Table 3-1 later in this report) because these gases are the primary contributors to GCC from development projects.

Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases.

TABLE 2-1: GHGS

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

GHGs	Description	Sources	Health Effects
	<p>unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it would eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the earth's surface and heat it up) (15).</p>		
<p>CO₂</p>	<p>CO₂ is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO₂ concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30%. Left unchecked, the concentration of CO₂ in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources (16).</p>	<p>CO₂ is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil, natural gas, and wood. CO₂ is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks (17).</p>	<p>Outdoor levels of CO₂ are not high enough to result in negative health effects.</p> <p>According to the National Institute for Occupational Safety and Health (NIOSH) high concentrations of CO₂ can result in health effects such as: headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. It should be noted that current concentrations of CO₂ in the earth's atmosphere are estimated to be approximately 370 ppm, the actual reference exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour workweek and short-term reference exposure levels of 30,000 ppm averaged over a 15 minute period (18).</p>

GHGs	Description	Sources	Health Effects
CH ₄	<p>CH₄ is an extremely effective absorber of radiation, although its atmospheric concentration is less than CO₂ and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs.</p>	<p>CH₄ has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of CH₄. Other anthropogenic sources include fossil-fuel combustion and biomass burning (19).</p>	<p>CH₄ is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to elevated levels of CH₄ can cause asphyxiation, loss of consciousness, headache and dizziness, nausea and vomiting, weakness, loss of coordination, and an increased breathing rate.</p>
N ₂ O	<p>N₂O, also known as laughing gas, is a colorless GHG. Concentrations of N₂O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb).</p>	<p>N₂O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant, i.e., in whipped cream</p>	<p>N₂O can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage) (20).</p>

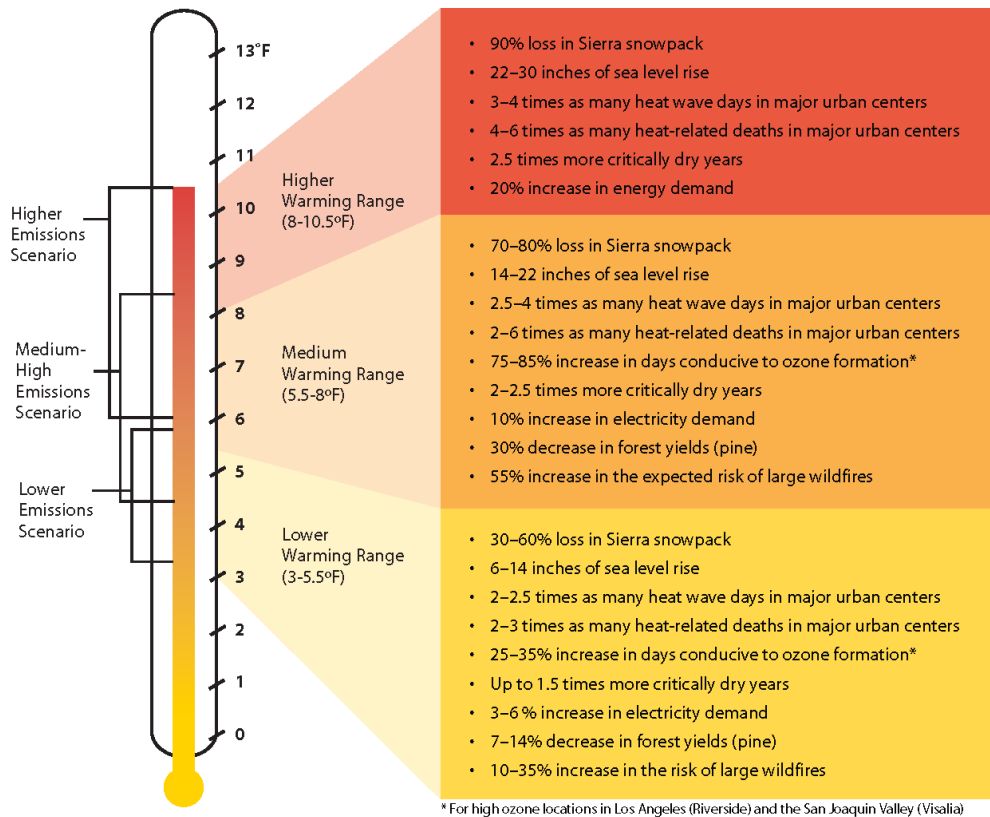
GHGs	Description	Sources	Health Effects
		<p>bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. N₂O can be transported into the stratosphere, be deposited on the earth's surface, and be converted to other compounds by chemical reaction (20).</p>	
<p>Chlorofluorocarbons (CFCs)</p>	<p>CFCs are gases formed synthetically by replacing all hydrogen atoms in CH₄ or ethane (C₂H₆) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the earth's surface).</p>	<p>CFCs have no natural source but were first synthesized in 1928. They were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of the CFCs would remain in the atmosphere for over 100 years (21).</p>	<p>In confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.</p>

GHGs	Description	Sources	Health Effects
HFCs	<p>HFCs are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential (GWP). The HFCs with the largest measured atmospheric abundances are (in order), Fluoroform (HFC-23), 1,1,1,2-tetrafluoroethane (HFC-134a), and 1,1-difluoroethane (HFC-152a). Prior to 1990, the only significant emissions were of HFC-23. HCF-134a emissions are increasing due to its use as a refrigerant.</p>	<p>HFCs are manmade for applications such as automobile air conditioners and refrigerants.</p>	<p>No health effects are known to result from exposure to HFCs.</p>
PFCs	<p>PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above earth's surface, are able to destroy the compounds. Because of this, PFCs have exceptionally long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF₄) and hexafluoroethane (C₂F₆). The EPA estimates that concentrations of CF₄ in the atmosphere are over 70 parts per trillion (ppt).</p>	<p>The two main sources of PFCs are primary aluminum production and semiconductor manufacture.</p>	<p>No health effects are known to result from exposure to PFCs.</p>
SF ₆	<p>SF₆ is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900) (22). The EPA indicates that concentrations in the 1990s were about 4 ppt.</p>	<p>SF₆ is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.</p>	<p>In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.</p>

GHGs	Description	Sources	Health Effects
Nitrogen Trifluoride (NF ₃)	NF ₃ is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that NF ₃ has a 100-year GWP of 17,200 (23).	NF ₃ is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display (LCD) panels, types of solar panels, and chemical lasers.	Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis (24).

The potential health effects related directly to the emissions of CO₂, CH₄, and N₂O as they relate to development projects such as the proposed Project are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth’s ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport those higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change would likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas (25). Exhibit 2-A presents the potential impacts of global warming (26).

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



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

2.4 GLOBAL WARMING POTENTIAL

GHGs have varying GWP values. GWP of a GHG indicates the amount of warming a gas cause over a given period of time and represents the potential of a gas to trap heat in the atmosphere. CO₂ is utilized as the reference gas for GWP, and thus has a GWP of 1. CO₂ equivalent (CO₂e) is a term used for describing the difference GHGs in a common unit. CO₂e signifies the amount of CO₂ which would have the equivalent GWP.

The atmospheric lifetime and GWP of selected GHGs are summarized at Table 2-2. As shown in the table below, GWP for the 2nd Assessment Report, the Intergovernmental Panel on Climate Change (IPCC)'s scientific and socio-economic assessment on climate change, range from 1 for CO₂ to 23,900 for SF₆ and GWP for the IPCC's 5th Assessment Report range from 1 for CO₂ to 23,500 for SF₆ (27).

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

Gas	Atmospheric Lifetime (years)	GWP (100-year time horizon)	
		2 nd Assessment Report	5 th Assessment Report
CO ₂	See*	1	1
CH ₄	12 .4	21	28
N ₂ O	121	310	265
HFC-23	222	11,700	12,400
HFC-134a	13.4	1,300	1,300
HFC-152a	1.5	140	138
SF ₆	3,200	23,900	23,500

*As per Appendix 8.A. of IPCC's 5th Assessment Report, no single lifetime can be given.

Source: Table 2.14 of the IPCC Fourth Assessment Report, 2007

2.5 GHG EMISSIONS INVENTORIES

2.5.1 GLOBAL

Worldwide anthropogenic GHG emissions are tracked by the IPCC for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2018. Based on the latest available data, the sum of these emissions totaled approximately 28,768,440 gigagram (Gg) CO₂e¹ (28) (29) as summarized on Table 2-3.

¹ The global emissions are the sum of Annex I and non-Annex I countries, without counting Land-Use, Land-Use Change and Forestry (LULUCF). For countries without 2018 data, the United Nations' Framework Convention on Climate Change (UNFCCC) data for the most recent year were used U.N. Framework Convention on Climate Change, "Annex I Parties – GHG total without LULUCF," The most recent GHG emissions for China and India are from 2014 and 2010, respectively.

2.5.2 UNITED STATES

As noted in Table 2-3, the United States, as a single country, was the number two producer of GHG emissions in 2018.

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

Emitting Countries	GHG Emissions (Gg CO ₂ e)
China	12,300,200
United States	6,676,650
European Union (28-member countries)	4,232,274
Russian Federation	2,220,123
India	2,100,850
Japan	1,238,343
Total	28,768,440

2.5.3 STATE OF CALIFORNIA

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the United States (U.S.) emissions inventory total (30). The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2020 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2019 GHG emissions period, California emitted an average 418.1 million metric tons of CO₂e per year (MMTCO₂e/yr) or 418,100 Gg CO₂e (6.26% of the total United States GHG emissions) (31).

2.6 EFFECTS OF CLIMATE CHANGE IN CALIFORNIA

2.6.1 PUBLIC HEALTH

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35% under the lower warming range to 75 to 85% under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. Based on *Our Changing Climate Assessing the Risks to California by the California Climate Change Center*, large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced (32).

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a

² Used <http://unfccc.int> data for Annex I countries. Consulted the CAIT Climate Data Explorer in <https://www.climatewatchdata.org> site to reference Non-Annex I countries of China and India.

significant increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat.

2.6.2 WATER RESOURCES

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

If temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90%. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding.

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

2.6.3 AGRICULTURE

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. First, California farmers could possibly lose as much as 25% of the water supply needed. Although higher CO₂ levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth.

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

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

2.6.4 FORESTS AND LANDSCAPES

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

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

2.6.5 RISING SEA LEVELS

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

2.7 REGULATORY SETTING

2.7.1 INTERNATIONAL

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

IPCC

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

UNITED NATION'S FRAMEWORK CONVENTION ON CLIMATE CHANGE (UNFCCC)

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

INTERNATIONAL CLIMATE CHANGE TREATIES

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

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

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

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

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

- Reaffirm the goal of limiting global temperature increase well below 2°C, while urging efforts to limit the increase to 1.5 degrees;
- Establish binding commitments by all parties to make “nationally determined contributions” (NDCs), and to pursue domestic measures aimed at achieving them;
- Commit all countries to report regularly on their emissions and “progress made in implementing and achieving” their NDCs, and to undergo international review;
- Commit all countries to submit new NDCs every five years, with the clear expectation that they would “represent a progression” beyond previous ones;
- Reaffirm the binding obligations of developed countries under the UNFCCC to support the efforts of developing countries, while for the first time encouraging voluntary contributions by developing countries too;
- Extend the current goal of mobilizing \$100 billion a year in support by 2020 through 2025, with a new, higher goal to be set for the period after 2025;
- Extend a mechanism to address “loss and damage” resulting from climate change, which explicitly would not “involve or provide a basis for any liability or compensation;”
- Require parties engaging in international emissions trading to avoid “double counting;” and
- Call for a new mechanism, similar to the Clean Development Mechanism under the Kyoto Protocol, enabling emission reductions in one country to be counted toward another country’s NDC (C2ES 2015a) (33).

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

2.7.2 NATIONAL

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

GHG ENDANGERMENT

In *Massachusetts v. Environmental Protection Agency* 549 U.S. 497 (2007), decided on April 2, 2007, the United States Supreme Court (Supreme Court) found that four GHGs, including CO₂, are air pollutants subject to regulation under Section 202(a)(1) of the Clean Air Act (CAA). The Supreme Court held that the EPA Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned

decision. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under section 202(a) of the CAA:

- **Endangerment Finding:** The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs— CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆—in the atmosphere threaten the public health and welfare of current and future generations.
- **Cause or Contribute Finding:** The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles, as discussed in the section “Clean Vehicles” below. After a lengthy legal challenge, the Supreme Court declined to review an Appeals Court ruling that upheld the EPA Administrator’s findings (34).

CLEAN VEHICLES

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

The first phase of the national program applies to passenger cars, light-duty trucks, and medium-duty (MD) passenger vehicles, covering model years 2012 through 2016. They require these vehicles to meet an estimated combined average emissions level of 250 grams of CO₂ per mile, equivalent to 35.5 miles per gallon (mpg) if the automobile industry were to meet this CO₂ level solely through fuel economy improvements. Together, these standards would cut CO₂ emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012–2016). 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 CO₂ in model year 2025, which is equivalent to 54.5 mpg if achieved exclusively through fuel economy improvements.

The EPA and the U.S. Department of Transportation issued final rules for the first national standards to reduce GHG emissions and improve fuel efficiency of heavy-duty trucks (HDT) and buses on September 15, 2011, effective November 14, 2011. For combination tractors, the agencies are proposing engine and vehicle standards that begin in the 2014 model year and achieve up to a 20% reduction in CO₂ emissions and fuel consumption by the 2018 model year. For HDT and vans, the agencies are proposing separate gasoline and diesel truck standards, which phase in starting in the 2014 model year and achieve up to a 10% reduction for gasoline vehicles and a 15% reduction for diesel vehicles by the 2018 model year (12 and 17% respectively if

accounting for air conditioning leakage). Lastly, for vocational vehicles, the engine and vehicle standards would achieve up to a 10% reduction in fuel consumption and CO₂ emissions from the 2014 to 2018 model years.

On April 2, 2018, the EPA signed the Mid-term Evaluation Final Determination, which declared that the MY 2022-2025 GHG standards are not appropriate and should be revised (35). This Final Determination serves to initiate a notice to further consider appropriate standards for MY 2022-2025 light-duty vehicles. On August 2, 2018, the NHTSA in conjunction with the EPA, released a notice of proposed rulemaking, the *Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule). The SAFE Vehicles Rule was proposed to amend exiting Corporate Average Fuel Economy (CAFE) and tailpipe CO₂ standards for passenger cars and light trucks and to establish new standards covering model years 2021 through 2026. As of March 31, 2020, the NHTSA and EPA finalized the SAFE Vehicle Rule which increased stringency of CAFE and CO₂ emissions standards by 1.5% each year through model year 2026 (36). However, on March 14, 2022, the EPA rescinded the SAFE Vehicles Rule, once again allowing California to enforce its own GHG emissions standards.

MANDATORY REPORTING OF GHGs

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

NEW SOURCE REVIEW

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

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

sources but excludes certain smaller sources from Prevention of Significant Deterioration and Title V permitting for GHG emissions until at least April 30, 2016.”

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

CAP-AND-TRADE

Cap-and-trade refers to a policy tool where emissions are limited to a certain amount and can be traded or provides flexibility on how the emitter can comply. Successful examples in the U.S. include the Acid Rain Program and the N₂O Budget Trading Program and Clean Air Interstate Rule in the northeast. There is no federal GHG cap-and-trade program currently; however, some states have joined to create initiatives to provide a mechanism for cap-and-trade.

The Regional GHG Initiative is an effort to reduce GHGs among the states of Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont. Each state caps CO₂ emissions from power plants, auctions CO₂ emission allowances, and invests the proceeds in strategic energy programs that further reduce emissions, save consumers money, create jobs, and build a clean energy economy. The Initiative began in 2008 and in 2020 has retained all participating states.

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

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. SmartWay is comprised of four components (37):

1. SmartWay Transport Partnership: A partnership in which freight carriers and shippers commit to benchmark operations, track fuel consumption, and improve performance annually.
2. SmartWay Technology Program: A testing, verification, and designation program to help freight companies identify equipment, technologies, and strategies that save fuel and lower emissions.
3. SmartWay Vehicles: A program that ranks light-duty cars and small trucks and identifies superior environmental performers with the SmartWay logo.

4. SmartWay International Interests: Guidance and resources for countries seeking to develop freight sustainability programs modeled after SmartWay.

SmartWay effectively refers to requirements geared towards reducing fuel consumption. Most large trucking fleets driving newer vehicles are compliant with SmartWay design requirements. Moreover, over time, all HDTs would have to comply with the CARB GHG Regulation that is designed with the SmartWay Program in mind, to reduce GHG emissions by making them more fuel-efficient. For instance, in 2015, 53 foot or longer dry vans or refrigerated trailers equipped with a combination of SmartWay-verified low-rolling resistance tires and SmartWay-verified aerodynamic devices would obtain a total of 10% or more fuel savings over traditional trailers.

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 used properly in their designed applications, and has verified certain products:

- Idle reduction technologies – less idling of the engine when it is not needed would reduce fuel consumption.
- Aerodynamic technologies minimize drag and improve airflow over the entire tractor-trailer vehicle. Aerodynamic technologies include gap fairings that reduce turbulence between the tractor and trailer, side skirts that minimize wind under the trailer, and rear fairings that reduce turbulence and pressure drop at the rear of the trailer.
- Low rolling resistance tires can roll longer without slowing down, thereby reducing the amount of fuel used. Rolling resistance (or rolling friction or rolling drag) is the force resisting the motion when a tire rolls on a surface. The wheel would eventually slow down because of this resistance.
- Retrofit technologies include things such as diesel particulate filters, emissions upgrades (to a higher tier), etc., which would reduce emissions.
- Federal excise tax exemptions.

EXECUTIVE ORDER 13990

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

2.7.3 CALIFORNIA

2.7.3.1 LEGISLATIVE ACTIONS TO REDUCE GHGs

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

AB 32

The California State Legislature enacted AB 32, which required that GHGs emitted in California be reduced to 1990 levels by the year 2020 (this goal has been met³). GHGs as defined under AB 32 include CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆. Since AB 32 was enacted, a seventh chemical, NF₃, has also been added to the list of GHGs. CARB is the state agency charged with monitoring and regulating sources of GHGs. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 states the following:

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

SB 375

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

SB 375 requires MPOs to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG

³ Based upon the 2019 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2017 GHG emissions period, California emitted an average 424.1 MMTCO₂e (57). This is less than the 2020 emissions target of 431 MMTCO₂e.

emissions. Although SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.

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

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

AB 1493 - Pavley Fuel Efficiency Standards

Enacted on July 22, 2002, California AB 1493, also known as the Pavley Fuel Efficiency Standards, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the EPA's denial of an implementation waiver. The EPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011.

The standards phase in during the 2009 through 2016 MY. Several technologies stand out as providing significant reductions in emissions at favorable costs. These include discrete variable valve lift or camless valve actuation to optimize valve operation rather than relying on fixed valve timing and lift as has historically been done; turbocharging to boost power and allow for engine downsizing; improved multi-speed transmissions; and improved air conditioning systems that operate optimally, leak less, and/or use an alternative refrigerant.

The second phase of the implementation for the Pavley bill was incorporated into Amendments to the Low-Emission Vehicle Program (LEV III) or the Advanced Clean Cars (ACC) program. The ACC program combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for MY 2017 through 2025. The regulation would reduce GHGs from new cars by 34% from 2016 levels by 2025. The new rules would clean up gasoline and diesel-powered cars, and deliver increasing numbers of zero-emission technologies, such as full battery electric cars, newly emerging plug-in hybrid electric vehicles (EV) and hydrogen fuel cell cars. The package would also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California.

CLEAN ENERGY AND POLLUTION REDUCTION ACT OF 2015 (SB 350)

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

the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40% by 2024, and 25% by 2027.
- Double the energy efficiency in existing buildings by 2030. This target would be achieved through the California Public Utilities Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which would facilitate the growth of renewable energy markets in the western United States.

SB 32

On September 8, 2016, Governor Brown signed SB 32 and its companion bill, AB 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80% below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature (11).

2017 SCOPING PLAN

In November 2017, CARB released the *Final 2017 Scoping Plan Update (2017 Scoping Plan)*, which identifies the State's post-2020 reduction strategy. The *2017 Scoping Plan* reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the LCFS, and much cleaner cars, trucks, and freight movement, utilizing cleaner, renewable energy, and strategies to reduce CH₄ emissions from agricultural and other wastes.

The *2017 Scoping Plan* establishes a new emissions limit of 260 MMTCO_{2e} for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030 (38).

California's climate strategy would require contributions from all sectors of the economy, including the land base, and would include enhanced focus on zero and near-zero emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (CH₄, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries would further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the *2017 Scoping Plan* framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing zero-emission vehicles (ZEV) buses and trucks.
- LCFS, with an increased stringency (18% by 2030).
- Implementing SB 350, which expands the RPS to 50% RPS and doubles energy efficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing CH₄ and HCF emissions by 40% and anthropogenic black carbon emissions by 50% by year 2030.
- Continued implementation of SB 375.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- 20% reduction in GHG emissions from refineries by 2030.
- Development of a Natural and Working Lands Action Plan to secure California’s land base as a net carbon sink.

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

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

In addition to the statewide strategies listed above, the *2017 Scoping Plan* also identifies local governments as essential partners in achieving the State’s long-term GHG reduction goals and identifies local actions to reduce GHG emissions. As part of the recommended actions, CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 metric tons of CO₂e (MTCO₂e) or less per capita by 2030 and 2 MTCO₂e or less per capita by 2050. For CEQA projects, CARB states that lead agencies may develop evidence-based bright-line numeric thresholds—consistent with the *2017 Scoping Plan* and the State’s long-term GHG goals—and projects with emissions over that amount may be required to incorporate on-site design features and MMs that avoid or minimize project emissions to the degree feasible; or a performance-based metric using a CAP or other plan to reduce GHG emissions is appropriate.

According to research conducted by the Lawrence Berkeley National Laboratory (LBNL) and supported by CARB, California, under its existing and proposed GHG reduction policies, could achieve the 2030 goals under SB 32. The research utilized a new, validated model known as the California LBNL GHG Analysis of Policies Spreadsheet (CALGAPS), which simulates GHG and criteria pollutant emissions in California from 2010 to 2050 in accordance to existing and future GHG-reducing policies. The CALGAPS model showed that by 2030, emissions could range from 211 to 428 MTCO₂e per year (MTCO₂e/yr), indicating that “even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40% below the 1990 level [of SB 32].” CALGAPS analyzed emissions through 2050 even though it did not generally account for

policies that might be put in place after 2030. Although the research indicated that the emissions would not meet the State’s 80% reduction goal by 2050, various combinations of policies could allow California’s cumulative emissions to remain very low through 2050 (39) (40).

2022 CARB SCOPING PLAN

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) (41). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to “deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor.” The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with CEQA Guidelines section 15183.5.

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

“The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on and accelerating carbon reduction programs that have been in place for a decade and a half. That means rapidly moving to zero-emission transportation; electrifying the cars, buses, trains, and trucks that now constitute California’s single largest source of planet-warming pollution.”

“[A]pproval of this plan catalyzes a number of efforts, including the development of new regulations as well as amendments to strengthen regulations and programs already in place, not just at CARB but across state agencies.”

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

- Reimagine roadway projects that increase VMT in a way that meets community needs and reduces the need to drive.
- Double local transit capacity and service frequencies by 2030.
- Complete the High-Speed Rail (HSR) System and other elements of the intercity rail network by 2040.
- Expand and complete planned networks of high-quality active transportation infrastructure.
- Increase availability and affordability of bikes, e-bikes, scooters, and other alternatives to light-duty vehicles, prioritizing needs of underserved communities.
- Shift revenue generation for transportation projects away from the gas tax into more durable sources by 2030.

- Authorize and implement roadway pricing strategies and reallocate revenues to equitably improve transit, bicycling, and other sustainable transportation choices.
- Prioritize addressing key transit bottlenecks and other infrastructure investments to improve transit operational efficiency over investments that increase VMT.
- Develop and implement a statewide transportation demand management (TDM) framework with VMT mitigation requirements for large employers and large developments.
- Prevent uncontrolled growth of autonomous vehicle (AV) VMT, particularly zero-passenger miles.
- Channel new mobility services towards pooled use models, transit complementarity, and lower VMT outcomes.
- Establish an integrated statewide system for trip planning, booking, payment, and user accounts that enables efficient and equitable multimodal systems.
- Provide financial support for low-income and disadvantaged Californians' use of transit and new mobility services.
- Expand universal design features for new mobility services.
- Accelerate infill development in existing transportation-efficient places and deploy strategic resources to create more transportation-efficient locations.
- Encourage alignment in land use, housing, transportation, and conservation planning in adopted regional plans (RTP/SCS and RHNA) and local plans (e.g., general plans, zoning, and local transportation plans).
- Accelerate production of affordable housing in forms and locations that reduce VMT and affirmatively further fair housing policy objectives.
- Reduce or eliminate parking requirements (and/or enact parking maximums, as appropriate) and promote redevelopment of excess parking, especially in infill locations.
- Preserve and protect existing affordable housing stock and protect existing residents and businesses from displacement and climate risk.

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

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

requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development.

CAP-AND-TRADE PROGRAM

The *2022 Scoping Plan* identifies a Cap-and-Trade Program as one of the key strategies for California to reduce GHG emissions. According to CARB, a cap-and-trade program would help put California on the path to meet its goal of achieving a 40% reduction in GHG emissions from 1990 levels by 2030. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap would be able to trade permits to emit GHGs within the overall limit.

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from regulated entities by more than 16% between 2013 and 2020, and by an additional 40% by 2030. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and would decline over time, achieving GHG emission reductions throughout the program’s duration.

Covered entities that emit more than 25,000 MTCO_{2e}/yr must comply with the Cap-and-Trade Program. Triggering of the 25,000 MTCO_{2e}/yr “inclusion threshold” is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of GHG Emissions (Mandatory Reporting Rule or “MRR”).

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender “compliance instruments” for each MTCO_{2e} of GHG they emit. There also are requirements to surrender compliance instruments covering 30% of the prior year’s compliance obligation by November of each year (42).

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

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

is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative.” (43)

The Cap-and-Trade Program covers approximately 80% of California’s GHG emissions (38). The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects’ electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program’s first compliance period. The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported.

2.7.3.2 EXECUTIVE ORDERS RELATED TO GHG EMISSIONS

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

EXECUTIVE ORDER S-3-05

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

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

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

EXECUTIVE ORDER S-01-07 (LCFS)

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

The LCFS was challenged in the U.S. District Court in Fresno in 2011. The court’s ruling issued on December 29, 2011, included a preliminary injunction against CARB’s implementation of the rule. The Ninth Circuit Court of Appeals stayed the injunction on April 23, 2012, pending final ruling on appeal, allowing CARB to continue to implement and enforce the regulation. The Ninth Circuit Court’s decision, filed September 18, 2013, vacated the preliminary injunction. In essence, the court held that LCFS adopted by CARB were not in conflict with federal law. On August 8, 2013, the Fifth District Court of Appeal (California) ruled CARB failed to comply with CEQA and the Administrative Procedure Act (APA) when adopting regulations for LCFS. In a partially published opinion, the Court of Appeal reversed the trial court’s judgment and directed issuance of a writ

of mandate setting aside Resolution 09-31 and two executive orders of CARB approving LCFS regulations promulgated to reduce GHG emissions. However, the court tailored its remedy to protect the public interest by allowing the LCFS regulations to remain operative while CARB complies with the procedural requirements it failed to satisfy.

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

In 2018, CARB approved amendments to the regulation, which included strengthening the carbon intensity benchmarks through 2030 in compliance with the SB 32 GHG emissions reduction target for 2030. The amendments included crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector (44).

EXECUTIVE ORDER S-13-08

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

EXECUTIVE ORDER B-30-15

On April 29, 2015, Governor Brown issued an executive order to establish a California GHG reduction target of 40% below 1990 levels by 2030. The Governor’s executive order aligned California’s GHG reduction targets with those of leading international governments ahead of the U.N. Climate Change Conference in Paris late 2015. The Order sets a new interim statewide GHG emission reduction target to reduce GHG emissions to 40% below 1990 levels by 2030 in order to ensure California meets its target of reducing GHG emissions to 80% below 1990 levels by 2050 and directs CARB to update the *2017 Scoping Plan* to express the 2030 target in terms of MMTCO₂e. The Order also requires the state’s climate adaptation plan to be updated every three years, and for the State to continue its climate change research program, among other provisions. As with Executive Order S-3-05, this Order is not legally enforceable as to local governments and the private sector. Legislation that would update AB 32 to make post 2020 targets and requirements a mandate is in process in the State Legislature.

EXECUTIVE ORDER B-55-18 AND SB 100

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

2.7.3.3 CALIFORNIA REGULATIONS AND BUILDING CODES

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

TITLE 20 CCR SECTIONS 1601 ET SEQ. – APPLIANCE EFFICIENCY REGULATIONS

The Appliance Efficiency Regulations regulate the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. 23 categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles (RV) or other mobile equipment (CEC 2012).

TITLE 24 CCR PART 6 – CALIFORNIA ENERGY CODE

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.

TITLE 24 CCR PART 11 – CALIFORNIA GREEN BUILDING STANDARDS CODE

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

The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: California Green Building

Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission.

CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective on January 1, 2023. The CEC anticipates that the 2022 energy code will provide \$1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons (45). The Project would be required to comply with the applicable standards in place at the time building permit document submittals are made. These require, among other items (46):

NONRESIDENTIAL MANDATORY MEASURES

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- Designated parking for clean air vehicles. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106.5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).

- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
 - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
 - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
 - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- Outdoor potable water uses in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

CARB REFRIGERANT MANAGEMENT PROGRAM

CARB adopted a regulation in 2009 to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is set forth in sections 95380 to 95398 of Title 17, CCR. The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with

refrigeration systems with more than 50 pounds of a high GWP refrigerant. The refrigerant management program is designed to (1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and (3) verify GHG emission reductions.

TRACTOR-TRAILER GHG REGULATION

The tractors and trailers subject to this regulation must either use EPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the HD tractors that pull them on California highways. These owners are responsible for replacing or retrofitting their affected vehicles with compliant aerodynamic technologies and low rolling resistance tires. Sleeper cab tractors MY 2011 and later must be SmartWay certified. All other tractors must use SmartWay verified low rolling resistance tires. There are also requirements for trailers to have low rolling resistance tires and aerodynamic devices.

PHASE 1 AND 2 HEAVY-DUTY VEHICLE GHG STANDARDS

In September 2011, CARB has adopted a regulation for GHG emissions from HDTs and engines sold in California. It establishes GHG emission limits on truck and engine manufacturers and harmonizes with the EPA rule for new trucks and engines nationally. Existing HD vehicle regulations in California include engine criteria emission standards, tractor-trailer GHG requirements to implement SmartWay strategies (i.e., the Heavy-Duty Tractor-Trailer GHG Regulation), and in-use fleet retrofit requirements such as the Truck and Bus Regulation. The EPA rule has compliance requirements for new compression and spark ignition engines, as well as trucks from Class 2b through Class 8. Compliance requirements began with MY 2014 with stringency levels increasing through MY 2018. The rule organizes truck compliance into three groupings, which include a) HD pickups and vans; b) vocational vehicles; and c) combination tractors. The EPA rule does not regulate trailers.

CARB staff has worked jointly with the EPA and the NHTSA on the next phase of federal GHG emission standards for medium-duty trucks (MDT) and HDT vehicles, called federal Phase 2. The federal Phase 2 standards were built on the improvements in engine and vehicle efficiency required by the Phase 1 emission standards and represent a significant opportunity to achieve further GHG reductions for 2018 and later MY HDT vehicles, including trailers. The EPA and NHTSA have proposed to roll back GHG and fuel economy standards for cars and light-duty trucks, which suggests a similar rollback of Phase 2 standards for MDT and HDT vehicles may be pursued.

SB 97 AND THE CEQA GUIDELINES UPDATE

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

Resources Agency shall certify and adopt guidelines prepared and developed by the OPR pursuant to subdivision (a).”

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

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

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

Section 15064.4 was added to the *State CEQA Guidelines* and states that in determining the significance of a project’s GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project’s emissions to the effects of climate change. A project’s incremental contribution may be cumulatively considerable even if it appears relatively insignificant compared to statewide, national, or global emissions. The agency’s analysis should consider a timeframe that is appropriate for the project. The agency’s analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. Additionally, a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project’s incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use (1).

2.7.4 REGIONAL

The project is within the SCAB, which is under the jurisdiction of the SCAQMD.

SCAQMD

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

In 2008, the SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. In December 2008, the SCAQMD adopted an interim 10,000 MTCO₂e per year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. The Working Group has also developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold, which could be considered for residential and general development projects. The most recent proposal issued in September 2010 uses the following tiered approach to evaluate potential GHG impacts from various uses. However, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current interim thresholds consist of the following tiered approach:

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

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

The thresholds identified above have not been adopted by the SCAQMD or distributed for widespread public review and comment, and the working group tasked with developing the

thresholds has not met since September 2010. The future schedule and likelihood of threshold adoption is uncertain.

In the absence of other thresholds of significance promulgated by the SCAQMD, the City of Perris has been using the SCAQMD's 10,000 MTCO₂e/yr threshold for industrial projects and the draft thresholds for non-industrial projects the purpose of evaluating the GHG impacts associated with proposed general development projects. As stated above, SCAQMD staff were proposing to recommend the 10,000 MTCO₂e/yr threshold for industrial uses by all lead agencies. The City's use of the 10,000 MTCO₂e/yr threshold is also considered to be conservative since it is being applied to all of the GHG emissions generated by the Project (i.e., area sources, energy sources, vehicular sources, solid waste sources, and water sources) whereas the SCAQMD's 10,000 MTCO₂e/yr threshold applies only to the new stationary sources generated at industrial facilities.

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

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

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

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

CITY OF PERRIS CLIMATE ACTION PLAN (CAP)

The City of Perris CAP was adopted by the City Council (Resolution Number 4966) on February 23, 2016 (47). The CAP was developed to address global climate change through the reduction of harmful GHG emissions at the community level, and as part of California's mandated statewide GHG emissions reduction goals under AB 32. Perris's CAP, including the GHG inventories and forecasts contained within, is based on WRCOG's Subregional CAP. The Perris CAP utilized WRCOG's analysis of existing GHG reduction programs and policies that have already been implemented in the subregion and applicable best practices from other regions to assist in meeting the 2020 subregional reduction target. The CAP reduction measures chosen for the City's CAP were based on their GHG reduction potential, cost-benefit characteristics, funding

availability, and feasibility of implementation in the City of Perris. The CAP used an inventory base year of 2010 and included emissions from the following sectors: residential energy, commercial/industrial energy, transportation, waste, and wastewater. The CAP's 2020 reduction target is 15% below 2010 levels, and the 2035 reduction target is 47.5% below 2010 levels. The City of Perris is expected to meet these reduction targets through implementation of statewide and local measures. Beyond 2020, Executive Order S-03-05 calls for a reduction of GHG emissions to a level 80% below 1990 levels by 2050.

This page intentionally left blank

3 PROJECT GHG IMPACT

3.1 INTRODUCTION

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

3.2 STANDARDS OF SIGNIFICANCE

The criteria used to determine the significance of potential Project-related GHG impacts are taken from the Initial Study Checklist in Appendix G of the State *CEQA Guidelines* (14 CCR of Regulations §§15000, et seq.). Based on these thresholds, a project would result in a significant impact related to GHG if it would (1):

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

3.2.1 THRESHOLDS OF SIGNIFICANCE

As discussed previously, the City of Perris has been using the SCAQMD's 10,000 MTCO₂e/yr threshold for industrial projects and the draft thresholds for non-industrial projects the purpose of evaluating the GHG impacts associated with proposed general development projects. In the case of this particular Project, the Project Applicant has requested that the City utilize a threshold of 3,000 MTCO₂e/yr for the analysis in this report out of an abundance of caution. The City, as the CEQA lead agency, has agreed to oblige the Applicant in this one case. However, the City stresses that the use of this threshold for this particular Project does not change the City's current practice of using the SCAQMD's 10,000 MTCO₂e/yr threshold for other industrial projects.

3.3 MODELS EMPLOYED TO ANALYZE GHGS

3.3.1 CALHEEMOD

In May 2022 California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released the latest version of CalHEEMod version 2022.1. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from MMs (48). Accordingly, the latest version of CalHEEMod has been used for this Project to determine GHG emissions. Output from the model runs for construction and operational activity are provided in Appendices 3.1 through 3.4. CalHEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water.

3.4 LIFE-CYCLE ANALYSIS NOT REQUIRED

A full life-cycle analysis (LCA) for construction and operational activity is not included in this analysis due to the lack of consensus guidance on LCA methodology at this time (49). Life-cycle analysis (i.e., assessing economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in the Project development, infrastructure, and on-going operations) depends on emission factors or econometric factors that are not well established for all processes. At this time, an LCA would be extremely speculative and thus has not been prepared.

Additionally, the SCAQMD recommends analyzing direct and indirect project GHG emissions generated within California and not life-cycle emissions because the life-cycle effects from a project could occur outside of California, might not be very well understood, or documented, and would be challenging to mitigate (50). Additionally, the science to calculate life cycle emissions is not yet established or well defined; therefore, SCAQMD has not recommended, and is not requiring, life-cycle emissions analysis.

3.5 CONSTRUCTION EMISSIONS

Project construction activities would generate CO₂ and CH₄ emissions. The report *OLC3 Air Quality Impact Analysis Report* (AQIA) contains detailed information regarding Project construction activities (51). As discussed in the AQIA, Construction related emissions are expected from the following construction activities:

- Site Preparation
- Grading
- Building/Vertical Construction
- Paving
- Architectural Coating
- Landscaping/Tenant Improvements

3.5.1 CONSTRUCTION DURATION

For purposes of analysis, construction of Project (retail and industrial components) is expected to last approximately 12 months, commencing in January 2023 and being completed in April 2024. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per the State *CEQA Guidelines* (1).

3.5.2 CONSTRUCTION EQUIPMENT

Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 3-3 will operate up to a total of eight (8) hours per day, or more than two-thirds of the period during which construction activities are allowed pursuant to the City's Municipal Code, Section 7.34.060 (Appendix 3.1) (52).

TABLE 3-2: CONSTRUCTION DURATION

Construction Activity	Start Date	End Date	Days
Site Preparation	1/1/2023	1/13/2023	10
Grading	1/14/2023	2/24/2023	30
Building Construction	2/25/2023	4/19/2024	300
Paving	3/23/2024	4/19/2024	20
Architectural Coating	2/24/2024	4/19/2024	40

TABLE 3-3: CONSTRUCTION EQUIPMENT ASSUMPTIONS

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

3.5.3 CONSTRUCTION EMISSIONS SUMMARY

For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions (53). As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 3-4.

TABLE 3-4: AMORTIZED ANNUAL CONSTRUCTION EMISSIONS

Year	Emissions (MT/yr)				
	CO ₂	CH ₄	N ₂ O	R	Total CO ₂ e ⁴
2023	1,500.00	0.05	0.12	1.66	1,538.00
2024	432.00	0.02	0.03	0.51	442.00
Total GHG Emissions	1,932.00	0.07	0.15	2.17	1,980.00
Amortized Construction Emissions (MTCO₂e)	64.40	0.00	0.01	0.07	66.00

Source CalEEMod annual construction-source emissions are presented in Appendix 3.1.

3.6 OPERATIONAL EMISSIONS

Operational activities associated with the Project will result in emissions of CO₂, CH₄, and N₂O from the following primary sources:

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions
- On-Site Cargo Handling Equipment Emissions
- Water Supply, Treatment, and Distribution
- Solid Waste

3.6.1 AREA SOURCE EMISSIONS

LANDSCAPE MAINTENANCE EQUIPMENT

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. The emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod.

3.6.2 ENERGY SOURCE EMISSIONS

COMBUSTION EMISSIONS ASSOCIATED WITH NATURAL GAS AND ELECTRICITY

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria

⁴ CalEEMod reports the most common GHGs emitted which include CO₂, CH₄, and N₂O. These GHGs are then converted into the CO₂e by multiplying the individual GHG by the GWP.

pollutant emissions from offsite generation of electricity are generally excluded from the evaluation of significance and only natural gas use is considered.

3.6.3 MOBILE SOURCE EMISSIONS

The Project GHG emissions derive primarily from vehicle trips generated by the Project, including employee trips to and from the site and truck trips associated with the proposed uses. Trip characteristics available from the *OLC3 Traffic Analysis* (TA) were utilized in this analysis (54). Per the *OLC3 Traffic Analysis*, the proposed Project expected to generate approximately 9,266 total trips per day which includes 8,972 passenger car trips per day and 294 truck trips per day. It should be noted that the majority of trips, approximately 82%, were generated by the retail component of the Project.

APPROACH FOR ANALYSIS OF THE PROJECT

To determine emissions from passenger car vehicles, the CalEEMod defaults were utilized for trip length and trip purpose for the proposed commercial and industrial land uses. For the proposed commercial uses, the CalEEMod default fleet mix will be used. For the proposed industrial uses, it is important to note that although the *OLC3 Traffic Analysis* does not breakdown passenger cars by type, this analysis assumes that passenger cars include Light-Duty-Auto vehicles (LDA), Light-Duty-Trucks (LDT1⁵ & LDT2⁶), Medium-Duty-Vehicles (MDV), and Motorcycles (MCY) vehicle types. In order to account for emissions generated by passenger cars, the following fleet mix was utilized in this analysis:

TABLE 3-5: PASSENGER CAR FLEET MIX

Land Use	% Vehicle Type				
	LDA	LDT1	LDT2	MDV	MCY
High-Cube Fulfillment Center Warehouse	54.02%	4.38%	21.48%	17.54%	2.58%

Note: The Project-specific passenger car fleet mix used in this analysis is based on a proportional split utilizing the default CalEEMod percentages assigned to LDA, LDT1, LDT2, and MDV vehicle types.

For purposes of analysis, CalEEMod default parameters were used to determine mobile-source emissions from all non-industrial land uses. In order to determine emissions from trucks for the proposed industrial uses, the analysis incorporated the SCAQMD recommended truck trip length of 40 miles⁷ and an assumption of 100% primary trips for the proposed industrial land uses.

In order to be consistent with the *OLC3 Traffic Analysis*, trucks are broken down by truck type. The truck fleet mix is estimated by rationing the trip rates for each truck type based on information provided in the *OLC3 Traffic Analysis*. Heavy trucks are broken down by truck type

⁵ Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.

⁶ Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

⁷ The average trip length for heavy trucks were based on the SCAQMD documents for the implementation of the Facility-Based Mobile Source Measures (FBMSMs) adopted in the 2016 AQMP. SCAQMD’s “Preliminary Warehouse Emission Calculations” cites 39.9-mile trip length for heavy-heavy trucks (41). As a conservative measure, a trip length of 40 miles has been utilized for all trucks for the purpose of this analysis (39)

(or axle type) and are categorized as either Light-Heavy-Duty Trucks (LHDT1⁸ & LHDT2⁹)/2-axle, Medium-Heavy-Duty Trucks (MHDT)/3-axle, and Heavy-Heavy-Duty Trucks (HHDT)/4+-axle. In order to account for emissions generated by trucks, the following fleet mix was utilized in this analysis:

TABLE 3-6: TRUCK FLEET MIX

Land Use	% Vehicle Type			
	LHDT1	LHDT2	MHDT	HHDT
High-Cube Fulfillment Center Warehouse	8.36%	2.36%	10.71%	78.57%

Note: Project-specific truck fleet mix is based on the number of trips generated by each truck type (LHDT1, LHDT2, MHDT, and HHDT) relative to the total number of truck trips.

3.6.4 ON-SITE CARGO HANDLING EQUIPMENT EMISSIONS

It is common for industrial buildings to require the operation of exterior cargo handling equipment in the building’s truck court areas. For this particular Project, on-site modeled operational equipment includes up to three (3) 175 horsepower (hp), natural gas-powered cargo handling equipment – port tractors operating at 4 hours a day¹⁰ for 365 days of the year.

3.6.6 WATER SUPPLY, TREATMENT AND DISTRIBUTION

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

3.6.7 SOLID WASTE

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

3.6.8 REFRIGERANTS

Air conditioning (A/C) and refrigeration equipment associated with the building are anticipated to generate GHG emissions. CalEEMod automatically generates a default A/C and refrigeration equipment inventory for each project land use subtype based on industry data from the USEPA (2016b). CalEEMod quantifies refrigerant emissions from leaks during regular operation and

⁸ Vehicles under the LHDT1 category have a GVWR of 8,501 to 10,000 lbs.

⁹ Vehicles under the LHDT2 category have a GVWR of 10,001 to 14,000 lbs.

¹⁰ Based on Table II-3, Port and Rail Cargo Handling Equipment Demographics by Type, from CARB’s Technology Assessment: Mobile Cargo Handling Equipment document, a single piece of equipment could operate up to 2 hours per day (Total Average Annual Activity divided by Total Number Pieces of Equipment). As such, the analysis conservatively assumes that the tractor/loader/backhoe would operate up to 4 hours per day.

routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. Note that CalEEMod does not quantify emissions from the disposal of refrigeration and A/C equipment at the end of its lifetime. Per 17 CCR 95371, new facilities with refrigeration equipment containing more than 50 pounds of refrigerant are prohibited from utilizing refrigerants with a GWP of 150 or greater as of January 1, 2022. As such, it was conservatively assumed that refrigeration systems installed at the cold storage warehouse portion of the Project would utilize refrigerants with a GWP of 150. Otherwise, GHG emissions associated with refrigerants were calculated by CalEEMod using default parameters.

3.6.9 EMERGENCY FIRE PUMPS

It is conservatively assumed that the proposed Project would include installation of two diesel-fueled emergency fire pumps rated at 190 brake horsepower (bhp) each. The analysis assumed that each pump could potentially operate for up to half an hour per day, one day per week, for a total of 26 hours per year for maintenance and testing purposes. Emissions resulting from the two emergency fire pumps were modeled using CalEEMod.

3.6.10 EMISSIONS SUMMARY

The annual GHG emissions associated with the Project are summarized in Table 3-7. As shown in Table 3-7, construction and operation of the Project would generate a net total of approximately 24,617.67 MTCO₂e/yr.

TABLE 3-7: PROJECT GHG EMISSIONS

Emission Source	Emissions (MT/yr)				
	CO ₂	CH ₄	N ₂ O	R	Total CO ₂ e
Annual construction-related emissions amortized over 30 years	64.40	0.00	0.01	0.07	66.00
Mobile	21,821.00	0.78	1.59	36.10	22,349.00
Area	17.10	< 0.005	< 0.005	0	17.60
Energy	1,169.00	0.11	0.01	0	1,175.00
Water	273.00	6.31	0.15	0	475.00
Waste	108.00	10.80	0	0	379.00
Refrigerants	0	0	0	10.20	10.20
Emergency Fire Pumps	3.76	< 0.005	< 0.005	0	3.77
On-Site Equipment	0	0	0	0	142.1
Total CO₂e (All Sources)	24,617.67				

Source: CalEEMod output, See Appendix 3.1 for detailed model outputs.

3.7 GHG EMISSIONS FINDINGS AND RECOMMENDATIONS

3.7.1 GHG IMPACT 1

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

The Project would result in approximately 2,264.90 MTCO₂e/yr from construction, area, energy, on-site equipment, waste, and water usage. In addition, the Project has the potential to result in an additional 22,349.00 MTCO₂e/yr from mobile sources if the assumption is made that all of the vehicle trips to and from the Project are “new” trips resulting from the development of the Project. As such, the Project has the potential to generate a total of approximately 24,617.67 MTCO₂e/yr. As such, the Project would exceed the 3,000 MTCO₂e/yr threshold of significance used for this analysis. Thus, the Project would have the potential to result in a cumulatively considerable impact with respect to GHG emissions. While the proposed Project will implement the mitigation measures discussed in Sections ES.3 and ES.4 in this report, as a conservative measure the GHG emissions presented in this report do not reflect emissions reductions that would result from the implementation of these mitigation measures. However, it is likely that that implementation of these measures will decrease Project emissions somewhat.

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

3.7.2 GHG IMPACT 2

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

As previously stated, pursuant to 15604.4 of the *CEQA Guidelines*, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions (55). As such, the Project’s consistency with the 2022 Scoping Plan, is discussed below. It should be noted that the Project’s consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 and 2017 Scoping Plan is not necessary, since both of these plans have been superseded by the 2022 Scoping Plan. As previously noted, the 2022 Scoping Plan advocates for compliance with a local CAP to determine consistency.

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

Program, and the Low Carbon Fuel Standard. Further, the Project will implement PVCCSP EIR mitigation measures MM Air-4 through MM Air-20 which are discreet mitigation measures aimed at reducing GHG emissions. As noted in the analysis herein, compliance with these mitigation measures will ensure that the Project would be consistent with the Perris CAP through compliance with the PVCCSP EIR mitigation measures and regulatory requirements. PVCCSP EIR mitigation measure MM Air-18 will improve the local public transit network by accommodating future bus turnouts at locations established through consultation with the Riverside Transit Agency. Additionally, PVCCSP EIR mitigation measures MM Air-11 through MM-AQ-20 will further reduce Project GHG emissions and VMT, including increased implementation and availability of vehicle and equipment electrification, Transportation Demand Management programs, and optimization of vehicle access and activity. The Project would result in a less than significant VMT impact as further discussed in the Project-specific VMT analysis. As such, the Project would be consistent with the 2022 Scoping Plan.

CONSISTENCY WITH THE CITY'S CAP

The City of Perris adopted its CAP in February 2016. The measures identified in the CAP represent the City's actions to achieve the GHG reduction targets of AB 32 for target year 2020. Local measures incorporated in the CAP include:

- Energy measure that directs the City to create an energy action plan to reduce energy consumption citywide
- Land use and transportation measures that encourage alternative modes of transportation (walking, biking, and transit), reduce motor vehicle use by allowing a reduction in parking supply, voluntary transportation demand management to reduce vehicle miles traveled, and land use strategies that improve jobs-housing balance (increased density and mixed-use)
- Solid waste measures that reduce landfilled solid waste in the City

The Project would comply with the CAP through compliance with the PVCCSP EIR MMs and additional project-level air quality MMs identified previously, which would lessen the Project's contribution of GHG emissions from both construction and operation. The Project would not conflict with local strategies and state/regional strategies listed in the Perris CAP.

Further, the Project is subject to California Building Code requirements. New buildings must meet the applicable building code requirements and standards in place at the time building permit documentation submittals are made. CALGreen is updated on a regular basis, with the most recent approved 2022 California Green Building Code Standards taking effect on January 1, 2023. As construction of the Project is anticipated to be completed in 2024, it is presumed that the Project would be required to comply with the Title 24 standards in place at that time. While the Project does not include reduced parking, or increased density, it would provide sidewalks, bike racks, pedestrian walkways, a bus stop, and TDM measures to encourage the use of alternative modes of transportation (walking, biking, and transit). As such, the Project would not conflict with applicable GHG reduction measures in the CAP and a less than significant impact is expected to occur.

This page intentionally left blank

4 REFERENCES

1. **Association of Environmental Professionals.** *Guidelines for Implementation of the California Environmental Quality Act.* As amended in 2018.
2. **California Air Resources Board.** Assembly Bill 32: Global Warming Solutions Act. [Online] 2006. <http://www.arb.ca.gov/cc/ab32/ab32.htm>.
3. **Air Resources Board.** Sustainable Communities. [Online] 2008. <http://www.arb.ca.gov/cc/sb375/sb375.htm>.
4. —. Clean Car Standards - Pavley, Assembly Bill 1493. [Online] September 24, 2009. <http://www.arb.ca.gov/cc/ccms/ccms.htm>.
5. **California Building Standards Commission.** California Building Standards Code (Title 24, California Code of Regulations). [Online] <http://www.bsc.ca.gov/codes.aspx>.
6. **California Energy Commission.** California Code of Regulations, TITLE 20, Division 2. [Online] September 3, 2013. <http://www.energy.ca.gov/reports/title20/index.html>.
7. **California Air Resources Board.** Title 17 - California Code of Regulation. [Online] 2010. <http://www.arb.ca.gov/regs/regs-17.htm>.
8. **California Department of Water Resources.** Updated Model Water Efficient Landscape Ordinance AB 1881. [Online] 2006. [Cited: November 13, 2013.] http://www.water.ca.gov/wateruseefficiency/landscapeordinance/updatedOrd_history.cfm.
9. **California Energy Commission.** SB 1368 Emission Performance Standards. [Online] September 29, 2006. http://www.energy.ca.gov/emission_standards/.
10. —. Renewables Portfolio Standard (RPS). [Online] 2002. <http://www.energy.ca.gov/portfolio/>.
11. **California Legislative Information.** Senate Bill No. 32. [Online] September 8, 2016. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB32.
12. **City of Perris.** *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report.* Perris : s.n., 2011.
13. **Urban Crossroads, Inc.** *Ramona Gateway Air Quality Impact Analysis Report.* 2022.
14. **City of Perris.** *Perris Valley Commerce Center Specific Plan.* 2022.
15. **National Oceanic and Atmospheric Administration.** Greenhouse Gases - Water Vapor. *NOAA National Centers For Environmental Information.* [Online] <https://www.ncdc.noaa.gov/monitoring-references/faq/greenhouse-gases.php?section=watervapor>.
16. **International Panel on Climate Change.** *Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report.* 2007.
17. **Bennington, Bret J.** *The Carbon Cycle and Climate Change.* s.l. : Brooks/Cole. ISBN 1 3: 978-0-495-73855-8.
18. **The National Institute for Occupational Safety and Health.** Carbon Dioxide. *Centers for Disease Control and Prevention.* [Online] <https://www.cdc.gov/niosh/npg/npgd0103.html>.
19. **National Oceanic and Atmospheric Administration.** Greenhouse Gases - Methane. *NOAA National Centers for Environmental Information.* [Online] <https://www.ncdc.noaa.gov/monitoring-references/faq/greenhouse-gases.php?section=methane>.
20. **World Resources Institute.** Climate Analysis Indicator Tool (CAIT). [Online] <http://cait.wri.org>.

21. **National Oceanic and Atmospheric Administration.** Greenhouse Gases - Chlorofluorocarbons. *NOAA National Centers For Environmental Information*. [Online] <https://www.ncdc.noaa.gov/monitoring-references/faq/greenhouse-gases.php?section=chlorofluorocarbons>.
22. **United States Environmental Protection Agency.** Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear. *Environmental Protection Agency*. [Online] May 7, 2014. <https://www.epa.gov/sites/production/files/2016-02/documents/mehl-arb-presentation-2014-wkshp.pdf>.
23. **World Resources Institute.** Nitrogen Trifluoride Now Required in GHG Protocol Greenhouse Gas Emissions Inventory. [Online] May 22, 2013. <https://www.wri.org/blog/2013/05/nitrogen-trifluoride-now-required-ghg-protocol-greenhouse-gas-emissions-inventories>.
24. **National Center for Biotechnology Information.** Nitrogen Trifluoride. *PubChem Compound Database*. [Online] <https://pubchem.ncbi.nlm.nih.gov/compound/24553>.
25. **American Lung Association.** Climate Change. [Online] <http://www.lung.org/our-initiatives/healthy-air/outdoor/climate-change/>.
26. **Barbara H. Allen-Diaz.** Climate change affects us all. *University of California Agriculture and Natural Resources*. [Online] April 1, 2009. <http://calag.ucanr.edu/Archive/?article=ca.v063n02p51>.
27. **Intergovernmental Panel on Climate Change.** Climate Change 2013 The Physical Science Basis - Working Group I Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. *AR5 Climate Change 2013: The Physical Science Basis*. [Online] September 2013. https://www.ipcc.ch/site/assets/uploads/2018/02/WG1AR5_all_final.pdf.
28. **United Nations.** GHG Profiles - Annex I. [Online] http://di.unfccc.int/ghg_profile_annex1.
29. —. GHG Profiles - Non-Annex I. [Online] http://di.unfccc.int/ghg_profile_non_annex1.
30. **World Resources Institute.** Climate Analysis Indicator Tool (CAIT). [Online] <http://cait.wri.org>.
31. **California Air Resources Board.** 2020 GHG Inventory. *California Greenhouse Gas Emission Inventory 2000-2019 Edition*. [Online] https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2019/ghg_inventory_trends_00-19.pdf.
32. **California Energy Commission.** *Our Changing Climate Assessing the Risks to California*. 2006.
33. **Center for Climate and Energy Solutions (C2ES).** Outcomes of the U.N. Climate Change Conference. *Center for Climate and Energy Solutions (C2ES)*. [Online] 2015. <http://www.c2es.org/international/negotiations/cop21-paris/summary>.
34. **United States Environmental Protection Agency.** Endangerment and Cause or Contribute Findings for Greenhouse Gases under the Section 202(a) of the Clean Air Act. *United States Environmental Protection Agency*. [Online] 2020. <https://www.epa.gov/ghgemissions/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a-clean>.
35. **Federal Register.** Mid-Term Evaluation of Greenhouse Gas Emissions Standards for Model Year 2022-2025 Light-Duty Vehicles. [Online] 2018. <https://www.federalregister.gov/documents/2018/04/13/2018-07364/mid-term-evaluation-of-greenhouse-gas-emissions-standards-for-model-year-2022-2025-light-duty>.
36. **National Highway Traffic Safety Administration.** SAFE: The Safer Affordable Fuel-Efficient 'SAFE' Vehicle Rule. *National Highway Traffic Safety Administration*. [Online] 2020. <https://www.nhtsa.gov/corporate-average-fuel-economy/safe>.
37. **United States Environmental Protection Agency.** SmartWay. [Online] 2017. <https://www.epa.gov/smartway/learn-about-smartway>.

38. **California Air Resources Board.** California's 2017 Climate Change Scoping Plan . [Online] 2017. https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017_es.pdf.
39. **Lawrence Berkeley National Laboratory.** California's Policies Can Significantly Cut Greenhouse Gas Emissions through 2030. *Lawrence Berkeley National Laboratory.* [Online] January 22, 2015. <http://newscenter.lbl.gov/2015/01/22/californias-policies-can-significantly-cut-greenhouse-gas-emissions-2030/>.
40. **Ernest Orlando Lawrence Berkeley National Laboratory.** Modeling California policy impacts on greenhouse gas emissions. [Online] 2015. <https://eaei.lbl.gov/sites/all/files/lbnl-7008e.pdf>.
41. **California Air Resources Board.** *2022 Scoping Plan for Achieving Carbon Neutrality.*
42. —. Legal Disclaimer & User's Notice. [Online] April 2019. https://ww3.arb.ca.gov/cc/capandtrade/capandtrade/ct_reg_unofficial.pdf.
43. —. Climate Change Scoping Plan. [Online] 2014. https://ww3.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.
44. —. Low Carbon Fuel Standard. [Online] December 2019. <https://ww3.arb.ca.gov/fuels/lcfs/lcfs.htm>.
45. **California Energy Commission.** Energy Commission Adopts Updated Building Standards to Improve Efficiency, Reduce Emissions from Homes and Businesses. [Online] August 11, 2021. <https://www.energy.ca.gov/news/2021-08/energy-commission-adopts-updated-building-standards-improve-efficiency-reduce-0>.
46. **California Department of General Services.** 2022 CALGreen Code. *CALGreen.* [Online] <https://codes.iccsafe.org/content/CAGBC2022P1>.
47. **City of Perris.** *City of Perris Climate Action Plan.* City of Perris : s.n., 2016.
48. **California Air Pollution Control Officers Association (CAPCOA).** California Emissions Estimator Model (CalEEMod). [Online] May 2022. www.caleemod.com.
49. **California Natural Resources Agency.** Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97. [Online] December 2009.
50. *Minutes for the GHG CEQA Significance.* **South Coast Air Quality Management District.** 2008.
51. **Urban Crossroads, Inc.** *OLC3 Air Quality Impact Analysis Report.* 2022.
52. **City of Perris.** *Municipal Code, Chapter 7.34 Noise Control.*
53. **South Coast Air Quality Management District.** *Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group #13.* [Powerpoint] Diamond Bar : s.n., 2009.
54. **Urban Crossroads, Inc.** *OLC3 Traffic Analysis.* 2022.
55. **Association of Environmental Professionals.** *2018 CEQA California Environmental Quality Act.* 2018.
56. **California Air Resources Board.** 2019 GHG Inventory. *California Greenhouse Gas Emission Inventory 2000-2017 Edition.* [Online] [Cited: September 19, 2019.] <http://www.arb.ca.gov/cc/inventory/data/data.htm>.

This page intentionally left blank

5 CERTIFICATIONS

The contents of this GHG study report represent an accurate depiction of the GHG impacts associated with the proposed OLC3 Project. The information contained in this GHG report is based on the best available data at the time of preparation. If you have any questions, please contact me directly at hqureshi@urbanxroads.com.

Haseeb Qureshi
Associate Principal
URBAN CROSSROADS, INC.
hqureshi@urbanxroads.com

EDUCATION

Master of Science in Environmental Studies
California State University, Fullerton • May 2010

Bachelor of Arts in Environmental Analysis and Design
University of California, Irvine • June, 2006

PROFESSIONAL AFFILIATIONS

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

PROFESSIONAL CERTIFICATIONS

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

This page intentionally left blank

APPENDIX 3.1:

CALEEMOD EMISSIONS MODEL OUTPUTS

This page intentionally left blank