

**BROWN STRAUSS BANNING  
INDUSTRIAL PROJECT  
AIR QUALITY, GLOBAL CLIMATE CHANGE,  
HRA, AND ENERGY IMPACT ANALYSIS**

City of Banning

November 29, 2023



Traffic Engineering • Transportation Planning • Parking • Noise & Vibration  
Air Quality • Global Climate Change • Health Risk Assessment

# **BROWN STRAUSS BANNING INDUSTRIAL PROJECT AIR QUALITY, GLOBAL CLIMATE CHANGE, HRA, AND ENERGY IMPACT ANALYSIS**

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Project No. 19588

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# EXECUTIVE SUMMARY

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The purpose of this air quality, global climate change, health risk assessment, and energy impact analysis is to provide an assessment of the impacts resulting from development of the proposed Brown Strauss Banning Industrial project and to identify measures that may be necessary to reduce potentially significant impacts.

## *Construction-Source Emissions*

Project construction-source emissions would not exceed applicable regional thresholds of significance established by the South Coast Air Quality Management District (SCAQMD). For localized emissions, the project will not exceed applicable Localized Significance Thresholds (LSTs) established by the SCAQMD.

Project construction-source emissions would not conflict with the Basin Air Quality Management Plan (AQMP). As discussed herein, the project will comply with all applicable SCAQMD construction-source emission reduction rules and guidelines. Project construction source emissions would not cause or substantively contribute to violation of the California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS).

Given the temporary and short-term construction schedule, the project would not result in a long-term (i.e., lifetime or 30-year) exposure to TACs as a result of project construction. Furthermore, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any local or regional thresholds. Therefore, impacts from TACs during construction would be less than significant.

Established requirements addressing construction equipment operations, and construction material use, storage, and disposal requirements act to minimize odor impacts that may result from construction activities. Moreover, construction-source odor emissions would be temporary, short-term, and intermittent in nature and would not result in persistent impacts that would affect substantial numbers of people. Potential construction-source odor impacts are therefore considered less than significant.

## *Operational-Source Emissions*

Project operational-sourced emissions would not exceed applicable regional thresholds of significance established by the SCAQMD. Project operational-source emissions would not result in or cause a significant localized air quality or toxic air contaminant (TAC) impacts as discussed in the Operations-Related Local Air Quality Impacts section of this report. Additionally, project-related trips will not cause or result in CO concentrations exceeding applicable state and/or federal standards (CO "hotspots"). The Diesel Emissions Health Risk Assessment conducted for this project showed that DPM emissions from on-site off road equipment, project-related truck and rail trips will not cause a significantly elevated cancer risk or significant non-cancer-related health risk to nearby receptors. Project operational-source emissions would therefore not adversely affect sensitive receptors within the vicinity of the project.

Project operational-source emissions would not conflict with the Basin Air Quality Management Plan (AQMP). The project's emissions meet SCAQMD regional thresholds and will not result in a significant cumulative impact. The project does not propose any such uses or activities that would result in potentially significant operational-source odor impacts. Potential operational-source odor impacts are therefore considered less than significant.

## *Greenhouse Gases*

Project-related GHG emissions would not exceed the SCAQMD screening threshold of 10,000 MTCO<sub>2e</sub> per year for industrial uses.

Furthermore, the project's GHG emissions would not exceed the SCAQMD screening threshold (based on EO S-3-05). The project would not conflict with the goals of AB-32, SB-32, or the CARB Scoping Plan; therefore, the project would not conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases and impacts are considered to be less than significant.

### *Energy*

For new development such as that proposed by the Brown Strauss Banning Industrial project, compliance with California Building Standards Code Title 24 energy efficiency requirements (CALGreen), are considered demonstrable evidence of efficient use of energy. As discussed below, the project would provide for, and promote, energy efficiencies required under other applicable federal and State of California standards and regulations, and in so doing would meet or exceed all California Building Standards Code Title 24 standards. Moreover, energy consumed by the project's operation is calculated to be comparable to, or less than, energy consumed by other industrial uses of similar scale and intensity that are constructed and operating in California. On this basis, the project would not result in the inefficient, wasteful, or unnecessary consumption of energy. Impacts are considered to be less than significant.

# 1. INTRODUCTION

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This section describes the purpose of this air quality, global climate change, health risk assessment, and energy impact analysis, project location, proposed development, and study area. Figure 1 shows the project location map and Figure 2 illustrates the project site plan.

## PURPOSE AND OBJECTIVES

This study was performed to address the possibility of regional/local air quality impacts and global climate change impacts, from project related air emissions. The objectives of the study include:

- documentation of the atmospheric setting
- discussion of criteria pollutants and greenhouse gases
- discussion of the air quality and global climate change regulatory framework
- analysis of the construction related air quality and greenhouse gas emissions
- analysis of the operations related air quality and greenhouse gas emissions
- discussion of the health risk impacts
- analysis of the conformity of the proposed project with the SCAQMD AQMP
- analysis of the project's energy use during construction and operation
- recommendations for mitigation measures

The City of Banning is the lead agency for this air quality and greenhouse gas analysis, in accordance with the California Environmental Quality Act authorizing legislation. Although this is a technical report, every effort has been made to write the report clearly and concisely. To assist the reader with terms unique to air quality and global climate change, a definition of terms has been provided in Appendix A.

## PROJECT LOCATION

The 14.92-acre project site is located at 1219 and 1431 West Lincoln Street in the City of Banning, California. The project site is currently vacant. A vicinity map showing the project location is provided on Figure 1.

## PROJECT DESCRIPTION

The currently vacant site is proposed to be developed with a steel distribution use. The total development proposal includes a 45,000 square foot warehouse, a 3,000 square foot office, two 500 square foot enclosed saw sheds, and an outdoor storage yard. The project also involves a General Plan Amendment/Zone Change for a portion of the site from Industrial (I) and General Commercial (CC) to Industrial (I).

The warehouse would be utilized to store structural tube, structural channel and structural angle. The outdoor storage yard would be utilized to store wide flange beam and structural tube. Products inside the warehouse are moved via overhead cranes and products in the outdoor storage yard are moved via forklifts. Brown Strauss is primarily a distributor, buying structural steel products in bulk quantities from the steel mills and selling the same products in smaller quantities to steel fabricators. The proposed operation does not include a steel mill or foundry. Instead, the only manufacturing activity that Brown Strauss performs is to cut in products within the enclosed saw sheds. Less than 10 percent of customer orders are cut to length by Brown Strauss.

The project site is proposed to provide four access driveways on West Lincoln Street. The project west driveway will be a truck entrance only driveway. The project central-west driveway will be a full access automobile only driveway. The project central-east and east driveways will be truck exit only driveways. For purposes of this analysis, the proposed project is anticipated to be constructed and fully operational by year 2025.



Brown Strauss Steel currently operates a larger facility located at 14970 Jurupa Avenue in the City of Fontana. If the proposed Banning project is approved, the existing operation in Fontana will be closed and its operations will be moved to the proposed Banning location. Figure 2 illustrates the proposed site plan.

## **PHASING AND TIMING**

The proposed project is anticipated to be operational in 2025. The project is anticipated to be built in one phase with project construction anticipated to start no sooner than the beginning of July 2024 with completion estimated by the end of June 2025. The construction schedule utilized in the analysis represents a “worst-case” analysis scenario even if construction was to occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.<sup>1</sup>

## **SENSITIVE RECEPTORS IN PROJECT VICINITY**

Those who are sensitive to air pollution include children, the elderly, and persons with preexisting respiratory or cardiovascular illness. For purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities (South Coast Air Quality Management District 2008). Commercial and industrial facilities are not included in the definition because employees do not typically remain on-site for 24 hours.

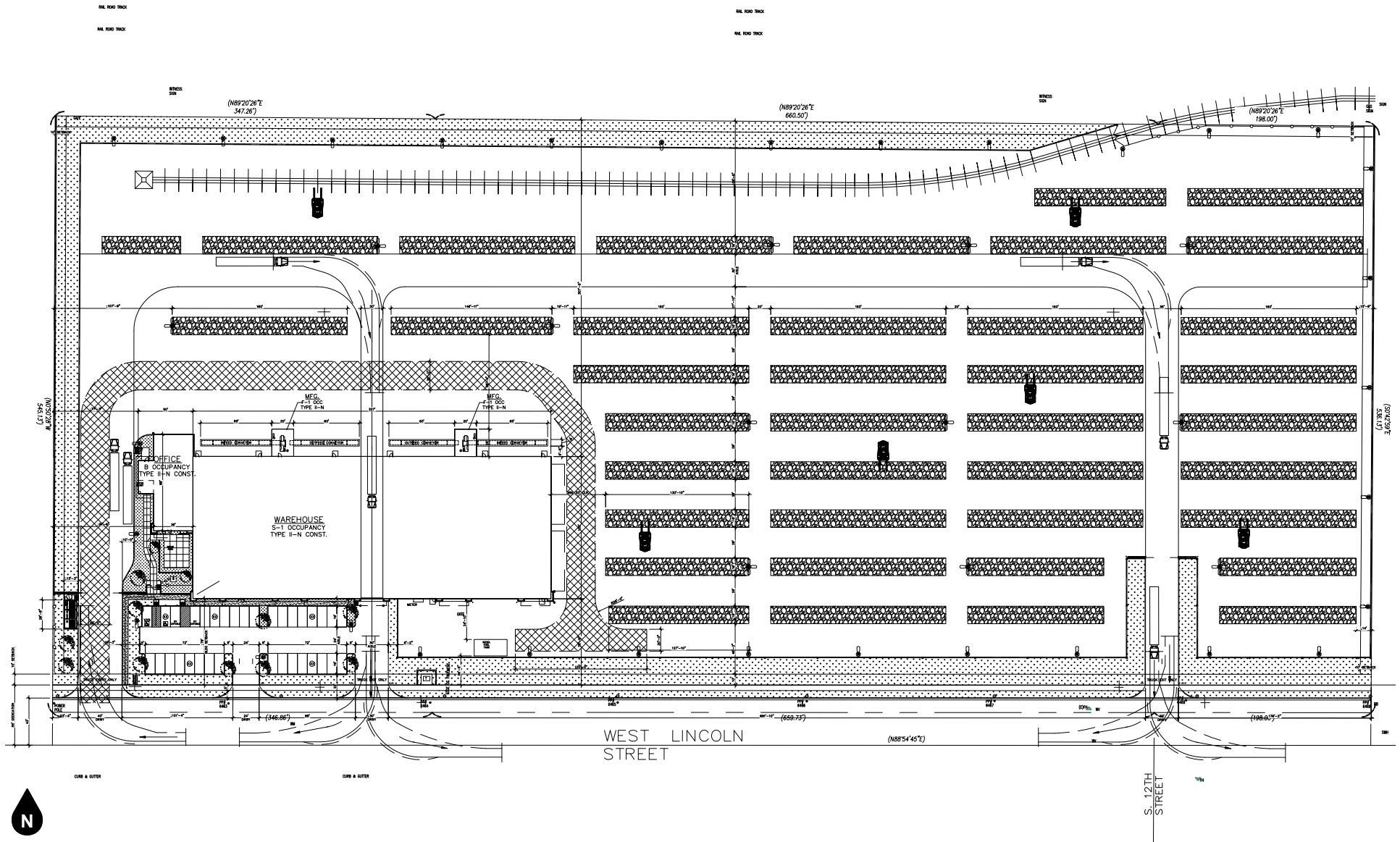
The nearest sensitive receptors to the project site include: the existing single-family residential land uses located as close as approximately 75 feet (~23 meters) south of the project site (along the southern side of Lincoln Avenue). Other air quality sensitive land uses are located further from the project site and would experience lower impacts.

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<sup>1</sup> As shown in the California Emissions Estimator Model (CalEEMod) User’s Guide Version 2020.4.0, Section 4.3.2 “OFFROAD Equipment” as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.



**Figure 1**  
**Project Location Map**



**Figure 2**  
**Site Plan**

## 2. AIR QUALITY ANALYSIS

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### EXISTING AIR QUALITY CONDITIONS

#### **Local Air Quality**

The project is located within the City of Banning, within the portion of Riverside County that lies within the South Coast Air Basin (Basin). The project area is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Basin is a 6,600-square-mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and all of Orange County.

The ambient concentrations of air pollutants are determined by the amount of emissions released by sources and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, existing air quality conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources.

Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. The topography and climate of southern California combine to make the Basin an area of high air pollution potential. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds.

The usually mild climatological pattern is disrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cool marine layer and inhibits the pollutants in the marine layer from dispersing upward. In addition, light winds during the summer further limit ventilation. Furthermore, sunlight triggers the photochemical reactions that produce ozone. The region experiences more days of sunlight than any other major urban area in the nation except Phoenix (SCAQMD, 2007).

The temperature and precipitation levels for the City of Redlands, the closest station with updated data, are shown below in Table 1. Table 1 shows that August is typically the warmest month and December is typically the coolest month. Rainfall in the project area varies considerably in both time and space. Almost all the annual rainfall comes from the fringes of mid-latitude storms from late November to early April, with summers being almost completely dry.

**Table 1  
Local Monthly Climate Data**

Descriptor	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Avg. Max. Temperature	66.9	67.5	71	75.7	81	88.1	94.7	95.6	91.3	82.4	71.4	66.9
Avg. Min. Temperature	41.1	43	45.3	48.4	53.2	57.3	62.1	62.8	59.6	53.1	44.1	40.9
Avg. Total Precipitation (in.)	2.66	2.88	2.1	0.99	0.35	0.11	0.07	0.16	0.23	0.62	1.01	2.14

Source: <https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca7306>  
Data from the Redlands, CA station (047306).



## **Pollutants**

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

### *Criteria Pollutants*

The criteria pollutants consist of: ozone, nitrogen dioxide, carbon monoxide, sulfur dioxide, lead, and particulate matter. These pollutants can harm your health and the environment, and cause property damage. The Environmental Protection Agency (EPA) calls these pollutants “criteria” air pollutants because it regulates them by developing human health-based and/or environmentally-based criteria for setting permissible levels. The following provides descriptions of each of the criteria pollutants.

### *Nitrogen Dioxides*

Nitrogen Oxides (NO<sub>x</sub>) is the generic term for a group of highly reactive gases which contain nitrogen and oxygen. While most NO<sub>x</sub> are colorless and odorless, concentrations of nitrogen dioxide (NO<sub>2</sub>) can often be seen as a reddish-brown layer over many urban areas. NO<sub>x</sub> form when fuel is burned at high temperatures, as in a combustion process. The primary manmade sources of NO<sub>x</sub> are motor vehicles, electric utilities, and other industrial, commercial, and residential sources that burn fuel. NO<sub>x</sub> reacts with other pollutants to form, ground-level ozone, nitrate particles, acid aerosols, as well as NO<sub>2</sub>, which cause respiratory problems. NO<sub>x</sub> and the pollutants formed from NO<sub>x</sub> can be transported over long distances, following the patterns of prevailing winds. Therefore, controlling NO<sub>x</sub> is often most effective if done from a regional perspective, rather than focusing on the nearest sources.

### *Ozone*

Ozone (O<sub>3</sub>) is not usually emitted directly into the air but at ground-level is created by a chemical reaction between NO<sub>x</sub> and volatile organic compounds (VOC) in the presence of sunlight. Motor vehicle exhaust, industrial emissions, gasoline vapors, chemical solvents as well as natural sources emit NO<sub>x</sub> and VOC that help form ozone. Ground-level ozone is the primary constituent of smog. Sunlight and hot weather cause ground-level ozone to form with the greatest concentrations usually occurring downwind from urban areas. Ozone is subsequently considered a regional pollutant. Ground-level ozone is a respiratory irritant and an oxidant that increases susceptibility to respiratory infections and can cause substantial damage to vegetation and other materials. Because NO<sub>x</sub> and VOC are ozone precursors, the health effects associated with ozone are also indirect health effects associated with significant levels of NO<sub>x</sub> and VOC emissions.

### *Carbon Monoxide*

Carbon monoxide (CO) is a colorless, odorless gas that is formed when carbon in fuel is not burned completely. It is a component of motor vehicle exhaust, which contributes about 56 percent of all CO emissions nationwide. In cities, 85 to 95 percent of all CO emissions may come from motor vehicle exhaust. Other sources of CO emissions include industrial processes (such as metals processing and chemical manufacturing), residential wood burning, and natural sources such as forest fires. Woodstoves, gas stoves, cigarette smoke, and unvented gas and kerosene space heaters are indoor sources of CO. The highest levels of CO in the outside air typically occur during the colder months of the year when inversion conditions are more frequent. The air pollution becomes trapped near the ground beneath a layer of warm air. CO is described as having only a local influence because it dissipates quickly. Since CO concentrations are strongly associated with motor vehicle emissions, high CO concentrations generally occur in the immediate vicinity of roadways with high

traffic volumes and traffic congestion, active parking lots, and in automobile tunnels. Areas adjacent to heavily traveled and congested intersections are particularly susceptible to high CO concentrations.

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

#### *Sulfur Dioxide*

Sulfur Oxide (SOx) gases (including sulfur dioxide [SO<sub>2</sub>]) are formed when fuel containing sulfur, such as coal and oil is burned, and from the refining of gasoline. SOx dissolves easily in water vapor to form acid and interacts with other gases and particles in the air to form sulfates and other products that can be harmful to people and the environment.

#### *Lead*

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

#### *Particulate Matter*

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

#### *Reactive Organic Gases (ROG)*

Although not a criteria pollutant, reactive organic gases (ROGs), or volatile organic compounds (VOCs), are defined as any compound of carbon—excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate—that participates in atmospheric photochemical reactions. Although there are slight differences in the definition of ROGs and VOCs, the two terms are often used interchangeably. Indoor sources of VOCs include paints, solvents, aerosol sprays, cleansers, tobacco smoke, etc. Outdoor sources of VOCs are from combustion and fuel evaporation. A reduction in VOC emissions reduces certain chemical reactions that contribute to the formulation of ozone. VOCs are transformed into organic aerosols in the atmosphere, which contribute to higher PM<sub>10</sub> and lower visibility.

## **Other Pollutants of Concern**

### *Toxic Air Contaminants*

In addition to the above-listed criteria pollutants, toxic air contaminants (TACs) are another group of pollutants of concern. Sources of toxic air contaminants include industrial processes such as petroleum refining and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. Cars and trucks release at least forty different toxic air contaminants. The most important of these toxic air contaminants, in terms of health risk, are diesel particulates, benzene, formaldehyde, 1,3-butadiene, and acetaldehyde. Public exposure to toxic air contaminants can result from emissions from normal operations as well as from accidental releases. Health effects of toxic air contaminants include cancer, birth defects, neurological damage, and death.

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

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

According to the SCAQMD's MATES-V study, the project area has an estimated multi-pathway cancer risk of 255 in a million and an inhalation pathway cancer risk of 241 in one million risk of cancer. In comparison the average multi-pathway cancer risk for the South Coast Air Basin portion of Riverside County is 332 in one million and the inhalation risk is 313 in a million risk of cancer.

### *Asbestos*

Asbestos is listed as a TAC by the ARB and as a Hazardous Air Pollutant by the EPA. Asbestos occurs naturally in mineral formations and crushing or breaking these rocks, through construction or other means, can release asbestiform fibers into the air. Asbestos emissions can result from the sale or use of asbestos-containing materials, road surfacing with such materials, grading activities, and surface mining. The risk of disease is dependent upon the intensity and duration of exposure. When inhaled, asbestos fibers may remain in the lungs and with time may be linked to such diseases as asbestosis, lung cancer, and mesothelioma. The nearest likely locations of naturally occurring asbestos, as identified in the [General Location Guide for Ultramafic Rocks in California](#) prepared by the California Division of Mines and Geology, is located at Asbestos Mountain in the San Jacinto Mountains, approximately 32 miles southeast of the project site. Due to the distance to the nearest natural occurrences of asbestos, the project site is not likely to contain asbestos.



## REGULATORY SETTING

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

### **Federal – United States Environmental Protection Agency**

The United States Environmental Protection Agency (EPA) is responsible for setting and enforcing the National Ambient Air Quality Standards (NAAQS) for atmospheric pollutants. It regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. The National Ambient Air Quality Standards (NAAQS) pollutants were identified using medical evidence and are shown below in Table 2.

The EPA and the California Air Resource Board (CARB) designate air basins where ambient air quality standards are exceeded as “nonattainment” areas. If standards are met, the area is designated as an “attainment” area. If there is inadequate or inconclusive data to make a definitive attainment designation, they are considered “unclassified.” National nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards. Each standard has a different definition, or ‘form’ of what constitutes attainment, based on specific air quality statistics. For example, the Federal 8-hour CO standard is not to be exceeded more than once per year; therefore, an area is in attainment of the CO standard if no more than one 8-hour ambient air monitoring values exceeds the threshold per year. In contrast, the Federal annual PM<sub>2.5</sub> standard is met if the three-year average of the annual average PM<sub>2.5</sub> concentration is less than or equal to the standard. Attainment status is shown in Table 3.

As part of its enforcement responsibilities, the EPA requires each state with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the national standards. The State Implementation Plan (SIP) must integrate federal, state, and local components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the State Implementation Plan (SIP).

As indicated below in Table 3, the Basin has been designated by the EPA as a non-attainment area for ozone (O<sub>3</sub>) and suspended particulates (PM<sub>2.5</sub>). Currently, the Basin is in attainment with the ambient air quality standards for carbon monoxide (CO), lead, sulfur dioxide (SO<sub>2</sub>), suspended particulate matter (PM-10), and nitrogen dioxide (NO<sub>2</sub>).

### **State – California Air Resources Board**

The California Air Resources Board (CARB), which is a part of the California Environmental Protection Agency, is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, the CARB conducts research, sets the California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the State Implementation Plan (SIP). The California Ambient Air Quality Standards (CAAQS) for criteria pollutants are shown in Table 2. In addition, the CARB establishes emission standards for motor vehicles sold in California, consumer products (e.g., hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. Furthermore, the motor vehicle emission standards established by CARB include compliance with the Safer Affordable Fuel-Efficient Vehicles (SAFE) Rule, issued by NHTSA and EPA in March 2020 (published on April 30, 2020 and effective after June 29, 2020). The SAFE Rule sets fuel economy and carbon dioxide standards that increase 1.5 percent in stringency each year from model years 2021 through 2026 and apply to both passenger cars and light trucks. CARB. It also sets fuel specifications to further reduce vehicular emissions. The SAFE Rule was repealed on December 21, 2021. NHTSA is in process of adopting more stringent corporate average fuel economy (CAFE) standards for model year 2024–2026 vehicles.

The South Coast Air Basin has been designated by the CARB as a nonattainment area for ozone, PM10 and PM2.5. Currently, the South Coast Air Basin is in attainment with the ambient air quality standards for CO, lead, SO2, NO2, and sulfates and is unclassified for visibility reducing particles and Hydrogen Sulfide.

On June 20, 2002, the CARB revised the PM10 annual average standard to 20 µg/m<sup>3</sup> and established an annual average standard for PM2.5 of 12 µg/m<sup>3</sup>. These standards were approved by the Office of Administrative Law in June 2003 and are now effective. On September 27, 2007, CARB approved the South Coast Air Basin and the Coachella Valley 2007 Air Quality Management Plan for Attaining the Federal 8-hour Ozone and PM2.5 Standards. The plan projected attainment for the 8-hour Ozone standard by 2024 and the PM2.5 standard by 2015.

On December 12, 2008, the CARB adopted Resolution 08-43, which limits NOx, PM10 and PM2.5 emissions from on-road diesel truck fleets that operate in California. On October 12, 2009, Executive Order R-09-010 was adopted that codified Resolution 08-43 into Section 2025, Title 13 of the California Code of Regulations. This regulation requires that by the year 2023 all commercial diesel trucks that operate in California shall meet model year 2010 (Tier 4) or latter emission standards. In the interim period, this regulation provides annual interim targets for fleet owners to meet. This regulation also provides a few exemptions including a once-per-year 3-day pass for trucks registered outside of California.

The CARB is also responsible for regulations pertaining to toxic air contaminants. The Air Toxics “Hot Spots” Information and Assessment Act (AB 2588, 1987, Connelly) was enacted in 1987 as a means to establish a formal air toxics emission inventory risk quantification program. AB 2588, as amended, establishes a process that requires stationary sources to report the type and quantities of certain substances their facilities routinely release into the South Coast Air Basin. The data is ranked by high, intermediate, and low categories, which are determined by: the potency, toxicity, quantity, volume, and proximity of the facility to nearby receptors.

#### *AB 617 Nonvehicular air pollution: criteria air pollutants and toxic air contaminants*

This bill requires the state board to develop a uniform statewide system of annual reporting of emissions of criteria air pollutants and toxic air contaminants for use by certain categories of stationary sources. The bill requires those stationary sources to report their annual emissions of criteria air pollutants and toxic air contaminants, as specified. This bill required the state board, by October 1, 2018, to prepare a monitoring plan regarding technologies for monitoring criteria air pollutants and toxic air contaminants and the need for and benefits of additional community air monitoring systems, as defined. The bill requires the state board to select, based on the monitoring plan, the highest priority locations in the state for the deployment of community air monitoring systems. The bill requires an air district containing a selected location, by July 1, 2019, to deploy a system in the selected location. The bill would authorize the air district to require a stationary source that emits air pollutants in, or that materially affect, the selected location to deploy a fence-line monitoring system, as defined, or other specified real-time, on-site monitoring. The bill authorizes the state board, by January 1, 2020, and annually thereafter, to select additional locations for the deployment of the systems. The bill would require air districts that have deployed a system to provide to the state board air quality data produced by the system. By increasing the duties of air districts, this bill would impose a state-mandated local program. The bill requires the state board to publish the data on its Internet Web site.

### **Regional**

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

## South Coast Air Quality Management District

The SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emission sources, and enforces such measures through educational programs or fines, when necessary. The SCAQMD is directly responsible for reducing emissions from stationary, mobile, and indirect sources. It has responded to this requirement by preparing a sequence of AQMPs. On June 30, 2016, the SCAQMD released its Draft 2016 AQMP.

### *Air Quality Management Plan*

The 2016 AQMP is a regional blueprint for achieving the federal air quality standards and healthful air. The 2016 AQMP includes both stationary and mobile source strategies to ensure that rapidly approaching attainment deadlines are met, that public health is protected to the maximum extent feasible, and that the region is not faced with burdensome sanctions if the Plan is not approved or if the NAAQS are not met on time. As with every AQMP, a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures is updated with the latest data and methods. The most significant air quality challenge in the Basin is to reduce nitrogen oxide (NO<sub>x</sub>) emissions sufficiently to meet the upcoming ozone standard deadlines. On March 23, 2017, the CARB approved the 2016 AQMP. The primary goal of this Air Quality Management Plan is to meet clean air standards and protect public health, including ensuring benefits to environmental justice and disadvantaged communities. Now that the Plan has been approved by the CARB, it has been forwarded to the U.S. EPA for its review. The Plan was approved by the EPA on June 15, 2017.

In May 2022, the SCAQMD completed the 2022 Draft AQMP. The 2022 Draft AQMP is focused on attaining the 2015 8-hour ozone standard (70 ppb) for the South Coast Air Basin and Coachella Valley. The Draft 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emission technologies, when cost-effective and feasible, and low NO<sub>x</sub> technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard. The 2022 AQMP was adopted December 2, 2022, by SCAQMD Governing Board. The 2022 AQMP was approved and adopted by CARB on January 26, 2023. The 2022 AQMP strategy includes the following:<sup>2</sup>

- Wide adoption of zero emissions technologies anywhere available.
- Low NO<sub>x</sub> technologies where zero emissions aren't feasible.
- Federal Action.
- Zero emissions technologies for residential and industrial sources such as water and space heaters in buildings and homes regionwide.
- Incentive funding in environmental justice areas.
- Prioritize benefits on the most disadvantaged communities.

### *SCAQMD Rules and Regulations*

During construction and operation, the project must comply with applicable rules and regulations. The following are the rules the project may be required to comply with, either directly, or indirectly:

#### *SCAQMD Rule 402*

Prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to

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<sup>2</sup> SCAQMD 2022 AQMP Infographic. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2022-aqmp-infographic>

the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

#### *SCAQMD Rule 403*

Governs emissions of fugitive dust during construction and operation activities. Compliance with this rule is achieved through application of standard Best Management Practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites.

Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Applicable dust suppression techniques from Rule 403 are summarized below. Implementation of these dust suppression techniques can reduce the fugitive dust generation (and thus the PM<sub>10</sub> component). Compliance with these rules would reduce impacts on nearby sensitive receptors. Rule 403 measures may include but are not limited to the following:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least three times daily. (Locations where grading is to occur will be thoroughly watered prior to earthmoving.)
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.
- Suspension of all grading activities when wind speeds (including instantaneous wind gusts) exceed 25 mph.
- Bumper strips or similar best management practices shall be provided where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Replanting disturbed areas as soon as practical.
- During all construction activities, construction contractors shall sweep on-site and off-site streets if silt is carried to adjacent public thoroughfares, to reduce the amount of particulate matter on public streets. All sweepers shall be compliant with SCAQMD Rule 1186.1, Less Polluting Sweepers.

#### *SCAQMD Rule 445*

Prohibits permanently installed wood burning devices into any new development. A wood burning device means any fireplace, wood burning heater, or pellet-fueled wood heater, or any similarly enclosed, permanently installed, indoor or outdoor device burning any solid fuel for aesthetic or space-heating purposes, which has a heat input of less than one million British thermal units per hour.

#### *SCAQMD Rule 481*

Applies to all spray painting and spray coating operations and equipment. The rule states that a person shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:

- (1) The spray coating equipment is operated inside a control enclosure, which is approved by the Executive Officer. Any control enclosure for which an application for permit for new construction, alteration, or change of ownership or location is submitted after the date of adoption of this rule shall be exhausted only through filters at a design face velocity not less than 100 feet per minute nor greater than 300 feet

per minute, or through a water wash system designed to be equally effective for the purpose of air pollution control.

- (2) Coatings are applied with high-volume low-pressure, electrostatic and/or airless spray equipment.
- (3) An alternative method of coating application or control is used which has effectiveness equal to or greater than the equipment specified in the rule.

#### *SCAQMD Rule 1108*

Governs the sale, use, and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the South Coast Air Basin. This rule would regulate the VOC content of asphalt used during construction. Therefore, all asphalt used during construction of the project must comply with SCAQMD Rule 1108.

#### *SCAQMD Rule 1113*

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

#### *SCAQMD Rule 1143*

Governs the manufacture, sale, and use of paint thinners and solvents used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content. This rule regulates the VOC content of solvents used during construction. Solvents used during the construction phase must comply with this rule.

#### *SCAQMD Rule 1186*

Limits the presence of fugitive dust on paved and unpaved roads and sets certification protocols and requirements for street sweepers that are under contract to provide sweeping services to any federal, state, county, agency or special district such as water, air, sanitation, transit, or school district.

#### *SCAQMD Rule 1303*

Governs the permitting of re-located or new major emission sources, requiring Best Available Control Measures and setting significance limits for PM<sub>10</sub> among other pollutants.

#### *SCAQMD Rule 1401*

New Source Review of Toxic Air Contaminants, specifies limits for maximum individual cancer risk, cancer burden, and non-cancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units, which emit toxic air contaminants.

#### *SCAQMD Rule 1403*

Asbestos Emissions from Demolition/Renovation Activities, specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM).

#### *SCAQMD Rule 2202*

On-Road Motor Vehicle Mitigation Options, is to provide employers with a menu of options to reduce mobile source emissions generated from employee commutes, to comply with federal and state Clean Air Act

requirements, Health & Safety Code Section 40458, and Section 182(d)(1)(B) of the federal Clean Air Act. It applies to any employer who employs 250 or more employees on a full or part-time basis at a worksite for a consecutive six-month period calculated as a monthly average.

#### *SCAQMD Rule 2305*

The Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program aims to reduce nitrogen oxide and diesel emissions associated with warehouses, help meet federal standards and improve public health. The WAIRE Program is an indirect source rule that regulates warehouse facilities to reduce emissions from the goods movement industry. Owners and operators of warehouses that have 100,000 square feet or more of indoor floor space in a single building must comply with the WAIRE Program. WAIRE is a menu-based point system in which warehouse operators are required to earn a specific number of points every year. The yearly number of points required is based on the number of trucks trips made to and from the warehouse each year, with larger trucks such as tractors or tractor-trailers multiplied by 2.5. Warehouse operators may be exempt from parts of the rule if they operate less than 50,000 square feet of warehousing activities, if the number of points required is less than 10, or if the WAIRE menu action chosen under performs due to circumstances beyond the operator's control, such as a manufacturer defect. SCAQMD Rule 316 establishes fees to fund Rule 2305 compliance activities.

#### Air Quality Guidance Documents

##### *SCAQMD CEQA Handbook*

Although the SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate air quality issues associated with plans and new development projects throughout the South Coast Air Basin. Instead, this is controlled through local jurisdictions in accordance with the California Environmental Quality Act (CEQA). In order to assist local jurisdictions with air quality compliance issues the CEQA Air Quality Handbook (SCAQMD CEQA Handbook) prepared by the SCAQMD (1993) with the most current updates found at <http://www.aqmd.gov/ceqa/hdbk.html>, was developed in accordance with the projections and programs of the AQMP. The purpose of the SCAQMD CEQA Handbook is to assist Lead Agencies, as well as consultants, project proponents, and other interested parties in evaluating a proposed project's potential air quality impacts. Specifically, the SCAQMD CEQA Handbook explains the procedures that the SCAQMD recommends be followed for the environmental review process required by CEQA. The SCAQMD CEQA Handbook provides direction on how to evaluate potential air quality impacts, how to determine whether these impacts are significant, and how to mitigate these impacts. SCAQMD is in the process of developing an "Air Quality Analysis Guidance Handbook" to replace the CEQA Air Quality Handbook approved by the AQMD Governing Board in 1993. The 1993 CEQA Air Quality Handbook is still available but not online. In addition, there are sections of the 1993 Handbook that are obsolete. In order to assist the CEQA practitioner in conducting an air quality analysis while the new Handbook is being prepared, supplemental information regarding: significance thresholds and analysis, emissions factors, cumulative impacts emissions analysis, and other useful subjects, are available at the SCAQMD website<sup>3</sup>. The SCAQMD CEQA Handbook and supplemental information is used in this analysis.

##### *Southern California Association of Governments*

The SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG is the Federally designated MPO for the majority of the southern California region and is the largest MPO in the nation. With respect to air quality planning, SCAG has prepared the Regional Transportation Plan and Regional Transportation Improvement Plan (RTIP), which addresses regional development and growth forecasts. These plans form the basis for the land use and transportation components of the AQMP, which are utilized in the preparation of air quality forecasts and in the consistency

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<sup>3</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

analysis included in the AQMP. The Regional Transportation Plan, Regional Transportation Improvement Plan, and AQMP are based on projections originating within the City and County General Plans.

On April 7, 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (2016 RTP/SCS or Plan). The Plan is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals. The Plan charts a course for closely integrating land use and transportation – so that the region can grow smartly and sustainably. It outlines more than \$556.5 billion in transportation system investments through 2040. The Plan was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. In June 2016, SCAG received its conformity determination from the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) indicating that all air quality conformity requirements for the 2016 RTP/SCS and associated 2015 FTIP Consistency Amendment through Amendment 15-12 have been met.

On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy), and the addendum to the Connect SoCal Program Environmental Impact Report. Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Connect SoCal outlines more than \$638 billion in transportation system investments through 2045. It was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura.

### **Local – City of Banning**

Local jurisdictions, such as the City of Banning, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City is also responsible for the implementation of transportation control measures as outlined in the 2022 AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals. In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation.

The City relies on the expertise of the SCAQMD and utilizes the SCAQMD CEQA Air Quality Handbook as the guidance document for the environmental review of plans and development proposals within its jurisdiction.

The Environmental Resources Air Quality Element of the City of Banning General Plan summarize air quality issues in the Basin, air quality-related plans and programs administered by federal, state, and special purpose agencies, and establishes goals and policies to improve air quality.

Applicable goals and policies from the Environmental Resources Air Quality Element include:

**Goal** To preserve and enhance local and regional air quality for the protection of the health and welfare of the community.

*Policy 1* The City shall be proactive in regulating local pollutant emitters and shall cooperate with the Southern California Association of Governments and the South Coast Air Quality Management District to assure compliance with air quality standards.

- Policy 2* The City shall continue to coordinate and cooperate with local, regional and federal efforts to monitor, manage and reduce the levels of major pollutants affecting the City and region, with particular emphasis on PM10 and ozone emissions, as well as other emissions associated with diesel-fueled equipment and motor vehicles.
- Policy 3* City land use planning efforts shall assure that sensitive receptors are separated from polluting point sources.
- Policy 4* Development proposals brought before the City shall be reviewed for their potential to adversely impact local and regional air quality and shall be required to mitigate any significant impacts.
- Policy 5* The City shall promote the use of clean and/or renewable alternative energy sources for transportation, heating and cooling.
- Policy 6* The City shall support the development of facilities and projects that facilitate and enhance the use of alternative modes of transportation, including pedestrian-oriented retail and activity centers, dedicated bicycle paths and lanes, and community-wide multi-use trails.



**Table 2  
State and Federal Criteria Pollutant Standards**

Air Pollutant	Concentration / Averaging Time		Most Relevant Effects
	California Standards	Federal Primary Standards	
Ozone (O <sub>3</sub> )	0.09 ppm/1-hour 0.07 ppm/8-hour	0.070 ppm/8-hour	(a) Decline in pulmonary function and localized lung edema in humans and animals; (b) Risk to public health implied by alterations in pulmonary morphology and host defense in animals; (c) Increased mortality risk; (d) Risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (e) Vegetation damage; and (f) Property damage.
Carbon Monoxide (CO)	20.0 ppm/1-hour 9.0 ppm/8-hour	35.0 ppm/1-hour 9.0 ppm/8-hour	(a) Aggravation of angina pectoris and other aspects of coronary heart disease; (b) Decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (c) Impairment of central nervous system functions; and (d) Possible increased risk to fetuses.
Nitrogen Dioxide (NO <sub>2</sub> )	0.18 ppm/1-hour 0.03 ppm/annual	100 ppb/1-hour 0.053 ppm/annual	(a) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (b) Risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; and (c) Contribution to atmospheric discoloration.
Sulfur Dioxide (SO <sub>2</sub> )	0.25 ppm/1-hour 0.04 ppm/24-hour	75 ppb/1-hour 0.14 ppm/annual	(a) Bronchoconstriction accompanied by symptoms which may include wheezing, shortness of breath and chest tightness, during exercise or physical activity in persons with asthma.
Suspended Particulate Matter (PM <sub>10</sub> )	50 µg/m <sup>3</sup> /24-hour 20 µg/m <sup>3</sup> /annual	150 µg/m <sup>3</sup> /24-hour	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; (c) Increased risk of premature death from heart or lung diseases in elderly.
Suspended Particulate Matter (PM <sub>2.5</sub> )	12 µg/m <sup>3</sup> / annual	35 µg/m <sup>3</sup> /24-hour 12 µg/m <sup>3</sup> /annual	
Sulfates	25 µg/m <sup>3</sup> /24-hour	No Federal Standards	(a) Decrease in ventilatory function; (b) Aggravation of asthmatic symptoms; (c) Aggravation of cardio-pulmonary disease; (d) Vegetation damage; (e) Degradation of visibility; (f) property damage.
Lead	1.5 µg/m <sup>3</sup> /30-day	0.15 µg/m <sup>3</sup> /3-month rolling	(a) Learning disabilities; (b) Impairment of blood formation and nerve conduction.
Visibility Reducing Particles	Extinction coefficient of 0.23 per kilometer-visibility of 10 miles or more due to particles when humidity is less than 70 percent.	No Federal Standards	Visibility impairment on days when relative humidity is less than 70 percent.

Source: <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>

**Table 3**  
**South Coast Air Basin Attainment Status**

Pollutant	State Status	National Status
Ozone	Nonattainment	Nonattainment (Extreme)
Carbon monoxide	Attainment	Attainment (Maintenance)
Nitrogen dioxide	Attainment	Unclassifiable/Attainment
Sulfur dioxide	Attainment	Unclassifiable/Attainment
PM10	Nonattainment	Attainment (Maintenance)
PM2.5	Nonattainment	Nonattainment (Serious)

Source (Federal and State Status): California Air Resources Board (2022) <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations> & SCAQMD 2022 Air Quality Management Plan (December 2022) <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16>.

## MONITORED AIR QUALITY

The air quality at any site is dependent on the regional air quality and local pollutant sources. Regional air quality is determined by the release of pollutants throughout the air basin. Estimates of the existing emissions in the Basin provided in the Final 2022 Air Quality Management Plan prepared by SCAQMD (December 2022) indicate that collectively, mobile sources account for 46 percent of the VOC, 85 percent of the NO<sub>x</sub> emissions, 89 percent of the CO emissions and 29 percent of directly emitted PM<sub>2.5</sub>, with another 18 percent of PM<sub>2.5</sub> from road dust.

The SCAQMD has divided the South Coast Air Basin into 38 air-monitoring areas with a designated ambient air monitoring station representative of each area. The project site is located in the Banning Airport Air Monitoring Area (Area 29). The nearest air monitoring station to the project site is the Banning Airport Monitoring Station (Banning Station). The Banning Station is located approximately 1.88 miles west of the project site at 200 S. Hathaway Street, Banning. However, it should be noted that due to the air monitoring station distance from the project site, recorded air pollution levels at the air monitoring station reflect with varying degrees of accuracy, local air quality conditions at the project site. Table 4 presents the monitored pollutant levels from the Banning Station.

Table 4 summarizes 2020 through 2022 published monitoring data, which is the most recent 3-year period available. The data shows that during the past few years, the project area has exceeded the ozone standards.

### **Ozone**

During the 2020 to 2022 monitoring period, the State 1-hour concentration standard for ozone was exceeded between 29 and 41 days each year at the Banning Station. The State 8-hour ozone standard has been exceeded between 59 and 82 days each year over the past three years at the Banning Station. The Federal 8-hour ozone standard was exceeded between 56 and 80 days each year over the past three years at the Banning Station.

Ozone is a secondary pollutant as it is not directly emitted. Ozone is the result of chemical reactions between other pollutants, most importantly hydrocarbons and NO<sub>2</sub>, which occur only in the presence of bright sunlight. Pollutants emitted from upwind cities react during transport downwind to produce the oxidant concentrations experienced in the area. Many areas of the SCAQMD contribute to the ozone levels experienced at the monitoring station, with the more significant areas being those directly upwind.

### **Carbon Monoxide**

CO is another important pollutant that is due mainly to motor vehicles. The Banning Station did not record an exceedance of the state or federal 8-hour CO standard for the last three years.

### **Nitrogen Dioxide**

The Banning Station did not record an exceedance of the State or Federal NO<sub>2</sub> standards for the last three years.

### **Particulate Matter**

The State 24-hour concentration standards for PM<sub>10</sub> were exceeded for one day in 2020 over the last three years at the Banning Station. Over the past three years, the Banning Station did not record an exceedance of the Federal 24-hour standards for PM<sub>10</sub>.

There was insufficient data over the last three years for the Federal 24-hour standard for PM<sub>2.5</sub> at the Banning Station.

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

**Table 4  
Air Quality Monitoring Summary**

Pollutant (Standard) <sup>1</sup>		Year		
		2020	2021	2022
Ozone:	Maximum 1-Hour Concentration (ppm)	0.150	0.139	0.116
	Days > CAAQS (0.09 ppm)	<b>29</b>	<b>41</b>	<b>30</b>
	Maximum 8-Hour Concentration (ppm)	0.116	0.116	0.101
	Days > NAAQS (0.070 ppm)	<b>68</b>	<b>80</b>	<b>56</b>
	Days > CAAQS (0.070 ppm)	<b>71</b>	<b>82</b>	<b>59</b>
Carbon Monoxide:	Maximum 8-Hour Concentration (ppm)	*	*	*
	Days > CAAQS (9 ppm)	0	0	0
	Days > NAAQS (9 ppm)	0	0	0
Nitrogen Dioxide:	Maximum 1-Hour Concentration (ppm)	0.051	0.057	0.052
	Days > CAAQS (0.18 ppm)	0	0	0
Inhalable Particulates (PM10):	Maximum 24-Hour Concentration (µg/m <sup>3</sup> )	69.3	48.6	52.4
	Days > NAAQS (150 µg/m <sup>3</sup> )	0	0	0
	Days > CAAQS (50 µg/m <sup>3</sup> )	<b>1</b>	0	0
	Annual Average (µg/m <sup>3</sup> )	21.2	21.2	22.5
Ultra-Fine Particulates (PM2.5):	Maximum 24-Hour Concentration (µg/m <sup>3</sup> )	46.7	40.9	37.9
	Days > NAAQS (35 µg/m <sup>3</sup> )	*	*	*
	Annual Average (µg/m <sup>3</sup> )	10.5	11.7	9.4

Notes:

Source: <http://www.arb.ca.gov/adam/topfour/topfour1.php>. Data from the Banning Airport Monitoring Station, unless otherwise noted.

(1) CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard; ppm = parts per million

\* Means there was insufficient data available to determine value.

## AIR QUALITY STANDARDS

### Significance Thresholds

#### *Appendix G of the State CEQA Guidelines*

Appendix G of the State CEQA Guidelines states that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make a significance determination. Pursuant to Appendix G, the project would result in a significant impact related to air quality if it would:

- Conflict with or obstruct the implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard;
- Expose sensitive receptors to substantial pollutant concentrations; or
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The CEQA Guidelines Section 15064.7 provides the significance criteria established by the applicable air quality management district or air pollution control district, when available, may be relied upon to make determinations of significance. The potential air quality impacts of the project are, therefore, evaluated according to thresholds developed by SCAQMD in their CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook, and subsequent guidance, which are listed below.<sup>4</sup> Therefore, the project would result in a potentially significant impact to air quality if it would:

AIR-1: Conflict with or obstruct the implementation of the applicable air quality plan;

AIR-2: Violate any air quality standard or contribute substantially to an existing or projected air quality violation as a result of:

- Criteria pollutant emissions during construction (direct and indirect) in excess of the SCAQMD's regional significance thresholds,
- Criteria pollutant emissions during operation (direct and indirect) in excess of the SCAQMD's regional significance thresholds.

AIR-3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);

AIR-4: Expose sensitive receptors to substantial pollutant concentrations that would:

- Exceed SCAQMD's localized significance thresholds,
- Cause or contribute to the formation of CO hotspots.

AIR-5: Create objectionable odors affecting a substantial number of people.

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<sup>4</sup> While the SCAQMD CEQA Air Quality Handbook contains significance thresholds for lead, Project construction and operation would not include sources of lead emissions and would not exceed the established thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from industrial land use projects such as the Project. As a result, lead emissions are not further evaluated herein.

The SCAQMD is in the process of developing an Air Quality Analysis Guidance Handbook to replace the CEQA Air Quality Handbook. In the interim, supplemental guidance has been adopted by the SCAQMD. The potential air quality impacts of the project are, therefore, evaluated according to numeric indicators developed by the SCAQMD in the CEQA Air Quality Handbook and supplemental guidance from the SCAQMD.<sup>5</sup>

### **Regional Air Quality**

Many air quality impacts that derive from dispersed mobile sources, which are the dominate pollution generators in the basin, often occurs hours later and miles away after photochemical processes have converted primary exhaust pollutants into secondary contaminants such as ozone. The incremental regional air quality impact of an individual project is generally very small and difficult to measure. Therefore, the SCAQMD has developed significance thresholds based on the volume of pollution emitted rather than on actual ambient air quality because the direct air quality impact of a project is not quantifiable on a regional scale. The SCAQMD CEQA Handbook states that any project in the South Coast Air Basin with daily emissions that exceed any of the identified significance thresholds should be considered as having an individually and cumulatively significant air quality impact. For the purposes to this air quality impact analysis, a regional air quality impact would be considered significant if emissions exceed the SCAQMD significance thresholds identified in Table 5.

### **Local Air Quality**

Project-related construction air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the South Coast Air Basin. In order to assess local air quality impacts the SCAQMD has developed Localized Significance Thresholds (LSTs) to assess the project-related air emissions in the project vicinity. The SCAQMD has also provided Final Localized Significance Threshold Methodology (LST Methodology), June 2003, which details the methodology to analyze local air emission impacts. The Localized Significance Threshold Methodology found that the primary emissions of concern are NO<sub>2</sub>, CO, PM10, and PM2.5.

The significance thresholds for the local emissions of NO<sub>2</sub> and CO are determined by subtracting the highest background concentration from the last three years of these pollutants from Table 4 above, from the most restrictive ambient air quality standards for these pollutants that are outlined in the Localized Significance Thresholds. Table 5 shows the ambient air quality standards for NO<sub>2</sub>, CO, and PM10 and PM2.5.

### **Toxic Air Contaminants**

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

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

In order to determine if the proposed project may have a significant impact related to hazardous air pollutants (HAP), the Health Risk Assessment Guidance for analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, (Diesel Analysis), prepared by SCAQMD, August 2003, recommends that if the proposed project is anticipated to create hazardous air pollutants through stationary sources or regular operations of diesel trucks on the project site, then the proximity of the nearest receptors to the

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<sup>5</sup> While the SCAQMD CEQA Air Quality Handbook contains significance thresholds for lead, Project construction and operation would not include sources of lead emissions and would not exceed the established thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from residential land use projects such as the Project. As a result, lead emissions are not further evaluated herein.

source of the hazardous air pollutants and the toxicity of the hazardous air pollutants should be analyzed through a comprehensive facility-wide health risk assessment (HRA).

The potential for health risks due to project-related diesel particulate matter (DPM) emissions is examined in Section 3 of this report.

### **Odor Impacts**

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

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

The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

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



**Table 5  
SCAQMD Air Quality Significance Thresholds**

Mass Daily Thresholds <sup>1</sup>		
Pollutant	Construction (lbs/day)	Operation (lbs/day)
NOx	100	55
VOC	75	55
PM10	150	150
PM2.5	55	55
SOx	150	150
CO	550	550
Lead	3	3
Toxic Air Contaminants (TACs), Odor and GHG Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk $\geq$ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas $\geq$ 1 in 1 million) Chronic & Acute Hazard Index > 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
GHG	10,000 MT/yr CO <sub>2</sub> e for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants <sup>2</sup>		
NO <sub>2</sub> 1-hour average annual arithmetic mean	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:  0.18 ppm (state) 0.03 ppm (state) & 0.0534 ppm (federal)	
PM <sub>10</sub> 24-hour average annual average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>3</sup> & 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$	
PM <sub>2.5</sub> 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>3</sup> & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
SO <sub>2</sub> 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal - 99th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 $\mu\text{g}/\text{m}^3$ (state)	
CO 1-hour average 8-hour average	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:  20 ppm (state) & 35 ppm (federal) 9 ppm (state/federal)	
Lead 30-day average Rolling 3-month average	1.5 $\mu\text{g}/\text{m}^3$ (state) 0.15 $\mu\text{g}/\text{m}^3$ (federal)	

Notes:

Source: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

(1) Source: South Coast AQMD CEQA Handbook (South Coast AQMD, 1993)

(2) Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated.

(3) Ambient air quality threshold based on South Coast AQMD Rule 403.

## SHORT-TERM CONSTRUCTION EMISSIONS

Construction activities associated with the proposed project would have the potential to generate air emissions, toxic air contaminant emissions, and odor impacts. Assumptions for the phasing, duration, and required equipment for the construction of the proposed project were obtained from the project applicant. The construction activities for the proposed project are anticipated to include: grading of approximately 14.27 net acres; construction of 49,000 square feet of industrial use (includes 45,000 square feet of warehouse use, 3,000 square feet of office use, and two 500 square foot enclosed saw sheds) with a building footprint of 46,545 square feet (~1.07 acres), 2.13 acres of gravel areas, and 62,456 square feet of landscaping; paving of a parking lot with 34 automobile parking spaces with the total asphalt area covering approximately 9.63 acres; and application of architectural coatings. Grading of the proposed project site is anticipated to balance. See Appendix B for more details.

The proposed project is anticipated to start construction no sooner than early July 2024 with completion estimated by the end of June 2025. The project is anticipated to be operational in 2025.

### **Methodology**

The following provides a discussion of the methodology used to calculate regional construction air emissions and an analysis of the proposed project's short-term construction emissions for the criteria pollutants. The construction-related regional air quality impacts have been analyzed for both criteria pollutants and GHGs.

Emissions are estimated using the CalEEMod (Version 2022.1.1.20) software, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California and is recommended by the SCAQMD.<sup>6</sup>

Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The input values used in this analysis were adjusted to be project-specific for the construction schedule and the equipment used was based on CalEEMod defaults. The CalEEMod program uses the EMFAC2021 computer program to calculate the emission rates specific for the southwestern portion of Riverside County for construction-related employee vehicle trips and the OFFROAD2017 computer program to calculate emission rates for heavy truck operations. EMFAC2021 and OFFROAD2017 are computer programs generated by CARB that calculates composite emission rates for vehicles. Emission rates are reported by the program in grams per trip and grams per mile or grams per running hour. Daily truck trips and CalEEMod default trip length data were used to assess roadway emissions from truck exhaust. The maximum daily emissions are estimated values for the worst-case day and do not represent the emissions that would occur for every day of project construction. The maximum daily emissions are compared to the SCAQMD daily regional numeric indicators. Detailed construction equipment lists, construction scheduling, and emission calculations are provided in Appendix B.

The project will be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. Compliance with this rule is achieved through application of standard best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 mph, sweeping loose dirt from paved site

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<sup>6</sup> South Coast Air Quality Management District, California Emissions Estimator Model, <http://www.aqmd.gov/caleemod/>.

access roadways, cessation of construction activity when winds exceed 25 mph and establishing a permanent, stabilizing ground cover on finished sites. In addition, projects that disturb 50 acres or more of soil or move 5,000 cubic yards of materials per day are required to submit a Fugitive Dust Control Plan or a Large Operation Notification Form to SCAQMD. Based on the size of the Project area (approximately 14.27 net acres) a Fugitive Dust Control Plan or Large Operation Notification would not be required.

SCAQMD's Rule 403 minimum requirements require that the application of the best available dust control measures is used for all grading operations and include the application of water or other soil stabilizers in sufficient quantity to prevent the generation of visible dust plumes. Compliance with Rule 403 would require the use of water trucks during all phases where earth moving operations would occur. Compliance with Rule 403 has been included in the CalEEMod modeling for the proposed project.

Per SCAQMD Rule 1113 as amended on June 3, 2011, the architectural coatings that would be applied after January 1, 2014 will be limited to an average of 50 grams per liter or less of VOCs for building coatings and 100 grams per liter or less of VOCs for traffic coatings.

The phases of the construction activities which have been analyzed below for each phase are: (1) grading, (2) building construction, (3) paving, and (4) application of architectural coatings. Details pertaining to the project's construction timing and the type of equipment modeled for each construction phase are available in the CalEEMod output in Appendix B.

### **Construction-Related Regional Impacts**

The maximum summer or winter criteria pollutant emissions from the proposed project's construction-related criteria pollutant emissions are shown below in Table 6. Table 6 shows that none of the project's emissions will exceed regional thresholds. Therefore, a less than significant regional air quality impact would occur from construction of the proposed project.

### **Construction-Related Local Impacts**

Construction-related air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the South Coast Air Basin. The proposed project has been analyzed for the potential local air quality impacts created from: construction-related fugitive dust and diesel emissions; from toxic air contaminants; and from construction-related odor impacts.

#### *Local Air Quality Impacts from Construction*

The SCAQMD has published a "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds" (South Coast Air Quality Management District 2011b). CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily disturbance activity possible for each piece of equipment. In order to compare CalEEMod reported emissions against the localized significance threshold lookup tables, the CEQA document should contain the following parameters:

- (1) The off-road equipment list (including type of equipment, horsepower, and hours of operation) assumed for the day of construction activity with maximum emissions.
- (2) The maximum number of acres disturbed on the peak day.
- (3) Any emission control devices added onto off-road equipment.
- (4) Specific dust suppression techniques used on the day of construction activity with maximum emissions.

The CalEEMod output in Appendix B show the equipment used for this analysis.

As shown in Table 7, the maximum number of acres disturbed in a day would be 4 acres during grading. The local air quality emissions from construction were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold Look-up Tables and the methodology described in Localized Significance Threshold Methodology prepared by SCAQMD (revised July 2008). The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NOx, PM10, and PM2.5 from the proposed project could result in a significant impact to the local air quality. The emission thresholds were calculated based on the Banning Airport source receptor area (SRA) 29 and a disturbance value of two acres per day, to be conservative. According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds. The nearest sensitive receptors to the project site are the existing single-family residential land uses located approximately 75 feet (~23 meters) south of the project site; therefore, the SCAQMD Look-up Tables for 25 meters was used. Table 8 shows the on-site emissions from the CalEEMod model for the different construction phases and the LST emissions thresholds.

The data provided in Table 8 shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors. Therefore, a less than significant local air quality impact would occur from construction of the proposed project.

### **Construction-Related Health Impacts**

Regarding health effects related to criteria pollutant emissions, the applicable significance thresholds are established for regional compliance with the state and federal ambient air quality standards, which are intended to protect public health from both acute and long-term health impacts, depending on the potential effects of the pollutant. Because regional and local emissions of criteria pollutants during construction of the project would be below the applicable thresholds, it would not contribute to long-term health impacts related to nonattainment of the ambient air quality standards. Therefore, significant adverse acute health impacts as a result of project construction are not anticipated.

### **Construction-Related Toxic Air Contaminant Impacts**

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed project. According to the Office of Environmental Health Hazard Assessment (OEHHA)<sup>7</sup> and the SCAQMD *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis* (August 2003),<sup>8</sup> health effects from TACs are described in terms of individual cancer risk based on a lifetime (i.e., 30-year) resident exposure duration. Given the temporary and short-term construction schedule (approximately 12 months), the project would not result in a long-term (i.e., lifetime or 30-year) exposure as a result of project construction. Furthermore, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any local or regional thresholds.

The project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. The project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the renovation and construction activities. Therefore, impacts from TACs during construction would be less than significant.

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<sup>7</sup> Office of Environmental Health Hazard Assessment, Air Toxic Hot Spots Program Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessment, February 2015, <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>.

<sup>8</sup> South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, August 2003, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/mobile-source-toxics-analysis.doc?sfvrsn=2>.

### **Construction-Related Odor Impacts**

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are of short-term in nature and the odor emissions are expected to cease upon the drying or hardening of the odor producing materials. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the proposed project. Diesel exhaust and VOCs would be emitted during construction of the project, which are objectionable to some; however, emissions would disperse rapidly from the project site and therefore should not reach an objectionable level at the nearest sensitive receptors.

**Table 6  
Construction-Related Regional Pollutant Emissions**

Activity	Pollutant Emissions (pounds/day)					
	ROG	NOx	CO	SO <sub>2</sub>	PM10	PM2.5
Maximum Daily Emissions <sup>1,2</sup>	33.70	34.40	31.80	0.06	5.30	2.82
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

Notes:

Source: CalEEMod Version 2022.1.1.20.

- (1) Includes on-site and off-site emissions. On-site grading PM-10 and PM-2.5 emissions show compliance with SCAQMD Rule 403 for fugitive dust.
- (2) Construction, painting and paving phases may overlap.

**Table 7  
Maximum Number of Acres Disturbed Per Day**

Activity	Equipment	Number	Acres/8hr-day	Total Acres
Grading	Rubber Tired Dozers	1	0.5	0.5
	Scrapers	2	1	2
	Graders	1	0.5	0.5
	Crawler Tractors <sup>1</sup>	2	0.5	1.0
Total for phase		-	-	4.0

Notes:

Source: South Coast AQMD, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, 2011b.

(1) Tractor/loader/backhoe is a suitable surrogate for a crawler tractor per SCAQMD staff.

**Table 8  
Local Construction Emissions at the Nearest Receptors**

Activity	On-Site Pollutant Emissions (pounds/day)			
	NOx	CO	PM10	PM2.5
Grading	34.30	30.20	5.04	2.75
Building Construction	14.40	17.50	0.64	0.59
Paving	7.45	9.98	0.35	0.32
Architectural Coating	0.88	1.14	0.03	0.03
SCAQMD Thresholds <sup>1</sup>	149	1,541	10	6
Exceeds Threshold?	No	No	No	No

Notes:

Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for 2 acres, to be conservative, at a distance of 25 m in SRA 29 Banning Airport.

- (1) The nearest sensitive receptors are the existing single-family residential land uses located approximately 75 feet (~23 meters) south of the project site; therefore, the 25 meter threshold was used.

Note: The project will disturb up to a maximum of 4 acres a day during grading (see Table 7).



## LONG-TERM OPERATIONAL EMISSIONS

The on-going operation of the proposed project would result in a long-term increase in air quality emissions. This increase would be due to emissions from the project-generated vehicle trips and through operational emissions from the on-going use of the proposed project. The following section provides an analysis of potential long-term air quality impacts due to: regional air quality and local air quality impacts with the on-going operations of the proposed project.

### **Operations-Related Regional Air Quality Impacts**

The potential operations-related air emissions have been analyzed below for the criteria pollutants and cumulative impacts.

#### *Operations-Related Criteria Pollutants Analysis*

The operations-related criteria air quality impacts created by the proposed project have been analyzed through the use of the CalEEMod model. The operating emissions were based on the year 2025, which is the anticipated opening year for the proposed project. The operations daily emissions printouts from the CalEEMod model are provided in Appendix B. The CalEEMod analyzes operational emissions from area sources, energy usage, and mobile sources, which are discussed below.

#### *Mobile Sources*

Mobile sources include emissions from the additional vehicle miles generated from the proposed project. The vehicle trips associated with the proposed project have been analyzed by inputting the project-generated vehicular trips (trip generation rate) from the Brown Strauss Banning Industrial Project Traffic Impact Analysis (TIA) prepared by Ganddini Group, Inc. (October 27, 2023) into the CalEEMod Model. The TIA found the proposed project would create approximately 191 vehicle trips per day (non-PCE) and 343 vehicle trips per day (PCE) with a trip generation rate of 8.3 trips per acre per day.<sup>9</sup> For use in the CalEEMod model, the trip generation rate was calculated at 3.9 trips per thousand square foot per day. The program then applies the emission factors for each trip which is provided by the EMFAC2021 model to determine the vehicular traffic pollutant emissions.

The TIA found that the project would create 99 automobile round trips, 19 2-axle truck round trips, 4 3-axle truck round trips, and 69 4+-axle truck round trips per day (non-PCE). The vehicle mix for the industrial use was changed in CalEEMod to match the TIA (see Table 9) and the percentages in CalEEMod were changed to 51.8% autos (H-W) and 48.2% trucks (W-O) to match the overall vehicle percentages given in the TIA. Due to the proposed project's location and proposed warehouse land use, the average customer based trip length was increased to 40 miles per SCAQMD recommendation, while all other trip lengths were based on the urban default values.

#### *Area Sources*

Per the CAPCOA Appendix A Calculation Details for CalEEMod, area sources include emissions from consumer products, landscape equipment and architectural coatings. Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers, as well as air compressors, generators, and pumps. As specifics were not known about the landscaping equipment fleet, CalEEMod defaults were used to estimate emissions from landscaping equipment. No changes were made to the default area source parameters.

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<sup>9</sup> As stated in the TIA, the proposed relocation of existing operations from the 23.0-acre facility in Fontana to a smaller 14.92-acre facility in Banning could arguably be expected to generate fewer trips. However, in order to provide a conservative assessment, the TIA assumed that the proposed 14.92-acre facility will generate the same number of trips as the existing 23.0-acre facility in the City of Fontana.

### *Offroad Sources*

Offroad sources include emissions from the use of eight diesel forklifts, 17 hours a day, 5 days a week within the yard and one electric crane 17 hours a day, 5 days a week within the warehouse.<sup>10</sup>

### *Energy Usage*

Energy usage includes emissions from the generation of electricity and natural gas used on-site. No changes were made to the default energy usage parameters.

### *Project Impacts*

The maximum daily pollutant emissions created from the proposed project's long-term operations have been calculated and are shown below in Table 10. The results show that none of the SCAQMD regional thresholds would be exceeded. Therefore, a less than significant regional air quality impact would occur from operation of the proposed project.

### **Operations-Related Local Air Quality Impacts**

Project-related air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the South Coast Air Basin. The proposed project has been analyzed for the potential local CO emission impacts from the project-generated vehicular trips and from the potential local air quality impacts from on-site operations. The following analysis analyzes the vehicular CO emissions, local impacts from on-site operations per SCAQMD LST methodology, and odor impacts.

#### *Local CO Emission Impacts from Project-Generated Vehicular Trips*

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with project CO levels to the State and Federal CO standards which were presented above.

To determine if the proposed project could cause emission levels in excess of the CO standards discussed above, a sensitivity analysis is typically conducted to determine the potential for CO "hot spots" at a number of intersections in the general project vicinity. Because of reduced speeds and vehicle queuing, "hot spots" potentially can occur at high traffic volume intersections with a Level of Service E or worse.

The analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the South Coast Air Basin. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (2003 AQMP) and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the South Coast Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of 1992 CO Plan and subsequent plan updates and air quality management plans. In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: South Long Beach Boulevard and Imperial

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<sup>10</sup> On-site operations in the yard include the use of up to 6 diesel forklifts, which are to be in operation during all shift hours (two shifts, 5 AM to 1:30 PM and 3:00 PM to 11:30 PM) or a total of 17 hours a day. To be conservative, the modeling assumed up to 8 diesel forklifts at 17 hours a day. In addition, 1 electric crane is to operate within the warehouse during shift hours.

Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per day. The Los Angeles County Metropolitan Transportation Authority<sup>11</sup> evaluated the Level of Service in the vicinity of the Wilshire Boulevard/Veteran Avenue intersection and found it to be Level of Service E during the morning peak hour and Level of Service F during the afternoon peak hour.

The TIA showed that the proposed project would generate a maximum of approximately 191 daily vehicle trips. The intersection with the highest traffic volume is located at 8<sup>th</sup> Street and Lincoln Street and has a Cumulative Conditions With Project (2025) AM peak hour volume of 240 vehicles. The 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan) showed that an intersection which has a daily traffic volume of approximately 100,000 vehicles per day would not violate the CO standard. Therefore, as the intersection volume falls far short of 100,000 vehicles per day, no CO “hot spot” modeling was performed, and no significant long-term air quality impact is anticipated to local air quality with the on-going use of the proposed project.

#### *Local Air Quality Impacts from On-Site Operations*

Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, on-site usage of natural gas appliances as well as the operation of vehicles on-site may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the South Coast Air Basin. The nearest sensitive receptors that may be impacted by the proposed project are the existing single-family residential land uses located approximately 75 feet (~23 meters) south of the project site.

The local air quality emissions from on-site operations were analyzed according to the methodology described in Localized Significance Threshold Methodology, prepared by SCAQMD, revised July 2008. The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NOx, PM10, and PM2.5 from the proposed project could result in a significant impact to the local air quality. Per SCAQMD staff, the 5-acre Look-up Table, which is the largest site available, can be used as a conservative screening analysis for on-site operational emissions to determine whether more-detailed dispersion modeling would be necessary. The proposed project was analyzed based on the Banning Airport source receptor area (SRA) 29 and as the site is 14.92 gross acres, used the screening thresholds for a five-acre project site.

Table 11 shows the on-site emissions from the CalEEMod model that includes natural gas usage, landscape maintenance equipment, and vehicles operating on-site and the calculated emissions thresholds. Per LST methodology, mobile emissions include only on-site sources which equate to approximately 10 percent of the project-related new mobile sources.<sup>12</sup> The data provided in Table 11 shows that the on-going operations of the proposed project would not exceed SCAQMD local operational thresholds of significance discussed above. Therefore, the on-going operations of the proposed project would create a less than significant operations-related impact to local air quality due to on-site emissions and no mitigation would be required.

#### **Operations-Related Human Impacts**

Regarding health effects related to criteria pollutant emissions, the applicable significance thresholds are established for regional compliance with the state and federal ambient air quality standards, which are intended to protect public health from both acute and long-term health impacts, depending on the potential

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<sup>11</sup> Metropolitan Transportation Authority, *2004 Congestion Management Plan for Los Angeles County*, Adopted July 22, 2004.

<sup>12</sup> The project site is approximately 0.25 miles in length at its longest point; therefore the on-site mobile source emissions represent approximately 1/24<sup>th</sup> of the shortest CalEEMod default distance of 6.1 miles. Therefore, to be conservative, 1/10<sup>th</sup> the distance (dividing the mobile source emissions by 10) was used to represent the portion of the overall mobile source emissions that would occur on-site.

effects of the pollutant. Because regional and local emissions of criteria pollutants during operation of the project would be below the applicable thresholds, it would not contribute to long-term health impacts related to nonattainment of the ambient air quality standards. Therefore, significant adverse acute health impacts as a result of project operation are not anticipated.

### **Operations-Related Odor Impacts**

Potential sources that may emit odors during the on-going operations of the proposed project would include odor emissions from the intermittent diesel delivery truck emissions and trash storage areas. Due to the distance of the nearest receptors from the project site and through compliance with SCAQMD's Rule 402 no significant impact related to odors would occur during the on-going operations of the proposed project.

**Table 9**  
**CalEEMod Revised Vehicle Mix Parameters**

CalEEMod Vehicle Type	Vehicle Mix from Traffic Analysis	CalEEMod Default Mix <sup>1</sup>		CalEEMod Revised Mix <sup>2</sup>	
		Ratio	Number of Vehicles	Ratio	Number of Vehicles
Light Auto	Automobile	0.496	95	0.280	53
Light Truck < 3750 lbs	Automobile	0.039	7	0.022	4
Light Truck 3751-5750 lbs	Automobile	0.201	38	0.113	22
Med Truck 5751-8500 lbs	Automobile	0.160	31	0.090	17
Lite-Heavy Truck 8501-10,000 lbs	2-Axle Truck	0.032	6	0.078	15
Lite-Heavy Truck 10,001-14,000 lbs	2-Axle Truck	0.009	2	0.022	4
Med-Heavy Truck 14,001-33,000 lbs	3-Axle Truck	0.014	3	0.021	4
Heavy-Heavy Truck 33,001-60,000 lbs	4+-Axle Truck	0.016	3	0.361	69
Other Bus	--	0.001	0	0.000	0
Urban Bus	--	0.000	0	0.000	0
Motorcycle	Automobile	0.023	4	0.013	3
School Bus	--	0.001	0	0.000	0
Motor Home	--	0.006	1	0.000	0
<b>Total</b>		<b>1.0</b>	<b>191</b>	<b>1.0</b>	<b>191</b>

Notes:

- (1) Source: CalEEMod Version 2022.1.1.20 default values for Opening year of 2025.
- (2) Revised per the vehicle mix provided in the Brown Strauss Industrial Project Traffic Impact Analysis (Ganddini Group, Inc., October 27, 2023) of 51.8% Autos, 10% 2-Axle Trucks, 2.1% 3-Axle Trucks and 36.1% 4+ Axle Trucks.

**Table 10**  
**Regional Operational Pollutant Emissions**

Activity	Pollutant Emissions (pounds/day)					
	ROG	NOx	CO	SO2	PM10	PM2.5
Maximum Daily Emissions	3.75	23.90	34.00	0.14	6.16	2.18
SCAQMD Thresholds	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Notes:

Source: CalEEMod Version 2022.1.1.20; the higher of either summer or winter emissions.

**Table 11**  
**Local Operational Emissions at the Nearest Receptors**

On-Site Emission Source	On-Site Pollutant Emissions (pounds/day) <sup>1</sup>			
	NOx	CO	PM10	PM2.5
Area Sources <sup>2</sup>	0.02	2.13	0.01	0.01
Energy Usage <sup>3</sup>	0.25	0.21	0.02	0.02
Vehicle Emissions <sup>4</sup>	1.11	1.39	0.55	0.16
Off-Road <sup>5</sup>	12.50	17.70	0.66	0.61
Total Emissions	13.88	21.43	1.23	0.79
SCAQMD Thresholds <sup>6</sup>	236	2,817	6	2
Exceeds Threshold?	No	No	No	No

Notes:

- (1) Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for 5 acres, to be conservative, in SRA 29.
- (2) Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
- (3) Energy usage consists of emissions from on-site natural gas usage.
- (4) On-site vehicular emissions based on 1/10 of the gross vehicular emissions and road dust.
- (5) On-site operations in the yard include the use of up to 6 diesel forklifts, which are to be in operation during all shift hours (two shifts, 5 AM to 1:30 PM and 3:00 PM to 11:30 PM) or a total of 17 hours a day. To be conservative, the modeling assumed up to 8 diesel forklifts at 17 hours a day. In addition, 1 electric crane is to operate within the warehouse during shift hours.
- (6) The nearest sensitive receptors are the existing single-family residential land uses located approximately 75 feet (~23 meters) south of the project site; therefore, the 25 meter threshold was used.

## CUMULATIVE AIR QUALITY IMPACTS

There are a number of cumulative projects in the project area that have not yet been built or are currently under construction. Since the timing or sequencing of the cumulative projects is unknown, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. Further, cumulative projects include local development as well as general growth within the project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered would cover an even larger area. The SCAQMD recommends using two different methodologies: (1) that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality;<sup>13</sup> and (2) that a project's consistency with the current AQMP be used to determine its potential cumulative impacts.

### **Project Specific Impacts**

The project area is out of attainment for ozone, PM10, and PM2.5. Construction and operation of cumulative projects will further degrade the local air quality, as well as the air quality of the South Coast Air Basin. The greatest cumulative impact on the quality of regional air cell will be the incremental addition of pollutants mainly from increased traffic volumes from residential, commercial, and industrial development and the use of heavy equipment and trucks associated with the construction of these projects. Air quality will be temporarily degraded during construction activities that occur separately or simultaneously. However, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact. This applies to TACs as well, as the SCAQMD does not have any cumulative TAC thresholds; therefore, projects that do not exceed the SCAQMD TAC threshold criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact. A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant.

Project operations would generate emissions of NO<sub>x</sub>, ROG, CO, PM10, and PM2.5, which, would not exceed the SCAQMD regional or local thresholds and would not be expected to result in ground level concentrations that exceed the NAAQS or CAAQS. The project will not be a source of significant TACs and will not cause significant cancer or non-cancer-related health risks. Since the project would not introduce any substantial stationary sources of emissions, CO is the benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations. As indicated earlier, no violations of the state and federal CO standards are projected to occur for the project, based on the magnitude of traffic the project is anticipated to create.

Therefore, operation of the project would not result in a cumulatively considerable net increase for non-attainment of criteria pollutants or ozone precursors, or TACs. As a result, the project would result in a less than significant cumulative impact for operational emissions.

### **Air Quality Compliance**

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

The purpose of this discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and discuss whether the proposed project would interfere with the region's ability to

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<sup>13</sup> South Coast Air Quality Management District, Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper, 1993, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.



comply with Federal and State air quality standards. If the decision-makers determine that the proposed project is inconsistent, the lead agency may consider project modifications or inclusion of mitigation to eliminate the inconsistency.

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

- (1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- (2) Whether the project will exceed the assumptions in the AQMP in 2022 or increments based on the year of project buildout and phase.

Both of these criteria are evaluated in the following sections.

#### *Criteria 1 – Increase in the Frequency or Severity of Violations*

Based on the air quality modeling analysis contained in this Air Analysis, short-term construction impacts will not result in significant impacts based on the SCAQMD regional and local thresholds of significance. This Air Analysis also found that, long-term operations impacts will not result in significant impacts based on the SCAQMD local and regional thresholds of significance.

Therefore, the proposed project is not projected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the AQMP for the first criterion.

#### *Criteria 2 – Exceed Assumptions in the AQMP?*

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the proposed project are based on the same forecasts as the AQMP. The 2020-2045 Regional Transportation/Sustainable Communities Strategy prepared by SCAG (2020) includes chapters on: the challenges in a changing region, creating a plan for our future, and the road to greater mobility and sustainable growth. These chapters currently respond directly to federal and state requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA. For this project, the City of Banning Land Use Plan defines the assumptions that are represented in the AQMP.

The project site has an existing designation of General Commercial (GC) and Industrial (I) in the City's General Plan. The proposed project includes a General Plan Amendment and Zone Change from General Commercial (GC) and Industrial (I) to Industrial (I). As the proposed project is that of a steel manufacturing and distribution use, it is not currently consistent with the existing land use and zoning designations. However, once the Policy Plan Amendment and Zone Change are approved, the project would be consistent with the general plan and zoning designations. Although the project and Policy Plan Amendment and Zone Change may initially result in an inconsistency with the AQMP on paper, the inconsistency would not necessarily constitute a conflict with the AQMP. Because the parcels in question would be changed from commercial and industrial to just industrial, the project would not be expected to result in population growth beyond that assumed in the AQMP assumptions. The SCAQMD acknowledges that strict consistency with all aspects of the AQMP is not required in order to make a finding of no conflict. Rather, a project is considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The project would implement contemporary energy-efficient technologies and regulatory/operational programs required per Title 24, CALGreen and City standards. Generally, compliance with SCAQMD emissions reductions and control

requirements also act to reduce project air pollutant emissions. In combination, project emissions-reducing design features and regulatory/operational programs are consistent with and support overarching AQMP air pollution reduction strategies. Project support of these strategies promotes timely attainment of AQMP air quality standards and would bring the project into conformance with the AQMP. Therefore, the proposed project is not anticipated to exceed the AQMP assumptions for the project site and is found to be consistent with the AQMP for the second criterion.

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

### 3. DIESEL EMISSIONS HEALTH RISK ASSESSMENT

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The on-going operation of the proposed project would generate toxic air contaminant (TAC) emissions from diesel truck and rail emissions created by the on-going operations of the proposed project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 30-year lifetime will contract cancer, based on the use of revised Office of Environmental Health Hazard Assessment (OEHHA) risk-assessment methodology<sup>14</sup>. The 2015 OEHHA guidance states that "Districts are to determine which facilities will prepare an HRA based on a prioritization process outlined in the law. The process by which Districts identify priority facilities for risk assessment involves consideration of potency, toxicity, quantity of emissions, and proximity to sensitive receptors such as hospitals, daycare centers, schools, work-sites, and residences". The Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis prepared by SCAQMD (August 2003) defers to CARB (State) guidance for "technical guidance for diesel toxic impact analyses for various source categories".

The California Air Pollution Control Officers Association (CAPCOA) has developed TAC health risk assessment guidelines to provide consistent, statewide procedures for preparing the health risk assessments required under the Air Toxics "Hot Spots" Act. The title of these guidelines is CAPCOA Air Toxics "Hot Spots" Program Revised 1992 Risk Assessment Guidelines. The District recommends that lead agencies conduct TAC risk assessments in accordance with the CAPCOA Risk Assessment Guidelines, as supplemented by the District's supplemental guidelines. According to SCAQMD and CAPCOA guidelines, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 30-year lifetime will contract cancer, based on the use of standard risk-assessment methodology.

The nearest sensitive receptors to the project site are the existing single-family residential land uses located approximately 75 feet (~23 meters) south of the project site. However, it should be noted that these existing residential uses are non-conforming land uses. The area is designated as Business Park on the City of Banning General Plan and Zoning Map.

The most recent Health Risk Assessment for Proposed Land Use Projects prepared by CAPCOA (July 2009) recommends avoiding siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week). In addition, new sensitive land uses should also be avoided within 1,000 feet of a major service and maintenance rail yard. A summary of the basis for the distance recommendations can be found in the CARB Handbook *Air Quality and Land Use Handbook: A Community Health Perspective*.

Per the Transportation Study Screening Assessment, the proposed project is anticipated to have up to approximately 92 truck trips per day (non-PCE). Therefore, as it is not anticipated to accommodate more than 100 trucks per day, a quantitative health risk assessment for the proposed on-site warehouse uses is not warranted or required. In addition, the number of rail cars anticipated by the proposed project was found to be negligible and was not included in the TIA. Per the project applicant, the proposed rail spur at the project site is anticipated to have up to three rail cars a week. At three rail cars a week, daily emissions from rail-related emissions would be from a maximum of one rail trip per day and would therefore be negligible. As shown in the operational LST analysis, the PM emissions from the on-site off-road equipment (diesel forklifts) does not exceed any operational LST thresholds, and would add a negligible TAC risk to the closest receptors.

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<sup>14</sup> In February 2015, the Office of Environmental Health Hazard Assessment updated their "Air Toxics Hot Spots Program, Risk Assessments Guidelines, Guidance Manual for Preparation of Health Risk Assessments; however, the updated OEHHA guidance states in the page footers "do not cite or quote". SCAQMD staff have incorporated the updates into their methodology for SCAQMD's Rules 1401, 1401.1, 1402, and 212, and have updated their HRA Guidance for permitting; however, they are still in the process of updating the guidance for CEQA analyses (via working group sessions).

Therefore, a quantitative health risk assessment for the proposed on-site rail, truck and forklift activity is not warranted or required as PM exhaust emissions and cancer risk would not exceed SCAQMD MICR threshold of 10 in a million at the closest receptor locations.

Significant TAC impacts from the project-related operational DPM sources are not anticipated and no significant long-term operations-related TAC impacts from the proposed project to nearby sensitive receptors would occur.

## 4. GLOBAL CLIMATE CHANGE ANALYSIS

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### EXISTING GREENHOUSE GAS ENVIRONMENT

Constituent gases of the Earth's atmosphere, called atmospheric greenhouse gases (GHG), play a critical role in the Earth's radiation amount by trapping infrared radiation emitted from the Earth's surface, which otherwise would have escaped to space. Prominent greenhouse gases contributing to this process include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), ozone, water vapor, nitrous oxide (N<sub>2</sub>O), and chlorofluorocarbons (CFCs). This phenomenon, known as the Greenhouse Effect, is responsible for maintaining a habitable climate. Anthropogenic (caused or produced by humans) emissions of these greenhouse gases in excess of natural ambient concentrations are responsible for the enhancement of the Greenhouse Effect and have led to a trend of unnatural warming of the Earth's natural climate, known as global warming or climate change. Emissions of gases that induce global warming are attributable to human activities associated with industrial/manufacturing, agriculture, utilities, transportation, and residential land uses. Transportation is responsible for 41 percent of the State's greenhouse gas emissions, followed by electricity generation. Emissions of CO<sub>2</sub> and nitrous oxide (NO<sub>x</sub>) are byproducts of fossil fuel combustion. Methane, a potent greenhouse gas, results from off-gassing associated with agricultural practices and landfills. Sinks of CO<sub>2</sub>, where CO<sub>2</sub> is stored outside of the atmosphere, include uptake by vegetation and dissolution into the ocean. The following provides a description of each of the greenhouse gases and their global warming potential.

#### **Water Vapor**

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

#### **Carbon Dioxide (CO<sub>2</sub>)**

The natural production and absorption of CO<sub>2</sub> is achieved through the terrestrial biosphere and the ocean. However, humankind has altered the natural carbon cycle by burning coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700s. Each of these activities has increased in scale and distribution. CO<sub>2</sub> was the first GHG demonstrated to be increasing in atmospheric concentration with the first conclusive measurements being made in the last half of the 20th century. Prior to the industrial revolution, concentrations were fairly stable at 280 parts per million (ppm). The International Panel on Climate Change (IPCC Fifth Assessment Report, 2014) Emissions of CO<sub>2</sub> from fossil fuel combustion and industrial processes contributed about 78% of the total GHG emissions increase from 1970 to 2010, with a similar percentage contribution for the increase during the period 2000 to 2010. Globally, economic and population growth continued to be the most important drivers of increases in CO<sub>2</sub> emissions from fossil fuel combustion. The contribution of population growth between 2000 and 2010 remained roughly identical to the previous three decades, while the contribution of economic growth has risen sharply.

## **Methane (CH<sub>4</sub>)**

CH<sub>4</sub> is an extremely effective absorber of radiation, although its atmospheric concentration is less than that of CO<sub>2</sub>. Its lifetime in the atmosphere is brief (10 to 12 years), compared to some other GHGs (such as CO<sub>2</sub>, N<sub>2</sub>O, and Chlorofluorocarbons (CFCs)). CH<sub>4</sub> has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other anthropocentric sources include fossil-fuel combustion and biomass burning.

## **Nitrous Oxide (N<sub>2</sub>O)**

Concentrations of N<sub>2</sub>O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration of this GHG was documented at 314 parts per billion (ppb). N<sub>2</sub>O 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 also commonly used as an aerosol spray propellant, (i.e., in whipped cream bottles, in potato chip bags to keep chips fresh, and in rocket engines and in race cars).

## **Chlorofluorocarbons (CFC)**

CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C<sub>2</sub>H<sub>6</sub>) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs have no natural source but were first synthesized in 1928. It was used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and in 1989 the European Community agreed to ban CFCs by 2000 and subsequent treaties banned CFCs worldwide by 2010. This effort was extremely successful, and the levels of the major CFCs are now remaining level or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.

## **Hydrofluorocarbons (HFC)**

HFCs are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF<sub>3</sub>), HFC-134a (CF<sub>3</sub>CH<sub>2</sub>F), and HFC-152a (CH<sub>3</sub>CHF<sub>2</sub>). Prior to 1990, the only significant emissions were HFC-23. HFC-134a use is increasing due to its use as a refrigerant. Concentrations of HFC-23 and HFC-134a in the atmosphere are now about 10 parts per trillion (ppt) each. Concentrations of HFC-152a are about 1 ppt. HFCs are manmade for applications such as automobile air conditioners and refrigerants.

## **Perfluorocarbons (PFC)**

PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF<sub>4</sub>) and hexafluoroethane (C<sub>2</sub>F<sub>6</sub>). Concentrations of CF<sub>4</sub> in the atmosphere are over 70 ppt. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing.

## **Sulfur Hexafluoride (SF<sub>6</sub>)**

SF<sub>6</sub> is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF<sub>6</sub> has the highest global warming potential of any gas evaluated; 23,900 times that of CO<sub>2</sub>. Concentrations in the 1990s were about 4 ppt. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

## **Aerosols**

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

## **Global Warming Potential**

The Global Warming Potential (GWP) was developed to allow comparisons of the global warming impacts of different gases. Specifically, it is a measure of how much energy the emissions of 1 ton of a gas will absorb over a given period of time, relative to the emissions of 1 ton of carbon dioxide (CO<sub>2</sub>). The larger the GWP, the more that a given gas warms the Earth compared to CO<sub>2</sub> over that time period. The time period usually used for GWPs is 100 years. GWPs provide a common unit of measure, which allows analysts to add up emissions estimates of different gases (e.g., to compile a national GHG inventory), and allows policymakers to compare emissions reduction opportunities across sectors and gases. A summary of the atmospheric lifetime and the global warming potential of selected gases are summarized in Table 12. As shown in Table 12, the global warming potential of GHGs ranges from 1 to 22,800.

**Table 12**  
**Global Warming Potentials and Atmospheric Lifetimes**

Gas	Atmospheric Lifetime	Global Warming Potential <sup>1</sup> (100 Year Horizon)
Carbon Dioxide (CO <sub>2</sub> )	-- <sup>2</sup>	1
Methane (CH <sub>4</sub> )	12	28-36
Nitrous Oxide (NO)	114	298
Hydrofluorocarbons (HFCs)	1-270	12-14,800
Perfluorocarbons (PFCs)	2,600-50,000	7,390-12,200
Nitrogen trifluoride (NF <sub>3</sub> )	740	17,200
Sulfur Hexafluoride (SF <sub>6</sub> )	3,200	22,800

Notes:

Source: <http://www3.epa.gov/climatechange/ghgemissions/gases.html>

- (1) Compared to the same quantity of CO<sub>2</sub> emissions.
- (2) Carbon dioxide's lifetime is poorly defined because the gas is not destroyed over time, but instead moves among different parts of the ocean-atmosphere-land system. Some of the excess carbon dioxide will be absorbed quickly (for example, by the ocean surface), but some will remain in the atmosphere for thousands of years, due in part to the very slow process by which carbon is transferred to ocean sediments.



## GREENHOUSE GAS STANDARDS AND REGULATION

### International

#### *Montreal Protocol*

In 1988, the United Nations established the Intergovernmental Panel on Climate Change (IPCC) to evaluate the impacts of global climate change and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling GHG emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHGs in the United States. The plan consists of more than 50 voluntary programs.

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

#### *The Paris Agreement*

The Paris Agreement became effective on November 4, 2016. Thirty days after this date at least 55 Parties to the United Nations Framework Convention on Climate Change (Convention), accounting in total for at least an estimated 55 % of the total global greenhouse gas emissions, had deposited their instruments of ratification, acceptance, approval or accession with the Depositary.

The Paris Agreement built upon the Convention and – for the first time – attempted to bring all nations into a common cause to undertake ambitious efforts to combat climate change and adapt to its effects, with enhanced support to assist developing countries to do so. As such, it charts a new course in the global climate effort.

The Paris Agreement's central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. Additionally, the agreement aims to strengthen the ability of countries to deal with the impacts of climate change. To reach these ambitious goals, appropriate financial flows, a new technology framework and an enhanced capacity building framework will be put in place, thus supporting action by developing countries and the most vulnerable countries, in line with their own national objectives. The Agreement also provides for enhanced transparency of action and support through a more robust transparency framework.

### Federal

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address GHGs. The federal government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency, renewable energy, methane and other non-CO<sub>2</sub> gases, agricultural practices, and implementation of technologies to achieve GHG reductions. The USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the ENERGY STAR labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

In *Massachusetts v. Environmental Protection Agency* (Docket No. 05–1120), argued November 29, 2006 and decided April 2, 2007, the U.S. Supreme Court held that not only did the EPA have authority to regulate greenhouse gases, but the EPA's reasons for not regulating this area did not fit the statutory requirements. As

such, the U.S. Supreme Court ruled that the EPA should be required to regulate CO<sub>2</sub> and other greenhouse gases as pollutants under the federal Clean Air Act (CAA).

In response to the FY2008 Consolidations Appropriations Act (H.R. 2764; Public Law 110-161), EPA proposed a rule on March 10, 2009 that requires mandatory reporting of GHG emissions from large sources in the United States. On September 22, 2009, the Final Mandatory Reporting of GHG Rule was signed and published in the Federal Register on October 30, 2009. The rule became effective on December 29, 2009. This rule requires suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHG emissions to submit annual reports to EPA.

On December 7, 2009, the EPA Administrator signed two distinct findings under section 202(a) of the Clean Air Act. One is an endangerment finding that finds concentrations of the six GHGs in the atmosphere threaten the public health and welfare of current and future generations. The other is a cause or contribute finding, that finds emissions from new motor vehicles and new motor vehicle engines contribute to the GHG pollution which threatens public health and welfare. These actions will not themselves impose any requirements on industry or other entities. However, it is a prerequisite to finalizing the EPA's proposed GHG emission standards for light-duty vehicles, which were jointly proposed by the EPA and Department of Transportation on September 15, 2009.

#### *Clean Air Act*

In *Massachusetts v. Environmental Protection Agency* (Docket No. 05-1120), the U.S. Supreme Court held in April of 2007 that the USEPA has statutory authority under Section 202 of the federal Clean Air Act (CAA) to regulate GHGs. The court did not hold that the USEPA was required to regulate GHG emissions; however, it indicated that the agency must decide whether GHGs cause or contribute to air pollution that is reasonably anticipated to endanger public health or welfare. On December 7, 2009, the USEPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the CAA. The USEPA adopted a Final Endangerment Finding for the six defined GHGs (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub>) on December 7, 2009. The Endangerment Finding is required before USEPA can regulate GHG emissions under Section 202(a)(1) of the CAA consistently with the United States Supreme Court decision. The USEPA also adopted a Cause or Contribute Finding in which the USEPA Administrator found that GHG emissions from new motor vehicle and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. These findings do not, by themselves, impose any requirements on industry or other entities. However, these actions were a prerequisite for implementing GHG emissions standards for vehicles.

#### *Energy Independence Security Act*

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the USEPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.<sup>15</sup>

#### *Executive Order 13432*

In response to the *Massachusetts v. Environmental Protection Agency* ruling, the President signed Executive Order 13432 on May 14, 2007, directing the USEPA, along with the Departments of Transportation, Energy, and Agriculture, to initiate a regulatory process that responds to the Supreme Court's decision. Executive Order 13432 was codified into law by the 2009 Omnibus Appropriations Law signed on February 17, 2009. The order sets goals in the areas of energy efficiency, acquisition, renewable energy, toxics reductions, recycling, sustainable buildings, electronics stewardship, fleets, and water conservation. Light-Duty Vehicle Greenhouse Gas and Corporate Average Fuel Economy Standards.

On May 19, 2009, President Obama announced a national policy for fuel efficiency and emissions standards in the United States auto industry. The adopted federal standard applies to passenger cars and light-duty trucks for model years 2012 through 2016. The rule surpasses the prior Corporate Average Fuel Economy standards (CAFE)<sup>16</sup> and requires an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of CO<sub>2</sub> per mile by model year 2016, based on USEPA calculation methods. These standards were formally adopted on April 1, 2010. In August 2012, standards were adopted for model year 2017 through 2025 for passenger cars and light-duty trucks. By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO<sub>2</sub> per mile. According to the USEPA, a model year 2025 vehicle would emit one-half of the GHG emissions from a model year 2010 vehicle.<sup>17</sup> In 2017, the USEPA recommended no change to the GHG standards for light-duty vehicles for model years 2022-2025.

Issued by NHTSA and EPA in March 2020 (published on April 30, 2020 and effective after June 29, 2020), the Safer Affordable Fuel-Efficient Vehicles Rule would maintain the CAFE and CO<sub>2</sub> standards applicable in model year 2020 for model years 2021 through 2026. The estimated CAFE and CO<sub>2</sub> standards for model year 2020 are 43.7 mpg and 204 grams of CO<sub>2</sub> per mile for passenger cars and 31.3 mpg and 284 grams of CO<sub>2</sub> per mile for light trucks, projecting an overall industry average of 37 mpg, as compared to 46.7 mpg under the standards issued in 2012. This Rule also excludes CO<sub>2</sub>-equivalent emission improvements associated with air conditioning refrigerants and leakage (and, optionally, offsets for nitrous oxide and methane emissions) after model year 2020.<sup>18</sup>

On May 12, 2021, the National Highway Traffic Safety Administration (NHTSA) published a notice of proposed rulemaking in the Federal Register, proposing to repeal "The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program," published Sept. 27, 2019 (SAFE I Rule), in which NHTSA codified regulatory text and made additional pronouncements regarding the preemption of state and local laws related to fuel economy standards. Specifically, this document proposes to fully repeal the regulatory text and appendices promulgated in the SAFE I Rule. In addition, this document proposes to repeal and withdraw the interpretative statements made by the Agency in the SAFE I Rule preamble, including those

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<sup>15</sup> A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

<sup>16</sup> The Corporate Average Fuel Economy standards are regulations in the United States, first enacted by Congress in 1975, to improve the average fuel economy of cars and light trucks. The U.S Department of Transportation has delegated the National Highway Traffic Safety Administration as the regulatory agency for the Corporate Average Fuel Economy standards.

<sup>17</sup> United States Environmental Protection Agency, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, August 2012, <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100EZ7C.PDF?Dockey=P100EZ7C.PDF>.

<sup>18</sup> National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA), 2018. Federal Register / Vol. 83, No. 165 / Friday, August 24, 2018 / Proposed Rules, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks 2018. Available at: <https://www.gpo.gov/fdsys/pkg/FR-2018-08-24/pdf/2018-16820.pdf>.

regarding the preemption of particular state Greenhouse Gas (GHG) Emissions standards or Zero Emissions Vehicle (ZEV) mandates. As such, this document proposes to establish a clean slate with respect to NHTSA's regulations and interpretations concerning preemption under the Energy Policy and Conservation Act (EPCA).<sup>19</sup>

## **State of California**

### *California Air Resources Board*

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets state ambient air quality standards (California Ambient Air Quality Standards [CAAQS]), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

In 2004, the California Air Resources Board (CARB) adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants (Title 13 California Code of Regulations [CCR], Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure generally does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given location with certain exemptions for equipment in which idling is a necessary function such as concrete trucks. While this measure primarily targets diesel particulate matter emissions, it has co-benefits of minimizing GHG emissions from unnecessary truck idling.

In 2008, CARB approved the Truck and Bus regulation to reduce particulate matter and nitrogen oxide emissions from existing diesel vehicles operating in California (13 CCR, Section 2025, subsection (h)). CARB has also promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The regulation, adopted by the CARB on July 26, 2007, aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. While these regulations primarily target reductions in criteria air pollutant emission, they have co-benefits of minimizing GHG emissions due to improved engine efficiencies.

The State currently has no regulations that establish ambient air quality standards for GHGs. However, the State has passed laws directing CARB to develop actions to reduce GHG emissions, which are listed below.

### *Assembly Bill 1493*

California Assembly Bill 1493 enacted on July 22, 2002, required the CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. In 2005, the CARB submitted a "waiver" request to the EPA from a portion of the federal Clean Air Act in order to allow the State to set more stringent tailpipe emission standards for CO<sub>2</sub> and other GHG emissions from passenger vehicles and light duty trucks. On December 19, 2007 the EPA announced that it denied the "waiver" request. On January 21, 2009, CARB submitted a letter to the EPA administrator regarding the State's request to reconsider the waiver denial. The EPA approved the waiver on June 30, 2009. After adopting these initial greenhouse gas standards for passenger vehicles, CARB adopted continuing standards for future model years.

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<sup>19</sup> <https://www.federalregister.gov/documents/2021/05/12/2021-08758/corporate-average-fuel-economy-cape-preemption>

### *Executive Order S-3-05*

The California Governor issued Executive Order S-3-05, GHG Emission, in June 2005, which established the following reduction targets:

- By 2010, California shall reduce GHG emissions to 2000 levels;
- By 2020, California shall reduce GHG emissions to 1990 levels; and
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

The Executive Order directed the secretary of the California Environmental Protection Agency (CalEPA) to coordinate a multi-agency effort to reduce GHG emissions to the target levels. To comply with the Executive Order, the secretary of CalEPA created the California Climate Action Team (CAT), made up of members from various state agencies and commissions. The team released its first report in March 2006. The report proposed to achieve the targets by building on the voluntary actions of businesses, local governments, and communities and through State incentive and regulatory programs.

### *Assembly Bill 32 (California Health and Safety Code, Division 25.5 – California Global Warming Solutions Act of 2006)*

In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (codified in the California Health and Safety Code [HSC], Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. HSC Division 25.5 defines GHGs as CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub> and represents the first enforceable statewide program to limit emissions of these GHGs from all major industries with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. Under HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing state actions that would achieve GHG emissions reductions equivalent to 1990 statewide levels by 2020.

### *Senate Bill 32 and Assembly Bill 197*

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, and both were signed by Governor Brown. SB 32 and AB 197 amends HSC Division 25.5 and establishes a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and includes provisions to ensure the benefits of state climate policies reach into disadvantaged communities.

### *Climate Change Scoping Plan (2008)*

A specific requirement of AB 32 was to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (Health and Safety Code section 38561 (h)). CARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. The initial Scoping Plan was approved in 2008 and contains a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the State's long-range climate objectives.

As required by HSC Division 25.5, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020. The 2020 emissions limit was originally set at 427 MMTCO<sub>2e</sub> using the GWP values from the IPCC SAR. CARB also projected the state's 2020 GHG emissions under no-action-taken (NAT) conditions – that is, emissions that would occur without any plans, policies, or regulations to reduce GHG emissions. CARB originally used an average of the state's GHG emissions from 2002 through 2004 and projected the 2020 levels at approximately 596 MMTCO<sub>2e</sub> (using GWP values from the IPCC SAR). Therefore, under the original projections, the state must reduce its 2020 NAT emissions by 28.4 percent in order to meet the 1990 target of 427 MMTCO<sub>2e</sub>.

### *First Update to the Climate Change Scoping Plan (2014)*

The First Update to the Scoping Plan was approved by CARB in May 2014 and builds upon the initial Scoping Plan with new strategies and recommendations. In 2014, CARB revised the target using the GWP values from the IPCC AR4 and determined that the 1990 GHG emissions inventory and 2020 GHG emissions limit is 431 MMTCO<sub>2e</sub>. CARB also updated the State's 2020 NAT emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulation that were recently adopted for motor vehicles and renewable energy. CARB's projected statewide 2020 emissions estimate using the GWP values from the IPCC AR4 is 509.4 MMTCO<sub>2e</sub>.

### *2017 Climate Change Scoping Plan*

In response to the 2030 GHG reduction target, CARB adopted the 2017 Climate Change Scoping Plan at a public meeting held in December 2017. The 2017 Scoping Plan outlines the strategies the State will implement to achieve the 2030 GHG reduction target of 40 percent below 1990 levels. The 2017 Scoping Plan also addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors. The 2017 Scoping Plan considered the Scoping Plan Scenario and four alternatives for achieving the required GHG reductions but ultimately selected the Scoping Plan Scenario.

CARB states that the Scoping Plan Scenario “is the best choice to achieve the State's climate and clean air goals.”<sup>20</sup> Under the Scoping Plan Scenario, the majority of the reductions would result from the continuation of the Cap-and-Trade regulation. Additional reductions are achieved from electricity sector standards (i.e., utility providers to supply at least 50 percent renewable electricity by 2030), doubling the energy efficiency savings at end uses, additional reductions from the LCFS, implementing the short-lived GHG strategy (e.g., hydrofluorocarbons), and implementing the mobile source strategy and sustainable freight action plan. The alternatives were designed to consider various combinations of these programs, as well as consideration of a carbon tax in the event the Cap-and-Trade regulation is not continued. However, in July 2017, the California Legislature voted to extend the Cap-and-Trade regulation to 2030. Implementing this Scoping Plan will ensure that California's climate actions continue to promote innovation, drive the generation of new jobs, and achieve continued reductions of smog and air toxics. The ambitious approach draws on a decade of successful programs that address the major sources of climate-changing gases in every sector of the economy:

- **More Clean Cars and Trucks:** The plan sets out far-reaching programs to incentivize the sale of millions of zero-emission vehicles, drive the deployment of zero-emission trucks, and shift to a cleaner system of handling freight statewide.
- **Increased Renewable Energy:** California's electric utilities are ahead of schedule meeting the requirement that 33 percent of electricity come from renewable sources by 2020. The Scoping Plan guides utilities to 50 percent renewables, as required under SB 350.
- **Slashing Super-Pollutants:** The plan calls for a significant cut in super-pollutants such as methane and HFC refrigerants, which are responsible for as much as 40 percent of global warming.
- **Cleaner Industry and Electricity:** California's renewed cap-and-trade program extends the declining cap on emissions from utilities and industries and the carbon allowance auctions. The auctions will continue to fund investments in clean energy and efficiency, particularly in disadvantaged communities.
- **Cleaner Fuels:** The Low Carbon Fuel Standard will drive further development of cleaner, renewable transportation fuels to replace fossil fuels.
- **Smart Community Planning:** Local communities will continue developing plans which will further link transportation and housing policies to create sustainable communities.
- **Improved Agriculture and Forests:** The Scoping Plan also outlines innovative programs to account for and reduce emissions from agriculture, as well as forests and other natural lands.

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<sup>20</sup> California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017, [https://www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf)



The 2017 Scoping Plan also evaluates reductions of smog-causing pollutants through California's climate programs.

### *2022 Climate Change Scoping Plan*

CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality on November 16, 2022. The 2022 Scoping Plan lays out the sector-by-sector roadmap for California, the world's fifth largest economy, to achieve carbon neutrality by 2045 or earlier, outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target. The Plan addresses recent legislation and direction from Governor Newsom and extends and expands upon earlier plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. The plan also takes the unprecedented step of adding carbon neutrality as a science-based guide and touchstone for California's climate work. Specifically, this plan:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California's most impacted communities as driving principles throughout the document.
- Incorporates the contribution of natural and working lands (NWL) to the state's GHG emissions, as well as their role in achieving carbon neutrality.
- Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
- Evaluates the substantial health and economic benefits of taking action.
- Identifies key implementation actions to ensure success.

### *SB 32, Pavley. California Global Warming Solutions Act of 2006*

- (1) The California Global Warming Solutions Act of 2006 designates the State Air Resources Board as the state agency charged with monitoring and regulating sources of emissions of greenhouse gases. The state board is required to approve a statewide greenhouse gas emissions limit equivalent to the statewide greenhouse gas emissions level in 1990 to be achieved by 2020 and to adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective greenhouse gas emissions reductions. This bill would require the state board to ensure that statewide greenhouse gas emissions are reduced to 40% below the 1990 level by 2030.
- (2) This bill would become operative only if AB 197 of the 2015–16 Regular Session is enacted and becomes effective on or before January 1, 2017. AB 197 requires that the California Air Resources Board, which directs implementation of emission-reduction programs, should target direct reductions at both stationary and mobile sources. AB 197 of the 2015-2016 Regular Session was approved on September 8, 2016.

### *Executive Order S-1-07*

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

On April 23, 2009, CARB approved the proposed regulation to implement the low carbon fuel standard and began implementation on January 1, 2011. The low carbon fuel standard is anticipated to reduce GHG

emissions by about 16 MMT per year by 2020. CARB approved some amendments to the LCFS in December 2011, which were implemented on January 1, 2013. In September 2015, the Board approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted. In 2018, the Board approved amendments to the regulation, which included strengthening and smoothing the carbon intensity benchmarks through 2030 in-line with California's 2030 GHG emission reduction target enacted through SB 32, adding new 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.

The LCFS is designed to encourage the use of cleaner low-carbon transportation fuels in California, encourage the production of those fuels, and therefore, reduce GHG emissions and decrease petroleum dependence in the transportation sector. Separate standards are established for gasoline and diesel fuels and the alternative fuels that can replace each. The standards are “back-loaded”, with more reductions required in the last five years, than during the first five years. This schedule allows for the development of advanced fuels that are lower in carbon than today’s fuels and the market penetration of plug-in hybrid electric vehicles, battery electric vehicles, fuel cell vehicles, and flexible fuel vehicles. It is anticipated that compliance with the low carbon fuel standard will be based on a combination of both lower carbon fuels and more efficient vehicles.

Reformulated gasoline mixed with corn-derived ethanol at ten percent by volume and low sulfur diesel fuel represent the baseline fuels. Lower carbon fuels may be ethanol, biodiesel, renewable diesel, or blends of these fuels with gasoline or diesel as appropriate. Compressed natural gas and liquefied natural gas also may be low carbon fuels. Hydrogen and electricity, when used in fuel cells or electric vehicles are also considered as low carbon fuels for the low carbon fuel standard.

#### *Senate Bill 97*

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

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

- Climate action plans and other greenhouse gas reduction plans can be used to determine whether a project has significant impacts, based upon its compliance with the plan.
- Local governments are encouraged to quantify the greenhouse gas emissions of proposed projects, noting that they have the freedom to select the models and methodologies that best meet their needs and circumstances. The section also recommends consideration of several qualitative factors that may be used in the determination of significance, such as the extent to which the given project complies with state, regional, or local GHG reduction plans and policies. OPR does not set or dictate specific thresholds of significance. Consistent with existing CEQA Guidelines, OPR encourages local governments to develop and publish their own thresholds of significance for GHG impacts assessment.
- When creating their own thresholds of significance, local governments may consider the thresholds of significance adopted or recommended by other public agencies, or recommended by experts.
- New amendments include guidelines for determining methods to mitigate the effects of greenhouse gas emissions in Appendix F of the CEQA Guidelines.



- OPR is clear to state that “to qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project; general compliance with a plan, by itself, is not mitigation”.
- OPR’s emphasizes the advantages of analyzing GHG impacts on an institutional, programmatic level. OPR therefore approves tiering of environmental analyses and highlights some benefits of such an approach.
- Environmental impact reports (EIRs) must specifically consider a project's energy use and energy efficiency potential.

#### *Senate Bill 100*

Senate Bill 100 (SB 100) requires 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. SB 100 was adopted September 2018.

The interim thresholds from prior Senate Bills and Executive Orders would also remain in effect. These include Senate Bill 1078 (SB 1078), which requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. Senate Bill 107 (SB 107) which changed the target date to 2010. Executive Order S-14-08, which was signed on November 2008 and expanded the State’s Renewable Energy Standard to 33 percent renewable energy by 2020. Executive Order S-21-09 directed the CARB to adopt regulations by July 31, 2010 to enforce S-14-08. Senate Bill X1-2 codifies the 33 percent renewable energy requirement by 2020.

#### *Senate Bill 375*

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

The proposed project is located within the Southern California Association of Governments (SCAG) jurisdiction, which has authority to develop the SCS or APS. For the SCAG region, the targets set by the CARB are at eight percent below 2005 per capita GHG emissions levels by 2020 and 19 percent below 2005 per capita GHG emissions levels by 2035. These reduction targets became effective October 2018.

#### *Senate Bill X7-7*

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

#### *Assembly Bill 939 and Senate Bill 1374*

Assembly Bill 939 (AB 939) requires that each jurisdiction in California to divert at least 50 percent of its waste away from landfills, whether through waste reduction, recycling or other means. Senate Bill 1374 (SB 1374) requires the California Integrated Waste Management Board to adopt a model ordinance by March 1,

2004, suitable for adoption by any local agency to require 50 to 75 percent diversion of construction and demolition of waste materials from landfills.

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

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

The Energy Commission adopted 2008 Standards on April 23, 2008, and Building Standards Commission approved them for publication on September 11, 2008. These updates became effective on August 1, 2009. 2013 Standards were approved and have been effective since July 1, 2014. 2016 Standards were adopted January 1, 2017. 2019 standards were published July 1, 2019 and became effective January 1, 2020. All buildings for which an application for a building permit is submitted on or after January 1, 2020 must follow the 2019 standards. The 2016 residential standards were estimated to be approximately 28 percent more efficient than the 2013 standards, whereas the 2019 residential standards are estimated to be approximately 7 percent more efficient than the 2016 standards. Furthermore, once rooftop solar electricity generation is factored in, 2019 residential standards are estimated to be approximately 53 percent more efficient than the 2016 standards. Under the 2019 standards, nonresidential buildings are estimated to be approximately 30 percent more efficient than the 2016 standards. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas emissions.

Per Section 100 Scope, the 2019 Title 24, Part 6 Building Code now requires healthcare facilities, such as assisted living facilities, hospitals, and nursing homes, to meet documentation requirements of Title 24, Part 1 Chapter 7 – Safety Standards for Health Facilities. A healthcare facility is defined as any building or portion thereof licensed pursuant to California Health and Safety Code Division 2, Chapter 1, Section 1204 or Chapter 2, Section 1250.

Section 120.1 Ventilation and Indoor Air Quality included both additions and revisions in the 2019 Code. This section now requires nonresidential and hotel/motel buildings to have air filtration systems that use forced air ducts to supply air to occupiable spaces to have air filters. Further, the air filter efficiency must be either MERV 13 or use a particle size efficiency rating specific in the Energy Code AND be equipped with air filters with a minimum 2-inch depth or minimum 1-inch depth if sized according to the equation 120.1-A. If natural ventilation is to be used the space must also use mechanical unless ventilation openings are either permanently open or controlled to stay open during occupied times. The 2019 version of the Code also completely revised the minimum ventilation requirements including DVC airflow rates within Section 120.1 Table 120.1-A. Table 120.1-A now includes air classification and recirculation limitations, these are based on either the number of occupants or the CFM/ft<sup>2</sup> (cubic feet per minute per square foot), whichever is greater.

Section 120.1 Ventilation and Indoor Air Quality also included additions for high-rise residential buildings. Requirements include that mechanical systems must provide air filters that and that air filters must be MERV 13 or use a particle size efficiency rating specified in the Energy Code. Window operation is no longer a method allowed to meet ventilation requirements, continuous operation of central forced air system handlers used in central fan integrated ventilation system is not a permissible method of providing the dwelling unit ventilation airflow, and central ventilation systems that serve multiple dwelling units must be balanced to provide ventilation airflow to each dwelling unit. In addition, requirements for kitchen range hoods were also provided in the updated Section 120.1.

Per Section 120.1(a) healthcare facilities must be ventilated in accordance with Chapter 4 of the California Mechanical Code and are NOT required to meet the ventilations requirements of Title 24, Part 6.

Section 140.4 Space Conditioning Systems included both additions and revisions within the 2019 Code. The changes provided new requirements for cooling tower efficiency, new chilled water-cooling system requirements, as well as new formulas for calculating allowed fan power. Section 140.4(n) also provide a new exception for mechanical system shut-offs for high-rise multifamily dwelling units, while Section 140.4(o) added new requirements for conditioned supply air being delivered to space with mechanical exhaust.

Section 120.6 Covered Processes added information in regards to adiabatic chiller requirements that included that all condenser fans for air-cooled converseness, evaporative-cooled condensers, adiabatic condensers, gas coolers, air or water fluid coolers or cooling towers must be continuously variable speed, with the speed of all fans serving a common condenser high side controlled in unison .Further, the mid-condensing setpoint must be 70 degrees Fahrenheit for all of the above mentioned systems.

New regulations were also adopted under Section 130.1 Indoor Lighting Controls. These included new exceptions being added for restrooms, the exception for classrooms being removed, as well as exceptions in regard to sunlight provided through skylights and overhangs.

Section 130.2 Outdoor Lighting Controls and Equipment added automatic scheduling controls which included that outdoor lighting power must be reduced by 50 to 90 percent, turn the lighting off during unoccupied times and have at least two scheduling options for each luminaire independent from each other and with a 2-hour override function. Furthermore, motion sensing controls must have the ability to reduce power within 15 minutes of area being vacant and be able to come back on again when occupied. An exception allows for lighting subject to a health or life safety statute, ordinance, or regulation may have a minimum time-out period longer than 15 minutes or a minimum dimming level above 50% when necessary to comply with the applicable law.

The 2022 Building Energy Efficiency Standards became effective on January 1, 2023.<sup>21</sup> The core focus of the building standards has been efficiency, but the 2019 Energy Code ventured into onsite generation by requiring solar PV on new homes, providing significant GHG savings. The 2022 update builds off this progress with expanded solar standards and the move to onsite energy storage that will help Californians save on utility bills while bolstering the grid. The 2022 Energy Code update focuses on four key areas in new construction of homes and businesses:

- Encouraging electric heat pump technology and use, which consumes less energy and produces fewer emissions than traditional HVACs and water heaters.
- Establishing electric-ready requirements when natural gas is installed, which positions owners to use cleaner electric heating, cooking and electric vehicle (EV) charging options whenever they choose to adopt those technologies.
- Expanding solar photovoltaic (PV) system and battery storage standards to make clean energy available onsite and complement the state's progress toward a 100 percent clean electricity grid.
- Strengthening ventilation standards to improve indoor air quality.

The 2022 Energy Code affects homes by establishing energy budgets based on efficient heat pumps for space or water heating to encourage builders to install heat pumps over gas-fueled HVAC units; requiring homes to be electric-ready, with dedicated 240-volt outlets and space (with plumbing for water heaters) so electric appliances can eventually replace installed gas appliances; increasing minimum kitchen ventilation requirements so that fans over cooktops have higher airflow or capture efficiency to better exhaust pollution from gas cooking and improve indoor air quality; and allowing exceptions to existing solar PV standards when roof area is not available (such as for smaller homes). In addition, the effect on businesses includes establishing combined solar PV and battery standards for select businesses with systems being sized to maximize onsite use of solar energy and avoid electricity demand during times when the grid must use gas-powered plants;

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21 California Energy Commission (CEC). 2022. Building Energy Efficiency Standards. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency>.

establishing new efficiency standards for commercial greenhouses (primarily cannabis growing); and improving efficiency standards for building envelope, various internal systems, and grid integration equipment, such as demand-responsive controls to buoy grid stability.<sup>22,23</sup>

*California Code of Regulations (CCR) Title 24, Part 11 (California Green Building Standards)*

On January 12, 2010, the State Building Standards Commission unanimously adopted updates to the California Green Building Standards Code, which went into effect on January 1, 2011.

2016 CALGreen Code: The 2016 residential standards were estimated to be approximately 28 percent more efficient than the 2013 standards. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas emissions. During the 2016-2017 fiscal year, the Department of Housing and Community Development (HCD) updated CALGreen through the 2015 Triennial Code Adoption Cycle.

HCD also increased the required construction waste reduction from 50 percent to 65 percent of the total building site waste. This increase aids in meeting CalRecycle's statewide solid waste recycling goal of 75 percent for 2020 as stated in Chapter 476, Statutes of 2011 (AB 341). HCD adopted new regulations requiring recycling areas for multifamily projects of five or more dwelling units. This regulation requires developers to provide readily accessible areas adequate in size to accommodate containers for depositing, storage and collection of non-hazardous materials (including organic waste) for recycling. This requirement assists businesses that were required as of April 1, 2016, to meet the requirements of Chapter 727, Statutes of 2014 (AB 1826).

HCD adopted new regulations to require information on photovoltaic systems and electric vehicle chargers to be included in operation and maintenance manuals. Currently, CALGreen section 4.410.1 Item 2(a) requires operation and maintenance instructions for equipment and appliances. Photovoltaic systems and electric vehicle chargers are systems that play an important role in many households in California, and their importance is increasing every day. HCD incorporated these two terms in the existing language in order to provide clarity to code users as to additional systems requiring operation and maintenance instructions.

HCD updated the reference to Clean Air Standards of the United States Environmental Protection Agency applicable to woodstoves and pellet stoves. HCD also adopted a new requirement for woodstoves and pellet stoves to have a permanent label indicating they are certified to meet the emission limits. This requirement provides clarity to the code user and is consistent with the United States Environmental Protection Agency's New Source Performance Standards. HCD updated the list of standards which can be used for verification of compliance for exterior grade composite wood products. This list now includes four standards from the Canadian Standards Association (CSA): CSA O121, CSA O151, CSA O153 and CSA O325. HCD updated heating and air-conditioning system design references to the ANSI/ACCA 2 Manual J, ANSI/ACCA 1 Manual D, and ANSI/ACCA 3 Manual S to the most recent versions approved by ANSI. HCD adopted a new elective measure for hot water recirculation systems for water conservation. The United States Department of Energy estimates that 3,600 to 12,000 gallons of water per year can be saved by the typical household (with four points of hot water use) if a hot water recirculation system is installed.

2019 CALGreen Code: During the 2019-2020 fiscal year, the Department of Housing and Community Development (HCD) updated CALGreen through the 2019 Triennial Code Adoption Cycle. The 2019 version of the California Green Building Standards became effective January 1, 2020.

HCD modified the best management practices for stormwater pollution prevention adding Section 5.106.2 for projects that disturb one or more acres of land. This section requires projects that disturb one acre or

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<sup>22</sup> <https://www.lightnowblog.com/2021/08/california-energy-commission-adopts-2022-building-energy-efficiency-standards/>

<sup>23</sup> State of California Energy Commission. 2022 Building Energy Efficiency Standards Summary.

[https://www.energy.ca.gov/sites/default/files/2021-08/CEC\\_2022\\_EnergyCodeUpdateSummary\\_ADA.pdf](https://www.energy.ca.gov/sites/default/files/2021-08/CEC_2022_EnergyCodeUpdateSummary_ADA.pdf)

more of land or less than one acre of land but are part of a larger common plan of development or sale must comply with the postconstruction requirement detailed in the applicable National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities issued by the State Water Resources Control Board. The NPDES permits require postconstruction runoff (post-project hydrology) to match the preconstruction runoff pre-project hydrology) with installation of postconstruction stormwater management measures.

HCD added sections 5.106.4.1.3 and 5.106.4.1.5 in regard to bicycle parking. Section 5.106.4.1.3 requires new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility. In addition, Section 5.106.4.1.5 states that acceptable bicycle parking facility for Sections 5.106.4.1.2 through 5.106.4.1.4 shall be convenient from the street and shall meeting one of the following: (1) covered, lockable enclosures with permanently anchored racks for bicycles; (2) lockable bicycle rooms with permanently anchored racks; or (3) lockable, permanently anchored bicycle lockers.

HCD amended section 5.106.5.3.5 allowing future charging spaces to qualify as designated parking for clean air vehicles.

HCD updated section 5.303.3.3 in regard to showerhead flow rates. This update reduced the flow rate to 1.8 GPM.

HCD amended section 5.304.1 for outdoor potable water use in landscape areas and repealed sections 5.304.2 and 5.304.3. The update requires nonresidential developments to comply with a local water efficient landscape ordinance or the current California Department of Water Resource's' Model Water Efficient Landscape Ordinance (MWELo), whichever is more stringent. Some updates were also made in regard to the outdoor potable water use in landscape areas for public schools and community colleges.

HCD updated Section 5.504.5.3 in regard to the use of MERV filters in mechanically ventilated buildings. This update changed the filter use from MERV 8 to MERV 13. MERV 13 filters are to be installed prior to occupancy, and recommendations for maintenance with filters of the same value shall be included in the operation and maintenance manual.

#### *Executive Order B-30-15*

On April 29, 2015, Governor Brown issued Executive Order B-30-15. Therein, the Governor directed the following:

- Established a new interim statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030.
- Ordered all state agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets.
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

The 2022 California Green Building Standards Code became effective on January 1, 2023.<sup>24</sup>

HCD amended Section 5.106.5.3 in regard to increasing the EV capable space percentages and adding a new requirement for installed Level 2 DCFC chargers.

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<sup>24</sup> California Building Standards Commission (CBSC). 2022. California Green Building Standards. Website: <https://codes.iccsafe.org/content/CAGBC2022P1>.

HCD under Section 5.106.5.4 added new regulation for electric vehicle charging readiness requirements for new construction of warehouse, grocery stores, and retail stores with planned off-street loading spaces.<sup>25</sup>

#### *Executive Order B-29-15*

Executive Order B-29-15, mandates a statewide 25 percent reduction in potable water usage. EO B-29-15 signed into law on April 1, 2015.

#### *Executive Order B-37-16*

Executive Order B-37-16, continuing the State's adopted water reductions, was signed into law on May 9, 2016. The water reductions build off the mandatory 25 percent reduction called for in EO B-29-15.

#### *Executive Order N-79-20*

Executive Order N-79-20 was signed into law on September 23, 2020 and mandates 100 percent of in-state sales of new passenger cars and trucks be zero-emission by 2035; 100 percent of medium- and heavy-duty vehicles in the state be zero-emission vehicles by 2045 for all operations where feasible and by 2035 for drayage trucks; and to transition to 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible.

#### *SBX1 2*

Signed into law in April 2011, SBX1 2, requires one-third of the State's electricity to come from renewable sources. The legislation increases California's current 20 percent renewables portfolio standard target in 2010 to a 33 percent renewables portfolio standard by December 31, 2020.

#### *Senate Bill 350*

Signed into law October 7, 2015, SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. This will increase the use of Renewables Portfolio Standard (RPS) eligible resources, including solar, wind, biomass, geothermal, and others. In addition, SB 350 requires the state to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. To help ensure these goals are met and the greenhouse gas emission reductions are realized, large utilities will be required to develop and submit Integrated Resource Plans (IRPs). These IRPs will detail how each entity will meet their customers resource needs, reduce greenhouse gas emissions and ramp up the deployment of clean energy resources.

#### *Energy Sector and CEQA Guidelines Appendix F*

The CEC first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically (typically every three years) to allow for the consideration and inclusion of new energy efficiency technologies and methods. The 2016 update to the Energy Efficiency Standards for Residential and Nonresidential Buildings focuses on several key areas to improve the energy efficiency of renovations and addition to existing buildings as well as newly constructed buildings and renovations and additions to existing buildings. The major efficiency improvements to the residential Standards involve improvements for attics, walls, water heating, and lighting, whereas the major efficiency improvements to the nonresidential Standards include alignment with the

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<sup>25</sup> <https://www.dgs.ca.gov/BSC/Resources/2022-Title-24-California-Code-Changes>

American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2013 national standards. Furthermore, the 2016 update required that enforcement agencies determine compliance with CCR, Title 24, Part 6 before issuing building permits for any construction.<sup>26</sup>

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to “improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality.”<sup>27</sup> As of January 1, 2011, the CALGreen Code is mandatory for all new buildings constructed in the state. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code was most recently updated in 2022 to include new mandatory measures for residential and nonresidential uses; the new measures take effect on January 1, 2023.

### **Regional – South Coast Air Quality Management District**

The project is within the South Coast Air Basin, which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

#### *SCAQMD Regulation XXVII, Climate Change*

SCAQMD Regulation XXVII currently includes three rules:

- The purpose of Rule 2700 is to define terms and post global warming potentials.
- The purpose of Rule 2701, SoCal Climate Solutions Exchange, is to establish a voluntary program to encourage, quantify, and certify voluntary, high quality certified greenhouse gas emission reductions in the SCAQMD.
- Rule 2702, Greenhouse Gas Reduction Program, was adopted on February 6, 2009. The purpose of this rule is to create a Greenhouse Gas Reduction Program for greenhouse gas emission reductions in the SCAQMD. The SCAQMD will fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

A variety of agencies have developed greenhouse gas emission thresholds and/or have made recommendations for how to identify a threshold. However, the thresholds for projects in the jurisdiction of the SCAQMD remain in flux. The California Air Pollution Control Officers Association explored a variety of threshold approaches but did not recommend one approach (2008). The ARB recommended approaches for setting interim significance thresholds (California Air Resources Board 2008b), in which a draft industrial project threshold suggests that non-transportation related emissions under 7,000 MTCO<sub>2e</sub> per year would be less than significant; however, the ARB has not approved those thresholds and has not published anything since then. The SCAQMD is in the process of developing thresholds, as discussed below.

#### *SCAQMD Threshold Development*

On December 5, 2008, the SCAQMD Governing Board adopted an interim greenhouse gas significance threshold for stationary sources, rules, and plans where the SCAQMD is lead agency (SCAQMD permit

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<sup>26</sup> California Energy Commission, 2016 Building Energy Efficiency Standards, June 2015, <http://www.energy.ca.gov/2015publications/CEC-400-2015-037/CEC-400-2015-037-CMF.pdf>

<sup>27</sup> California Building Standards Commission, 2010 California Green Building Standards Code, (2010).



threshold). The SCAQMD permit threshold consists of five tiers. However, the SCAQMD is not the lead agency for this project. Therefore, the five permit threshold tiers do not apply to the proposed project.

The SCAQMD is in the process of preparing recommended significance thresholds for greenhouse gases for local lead agency consideration (“SCAQMD draft local agency threshold”); however, the SCAQMD Board has not approved the thresholds as of the date of the Notice of Preparation. The current draft 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 greenhouse gas reduction plan. If a project is consistent with a qualifying local greenhouse gas reduction plan, it does not have significant greenhouse gas 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 a project’s operational emissions. If a project’s emissions are under one of the following screening thresholds, then the project is less than significant:
  - All land use types: 3,000 MTCO<sub>2</sub>e per year
  - Based on land use type: residential: 3,500 MTCO<sub>2</sub>e per year; commercial: 1,400 MTCO<sub>2</sub>e per year; or mixed use: 3,000 MTCO<sub>2</sub>e per year.
  - Based on land type: Industrial (where SCAQMD is the lead agency), 10,000 MTCO<sub>2</sub>e per year.
- Tier 4 has the following options:
  - Option 1: Reduce emissions from business as usual (BAU) 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 MTCO<sub>2</sub>e/SP/year for projects and 6.6 MTCO<sub>2</sub>e/SP/year for plans;
  - Option 3, 2035 target: 3.0 MTCO<sub>2</sub>e/SP/year for projects and 4.1 MTCO<sub>2</sub>e/SP/year for plans.
- Tier 5 involves mitigation offsets to achieve target significance threshold.

The SCAQMD’s draft threshold uses the Executive Order S-3-05 goal as the basis for the Tier 3 screening level. Achieving the Executive Order’s objective would contribute to worldwide efforts to cap carbon dioxide concentrations at 450 ppm, thus stabilizing global climate. Specifically, the Tier 3 screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects. A 90 percent emission capture rate means that 90 percent of total emissions from all new or modified stationary source projects would be subject to a CEQA analysis, including a negative declaration, a mitigated negative declaration, or an environmental impact report, which includes analyzing feasible alternatives and imposing feasible mitigation measures. A GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that staff estimates that these GHG emissions would account for slightly less than one percent of future 2050 statewide GHG emissions target (85 MMTCO<sub>2</sub>e/year). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to BACT for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility.



### *SCAQMD Working Group*

Since neither the CARB nor the OPR has developed GHG emissions threshold, the SCAQMD formed a Working Group to develop significance thresholds related to GHG emissions. At the September 28, 2010 Working Group meeting, the SCAQMD released its most current version of the draft GHG emissions thresholds, which recommends a tiered approach that provides a quantitative annual threshold of 10,000 MTCO<sub>2e</sub> for industrial uses.

In order to assist local agencies with direction on GHG emissions, the SCAQMD organized a working group and adopted Rules 2700, 2701, 2702, and 3002 which are described below.

### *SCAQMD Rules 2700 and 2701*

The SCAQMD adopted Rules 2700 and 2701 on December 5, 2008, which establishes the administrative structure for a voluntary program designed to quantify GHG emission reductions. Rule 2700 establishes definitions for the various terms used in Regulation XXVII – Global Climate Change. Rule 2701 provides specific protocols for private parties to follow to generate certified GHG emission reductions for projects within the district. Approved protocols include forest projects, urban tree planting, and manure management. The SCAQMD is currently developing additional protocols for other reduction measures. For a GHG emission reduction project to qualify, it must be verified and certified by the SCAQMD Executive Officer, who has 60 days to approve or deny the Plan to reduce GHG emissions. Upon approval of the Plan, the Executive Officer issues required to issue a certified receipt of the GHG emission reductions within 90 days.

### *SCAQMD Rule 2702*

The SCAQMD adopted Rule 2702 on February 6, 2009, which establishes a voluntary air quality investment program from which SCAQMD can collect funds from parties that desire certified GHG emission reductions, pool those funds, and use them to purchase or fund GHG emission reduction projects within two years, unless extended by the Governing Board. Priority will be given to projects that result in co-benefit emission reductions of GHG emissions and criteria or toxic air pollutants within environmental justice areas. Further, this voluntary program may compete with the cap-and-trade program identified for implementation in CARB's Scoping Plan, or a federal cap and trade program.

### *SCAQMD Rule 3002*

The SCAQMD amended Rule 3002 on November 5, 2010 to include facilities that emit greater than 100,000 tons per year of CO<sub>2e</sub> are required to apply for a Title V permit by July 1, 2011. A Title V permit is for facilities that are considered major sources of emissions.

## **SIGNIFICANCE THRESHOLDS**

### **Appendix G of State CEQA Guidelines**

The CEQA Guidelines recommend that a lead agency consider the following when assessing the significance of impacts from GHG emissions on the environment:

- The extent to which the project may increase (or reduce) GHG emissions as compared to the existing environmental setting;
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project;

- The extent to which the project complies with regulations or requirements adopted to implement an adopted statewide, regional, or local plan for the reduction or mitigation of GHG emissions<sup>28</sup>.

### **Thresholds of Significance for this Project**

To determine whether the project's GHG emissions are significant, this analysis conservatively uses the SCAQMD draft screening threshold of 3,000 MTCO<sub>2e</sub> per year for all land uses.

### **METHODOLOGY**

The proposed project is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste, water, and construction equipment. The following provides the methodology used to calculate the project-related GHG emissions and the project impacts.

CalEEMod Version 2022.1.1.20 was used to calculate the GHG emissions from the proposed project. The CalEEMod output for year 2025 is available in Appendix B. Each source of GHG emissions is described in greater detail below.

#### *Area Sources*

Area sources include emissions from consumer products, landscape equipment and architectural coatings. No changes were made to the default area source emissions.

#### *Energy Usage*

Energy usage includes emissions from the generation of electricity and natural gas used on-site. No changes were made to the default energy usage parameters.

#### *Mobile Sources*

Mobile sources include emissions from the additional vehicle miles generated from the proposed project. The vehicle trips associated with the proposed project have been analyzed by inputting the project-generated vehicular trips from the TIA into the CalEEMod Model. The program then applies the emission factors for each trip which is provided by the EMFAC2021 model to determine the vehicular traffic pollutant emissions. See Section 2 for details.

#### *Waste*

Waste includes the GHG emissions generated from the processing of waste from the proposed project as well as the GHG emissions from the waste once it is interred into a landfill. No changes were made to the default waste parameters.

#### *Water*

Water includes the water used for the interior of the building as well as for landscaping and is based on the GHG emissions associated with the energy used to transport and filter the water. No changes were made to the default water usage parameters.

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<sup>28</sup> The Governor's Office of Planning and Research recommendations include a requirement that such a plan must be adopted through a public review process and include specific requirements that reduce or mitigate the project's incremental contribution of GHG emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable, notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

### *Offroad Sources*

Offroad sources include emissions from the use of eight diesel forklifts, 17 hours a day, 5 days a week within the yard and one electric crane 17 hours a day, 5 days a week within the warehouse.<sup>29</sup>

### *Construction*

The construction-related GHG emissions were also included in the analysis and were based on a 30-year amortization rate as recommended in the SCAQMD GHG Working Group meeting on November 19, 2009. The construction-related GHG emissions were calculated by CalEEMod and in the manner detailed above in Section 2.

## **PROJECT GREENHOUSE GAS EMISSIONS**

The GHG emissions have been calculated based on the parameters described above. A summary of the results is shown below in Table 13 and the CalEEMod Model run for the proposed project is provided in Appendix B. Table 13 shows that the total for the proposed project's emissions (without credit for any reductions from sustainable design and/or regulatory requirements) would be 2,638.63 MTCO<sub>2e</sub> per year. According to the thresholds of significance established above, a cumulative global climate change impact would occur if the GHG emissions created from the on-going operations of the proposed project would exceed the SCAQMD draft screening threshold of 3,000 MTCO<sub>2e</sub> per year for all land uses. Therefore, operation of the proposed project would not create a significant cumulative impact to global climate change. No mitigation is required.

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<sup>29</sup> On-site operations in the yard include the use of up to 6 diesel forklifts, which are to be in operation during all shift hours (two shifts, 5 AM to 1:30 PM and 3:00 PM to 11:30 PM) or a total of 17 hours a day. To be conservative, the modeling assumed up to 8 diesel forklifts at 17 hours a day. In addition, 1 electric crane is to operate within the warehouse during shift hours.

**Table 13**  
**Project-Related Greenhouse Gas Emissions**

Category	Greenhouse Gas Emissions (Metric Tons/Year)					
	Bio-CO <sub>2</sub>	NonBio-CO <sub>2</sub>	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
Maximum Annual Operations	7.70	2,521.00	2,529.00	0.85	0.26	2,630.00
Construction <sup>1</sup>	0.00	8.57	8.57	0.00	0.00	8.63
Total Emissions	7.70	2,529.57	2,537.57	0.85	0.26	2,638.63
SCAQMD Screening Threshold for All Land Uses						3,000
Exceeds Threshold?						No

Notes:

Source: CalEEMod Version 2022.1.1.20 for Opening Year 2025.

(1) Construction GHG emissions CO<sub>2</sub>e based on a 30 year amortization rate.

## CONSISTENCY WITH APPLICABLE GREENHOUSE GAS REDUCTION PLANS AND POLICIES

The proposed 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 greenhouse gases. The City of Banning does not currently have a Climate Action Plan; therefore, the project has been compared to the goals of the CARB Scoping Plan.

Emission reductions in California alone would not be able to stabilize the concentration of greenhouse gases in the earth's atmosphere. However, California's actions set an example and drive progress towards a reduction in greenhouse gases elsewhere. If other states and countries were to follow California's emission reduction targets, this could avoid medium or higher ranges of global temperature increases. Thus, severe consequences of climate change could also be avoided.

The CARB Board approved a Climate Change Scoping Plan in December 2008. The Scoping Plan outlines the State's strategy to achieve the 2020 greenhouse gas emissions limit. The Scoping Plan "proposes a comprehensive set of actions designed to reduce overall greenhouse gas emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health" (California Air Resources Board 2008). The measures in the Scoping Plan have been in place since 2012.

In May 2014, the CARB released its *First Update to the Climate Change Scoping Plan* (CARB 2014). This *Update* identifies the next steps for California's leadership on climate change. While California continues on its path to meet the near-term 2020 greenhouse gas limit, it must also set a clear path toward long-term, deep GHG emission reductions. This report highlights California's success to date in reducing its GHG emissions and lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050.

In November 2017, the CARB released the 2017 Scoping Plan. This Scoping Plan incorporates, coordinates, and leverages many existing and ongoing efforts and identifies new policies and actions to accomplish the State's climate goals, and includes a description of a suite of specific actions to meet the State's 2030 GHG limit. In addition, Chapter 4 provides a broader description of the many actions and proposals being explored across the sectors, including the natural resources sector, to achieve the State's mid and long-term climate goals.

Guided by legislative direction, the actions identified in the 2017 Scoping Plan reduce overall GHG emissions in California and deliver policy signals that will continue to drive investment and certainty in a low carbon economy. The 2017 Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets for SB 32 in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The Plan includes policies to require direct GHG reductions at some of the State's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and Trade Program, which constrains and reduces emissions at covered sources.

Independent studies confirm CARB's determination that the state's existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction measures are

adopted.<sup>30</sup> Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies would allow the state to meet the 2050 target.

In November of 2022, the CARB released the 2022 Scoping Plan. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

As the latest, 2022 Scoping Plan builds upon previous versions, project consistency with applicable strategies of the 2008, 2017, and 2022 Plan are assessed in Table 14. As shown in Table 14, the project is consistent with the applicable strategies within the Scoping Plan.

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<sup>30</sup> Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158-172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation and electricity sectors. [https://www.ethree.com/wp-content/uploads/2017/02/E3\\_Project\\_Overview\\_20150406.pdf](https://www.ethree.com/wp-content/uploads/2017/02/E3_Project_Overview_20150406.pdf)

**Table 14 (1 of 2)**  
**Project Consistency with CARB Scoping Plan Policies and Measures**

2008 Scoping Plan Measures to Reduce Greenhouse Gas Emissions	Project Compliance with Measure
California Light-Duty Vehicle Greenhouse Gas Standards – Implement adopted standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	No Conflict. These are CARB enforced standards; vehicles that access the project (that are required to comply with the standards) will comply with the strategy.
Energy Efficiency – Maximize energy efficiency building and appliance standards; pursue additional efficiency including new technologies, policy, and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	No Conflict. The project will be compliant with the current Title 24 standards.
Low Carbon Fuel Standard – Develop and adopt the Low Carbon Fuel Standard.	No Conflict. These are CARB enforced standards; vehicles that access the project (that are required to comply with the standards) will comply with the strategy.
Vehicle Efficiency Measures – Implement light-duty vehicle efficiency measures.	No Conflict. These are CARB enforced standards; vehicles that access the project (that are required to comply with the standards) will comply with the strategy.
Medium/Heavy-Duty Vehicles – Adopt medium and heavy-duty vehicle efficiency measures.	No Conflict. These are CARB enforced standards; vehicles that access the project (that are required to comply with the standards) will comply with the strategy.
Green Building Strategy – Expand the use of green building practices to reduce the carbon footprint of California’s new and existing inventory of buildings.	No Conflict. The California Green Building Standards Code (proposed Part 11, Title 24) was adopted as part of the California Building Standards Code in the CCR. Part 11 establishes voluntary standards, that are mandatory in the 2019 edition of the Code, on planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. In addition, the 2022 edition of the Code took effect January 1, 2023. The project will be subject to these mandatory standards.
High Global Warming Potential Gases – Adopt measures to reduce high global warming potential gases.	No Conflict. CARB identified five measures that reduce HFC emissions from vehicular and commercial refrigeration systems; vehicles that access the project that are required to comply with the measures will comply with the strategy.
Recycling and Waste – Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero waste.	No Conflict. The state is currently developing a regulation to reduce methane emissions from municipal solid waste landfills. The project will be required to comply with City programs, such as City’s recycling and waste reduction program, which comply, with the 75 percent reduction required by 2020 per AB 341.
Water – Continue efficiency programs and use cleaner energy sources to move and treat water.	No Conflict. The project will comply with all applicable City ordinances and CAL Green requirements.

2017 Scoping Plan Recommended Actions to Reduce Greenhouse Gas Emissions	Project Compliance with Recommended Action
Implement Mobile Source Strategy: Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Car regulations.	No Conflict. These are CARB enforced standards; vehicles that access the project (that are required to comply with the standards) will comply with the strategy.
Implement Mobile Source Strategy: At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025 and at least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030.	No Conflict. These are CARB enforced standards; vehicles that access the project (that are required to comply with the standards) will comply with the strategy.
Implement Mobile Source Strategy: Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NOX standard.	No Conflict. These are CARB enforced standards; vehicles that access the project (that are required to comply with the standards) will comply with the strategy.

**Table 14 (2 of 2)**  
**Project Consistency with CARB Scoping Plan Policies and Measures**

Implement Mobile Source Strategy: Last Mile Delivery: New regulation that would result in the use of low NOX or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3-7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030.	No Conflict. These are CARB enforced standards; vehicles that access the project (that are required to comply with the standards) will comply with the strategy.
Implement SB 350 by 2030: Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.	No Conflict. The project will be compliant with the current Title 24 standards.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	No Conflict. The project will be required to comply with City programs, such as City's recycling and waste reduction program, which comply, with the 75 percent reduction required by 2020 per AB 341.

2022 Scoping Plan Priority Key Actions and Recommendations	Project Compliance with Recommended Actions
100 percent of light-duty vehicle sales are ZEVs by 2035.	Not Applicable. This action is in regard to vehicle sales, with an aim to have 100 percent of light-duty vehicle sales be ZEVs by 2035. The proposed project is a steel manufacturing and distribution use and would not interfere with such policymaking.
VMT per capita reduced 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.	No Conflict. The Project would not result in an unmitigated impact to VMT. The Project is a steel manufacturing and distribution use located in close proximity to existing roadways and residential and commercial uses. Therefore, the Project would be anticipated to contribute to a reduction in VMT per capita.
All electric appliances in new construction beginning 2026 (residential) and 2029 (commercial).	No Conflict. The California Green Building Standards Code (proposed Part 11, Title 24) was adopted as part of the California Building Standards Code in the CCR. Part 11 establishes voluntary standards, that are mandatory in the 2019 edition of the Code, on planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. In addition, the 2022 edition of the Code took effect January 1, 2023. The project will be subject to these mandatory standards.
For existing residential buildings, 80 percent of appliance sales are electric by 2030 and 100 percent of appliance sales are electric by 2035 (appliances replaced at end of life). For existing commercial buildings, 80 percent of appliance sales are electric by 2030 and 100 percent of appliance sales are electric by 2045 (appliances replaced at end of life)	Not Applicable. This action is in regard to appliance sales and the proposed project is a hotel use with rooftop restaurant and would not interfere with such policymaking. Furthermore, although this action is not necessarily applicable on a project-specific basis, the proposed project is subject to the California Green Building Standards Code (proposed Part 11, Title 24) which was adopted as part of the California Building Standards Code in the CCR. Part 11 establishes voluntary standards, that are mandatory in the 2019 edition of the Code, on planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. In addition, the 2022 edition of the Code took effect January 1, 2023. The project will be subject to these mandatory standards.

Notes:

(1) Source: CARB Scoping Plan (2008, 2017, and 2022)



## CUMULATIVE GREENHOUSE GAS IMPACTS

Although the project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. Therefore, in the case of global climate change, the proximity of the project to other GHG emission generating activities is not directly relevant to the determination of a cumulative impact because climate change is a global condition. According to CAPCOA, “GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective.”<sup>31</sup> The resultant consequences of that climate change can cause adverse environmental effects. A project’s GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change.

The state has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce are predicted to continue to expand. In order to achieve this goal, CARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. Consistent with CEQA Guidelines Section 15064h(3),<sup>32</sup> the City, as lead agency, has determined that the project’s contribution to cumulative GHG emissions and global climate change would be less than significant if the project is consistent with the applicable regulatory plans and policies to reduce GHG emissions.

As discussed in the Consistency With Applicable Greenhouse Gas Reduction Plans and Policies section above, the project is consistent with the goals and objectives of the CARB Scoping Plan.

Thus, given the project’s consistency with the CARB Scoping Plan and SCAQMD’s draft screening threshold of 3,000 MTCO<sub>2</sub>e per year threshold for all land uses, the project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Given this consistency, it is concluded that the project’s incremental contribution to greenhouse gas emissions and their effects on climate change would not be cumulatively considerable.

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<sup>31</sup> Source: California Air Pollution Control Officers Association, CEQA & Climate change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, (2008).

<sup>32</sup> The State CEQA Guidelines were amended in response to SB 97. In particular, the State CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction program renders a cumulative impact insignificant. Per State CEQA Guidelines Section 15064(h)(3), a project’s incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a “water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions.”

## 5. ENERGY ANALYSIS

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### EXISTING CONDITIONS

This section provides an overview of the existing energy conditions in the project area and region.

#### **Overview**

California's estimated annual energy use as of 2022 included:

- Approximately 287,220 gigawatt hours of electricity;<sup>33</sup>
- Approximately 2,056,267 million cubic feet of natural gas per year;<sup>34</sup> and
- Approximately 23.2 billion gallons of transportation fuel (for the year 2015).<sup>35</sup>

As of 2021, the year of most recent data currently available by the United States Energy Information Administration (EIA), energy use in California by demand sector was:

- Approximately 41.2 percent transportation;
- Approximately 23.6 percent industrial;
- Approximately 18.2 percent residential; and
- Approximately 17.1 percent commercial.<sup>36</sup>

California's electricity in-state generation system generates approximately 194,127 gigawatt-hours each year. In 2021, California produced approximately 70 percent of the electricity it uses; the rest was imported from the Pacific Northwest (approximately 12 percent) and the U.S. Southwest (approximately 18 percent). Natural gas is the main source for electricity generation at approximately 50.2 percent of the total in-state electric generation system power as shown in Table 15.

A summary of and context for energy consumption and energy demands within the State is presented in "U.S. Energy Information Administration, California State Profile and Energy Estimates, Quick Facts" excerpted below:

- California was the seventh-largest producer of crude oil among the 50 states in 2022, and, as of January 2022, it ranked third in oil refining capacity.
- California is the largest consumer of jet fuel and second-largest consumer of motor gasoline among the 50 states.
- In 2020, California was the second-largest total energy consumer among the states, but its per capita energy consumption was less than in all but three other states.
- In 2022, renewable resources, including hydroelectric power and small-scale, customer-sited solar power, accounted for 49 percent of California's in-state electricity generation. Natural gas fueled another 42 percent. Nuclear power supplied almost all the rest.

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<sup>33</sup> California Energy Commission. Energy Almanac. Total Electric Generation. [Online] 2022.

<https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2022-total-system-electric-generation>.

<sup>34</sup> Natural Gas Consumption by End Use. U.S. Energy Information Administration. [Online] 2022.

[https://www.eia.gov/dnav/ng/ng\\_cons\\_sum\\_dcu\\_SCA\\_a.htm](https://www.eia.gov/dnav/ng/ng_cons_sum_dcu_SCA_a.htm).

<sup>35</sup> California Energy Commission. Revised Transportation Energy Demand Forecast 2018-2030. [Online] 2021.

<https://www.energy.ca.gov/data-reports/planning-and-forecasting>

<sup>36</sup> U.S. Energy Information Administration. California Energy Consumption by End-Use Sector, 2021.

California State Profile Overview.[Online] 2023 <https://www.eia.gov/state/?sid=CA#tabs-2>

- In 2022, California was the fourth-largest electricity producer in the nation, but the state was also the nation's third-largest consumer of electricity, and additional needed electricity supplies came from out-of-state generators.<sup>37</sup>

As indicated above, California is one of the nation's leading energy-producing states, and California per capita energy use is among the nation's most efficient. Given the nature of the proposed project, the remainder of this discussion will focus on the three sources of energy that are most relevant to the project—namely, electricity and natural gas for building uses, and transportation fuel for vehicle trips associated with the proposed project.

### **Electricity**

Electricity would be provided to the project by Banning Electric Utility (BEU). BEU is a not-for-profit, publicly owned retail electrical energy distribution utility with six distribution substations and 134 miles of power lines serving nearly 13,500 citizens and business patrons. .<sup>38</sup> SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers.<sup>39</sup>

Table 16 identifies BEU's specific proportional shares of electricity sources in 2022. As shown in Table 16, the 2022 BEU Power Mix has renewable energy at 81.3 percent of the overall energy resources, of which biomass and waste is at 25 percent, geothermal is at 48.7 percent, and solar energy is at 7.6 percent; other energy sources include large hydroelectric at 0.9 percent, nuclear at 9.2 percent, and unspecified sources of power at 8.6 percent.

### **Natural Gas**

Natural gas would be provided to the project by Southern California Gas (SoCalGas). The following summary of natural gas resources and service providers, delivery systems, and associated regulation is excerpted from information provided by the California Public Utilities Commission (CPUC).

The CPUC regulates natural gas utility service for approximately 11 million customers that receive natural gas from Pacific Gas and Electric (PG&E), Southern California Gas (SoCalGas), San Diego Gas & Electric (SDG&E), Southwest Gas, and several smaller investor-owned natural gas utilities. The CPUC also regulates independent storage operators Lodi Gas Storage, Wild Goose Storage, Central Valley Storage and Gill Ranch Storage.

The vast majority of California's natural gas customers are residential and small commercial customers, referred to as "core" customers. Larger volume gas customers, like electric generators and industrial customers, are called "noncore" customers. Although very small in number relative to core customers, noncore customers consume about 65% of the natural gas delivered by the state's natural gas utilities, while core customers consume about 35%.

The PUC regulates the California utilities' natural gas rates and natural gas services, including in-state transportation over the utilities' transmission and distribution pipeline systems, storage, procurement, metering and billing.

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<sup>37</sup> State Profile Overview. [Online] [Cited: April 20, 2023.] <https://www.eia.gov/state/?sid=CA#tabs-2>

<sup>38</sup> <https://www.ci.banning.ca.us/57/Banning-Electric-Utility>

<sup>39</sup> California Energy Commission. Utility Energy Supply plans from 2015. [https://www.energy.ca.gov/almanac/electricity\\_data/supply\\_forms.html](https://www.energy.ca.gov/almanac/electricity_data/supply_forms.html)

Most of the natural gas used in California comes from out-of-state natural gas basins. In 2017, for example, California utility customers received 38% of their natural gas supply from basins located in the U.S. Southwest, 27% from Canada, 27% from the U.S. Rocky Mountain area, and 8% from production located in California.<sup>40</sup>

## **Transportation Energy Resources**

The project would attract additional vehicle trips with resulting consumption of energy resources, predominantly gasoline and diesel fuel. Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to the project patrons and employees via commercial outlets.

The most recent data available shows the transportation sector emits 38 percent of the total greenhouse gases in the state and about 84 percent of smog-forming oxides of nitrogen (NOx).<sup>41,42</sup> About 36 percent of total United States energy consumption in 2021 was for transporting people and goods from one place to another. In 2022, petroleum comprised about 90 percent of all transportation energy use.<sup>43</sup> In 2022, about 135.06 billion gallons (or about 3.22 billion barrels) of finished motor gasoline were consumed in the United States, an average of about 370 million gallons (or about 8.81 million barrels) per day.<sup>44</sup>

## **REGULATORY BACKGROUND**

Federal and state agencies regulate energy use and consumption through various means and programs. On the federal level, the United States Department of Transportation, the United States Department of Energy, and the United States Environmental Protection Agency are three federal agencies with substantial influence over energy policies and programs. On the state level, the PUC and the California Energy Commissions (CEC) are two agencies with authority over different aspects of energy. Relevant federal and state energy-related laws and plans are summarized below.

### **Federal Regulations**

#### *Corporate Average Fuel Economy (CAFE) Standards*

First established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) standards reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA) jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the “maximum feasible level” with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.<sup>45</sup>

Issued by NHTSA and EPA in March 2020 (published on April 30, 2020 and effective after June 29, 2020), the Safer Affordable Fuel-Efficient Vehicles Rule would maintain the CAFE and CO<sub>2</sub> standards applicable in model year 2020 for model years 2021 through 2026. The estimated CAFE and CO<sub>2</sub> standards for model year 2020 are 43.7 mpg and 204 grams of CO<sub>2</sub> per mile for passenger cars and 31.3 mpg and 284 grams of

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<sup>40</sup> California Public Utilities Commission. Natural Gas and California. [http://www.cpuc.ca.gov/natural\\_gas/](http://www.cpuc.ca.gov/natural_gas/)

<sup>41</sup> CARB. California Greenhouse Gas Emissions Inventory – 2022 Edition. <https://ww2.arb.ca.gov/ghg-inventory-data>

<sup>42</sup> CARB. 2016 SIP Emission Projection Data. [https://www.arb.ca.gov/app/emsmv/2017/emseic1\\_query.php?F\\_DIV=-4&F\\_YR=2012&F\\_SEASON=A&SP=SIP105ADJ&F\\_AREA=CA](https://www.arb.ca.gov/app/emsmv/2017/emseic1_query.php?F_DIV=-4&F_YR=2012&F_SEASON=A&SP=SIP105ADJ&F_AREA=CA)

<sup>43</sup> US Energy Information Administration. Use of Energy in the United States Explained: Energy Use for Transportation. [https://www.eia.gov/energyexplained/?page=us\\_energy\\_transportation](https://www.eia.gov/energyexplained/?page=us_energy_transportation)

<sup>44</sup> <https://www.eia.gov/tools/faqs/faq.php?id=23&t=10>

<sup>45</sup> <https://www.nhtsa.gov/lawsregulations/corporate-average-fuel-economy>.

CO2 per mile for light trucks, projecting an overall industry average of 37 mpg, as compared to 46.7 mpg under the standards issued in 2012.<sup>46</sup>

#### *Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)*

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of intermodal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions.

#### *The Transportation Equity Act of the 21st Century (TEA-21)*

The Transportation Equity Act for the 21st Century (TEA-21) was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety.

### **State Regulations**

#### Integrated Energy Policy Report (IEPR)

Senate Bill 1389 requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the State's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety. The Energy Commission prepares these assessments and associated policy recommendations every two years, with updates in alternate years, as part of the Integrated Energy Policy Report.

The 2019 Integrated Energy Policy Report (2019 IEPR) was adopted February 20, 2020, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2019 IEPR focuses on a variety of topics such as decarbonizing buildings, integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecast, and the California Energy Demand Forecast.<sup>47</sup>

#### State of California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce

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<sup>46</sup> National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA). 2018. Federal Register / Vol. 83, No. 165 / Friday, August 24, 2018 / Proposed Rules, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks 2018. Available at: <https://www.epa.gov/regulations-emissions-vehicles-and-engines/safer-affordable-fuel-efficient-safe-vehicles-final-rule>.

<sup>47</sup> California Energy Commission. Final 2019 Integrated Energy Policy Report. February 20, 2020. <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2019-integrated-energy-policy-report>

congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access.

#### California Building Standards Code (Title 24)

The California Building Standards Code Title 24 was previously discussed in Section 4 of this report.

#### *California Building Energy Efficiency Standards (Title 24, Part 6)*

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020. The 2019 Title 24 standards include efficiency improvements to the lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers. For example, window operation is no longer a method allowed to meet ventilation requirements, continuous operation of central forced air system handlers used in central fan integrated ventilation system is not a permissible method of providing the dwelling unit ventilation airflow, and central ventilation systems that serve multiple dwelling units must be balanced to provide ventilation airflow to each dwelling unit. In addition, requirements for kitchen range hoods were also provided in the updated Section 120.1. Ventilation and Indoor Air Quality included both additions and revisions in the 2019 Code. This section now requires nonresidential and hotel/motel buildings to have air filtration systems that use forced air ducts to supply air to occupiable spaces to have air filters. Further, the air filter efficiency must be either MERV 13 or use a particle size efficiency rating specific in the Energy Code AND be equipped with air filters with a minimum 2-inch depth or minimum 1-inch depth if sized according to the equation 120.1-A. If natural ventilation is to be used the space must also use mechanical unless ventilation openings are either permanently open or controlled to stay open during occupied times.

New regulations were also adopted under Section 130.1 Indoor Lighting Controls. These included new exceptions being added for restrooms, the exception for classrooms being removed, as well as exceptions in regard to sunlight provided through skylights and overhangs.

The 2016 residential standards were estimated to be approximately 28 percent more efficient than the 2013 standards, whereas the 2019 residential standards are estimated to be approximately 7 percent more efficient than the 2016 standards. Furthermore, once rooftop solar electricity generation is factored in, 2019 residential standards are estimated to be approximately 53 percent more efficient than the 2016 standards. Under the 2019 standards, nonresidential buildings are estimated to be approximately 30 percent more efficient than the 2016 standards. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas emissions.

The 2022 Building Energy Efficiency Standards became effective on January 1, 2023.<sup>48</sup> All buildings for which an application for a building permit is submitted on or after January 1, 2023 must follow the 2022 standards. The core focus of the building standards has been efficiency, but the 2019 Energy Code ventured into onsite generation by requiring solar PV on new homes, providing significant GHG savings. The 2022 update builds off this progress with expanded solar standards and the move to onsite energy storage that will help Californians save on utility bills while bolstering the grid. The 2022 Energy Code update focuses on four key areas in new construction of homes and businesses:

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<sup>48</sup> California Energy Commission (CEC). 2022. Building Energy Efficiency Standards. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency>.

- Encouraging electric heat pump technology and use, which consumes less energy and produces fewer emissions than traditional HVACs and water heaters.
- Establishing electric-ready requirements when natural gas is installed, which positions owners to use cleaner electric heating, cooking and electric vehicle (EV) charging options whenever they choose to adopt those technologies.
- Expanding solar photovoltaic (PV) system and battery storage standards to make clean energy available onsite and complement the state's progress toward a 100 percent clean electricity grid.
- Strengthening ventilation standards to improve indoor air quality.

The 2022 Energy Code affects homes by establishing energy budgets based on efficient heat pumps for space or water heating to encourage builders to install heat pumps over gas-fueled HVAC units; requiring homes to be electric-ready, with dedicated 240-volt outlets and space (with plumbing for water heaters) so electric appliances can eventually replace installed gas appliances; increasing minimum kitchen ventilation requirements so that fans over cooktops have higher airflow or capture efficiency to better exhaust pollution from gas cooking and improve indoor air quality; and allowing exceptions to existing solar PV standards when roof area is not available (such as for smaller homes). In addition, the effect on businesses includes establishing combined solar PV and battery standards for select businesses with systems being sized to maximize onsite use of solar energy and avoid electricity demand during times when the grid must use gas-powered plants; establishing new efficiency standards for commercial greenhouses (primarily cannabis growing); and improving efficiency standards for building envelope, various internal systems, and grid integration equipment, such as demand-responsive controls to buoy grid stability.<sup>49,50</sup>

#### *California Building Energy Efficiency Standards (Title 24, Part 11)*

The 2019 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, went into effect on January 1, 2020. The 2019 CALGreen Code includes mandatory measures for non-residential development related to site development; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality.

As previously discussed in Section 4 of this report, the Department of Housing and Community Development (HCD) updated CALGreen through the 2019 Triennial Code Adoption Cycle. HCD modified the best management practices for stormwater pollution prevention adding Section 5.106.2 for projects that disturb one or more acres of land. This section requires projects that disturb one acre or more of land or less than one acre of land but are part of a larger common plan of development or sale must comply with the postconstruction requirement detailed in the applicable National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities issued by the State Water Resources Control Board. The NPDES permits require postconstruction runoff (post-project hydrology) to match the preconstruction runoff pre-project hydrology) with installation of postconstruction stormwater management measures.

HCD added sections 5.106.4.1.3 and 5.106.4.1.5 in regard to bicycle parking. Section 5.106.4.1.3 requires new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility. In addition, Section 5.106.4.1.5 states that acceptable bicycle parking facility for Sections 5.106.4.1.2 through 5.106.4.1.4 shall be convenient from the street and shall meeting one of the following: (1) covered, lockable enclosures with permanently anchored racks for bicycles; (2) lockable bicycle rooms with permanently anchored racks; or (3) lockable, permanently anchored bicycle lockers.

<sup>49</sup> <https://www.lightnowblog.com/2021/08/california-energy-commission-adopts-2022-building-energy-efficiency-standards/>

<sup>50</sup> State of California Energy Commission. 2022 Building Energy Efficiency Standards Summary.

[https://www.energy.ca.gov/sites/default/files/2021-08/CEC\\_2022\\_EnergyCodeUpdateSummary\\_ADA.pdf](https://www.energy.ca.gov/sites/default/files/2021-08/CEC_2022_EnergyCodeUpdateSummary_ADA.pdf)



HCD amended section 5.106.5.3.5 allowing future charging spaces to qualify as designated parking for clean air vehicles.

HCD updated section 5.303.3.3 in regard to showerhead flow rates. This update reduced the flow rate to 1.8 GPM.

HCD amended section 5.304.1 for outdoor potable water use in landscape areas and repealed sections 5.304.2 and 5.304.3. The update requires nonresidential developments to comply with a local water efficient landscape ordinance or the current California Department of Water Resource's' Model Water Efficient Landscape Ordinance (MWELo), whichever is more stringent. Some updates were also made in regard to the outdoor potable water use in landscape areas for public schools and community colleges.

HCD updated Section 5.504.5.3 in regard to the use of MERV filters in mechanically ventilated buildings. This update changed the filter use from MERV 8 to MERV 13. MERV 13 filters are to be installed prior to occupancy, and recommendations for maintenance with filters of the same value shall be included in the operation and maintenance manual.

The 2022 California Green Building Standards Code became effective on January 1, 2023.<sup>51</sup>

In the 2022 Standards, HCD amended Section 5.106.5.3 in regard to increasing the EV capable space percentages and adding a new requirement for installed Level 2 DCFC chargers. HCD under Section 5.106.5.4 added new regulation for electric vehicle charging readiness requirements for new construction of warehouse, grocery stores, and retail stores with planned off-street loading spaces.<sup>52</sup>

#### Senate Bill 100

Senate Bill 100 (SB 100) requires 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. SB 100 was adopted September 2018.

The interim thresholds from prior Senate Bills and Executive Orders would also remain in effect. These include Senate Bill 1078 (SB 1078), which requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. Senate Bill 107 (SB 107) which changed the target date to 2010. Executive Order S-14-08, which was signed on November 2008 and expanded the State's Renewable Energy Standard to 33 percent renewable energy by 2020. Executive Order S-21-09 directed the CARB to adopt regulations by July 31, 2010 to enforce S-14-08. Senate Bill X1-2 codifies the 33 percent renewable energy requirement by 2020.

#### Senate Bill 350

As previously discussed in Section 4 of this report, Senate Bill 350 (SB 350) was signed into law October 7, 2015, SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. This will increase the use of Renewables Portfolio Standard (RPS) eligible resources, including solar, wind, biomass, geothermal, and others. In addition, SB 350 requires the state to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. To help ensure these goals are met and the greenhouse gas emission reductions are realized, large utilities will be required to develop and submit Integrated Resource Plans (IRPs). These IRPs will detail how each entity will meet their customers resource needs, reduce greenhouse gas emissions and ramp up the deployment of clean energy resources.

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<sup>51</sup> California Building Standards Commission (CBSC). 2022. California Green Building Standards. Website: <https://codes.iccsafe.org/content/CAGBC2022P1>.

<sup>52</sup> <https://www.dgs.ca.gov/BSC/Resources/2022-Title-24-California-Code-Changes>



### Assembly Bill 32

As discussed in Section 4 of this report, in 2006 the California State Legislature adopted Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006. AB 32 requires CARB, to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020 through an enforceable statewide emission cap which will be phased in starting in 2012. Emission reductions shall include carbon sequestration projects that would remove carbon from the atmosphere and best management practices that are technologically feasible and cost effective. Please see Section 4 for further detail on AB 32.

### Assembly Bill 1493/Pavley Regulations

As discussed in Section 4 of this report, California Assembly Bill 1493 enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. In 2005, the CARB submitted a “waiver” request to the EPA from a portion of the federal Clean Air Act in order to allow the State to set more stringent tailpipe emission standards for CO<sub>2</sub> and other GHG emissions from passenger vehicles and light duty trucks. On December 19, 2007 the EPA announced that it denied the “waiver” request. On January 21, 2009, CARB submitted a letter to the EPA administrator regarding the State’s request to reconsider the waiver denial. The EPA approved the waiver on June 30, 2009.

### Executive Order S-1-07/Low Carbon Fuel Standard

As discussed in Section 4 of this report, Executive Order S-1-07 was issued in 2007 and proclaims that the transportation sector is the main source of GHG emissions in the State, since it generates more than 40 percent of the State’s GHG emissions. It establishes a goal to reduce the carbon intensity of transportation fuels sold in the State by at least ten percent by 2020. This Order also directs CARB to determine whether this Low Carbon Fuel Standard (LCFS) could be adopted as a discrete early-action measure as part of the effort to meet the mandates in AB 32.

On April 23, 2009 CARB approved the proposed regulation to implement the low carbon fuel standard. The low carbon fuel standard is anticipated to reduce GHG emissions by about 16 MMT per year by 2020. The low carbon fuel standard is designed to provide a framework that uses market mechanisms to spur the steady introduction of lower carbon fuels. The framework establishes performance standards that fuel producers and importers must meet each year beginning in 2011. Separate standards are established for gasoline and diesel fuels and the alternative fuels that can replace each. The standards are “back-loaded”, with more reductions required in the last five years, than during the first five years. This schedule allows for the development of advanced fuels that are lower in carbon than today’s fuels and the market penetration of plug-in hybrid electric vehicles, battery electric vehicles, fuel cell vehicles, and flexible fuel vehicles. It is anticipated that compliance with the low carbon fuel standard will be based on a combination of both lower carbon fuels and more efficient vehicles.

Reformulated gasoline mixed with corn-derived ethanol at ten percent by volume and low sulfur diesel fuel represent the baseline fuels. Lower carbon fuels may be ethanol, biodiesel, renewable diesel, or blends of these fuels with gasoline or diesel as appropriate. Compressed natural gas and liquefied natural gas also may be low carbon fuels. Hydrogen and electricity, when used in fuel cells or electric vehicles are also considered as low carbon fuels for the low carbon fuel standard.

### California Air Resources Board

#### *CARB’s Advanced Clean Cars Program*

Closely associated with the Pavley regulations, the Advanced Clean Cars emissions control program was approved by CARB in 2012. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles for model years 2015–2025.<sup>15</sup> The components of the Advanced Clean Cars program include the Low-Emission Vehicle (LEV) regulations that reduce criteria

pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.<sup>53</sup>

#### *Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling*

The Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13, California Code of Regulations, Division 3, Chapter 10, Section 2435) was adopted to reduce public exposure to diesel particulate matter and other air contaminants by limiting the idling of diesel-fueled commercial motor vehicles. This section applies to diesel-fueled commercial motor vehicles with gross vehicular weight ratings of greater than 10,000 pounds that are or must be licensed for operation on highways. Reducing idling of diesel-fueled commercial motor vehicles reduces the amount of petroleum-based fuel used by the vehicle.

#### *Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen, and other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles*

The Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles (Title 13, California Code of Regulations, Division 3, Chapter 1, Section 2025) was adopted to reduce emissions of diesel particulate matter, oxides of nitrogen (NOX) and other criteria pollutants from in-use diesel-fueled vehicles. This regulation is phased, with full implementation by 2023. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. The newer emission-controlled models would use petroleum-based fuel in a more efficient manner.

#### Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or Senate Bill 375 (SB 375), coordinates land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction mandates established in AB 32.

As previously stated in Section 4 of this report, Senate Bill 375 (SB 375) was adopted September 2008 and aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPO) to adopt a sustainable communities strategy (SCS) or alternate planning strategy (APS) that will prescribe land use allocation in that MPOs Regional Transportation Plan (RTP). CARB, in consultation with each MPO, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's sustainable communities strategy or alternate planning strategy for consistency with its assigned targets.

The proposed project is located within the Southern California Association of Governments (SCAG) jurisdiction, which has authority to develop the SCS or APS. For the SCAG region, the targets set by CARB are at eight percent below 2005 per capita GHG emissions levels by 2020 and 19 percent below 2005 per capita GHG emissions levels by 2035. These reduction targets became effective October 2018.

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<sup>53</sup> California Air Resources Board, California's Advanced Clean Cars Program, January 18, 2017. [www.arb.ca.gov/msprog/acc/acc.htm](http://www.arb.ca.gov/msprog/acc/acc.htm).

## PROJECT ENERGY DEMANDS AND ENERGY EFFICIENCY MEASURES

### **Evaluation Criteria**

In compliance with Appendix G of the State CEQA Guidelines, this report analyzes the project's anticipated energy use to determine if the project would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

In addition, Appendix F of the State CEQA Guidelines states that the means of achieving the goal of energy conservation includes the following:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on fossil fuels such as coal, natural gas and oil; and
- Increasing reliance on renewable energy sources.

### **Methodology**

Information from the CalEEMod 2022.1.1.20 Output contained in Appendix B, utilized for air quality and greenhouse gas analyses in Sections 2 and 4 of this report, was also utilized for this analysis. The CalEEMod output details project related construction equipment, transportation energy demands, and facility energy demands.

### **Construction Energy Demands**

The construction is anticipated to occur between the beginning of July 2024 and the end of June 2025, and be completed in one phase. Staging of construction vehicles and equipment will occur on-site. The approximately twelve-month schedule is relatively short and the project site is approximately 14.92 gross acres.

#### *Construction Equipment Electricity Usage Estimates*

As stated previously, Electrical service will be provided by BEU. The focus within this section is the energy implications of the construction process, specifically the power cost from on-site electricity consumption during construction of the proposed project. Based on the 2021 National Construction Estimator, Richard Pray (2021),<sup>54</sup> the typical power cost per 1,000 square feet of building construction per month is estimated to be \$2.37. The project plans to develop the site with an approximately 49,000 square foot industrial building. Based on Table 17, the total power cost of the on-site electricity usage during the construction of the proposed project is estimated to be approximately \$1,393.56. Furthermore, as shown in Table 17, the total electricity usage from project construction related activities is estimated to be approximately 13,798 kWh.<sup>55</sup>

#### *Construction Equipment Fuel Estimates*

Fuel consumed by construction equipment would be the primary energy resource expended over the course of project construction. Fuel consumed by construction equipment was evaluated with the following assumptions:

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<sup>54</sup> Pray, Richard. 2021 National Construction Estimator. Carlsbad : Craftsman Book Company, 2021.

<sup>55</sup> Assumes the project will be under the Industrial Service (IS-1) rate under BEU.

<https://www.banningca.gov/DocumentCenter/View/9921/Industrial-Service-Rate-Schedule---Effective-January-1-2022>

- Construction schedule of 12 months
- All construction equipment was assumed to run on diesel fuel
- Typical daily use of 8 hours, with some equipment operating from ~6-7 hours
- Aggregate fuel consumption rate for all equipment was estimated at 18.5 hp-hr/gallon (from CARB's 2017 Emissions Factors Tables and fuel consumption rate factors as shown in Table D-21 of the Moyer Guidelines: ([https://www.arb.ca.gov/msprog/moyer/guidelines/2017gl/2017\\_gl\\_appendix\\_d.pdf](https://www.arb.ca.gov/msprog/moyer/guidelines/2017gl/2017_gl_appendix_d.pdf)).
- Diesel fuel would be the responsibility of the equipment operators/contractors and would be sources within the region.
- Project construction represents a "single-event" for diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources during long term operation.

Using the CalEEMod data input for the air quality and greenhouse gas analyses (Sections 2 and 4 of this report), the project's construction phase would consume electricity and fossil fuels as a single energy demand, that is, once construction is completed their use would cease. CARB's 2017 Emissions Factors Tables show that on average, aggregate fuel consumption (gasoline and diesel fuel) would be approximately 18.5 hp-hr-gal. Table 18 shows the results of the analysis of construction equipment.

As presented in Table 18, project construction activities would consume an estimated 40,299 gallons of diesel fuel. As stated previously, project construction would represent a "single-event" diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose.

#### *Construction Worker Fuel Estimates*

It is assumed that construction worker trips are from light duty autos (LDA), light duty truck 1 (LDT1), and light duty truck 2 (LDT2) at a mix of 25 percent/50 percent/25 percent, respectively, along area roadways.<sup>56</sup> With respect to estimated VMT, the construction worker trips would generate an estimated 100,111 VMT. Data regarding project related construction worker trips were based on CalEEMod 2022.1.1.20 model defaults.

Vehicle fuel efficiencies for construction workers were estimated in the air quality and greenhouse gas analyses (Sections 2 and 4 of this report) using information generated using CARB's 2021 EMFAC model (see Appendix B for details). An aggregate fuel efficiency of 26.02 miles per gallon (mpg) was used to calculate vehicle miles traveled for construction worker trips. Table 19 shows that an estimated 3,848 gallons of fuel would be consumed for construction worker trips.

#### *Construction Vendor/Hauling Fuel Estimates*

Tables 20 and 21 show the estimated fuel consumption for vendor and hauling during building construction and architectural coating. With respect to estimated VMT, the vendor and hauling trips would generate an estimated 17,610 VMT. Data regarding project related construction worker trips were based on CalEEMod 2022.1.1.20 model defaults.

For the architectural coatings it is assumed that the contractors would be responsible for bringing coatings and equipment with them in their light duty vehicles. Therefore, vendors delivering construction material or hauling debris from the site during building construction would use medium to heavy duty vehicles with an average fuel consumption of 7.75 mpg for medium heavy-duty trucks and 6.05 mpg for heavy heavy-duty trucks (see Appendix B for details).<sup>57</sup> Tables 20 and 21 show that an estimated 2,552 gallons of fuel would be consumed for vendor and hauling trips.

<sup>56</sup> CalEEMod User's Guide Appendix C (April 2022) states that construction work trips are made by a fleet consisting of 25 percent light-duty auto (or passenger car), 50 percent light-duty truck type 1 (LDT1), and 25 percent light duty truck type 2 (LDT2).

<sup>57</sup> CalEEMod User's Guide Appendix C (April 2022) states that vendor trips are made by a fleet consisting of 50 percent medium trucks (MHDT) and 50 percent heavy trucks (HHDT) and that hauling and onsite truck trips are made by a fleet consisting of 100 percent HHDT.

### *Construction Energy Efficiency/Conservation Measures*

Construction equipment used over the approximately twelve-month construction phase would conform to CARB regulations and California emissions standards and is evidence of related fuel efficiencies. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

The project would utilize construction contractors which practice compliance with applicable CARB regulation regarding retrofiting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with these measures would result in a more efficient use of construction-related energy and would minimize or eliminate wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption.

Additionally, as required by California Code of Regulations Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby minimizing or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Enforcement of idling limitations is realized through periodic site inspections conducted by County building officials, and/or in response to citizen complaints.

### **Operational Energy Demands**

Energy consumption in support of or related to project operations would include transportation energy demands (energy consumed by employee and patron vehicles accessing the project site) and facilities energy demands (energy consumed by building operations and site maintenance activities).

#### *Transportation Fuel Consumption*

Using the CalEEMod output from the air quality and greenhouse gas analyses (Sections 2 and 4 of this report), it is assumed that an average trip for autos and light trucks was assumed to be 30.6 miles and medium trucks and 2- 4-axle trucks were assumed to travel an average of 40 miles.<sup>58</sup> As the project includes the development of the site with industrial uses, in order to present a worst-case scenario, it was assumed that vehicles would operate 365 days per year. Table 22 shows the estimated annual fuel consumption for all classes of vehicles from autos to heavy-heavy trucks.<sup>59</sup>

The proposed project would generate 191 trips per day. The vehicle fleet mix was used from the CalEEMod output. Table 22 shows that an estimated 232,140 gallons of fuel would be consumed per year for the operation of the proposed project.

Trip generation and VMT generated by the proposed project are consistent with other similar industrial uses of similar scale and configuration as reflected respectively in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11<sup>th</sup> Edition, 2021). That is, the proposed project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT, nor associated excess and wasteful vehicle energy consumption. Furthermore, the state of California consumed approximately 4.2

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<sup>58</sup> CalEEMod default distance for W-O (work-other) is 17.4 miles (with trips changed to 40 miles per SCAQMD recommendations) and 30.6 miles for H-W (home-work).

<sup>59</sup> Average fuel economy based on aggregate mileage calculated in EMFAC 2021 for opening year (2025). See Appendix B for EMFAC output.

billion gallons of diesel and 15.1 billion gallons of gasoline in 2015.<sup>60,61</sup> Therefore, the increase in fuel consumption from the proposed project is insignificant in comparison to the State's demand. Therefore, project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

#### *Facility Energy Demands (Electricity and Natural Gas)*

Building operation and site maintenance (including landscape maintenance) would result in the consumption of electricity (provided by BEU) and natural gas (provided by Southern California Gas Company). The annual natural gas and electricity demands were provided per the CalEEMod output from the air quality and greenhouse gas analyses (Sections 2 and 4 of this report) and are provided in Table 23.

As shown in Table 23, the estimated electricity demand for the proposed project is approximately 592,982 kWh per year. In 2022, the non-residential sector of the County of Riverside consumed approximately 8,720 million kWh of electricity.<sup>62</sup> In addition, the estimated natural gas consumption for the proposed project is approximately 935,517 kBtu per year. In 2022, the non-residential sector of the County of Riverside consumed approximately 147 million therms of gas.<sup>63</sup> Therefore, the increase in both electricity and natural gas demand from the proposed project is insignificant compared to the County's 2022 non-residential sector demand.

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building such as in plug-in appliances. In California, the California Building Standards Code Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. Non-building energy use, or "plug-in" energy use can be further subdivided by specific end-use (refrigeration, cooking, appliances, etc.). The proposed project would be required to comply with Title 24 standards.

Furthermore, the proposed project energy demands in total would be comparable to other non-residential projects of similar scale and configuration. Therefore, the project facilities' energy demands and energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

### **RENEWABLE ENERGY AND ENERGY EFFICIENCY PLAN CONSISTENCY**

Regarding federal transportation regulations, the project site is located in an already developed area. Access to/from the project site is from existing roads. These roads are already in place so the project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be proposed pursuant to the ISTEA because SCAG is not planning for intermodal facilities in the project area.

Regarding the State's Energy Plan and compliance with Title 24 CCR energy efficiency standards, the applicant is required to comply with the California Green Building Standard Code requirements for energy efficient buildings and appliances as well as utility energy efficiency programs implemented by BEU and Southern California Gas Company.

Regarding Pavley (AB 1493) regulations, an individual project does not have the ability to comply or conflict with these regulations because they are intended for agencies and their adoption of procedures and protocols for reporting and certifying GHG emission reductions from mobile sources. However, the vehicles associated with the proposed project would be required to comply with federal and state fuel efficiency standards.

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<sup>60</sup> <https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-gasoline-data-facts-and-statistics>

<sup>61</sup> <https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/diesel-fuel-data-facts-and-statistics>

<sup>62</sup> California Energy Commission, Electricity Consumption by County. <https://ecdms.energy.ca.gov/elecbycounty.aspx>

<sup>63</sup> California Energy Commission, Gas Consumption by County. <http://ecdms.energy.ca.gov/gasbycounty.aspx>

Regarding the State's Renewable Energy Portfolio Standards, the project would be required to meet or exceed the energy standards established in the California Green Building Standards Code, Title 24, Part 11 (CALGreen). CALGreen Standards require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials.

As shown in Section 4 above, the proposed project would be consistent with the applicable strategies of the CARB Scoping Plan.

## **CONCLUSIONS**

As supported by the preceding analyses, project construction and operations would not result in the inefficient, wasteful or unnecessary consumption of energy. The proposed project does not include any unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities and is an industrial project that is not proposing any additional features that would require a larger energy demand than other industrial projects of similar scale and configuration. The energy demands of the project are anticipated to be accommodated within the context of available resources and energy delivery systems. The project would therefore not cause or result in the need for additional energy producing or transmission facilities. The project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservation goals within the State of California. Notwithstanding, the project proposes industrial uses and will not have any long-term effects on an energy provider's future energy development or future energy conservation strategies.

**Table 15**  
**Total Electricity System Power (California 2021)**

Fuel Type	California In-State Generation (GWh)	Percent of California In-State Generation	Northwest Imports (GWh)	Southwest Imports (GWh)	Total Imports (GWh)	Percent of Imports	Total California Energy Mix (GWh)	Total California Power Mix
Coal	303	0.20%	181	7,788	7,969	9.50%	8,272	3.00%
Natural Gas	97,431	50.20%	45	7,880	7,925	9.50%	105,356	37.90%
Oil	37	0.00%	-	-	-	0.00%	37	0.00%
Other (Waste Heat/Petroleum Coke)	382	0.20%	68	15	83	0.10%	465	0.20%
Nuclear	16,477	8.50%	524	8,756	9,281	11.10%	25,758	9.30%
Large Hydro	12,036	6.20%	12,042	1,578	13,620	16.30%	25,656	9.20%
Unspecified Sources of Power	-	0.00%	8,156	10,731	18,887	22.60%	18,887	6.80%
Renewables	67,461	34.80%	11,555	14,317	25,872	30.90%	93,333	33.60%
Biomass	5,381	2.80%	864	26	890	1.10%	6,271	2.30%
Geothermal	11,116	5.70%	192	1,906	2,098	2.50%	13,214	4.80%
Small Hydro	2,531	1.30%	304	1	304	0.40%	2,835	1.00%
Solar	33,260	17.10%	220	5,979	6,199	7.40%	39,458	14.20%
Wind	15,173	7.80%	9,976	6,405	16,381	19.60%	31,555	11.40%
<b>Total</b>	<b>194,127</b>	<b>100%</b>	<b>32,572</b>	<b>51,064</b>	<b>83,636</b>	<b>100%</b>	<b>277,764</b>	<b>100%</b>

**Notes:**

- (1) Source: California Energy Commission. 2021 Total System Electric Generation. <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2021-total-system-electric-generation>



**Table 16**  
**BEU 2022 Power Content Mix**

Energy Resources	2022 BEU Power Mix
Eligible Renewable	81.3%
<i>Biomass &amp; Biowaste</i>	25.0%
<i>Geothermal</i>	48.7%
<i>Eligible Hydroelectric</i>	0.0%
<i>Solar</i>	7.6%
<i>Wind</i>	0.0%
Coal	0.0%
Large Hydroelectric	0.9%
Natural Gas	0.0%
Nuclear	9.2%
Other	0.0%
Unspecified Sources of power*	8.6%
Total	100%

Notes:

(1) [https://www.ci.banning.ca.us/DocumentCenter/View/224/PowerContentLabel\\_2015\\_Annual?bidId=](https://www.ci.banning.ca.us/DocumentCenter/View/224/PowerContentLabel_2015_Annual?bidId=)

\* Unspecified sources of power means electricity from transactions that are not traceable to specific generation sources.

**Table 17**  
**Project Construction Power Cost and Electricity Usage**

Power Cost (per 1,000 square foot of building per month of construction)	Total Building Size (1,000 Square Foot)	Construction Duration (months)	Total Project Construction Power Cost
\$2.37	49,000	12	\$1,393.56

Cost per kWh <sup>1</sup>	Total Project Construction Electricity Usage (kWh)
\$0.10	13,798

Notes:

(1) Assumes the project will be under the Industrial Service (IS-1) rate under BEU.

<https://www.banningca.gov/DocumentCenter/View/9921/Industrial-Service-Rate-Schedule---Effective-January-1-2022>

**Table 18  
Construction Equipment Fuel Consumption Estimates**

Phase	Number of Days	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor	HP hrs/day	Total Fuel Consumption (gal diesel fuel) <sup>1</sup>
Grading	30	Graders	1	8	148	0.41	485	787
	30	Excavator	2	8	36	0.38	219	355
	30	Tractors/Loaders/Backhoes	2	8	84	0.37	497	806
	30	Scrapers	2	8	423	0.48	3249	5,268
	30	Rubber Tired Dozers	1	8	367	0.40	1174	1,904
Building Construction	215	Forklifts	4	8	82	0.20	525	6,099
	215	Generator Sets	1	8	14	0.74	83	963
	215	Cranes	1	7	367	0.29	745	8,658
	215	Welders	2	8	46	0.45	331	3,849
	215	Tractors/Loaders/Backhoes	4	7	84	0.37	870	10,114
Paving	20	Pavers	2	8	81	0.42	544	588
	20	Paving Equipment	2	8	89	0.36	513	554
	20	Rollers	2	8	36	0.38	219	237
Architectural Coating	20	Air Compressors	1	6	37	0.48	107	115
<b>CONSTRUCTION FUEL DEMAND (gallons of diesel fuel)</b>								<b>40,299</b>

Notes:

- (1) Using Carl Moyer Guidelines Table D-21 Fuel consumption rate factors (bhp-hr/gal) for engines less than 750 hp.  
(Source: [https://www.arb.ca.gov/msprog/moyer/guidelines/2017gl/2017\\_gl\\_appendix\\_d.pdf](https://www.arb.ca.gov/msprog/moyer/guidelines/2017gl/2017_gl_appendix_d.pdf))

**Table 19  
Construction Worker Fuel Consumption Estimates**

Phase	Number of Days	Worker Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Grading	30	20	18.5	11,100	26.02	427
Building Construction	215	21	18.5	81,937	26.02	3,150
Paving	20	15	18.5	5,550	26.02	213
Architectural Coating	20	4	18.5	1,524	26.02	59
Total Construction Worker Fuel Consumption						3,848

Notes:

- (1) Assumptions for the worker trip length and vehicle miles traveled are consistent with CalEEMod 2022.1.1.20 defaults.
- (2) Per CalEEMod User's Guide Appendix C (April 2022), CalEEMod assumes that construction work trips are made by a fleet consisting of 25 percent light-duty auto (or passenger car), 50 percent light-duty truck type 1 (LDT1), and 25 percent light duty truck type 2 (LDT2).

**Table 20**  
**Construction Vendor Fuel Consumption Estimates (MHD & HHD Trucks)**

Phase	Number of Days	Vendor Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Grading	30	0	10.2	0	6.90	0
Building Construction	215	8	10.2	17,610	6.90	2,552
Paving	20	0	10.2	0	6.90	0
Architectural Coating	20	0	10.2	0	6.90	0
Total Construction Vendor Fuel Consumption						2,552

Notes:

- (1) Assumptions for the vendor trip length and vehicle miles traveled are consistent with CalEEMod 2022.1.1.20 defaults.
- (2) Per CalEEMod User's Guide Appendix C (April 2022), CalEEMod assumes vendor trips are made by a fleet consisting of 50 percent medium trucks (MHDT) and 50 percent heavy trucks (HHDT).

**Table 21**  
**Construction Hauling Fuel Consumption Estimates (HHD Trucks)**

Phase	Number of Days	Total Hauling Trips	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Grading	30	0	20	0	6.05	0
Building Construction	215	0	20	0	6.05	0
Paving	20	0	20	0	6.05	0
Architectural Coating	20	0	20	0	6.05	0
Total Construction Hauling Fuel Consumption						0

Notes:

- (1) Assumptions for the hauling trip length and vehicle miles traveled are consistent with CalEEMod Version 2022.1.1.20 defaults.
- (2) Per CalEEMod User's Guide Appendix C (April 2022), CalEEMod assumes hauling and onsite truck trips are made by a fleet consisting of 100 percent HHDT.

**Table 22**  
**Estimated Vehicle Operations Fuel Consumption**

Vehicle Type	Vehicle Mix	Number of Vehicles	Average Trip (miles) <sup>1</sup>	Daily VMT	Average Fuel Economy (mpg)	Total Gallons per Day	Total Annual Fuel Consumption (gallons)
Light Auto	Automobile	53	30.6	1,622	32.23	50.32	18,367
Light Truck	Automobile	4	30.6	122	24.83	4.93	1,799
Light Truck	Automobile	22	30.6	673	24.45	27.53	10,050
Medium Truck	Automobile	17	40	680	20.06	33.90	12,373
Light Heavy Truck	2-Axle Truck	15	40	600	16	37.50	13,688
Light Heavy Truck 10,000 lbs +	2-Axle Truck	4	40	160	15.23	10.51	3,835
Medium Heavy Truck	3-Axle Truck	4	40	160	7.87	20.33	7,421
Heavy Heavy Truck	4-Axle Truck	69	40	2,760	6.15	448.78	163,805
Motorcycle	Automobile	3	30.6	92	41.66	2.20	804
Total		191	--	6,869	-	636.00	--
Total Annual Fuel Consumption							232,140

Notes:

(1) Based on the size of the site and relative location, trips were assumed to be local rather than regional.

**Table 23**  
**Project Annual Operational Energy Demand Summary**

Natural Gas Demand	kBTU/year <sup>1</sup>
General Light Industry	935,517
Total	935,517

Electricity Demand	kWh/year
General Light Industry	225,515
Parking Lot	367,467
Total	592,982

Notes:

(1) Taken from the CalEEMod Version 2022.1.1.20 output (Appendix B of this report).



## 6. EMISSIONS REDUCTION MEASURES

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### CONSTRUCTION MEASURES

*Adherence to SCAQMD Rule 403 is required.*

No construction mitigation is required.

### OPERATIONAL MEASURES

No operational mitigation is required.

## 7. REFERENCES

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2009 Health Risk Assessments for Proposed Land Use Projects

### **California Air Resources Board**

2008 Resolution 08-43

2008 Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act

2008 ARB Recommended Interim Risk Management Policy for Inhalation-Based Residential Cancer Risk – Frequently Asked Questions

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### **South Coast Air Quality Management District**

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- 2007 2007 Air Quality Management Plan
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### **U.S. Geological Survey**

- 2011 Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California

# APPENDICES

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Appendix A Glossary

Appendix B CalEEMod Model Detailed Report & EMFAC Data

## **APPENDIX A**

### **GLOSSARY**

AQMP	Air Quality Management Plan
BACT	Best Available Control Technologies
CAAQS	California Ambient Air Quality Standards
CalEPA	California Environmental Protection Agency
CARB	California Air Resources Board
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CEQA	California Environmental Quality Act
CFCs	Chlorofluorocarbons
CH <sub>4</sub>	Methane
CNG	Compressed natural gas
CO	Carbon monoxide
CO <sub>2</sub>	Carbon dioxide
CO <sub>2</sub> e	Carbon dioxide equivalent
DPM	Diesel particulate matter
EPA	U.S. Environmental Protection Agency
GHG	Greenhouse gas
GWP	Global warming potential
HIDPM	Hazard Index Diesel Particulate Matter
HFCs	Hydrofluorocarbons
IPCC	International Panel on Climate Change
LCFS	Low Carbon Fuel Standard
LST	Localized Significant Thresholds
MTCO <sub>2</sub> e	Metric tons of carbon dioxide equivalent
MMTCO <sub>2</sub> e	Million metric tons of carbon dioxide equivalent
MPO	Metropolitan Planning Organization
NAAQS	National Ambient Air Quality Standards
NO <sub>x</sub>	Nitrogen Oxides
NO <sub>2</sub>	Nitrogen dioxide
N <sub>2</sub> O	Nitrous oxide
O <sub>3</sub>	Ozone
OPR	Governor's Office of Planning and Research
PFCs	Perfluorocarbons
PM	Particle matter
PM <sub>10</sub>	Particles that are less than 10 micrometers in diameter
PM <sub>2.5</sub>	Particles that are less than 2.5 micrometers in diameter
PMI	Point of maximum impact
PPM	Parts per million
PPB	Parts per billion
RTIP	Regional Transportation Improvement Plan
RTP	Regional Transportation Plan
SANBAG	San Bernardino Association of Governments
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SSAB	Salton Sea Air Basin
SF <sub>6</sub>	Sulfur hexafluoride
SIP	State Implementation Plan
SO <sub>x</sub>	Sulfur Oxides
TAC	Toxic air contaminants
VOC	Volatile organic compounds

## **APPENDIX B**

### **CALEEMOD MODEL DETAILED REPORT & EMFAC DATA**

# 19588 Brown Strauss Industrial Project Detailed Report

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# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	19588 Brown Strauss Industrial Project
Construction Start Date	7/1/2024
Operational Year	2025
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.50
Precipitation (days)	19.2
Location	33.92269925474096, -116.89204801606418
County	Riverside-South Coast
City	Banning
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5635
EDFZ	11
Electric Utility	City of Banning Electric Department
Gas Utility	Southern California Gas
App Version	2022.1.1.20

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
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Unrefrigerated Warehouse-Rail	49.0	1000sqft	1.07	49,000	62,456	—	—	—
Parking Lot	34.0	Space	9.63	0.00	0.00	—	—	—
Other Non-Asphalt Surfaces	2.13	Acre	2.13	0.00	0.00	—	—	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.30	33.7	34.4	31.8	0.06	1.45	3.85	5.30	1.33	1.49	2.82	—	6,886	6,886	0.28	0.09	2.75	6,913
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.02	1.69	14.9	18.9	0.03	0.64	0.34	0.98	0.59	0.08	0.67	—	3,533	3,533	0.14	0.07	0.05	3,559
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.92	2.24	6.99	7.89	0.01	0.30	0.41	0.71	0.27	0.14	0.42	—	1,554	1,554	0.06	0.03	0.27	1,563
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.17	0.41	1.27	1.44	< 0.005	0.05	0.07	0.13	0.05	0.03	0.08	—	257	257	0.01	< 0.005	0.04	259

### 2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	4.30	3.62	34.4	31.8	0.06	1.45	3.85	5.30	1.33	1.49	2.82	—	6,886	6,886	0.28	0.07	1.88	6,913
2025	3.10	33.7	22.3	31.7	0.05	0.93	0.59	1.52	0.85	0.14	1.00	—	5,462	5,462	0.22	0.09	2.75	5,498
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	2.02	1.69	14.9	18.9	0.03	0.64	0.34	0.98	0.59	0.08	0.67	—	3,533	3,533	0.14	0.07	0.05	3,559
2025	1.88	1.57	13.9	18.7	0.03	0.55	0.34	0.89	0.51	0.08	0.59	—	3,524	3,524	0.14	0.07	0.05	3,549
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.92	0.77	6.99	7.89	0.01	0.30	0.41	0.71	0.27	0.14	0.42	—	1,554	1,554	0.06	0.03	0.27	1,563
2025	0.64	2.24	4.73	6.44	0.01	0.19	0.12	0.31	0.18	0.03	0.20	—	1,188	1,188	0.05	0.02	0.26	1,196
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.17	0.14	1.27	1.44	< 0.005	0.05	0.07	0.13	0.05	0.03	0.08	—	257	257	0.01	< 0.005	0.04	259
2025	0.12	0.41	0.86	1.17	< 0.005	0.03	0.02	0.06	0.03	0.01	0.04	—	197	197	0.01	< 0.005	0.04	198

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.06	3.75	23.4	34.0	0.14	0.87	5.29	6.16	0.80	1.38	2.18	46.5	16,320	16,366	5.18	1.57	36.3	16,999
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.65	3.37	23.9	29.5	0.14	0.86	5.29	6.15	0.80	1.38	2.18	46.5	16,117	16,164	5.18	1.57	0.94	16,762



Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.46	3.23	20.4	26.3	0.13	0.67	5.23	5.91	0.63	1.37	1.99	46.5	15,229	15,275	5.13	1.56	15.7	15,885
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.45	0.59	3.73	4.79	0.02	0.12	0.95	1.08	0.11	0.25	0.36	7.70	2,521	2,529	0.85	0.26	2.60	2,630

## 2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.08	0.81	10.6	13.9	0.11	0.18	5.29	5.47	0.17	1.38	1.55	—	11,969	11,969	0.23	1.48	36.3	12,452
Area	0.38	1.60	0.02	2.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.76	8.76	< 0.005	< 0.005	—	8.80
Energy	0.03	0.01	0.25	0.21	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,648	1,648	0.12	0.01	—	1,654
Water	—	—	—	—	—	—	—	—	—	—	—	21.7	102	124	2.23	0.05	—	196
Waste	—	—	—	—	—	—	—	—	—	—	—	24.8	0.00	24.8	2.48	0.00	—	86.8
Off-Road	1.58	1.32	12.5	17.7	0.02	0.66	—	0.66	0.61	—	0.61	—	2,592	2,592	0.11	0.02	—	2,601
Total	3.06	3.75	23.4	34.0	0.14	0.87	5.29	6.16	0.80	1.38	2.18	46.5	16,320	16,366	5.18	1.57	36.3	16,999
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.05	0.78	11.1	11.6	0.11	0.18	5.29	5.47	0.17	1.38	1.55	—	11,776	11,776	0.23	1.48	0.94	12,224
Area	—	1.25	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.03	0.01	0.25	0.21	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,648	1,648	0.12	0.01	—	1,654
Water	—	—	—	—	—	—	—	—	—	—	—	21.7	102	124	2.23	0.05	—	196
Waste	—	—	—	—	—	—	—	—	—	—	—	24.8	0.00	24.8	2.48	0.00	—	86.8
Off-Road	1.58	1.32	12.5	17.7	0.02	0.66	—	0.66	0.61	—	0.61	—	2,592	2,592	0.11	0.02	—	2,601

Total	2.65	3.37	23.9	29.5	0.14	0.86	5.29	6.15	0.80	1.38	2.18	46.5	16,117	16,164	5.18	1.57	0.94	16,762
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.05	0.78	11.2	12.0	0.11	0.18	5.23	5.41	0.17	1.37	1.54	—	11,803	11,803	0.23	1.48	15.7	12,266
Area	0.26	1.49	0.01	1.46	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.00	6.00	< 0.005	< 0.005	—	6.02
Energy	0.03	0.01	0.25	0.21	< 0.005	0.02	—	0.02	0.02	—	0.02	—	1,472	1,472	0.11	0.01	—	1,478
Water	—	—	—	—	—	—	—	—	—	—	—	21.7	102	124	2.23	0.05	—	196
Waste	—	—	—	—	—	—	—	—	—	—	—	24.8	0.00	24.8	2.48	0.00	—	86.8
Off-Road	1.12	0.94	8.94	12.6	0.02	0.47	—	0.47	0.43	—	0.43	—	1,846	1,846	0.07	0.01	—	1,853
Total	2.46	3.23	20.4	26.3	0.13	0.67	5.23	5.91	0.63	1.37	1.99	46.5	15,229	15,275	5.13	1.56	15.7	15,885
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.19	0.14	2.05	2.19	0.02	0.03	0.95	0.99	0.03	0.25	0.28	—	1,954	1,954	0.04	0.25	2.60	2,031
Area	0.05	0.27	< 0.005	0.27	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.99	0.99	< 0.005	< 0.005	—	1.00
Energy	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	244	244	0.02	< 0.005	—	245
Water	—	—	—	—	—	—	—	—	—	—	—	3.59	16.9	20.5	0.37	0.01	—	32.4
Waste	—	—	—	—	—	—	—	—	—	—	—	4.11	0.00	4.11	0.41	0.00	—	14.4
Off-Road	0.20	0.17	1.63	2.30	< 0.005	0.09	—	0.09	0.08	—	0.08	—	306	306	0.01	< 0.005	—	307
Total	0.45	0.59	3.73	4.79	0.02	0.12	0.95	1.08	0.11	0.25	0.36	7.70	2,521	2,529	0.85	0.26	2.60	2,630

### 3. Construction Emissions Details

#### 3.1. Grading (2024) - Unmitigated

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

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

Off-Road Equipment	4.19	3.52	34.3	30.2	0.06	1.45	—	1.45	1.33	—	1.33	—	6,598	6,598	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	3.59	3.59	—	1.42	1.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.34	0.29	2.82	2.48	0.01	0.12	—	0.12	0.11	—	0.11	—	542	542	0.02	< 0.005	—	544
Dust From Material Movement	—	—	—	—	—	—	0.30	0.30	—	0.12	0.12	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.51	0.45	< 0.005	0.02	—	0.02	0.02	—	0.02	—	89.8	89.8	< 0.005	< 0.005	—	90.1
Dust From Material Movement	—	—	—	—	—	—	0.05	0.05	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.10	0.10	1.67	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	288	288	0.01	0.01	1.14	292

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	22.0	22.0	< 0.005	< 0.005	0.04	22.3	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.65	3.65	< 0.005	< 0.005	0.01	3.70	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	

### 3.3. Building Construction (2024) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.90	1.59	14.4	17.5	0.03	0.64	—	0.64	0.59	—	0.59	—	3,012	3,012	0.12	0.02	—	3,022
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.90	1.59	14.4	17.5	0.03	0.64	—	0.64	0.59	—	0.59	—	3,012	3,012	0.12	0.02	—	3,022

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.53	0.44	4.04	4.90	0.01	0.18	—	0.18	0.16	—	0.16	—	843	843	0.03	0.01	—	846	
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Off-Road Equipment	0.10	0.08	0.74	0.89	< 0.005	0.03	—	0.03	0.03	—	0.03	—	140	140	0.01	< 0.005	—	140	
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.12	0.11	0.10	1.72	0.00	0.00	0.27	0.27	0.00	0.06	0.06	—	296	296	0.01	0.01	1.18	301	
Vendor	0.01	0.01	0.28	0.09	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	249	249	0.01	0.04	0.70	261	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.11	0.10	0.12	1.30	0.00	0.00	0.27	0.27	0.00	0.06	0.06	—	272	272	0.01	0.01	0.03	276	
Vendor	0.01	0.01	0.30	0.09	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	250	250	0.01	0.04	0.02	261	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.03	0.03	0.03	0.38	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	77.2	77.2	< 0.005	< 0.005	0.14	78.2	
Vendor	< 0.005	< 0.005	0.08	0.02	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	69.8	69.8	< 0.005	0.01	0.08	73.0	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	

Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	12.8	12.8	< 0.005	< 0.005	0.02	13.0
Vendor	< 0.005	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	11.6	11.6	< 0.005	< 0.005	0.01	12.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.5. Building Construction (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.77	1.48	13.5	17.4	0.03	0.55	—	0.55	0.51	—	0.51	—	3,012	3,012	0.12	0.02	—	3,022
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.77	1.48	13.5	17.4	0.03	0.55	—	0.55	0.51	—	0.51	—	3,012	3,012	0.12	0.02	—	3,022
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.54	0.45	4.14	5.35	0.01	0.17	—	0.17	0.16	—	0.16	—	925	925	0.04	0.01	—	929
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.08	0.76	0.98	< 0.005	0.03	—	0.03	0.03	—	0.03	—	153	153	0.01	< 0.005	—	154

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.09	0.09	1.59	0.00	0.00	0.27	0.27	0.00	0.06	0.06	—	290	290	0.01	0.01	1.07	294
Vendor	0.01	0.01	0.27	0.08	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	246	246	0.01	0.04	0.70	258
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.10	1.20	0.00	0.00	0.27	0.27	0.00	0.06	0.06	—	267	267	0.01	0.01	0.03	270
Vendor	0.01	< 0.005	0.28	0.09	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	246	246	0.01	0.04	0.02	257
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.39	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	83.0	83.0	< 0.005	< 0.005	0.14	84.1
Vendor	< 0.005	< 0.005	0.09	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	75.5	75.5	< 0.005	0.01	0.09	79.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	13.7	13.7	< 0.005	< 0.005	0.02	13.9
Vendor	< 0.005	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	12.5	12.5	< 0.005	< 0.005	0.02	13.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.7. Paving (2025) - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.95	0.80	7.45	9.98	0.01	0.35	—	0.35	0.32	—	0.32	—	1,511	1,511	0.06	0.01	—	1,517
Paving	—	1.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.41	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Paving	—	0.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Paving	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.07	1.16	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	211	211	0.01	0.01	0.78	215
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00



Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.8	10.8	< 0.005	< 0.005	0.02	10.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.79	1.79	< 0.005	< 0.005	< 0.005	1.81
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

### 3.9. Architectural Coating (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	29.8	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.32	7.32	< 0.005	< 0.005	—	7.34
Architectural Coatings	—	1.64	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.21	1.21	< 0.005	< 0.005	—	1.22
Architectural Coatings	—	0.30	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.32	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	58.0	58.0	< 0.005	< 0.005	0.21	58.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.96	2.96	< 0.005	< 0.005	0.01	3.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.49	0.49	< 0.005	< 0.005	< 0.005	0.50

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-Rail	1.08	0.81	10.6	13.9	0.11	0.18	5.29	5.47	0.17	1.38	1.55	—	11,969	11,969	0.23	1.48	36.3	12,452
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.08	0.81	10.6	13.9	0.11	0.18	5.29	5.47	0.17	1.38	1.55	—	11,969	11,969	0.23	1.48	36.3	12,452
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-Rail	1.05	0.78	11.1	11.6	0.11	0.18	5.29	5.47	0.17	1.38	1.55	—	11,776	11,776	0.23	1.48	0.94	12,224
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.05	0.78	11.1	11.6	0.11	0.18	5.29	5.47	0.17	1.38	1.55	—	11,776	11,776	0.23	1.48	0.94	12,224	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Unrefrigerated Warehouse-Rail	0.19	0.14	2.05	2.19	0.02	0.03	0.95	0.99	0.03	0.25	0.28	—	1,954	1,954	0.04	0.25	2.60	2,031	
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Total	0.19	0.14	2.05	2.19	0.02	0.03	0.95	0.99	0.03	0.25	0.28	—	1,954	1,954	0.04	0.25	2.60	2,031	

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	—	280	280	0.02	< 0.005	—	281
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	456	456	0.03	< 0.005	—	458
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

undefined	—	—	—	—	—	—	—	—	—	—	—	—	611	611	0.04	0.01	—	614
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,348	1,348	0.10	0.01	—	1,354
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	—	280	280	0.02	< 0.005	—	281
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	456	456	0.03	< 0.005	—	458
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
undefined	—	—	—	—	—	—	—	—	—	—	—	—	611	611	0.04	0.01	—	614
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,348	1,348	0.10	0.01	—	1,354
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	—	46.4	46.4	< 0.005	< 0.005	—	46.6
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	75.5	75.5	0.01	< 0.005	—	75.9
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
undefined	—	—	—	—	—	—	—	—	—	—	—	—	72.1	72.1	0.01	< 0.005	—	72.4
Total	—	—	—	—	—	—	—	—	—	—	—	—	194	194	0.01	< 0.005	—	195

#### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-Rail	0.03	0.01	0.25	0.21	< 0.005	0.02	—	0.02	0.02	—	0.02	—	300	300	0.03	< 0.005	—	301
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.01	0.25	0.21	< 0.005	0.02	—	0.02	0.02	—	0.02	—	300	300	0.03	< 0.005	—	301
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-Rail	0.03	0.01	0.25	0.21	< 0.005	0.02	—	0.02	0.02	—	0.02	—	300	300	0.03	< 0.005	—	301
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.01	0.25	0.21	< 0.005	0.02	—	0.02	0.02	—	0.02	—	300	300	0.03	< 0.005	—	301
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-Rail	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	49.6	49.6	< 0.005	< 0.005	—	49.8
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.01	< 0.005	0.05	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	49.6	49.6	< 0.005	< 0.005	—	49.8

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	1.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.38	0.35	0.02	2.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.76	8.76	< 0.005	< 0.005	—	8.80
Total	0.38	1.60	0.02	2.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.76	8.76	< 0.005	< 0.005	—	8.80
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	1.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	1.25	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.20	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.05	0.04	< 0.005	0.27	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.99	0.99	< 0.005	< 0.005	—	1.00
Total	0.05	0.27	< 0.005	0.27	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.99	0.99	< 0.005	< 0.005	—	1.00

#### 4.4. Water Emissions by Land Use

##### 4.4.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	21.7	102	124	2.23	0.05	—	196
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	21.7	102	124	2.23	0.05	—	196



Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	21.7	102	124	2.23	0.05	—	196
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	21.7	102	124	2.23	0.05	—	196
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	3.59	16.9	20.5	0.37	0.01	—	32.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	3.59	16.9	20.5	0.37	0.01	—	32.4

## 4.5. Waste Emissions by Land Use

### 4.5.1. Unmitigated

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

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

Unrefrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	24.8	0.00	24.8	2.48	0.00	—	86.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	24.8	0.00	24.8	2.48	0.00	—	86.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	24.8	0.00	24.8	2.48	0.00	—	86.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	24.8	0.00	24.8	2.48	0.00	—	86.8
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unrefrigerated Warehouse-Rail	—	—	—	—	—	—	—	—	—	—	—	4.11	0.00	4.11	0.41	0.00	—	14.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.11	0.00	4.11	0.41	0.00	—	14.4

4.6. Refrigerant Emissions by Land Use

#### 4.6.1. Unmitigated

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

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

#### 4.7. Offroad Emissions By Equipment Type

##### 4.7.1. Unmitigated

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

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Forklifts	1.58	1.32	12.5	17.7	0.02	0.66	—	0.66	0.61	—	0.61	—	2,592	2,592	0.11	0.02	—	2,601
Cranes	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	1.58	1.32	12.5	17.7	0.02	0.66	—	0.66	0.61	—	0.61	—	2,592	2,592	0.11	0.02	—	2,601
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Forklifts	1.58	1.32	12.5	17.7	0.02	0.66	—	0.66	0.61	—	0.61	—	2,592	2,592	0.11	0.02	—	2,601
Cranes	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	1.58	1.32	12.5	17.7	0.02	0.66	—	0.66	0.61	—	0.61	—	2,592	2,592	0.11	0.02	—	2,601
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Forklifts	0.20	0.17	1.63	2.30	< 0.005	0.09	—	0.09	0.08	—	0.08	—	306	306	0.01	< 0.005	—	307
Cranes	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.20	0.17	1.63	2.30	< 0.005	0.09	—	0.09	0.08	—	0.08	—	306	306	0.01	< 0.005	—	307

## 4.8. Stationary Emissions By Equipment Type

### 4.8.1. Unmitigated

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

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

## 4.9. User Defined Emissions By Equipment Type

### 4.9.1. Unmitigated

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

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

### 4.10. Soil Carbon Accumulation By Vegetation Type

#### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Grading	Grading	7/1/2024	8/10/2024	5.00	30.0	—
Building Construction	Building Construction	8/11/2024	6/6/2025	5.00	215	—

Paving	Paving	5/25/2025	6/21/2025	5.00	20.0	—
Architectural Coating	Architectural Coating	6/3/2025	6/30/2025	5.00	20.0	—

## 5.2. Off-Road Equipment

### 5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Building Construction	Forklifts	Diesel	Average	4.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Welders	Diesel	Average	2.00	8.00	46.0	0.45
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	4.00	7.00	84.0	0.37
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

## 5.3. Construction Vehicles

### 5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
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Grading	—	—	—	—
Grading	Worker	20.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	20.6	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	8.03	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	4.12	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

## 5.4. Vehicles

### 5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%

## 5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	73,500	24,500	30,736

## 5.6. Dust Mitigation

### 5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Grading	—	—	90.0	0.00	—
Paving	0.00	0.00	0.00	0.00	11.8

### 5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%

## 5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Unrefrigerated Warehouse-Rail	0.00	0%
Parking Lot	9.63	100%
Other Non-Asphalt Surfaces	2.13	0%

## 5.8. Construction Electricity Consumption and Emissions Factors

### kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	453	0.03	< 0.005

2025	0.00	453	0.03	< 0.005
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## 5.9. Operational Mobile Sources

### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Unrefrigerated Warehouse-Rail	191	191	191	69,752	6,709	6,709	6,709	2,448,936
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

## 5.10. Operational Area Sources

### 5.10.1. Hearths

#### 5.10.1.1. Unmitigated

### 5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	73,500	24,500	30,736

### 5.10.3. Landscape Equipment

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

## 5.11. Operational Energy Consumption

### 5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Unrefrigerated Warehouse-Rail	225,515	453	0.0330	0.0040	935,517
Parking Lot	367,467	453	0.0330	0.0040	0.00
Other Non-Asphalt Surfaces	0.00	453	0.0330	0.0040	0.00

## 5.12. Operational Water and Wastewater Consumption

### 5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Unrefrigerated Warehouse-Rail	11,331,250	990,284
Parking Lot	0.00	0.00
Other Non-Asphalt Surfaces	0.00	0.00

## 5.13. Operational Waste Generation

### 5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Unrefrigerated Warehouse-Rail	46.1	—
Parking Lot	0.00	—
Other Non-Asphalt Surfaces	0.00	—

## 5.14. Operational Refrigeration and Air Conditioning Equipment

## 5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
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## 5.15. Operational Off-Road Equipment

## 5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Forklifts	Diesel	Average	8.00	17.0	82.0	0.20
Cranes	Electric	Average	1.00	17.0	367	0.29

## 5.16. Stationary Sources

## 5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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## 5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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## 5.17. User Defined

Equipment Type	Fuel Type
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## 5.18. Vegetation

## 5.18.1. Land Use Change

## 5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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### 5.18.1. Biomass Cover Type

#### 5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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### 5.18.2. Sequestration

#### 5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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## 6. Climate Risk Detailed Report

### 6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	31.8	annual days of extreme heat
Extreme Precipitation	5.45	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	23.6	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events.

Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

## 6.2. Initial Climate Risk Scores

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

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

## 6.3. Adjusted Climate Risk Scores

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

Air Quality Degradation	N/A	N/A	N/A	N/A
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The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

## 6.4. Climate Risk Reduction Measures

# 7. Health and Equity Details

## 7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	97.0
AQ-PM	45.3
AQ-DPM	53.7
Drinking Water	59.0
Lead Risk Housing	41.8
Pesticides	0.00
Toxic Releases	20.7
Traffic	79.7
Effect Indicators	—
CleanUp Sites	53.4
Groundwater	0.00
Haz Waste Facilities/Generators	81.5
Impaired Water Bodies	0.00
Solid Waste	25.7



Sensitive Population	—
Asthma	89.4
Cardio-vascular	98.2
Low Birth Weights	26.6
Socioeconomic Factor Indicators	—
Education	82.8
Housing	30.2
Linguistic	47.1
Poverty	87.6
Unemployment	77.8

## 7.2. Healthy Places Index Scores

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

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	25.92069806
Employed	1.000898242
Median HI	28.89772873
Education	—
Bachelor's or higher	27.90966252
High school enrollment	100
Preschool enrollment	4.260233543
Transportation	—
Auto Access	44.50147568
Active commuting	21.84011292
Social	—
2-parent households	53.68920826

Voting	36.84075452
Neighborhood	—
Alcohol availability	73.73283716
Park access	22.95649942
Retail density	14.44886437
Supermarket access	40.24124214
Tree canopy	1.642499679
Housing	—
Homeownership	52.86795842
Housing habitability	69.62658796
Low-inc homeowner severe housing cost burden	47.17053766
Low-inc renter severe housing cost burden	91.21006031
Uncrowded housing	34.15886052
Health Outcomes	—
Insured adults	21.67329655
Arthritis	0.0
Asthma ER Admissions	8.2
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	33.4
Cognitively Disabled	30.7
Physically Disabled	12.7
Heart Attack ER Admissions	0.0

Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	88.4
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.9
SLR Inundation Area	0.0
Children	56.6
Elderly	42.0
English Speaking	60.7
Foreign-born	38.6
Outdoor Workers	41.1
Climate Change Adaptive Capacity	—
Impervious Surface Cover	90.7
Traffic Density	62.4
Traffic Access	23.0
Other Indices	—
Hardship	63.7
Other Decision Support	—
2016 Voting	39.7

### 7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	72.0
Healthy Places Index Score for Project Location (b)	13.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

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

### 7.4. Health & Equity Measures

No Health & Equity Measures selected.

### 7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

### 7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

## 8. User Changes to Default Data

Screen	Justification
Land Use	14.27 net acre site with 49,000 sf total industrial use including 45,000 sf warehouse, 3,000 sf office, & two 500 sf enclosed saw sheds (46,454 sf or 1.07 ac footprint); 34 parking spaces with total parking/asphalt area covering 9.63 ac; 2.13 ac of gravel areas; & 62,456 sf or 1.44 ac landscaping.
Construction: Construction Phases	Construction to begin early July 2024 and be complete June 2024, taking 12 months. Site is vacant, no site prep or demolition needed. Site anticipated to balance.
Construction: Off-Road Equipment	CalEEMod default construction timing for building construction was reduced by ~28%; therefore, CalEEMod default construction equipment list has been increased by ~28%.
Operations: Vehicle Data	Per TIA, 191 total daily trips at 8.3 trips per acre (3.9 trips/thousand square foot). Percentages changed to 51.8% autos (H-W) & 48.2% trucks (W-O) for warehouse use. Per SCAQMD W-O trip length changed to 40 miles.

Operations: Fleet Mix	Revised vehicle mix from TIA of 51.8% Autos, 10% 2-Axle Trucks, 2.1% 3-Axle Trucks and 36.1% 4+ Axle Trucks.
Operations: Off-Road Equipment	Site is anticipated to utilize up to 6 forklifts on-site within the yard. The forklifts will be in operation during all shift hours (two shifts, 5 AM to 1:30 PM and 3:00 PM to 11:30 PM) or a total of 17 hours a day. To be conservative, assumed up to 8 forklifts at 17 hours a day. There will also be 1 crane operating within the building during shift hours.

Source: EMFAC2021 (v1.0.1) Emissions Inventory

Region Type: Air Basin

Region: South Coast

Calendar Year: 2024

Season: Annual

Vehicle Classification: EMFAC2007 Categories

Units: miles/day for CVMT and EVMT, trips/day for Trips, kWh/day for Energy Consumption, tons/day for Emissions, 1000 gallons/day for Fuel Consumption

Region	Calendar Year	Vehicle Category	Model Year	Speed	Fuel	Population	Trips	Energy Consumption	Fuel Consumption	Fuel Consumption	Fuel Consumption	Total Fuel Consumption	Total VMT	Total VMT	Miles Per Gallon	Vehicle Class
South Coast	2024	HHDT	Aggregate	Aggregate	Gasoline	64.44258918	1289.367324	0	1.014953313	1014.953313	0	2024777.341	4089.563798	12241163.02	6.05	HHDT
South Coast	2024	HHDT	Aggregate	Aggregate	Diesel	92441.35478	1412165.896	0	1913.394963	1913394.963	0	0	11547992.76	0	0	
South Coast	2024	HHDT	Aggregate	Aggregate	Electricity	291.6455699	3957.931048	53675.68637	0	0	0	0	29968.60823	0	0	
South Coast	2024	HHDT	Aggregate	Aggregate	Natural Gas	10239.41118	65591.6649	0	110.3674239	110367.4239	0	0	659112.0885	0	0	
South Coast	2024	LDA	Aggregate	Aggregate	Gasoline	5306414.643	24694249.92	0	7344.088111	7344088.111	0	7477826.02	213709568	234427100.1	31.35	LDA
South Coast	2024	LDA	Aggregate	Aggregate	Diesel	14576.24539	60769.87324	0	10.8801639	10880.1639	0	0	447477.6987	0	0	
South Coast	2024	LDA	Aggregate	Aggregate	Electricity	278128.8376	1389682.584	5111363.117	0	0	0	0	13239042.59	0	0	
South Coast	2024	LDA	Aggregate	Aggregate	Plug-in Hybrid	148523.7719	614145.7966	1077276.451	122.8577446	122857.7446	0	0	7031011.891	0	0	
South Coast	2024	LDT1	Aggregate	Aggregate	Gasoline	490973.66	2160511.155	0	732.0519082	732051.9082	0	732790.8073	17788975.08	17880208.77	24.40	LDT1
South Coast	2024	LDT1	Aggregate	Aggregate	Diesel	178.9755587	511.7069897	0	0.143610092	143.6100917	0	0	3350.970633	0	0	
South Coast	2024	LDT1	Aggregate	Aggregate	Electricity	1222.38175	5792.038269	19502.00434	0	0	0	0	50512.52673	0	0	
South Coast	2024	LDT1	Aggregate	Aggregate	Plug-in Hybrid	719.1459798	2973.668627	6252.19918	0.595288961	595.288961	0	0	37370.18633	0	0	
South Coast	2024	LDT2	Aggregate	Aggregate	Gasoline	2478766.891	11657788.42	0	4349.789244	4349789.244	0	4378677.328	102696789.3	104694804	23.91	LDT2
South Coast	2024	LDT2	Aggregate	Aggregate	Diesel	8144.015434	39238.54602	0	11.30594953	11305.94953	0	0	354089.2658	0	0	
South Coast	2024	LDT2	Aggregate	Aggregate	Electricity	16093.72479	82313.84321	227422.9885	0	0	0	0	589052.7755	0	0	
South Coast	2024	LDT2	Aggregate	Aggregate	Plug-in Hybrid	21096.29549	87233.18184	170348.4264	17.58213479	17582.13479	0	0	1054872.659	0	0	
South Coast	2024	LHDT1	Aggregate	Aggregate	Gasoline	200171.2476	2982253.334	0	578.7247685	578724.7685	0	792458.1109	7891021.12	12336952.39	15.57	LHDT1
South Coast	2024	LHDT1	Aggregate	Aggregate	Diesel	103884.7559	1306739.542	0	213.7333424	213733.3424	0	0	4387648.579	0	0	
South Coast	2024	LHDT1	Aggregate	Aggregate	Electricity	772.5188678	10791.59936	32624.15974	0	0	0	0	58282.68619	0	0	
South Coast	2024	LHDT2	Aggregate	Aggregate	Gasoline	31062.46526	462784.4493	0	96.72139231	96721.39231	0	208303.4828	1155378.828	3095264.249	14.86	LHDT2
South Coast	2024	LHDT2	Aggregate	Aggregate	Diesel	45926.82058	577701.627	0	111.5820905	111582.0905	0	0	1925592.444	0	0	
South Coast	2024	LHDT2	Aggregate	Aggregate	Electricity	199.9520404	2646.759351	8006.869611	0	0	0	0	14292.97674	0	0	
South Coast	2024	MCY	Aggregate	Aggregate	Gasoline	242059.9929	484119.9858	0	37.44895514	37448.95514	0	37448.95514	1554780.429	1554780.429	41.52	MCY
South Coast	2024	MDV	Aggregate	Aggregate	Gasoline	1571312.1	7270009.961	0	3162.700535	3162700.535	0	3206338.183	60817091.34	62832018.9	19.60	MDV
South Coast	2024	MDV	Aggregate	Aggregate	Diesel	19826.89781	93051.64962	0	33.54860069	33548.60069	0	0	786624.2122	0	0	
South Coast	2024	MDV	Aggregate	Aggregate	Electricity	17569.44798	89870.84023	248334.7848	0	0	0	0	643216.8322	0	0	
South Coast	2024	MDV	Aggregate	Aggregate	Plug-in Hybrid	12690.57185	52475.51459	92596.30611	10.08904803	10089.04803	0	0	585086.5214	0	0	
South Coast	2024	MH	Aggregate	Aggregate	Gasoline	29244.94397	2925.664195	0	57.51222476	57512.22476	0	68984.14797	279544.6577	395398.9997	5.73	MH
South Coast	2024	MH	Aggregate	Aggregate	Diesel	11703.55798	1170.355798	0	11.47192321	11471.92321	0	0	115854.342	0	0	
South Coast	2024	MHDT	Aggregate	Aggregate	Gasoline	24845.17438	497102.249	0	256.9342026	256934.2026	0	812250.5213	1326417.556	6295601.951	7.75	MHDT
South Coast	2024	MHDT	Aggregate	Aggregate	Diesel	114693.757	1409921.86	0	546.7152883	546715.2883	0	0	4878223.739	0	0	
South Coast	2024	MHDT	Aggregate	Aggregate	Electricity	355.3876422	4781.870526	20310.12518	0	0	0	0	19393.49808	0	0	
South Coast	2024	MHDT	Aggregate	Aggregate	Natural Gas	1491.278079	13281.28453	0	8.601030453	8601.030453	0	0	71567.15805	0	0	
South Coast	2024	OBUS	Aggregate	Aggregate	Gasoline	5296.379398	105969.959	0	41.44060197	41440.60197	0	78066.51924	209991.62	473651.4166	6.07	OBUS
South Coast	2024	OBUS	Aggregate	Aggregate	Diesel	2997.3176	37996.11149	0	33.30106375	33301.06375	0	0	233646.4445	0	0	
South Coast	2024	OBUS	Aggregate	Aggregate	Electricity	11.86106715	237.3162316	941.3362619	0	0	0	0	895.192351	0	0	
South Coast	2024	OBUS	Aggregate	Aggregate	Natural Gas	480.7769521	4278.914873	0	3.324853528	3324.853528	0	0	29118.15975	0	0	
South Coast	2024	SBUS	Aggregate	Aggregate	Gasoline	2763.091965	11052.36786	0	13.6568139	13656.8139	0	40972.05843	121721.653	266076.6289	6.49	SBUS
South Coast	2024	SBUS	Aggregate	Aggregate	Diesel	3283.370627	47543.20668	0	9.104107226	9104.107226	0	0	66807.29386	0	0	
South Coast	2024	SBUS	Aggregate	Aggregate	Electricity	21.89425828	248.8609268	740.8107178	0	0	0	0	640.6727128	0	0	
South Coast	2024	SBUS	Aggregate	Aggregate	Natural Gas	3093.465789	44793.38463	0	18.21113731	18211.13731	0	0	76907.00926	0	0	
South Coast	2024	UBUS	Aggregate	Aggregate	Gasoline	894.3284655	3577.313862	0	13.89822542	13898.22542	0	201736.9577	96953.45183	696232.1909	3.45	UBUS
South Coast	2024	UBUS	Aggregate	Aggregate	Diesel	14.32857314	57.31429256	0	0.259550733	259.5507326	0	0	1721.679298	0	0	
South Coast	2024	UBUS	Aggregate	Aggregate	Electricity	109.3235246	437.2940985	19519.17282	0	0	0	0	9364.629999	0	0	
South Coast	2024	UBUS	Aggregate	Aggregate	Natural Gas	4918.59249	19674.36996	0	187.5791815	187579.1815	0	0	588192.4297	0	0	

Source: EMFAC2021 (v1.0.1) Emissions Inventory

Region Type: Air Basin

Region: South Coast

Calendar Year: 2025

Season: Annual

Vehicle Classification: EMFAC2007 Categories

Units: miles/day for CVMT and EVMT, trips/day for Trips, kWh/day for Energy Consumption, tons/day for Emissions, 1000 gallons/day for Fuel Consumption

Region	Calendar Year	Vehicle Category	Model Year	Speed	Fuel	Population	Trips	Energy Consumption	Fuel Consumption	Fuel Consumption	Total Fuel Consumption	Total VMT	Total VMT	Miles Per Gallon	Vehicle Class
South Coast	2025	HHDT	Aggregate	Aggregate	Gasoline	54.83401411	1097.118954	0	0.915660885	915.6608849	2033428.223	3783.739566	12499201.56	6.15	HHDT
South Coast	2025	HHDT	Aggregate	Aggregate	Diesel	95337.36817	1459640.636	0	1919.938673	1919938.673		11745346.31			
South Coast	2025	HHDT	Aggregate	Aggregate	Electricity	647.565363	8586.113967	125035.0292	0	0		69780.1703			
South Coast	2025	HHDT	Aggregate	Aggregate	Natural Gas	10701.05249	68656.35135	0	112.5738892	112573.8892		680291.3416			
South Coast	2025	LDA	Aggregate	Aggregate	Gasoline	5244723.652	24385315.28	0	7108.358927	7108358.927	7245907.135	210339700.5	233546247.7	32.23	LDA
South Coast	2025	LDA	Aggregate	Aggregate	Diesel	13504.15254	56096.65324	0	9.832104986	9832.104986		408222.3366			
South Coast	2025	LDA	Aggregate	Aggregate	Electricity	314906.6469	1568075.372	5911352.826	0	0		15311111.74			
South Coast	2025	LDA	Aggregate	Aggregate	Plug-in Hybrid	159860.278	661022.2496	1174382.35	127.7161032	127716.1032		7487213.196			
South Coast	2025	LDT1	Aggregate	Aggregate	Gasoline	483367.514	2127610.282	0	708.9359688	708935.9688	709884.4736	17503198.77	17626287.18	24.83	LDT1
South Coast	2025	LDT1	Aggregate	Aggregate	Diesel	161.5260868	453.3891137	0	0.127085477	127.0854768		2967.035899			
South Coast	2025	LDT1	Aggregate	Aggregate	Electricity	1505.26458	7236.189381	25889.93818	0	0		67058.04036			
South Coast	2025	LDT1	Aggregate	Aggregate	Plug-in Hybrid	1033.948372	4275.376518	9086.363765	0.821419376	821.4193759		53063.32883			
South Coast	2025	LDT2	Aggregate	Aggregate	Gasoline	2528171.942	11891190.15	0	4341.426391	4341426.391	4373117.135	104543301.5	106927231	24.45	LDT2
South Coast	2025	LDT2	Aggregate	Aggregate	Diesel	8518.978579	40955.39339	0	11.53683826	11536.83826		366939.3838			
South Coast	2025	LDT2	Aggregate	Aggregate	Electricity	21565.05505	109850.7805	300027.449	0	0		777107.023			
South Coast	2025	LDT2	Aggregate	Aggregate	Plug-in Hybrid	25221.81395	104292.2007	204751.9727	20.15390552	20153.90552		1239883.058			
South Coast	2025	LHDT1	Aggregate	Aggregate	Gasoline	199655.4178	2974568.238	0	565.7929114	565792.9114	785253.6339	7899242.311	12579982.86	16.02	LHDT1
South Coast	2025	LHDT1	Aggregate	Aggregate	Diesel	107539.0383	1352705.817	0	219.4607225	219460.7225		4531936.528			
South Coast	2025	LHDT1	Aggregate	Aggregate	Electricity	2131.529069	29802.51665	83294.25907	0	0		148804.02			
South Coast	2025	LHDT2	Aggregate	Aggregate	Gasoline	30849.1838	459606.8733	0	93.96299335	93962.99335	208962.5987	1145449.689	3183322.084	15.23	LHDT2
South Coast	2025	LHDT2	Aggregate	Aggregate	Diesel	48016.98656	603993.2855	0	114.9996053	114999.6053		2001431.485			
South Coast	2025	LHDT2	Aggregate	Aggregate	Electricity	549.452873	7286.296511	20413.74678	0	0		36440.90994			
South Coast	2025	MCY	Aggregate	Aggregate	Gasoline	246317.3152	492634.6304	0	37.82728892	37827.28892	37827.28892	1575969.655	1575969.655	41.66	MCY
South Coast	2025	MDV	Aggregate	Aggregate	Gasoline	1582911.671	7327873.919	0	3124.528435	3124528.435	3169334.086	61244218.19	63579746.09	20.06	MDV
South Coast	2025	MDV	Aggregate	Aggregate	Diesel	19966.30161	93386.67778	0	32.96063764	32960.63764		783550.3632			
South Coast	2025	MDV	Aggregate	Aggregate	Electricity	23405.95686	119202.2123	325389.6809	0	0		842798.2408			
South Coast	2025	MDV	Aggregate	Aggregate	Plug-in Hybrid	15515.87163	64158.1292	115605.1765	11.8450132	11845.0132		709179.3041			
South Coast	2025	MH	Aggregate	Aggregate	Gasoline	28222.75742	2823.404652	0	55.89330175	55893.30175	67478.95091	271714.048	388622.5468	5.76	MH
South Coast	2025	MH	Aggregate	Aggregate	Diesel	11853.97154	1185.397154	0	11.58564916	11585.64916		116908.4988			
South Coast	2025	MHDT	Aggregate	Aggregate	Gasoline	24266.37368	485521.6046	0	246.6220886	246622.0886	803911.5702	1285729.87	6330495.207	7.87	MHDT
South Coast	2025	MHDT	Aggregate	Aggregate	Diesel	117076.634	1440705.231	0	548.3413637	548341.3637		4914316.485			
South Coast	2025	MHDT	Aggregate	Aggregate	Electricity	1030.710845	13697.48889	58527.95377	0	0		55891.50984			
South Coast	2025	MHDT	Aggregate	Aggregate	Natural Gas	1586.964447	14102.34275	0	8.94811801	8948.11801		74557.34189			
South Coast	2025	OBUS	Aggregate	Aggregate	Gasoline	5130.782804	102656.7023	0	38.98709136	38987.09136	75404.10956	199581.2481	465625.8692	6.18	OBUS
South Coast	2025	OBUS	Aggregate	Aggregate	Diesel	3078.572652	39272.27543	0	33.03961652	33039.61652		233905.0145			
South Coast	2025	OBUS	Aggregate	Aggregate	Electricity	29.09533983	582.1395594	2258.641236	0	0		2147.933443			
South Coast	2025	OBUS	Aggregate	Aggregate	Natural Gas	505.1478218	4495.815614	0	3.377401677	3377.401677		29991.67319			
South Coast	2025	SBUS	Aggregate	Aggregate	Gasoline	2812.998756	11251.99503	0	13.81627409	13816.27409	41147.02398	123623.802	268314.9981	6.52	SBUS
South Coast	2025	SBUS	Aggregate	Aggregate	Diesel	3181.542446	46068.73461	0	8.734797087	8734.797087		64276.54474			
South Coast	2025	SBUS	Aggregate	Aggregate	Electricity	47.38132065	537.5923668	1681.228052	0	0		1453.97051			
South Coast	2025	SBUS	Aggregate	Aggregate	Natural Gas	3209.535885	46474.07961	0	18.59595281	18595.95281		78960.68088			
South Coast	2025	UBUS	Aggregate	Aggregate	Gasoline	892.063682	3568.254728	0	13.80114714	13801.14714	198998.2045	96751.77026	697627.2588	3.51	UBUS
South Coast	2025	UBUS	Aggregate	Aggregate	Diesel	11.19759793	44.79039173	0	0.207460052	207.4600516		1417.05095			
South Coast	2025	UBUS	Aggregate	Aggregate	Electricity	163.9010308	655.6041234	34521.6162	0	0		16501.94536			
South Coast	2025	UBUS	Aggregate	Aggregate	Natural Gas	4881.393278	19525.57311	0	184.9895973	184989.5973		582956.4922			



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