

Greenhouse Gas Emissions Assessment
Redlands Used Automobile Sales and Service Facility
Project
City of Redlands, California



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LIST OF ABBREVIATED TERMS

AB	Assembly Bill
CARB	California Air Resource Board
CCR	California Code of Regulations
CalEEMod	California Emissions Estimator Model
CEQA	California Environmental Quality Act
CALGreen Code	California Green Building Standards Code
CPUC	California Public Utilities Commission
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CFC	Chlorofluorocarbon
CCSP	Climate Change Scoping Plan
cy	cubic yard
FAAA	Federal Clean Air Act
FR	Federal Register
GHG	greenhouse gas
HCFC	Hydrochlorofluorocarbon
HFC	Hydrofluorocarbon
LCFS	Low Carbon Fuel Standard
LOR	Laws, Ordinances, and Regulations
CH ₄	Methane
MMTCO ₂ e	million metric tons of carbon dioxide equivalent
MTCO ₂ e	metric tons of carbon dioxide equivalent
NHTSA	National Highway Traffic Safety Administration
NF ₃	nitrogen trifluoride
N ₂ O	nitrous oxide
PFC	Perfluorocarbon
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SCAG	Southern California Association of Government
Sf	square foot
SF ₆	sulfur hexafluoride
TAC	toxic air contaminants
U.S. EPA	United States Environmental Protection Agency

1 INTRODUCTION

This report documents the results of a Greenhouse Gas (GHG) Emissions Assessment completed for the Redlands Used Automobile Sales and Service Facility Project (“Project” or “Proposed Project”). The purpose of this GHG Emissions Assessment is to evaluate the potential construction and operational emissions associated with the Project and determine the level of impact the Project would have on the environment.

1.1 Project Location and Setting

The Project site is located northeast of the State Route 210 (SR-210) and Interstate 10 (I-10) interchange in the City of Redlands (City), California; refer to [Exhibit 1: Regional Vicinity Map](#). The 18.56-acre Project site is specifically located directly west of the New York Street and W Brockton Avenue intersection and is comprised of Assessor’s Parcel Numbers (APNs) 0169-011-38 and -39; refer to [Exhibit 2: Site Vicinity Map](#). The Project site is generally surrounded by commercial uses. The site is bordered by a Home Depot store to the north, a surface parking lot and vacant land to the east, a Toyota dealership to the south, and the I-10/SR-210 interchange to the west; see [Exhibit 2](#).

1.2 Project Description

The Project proposes the development of a Used Automobile Sales and Service Facility (49,491 square-foot) on a 18.56 acre parcel. The pre-owned automobiles will be sold to both retail and wholesale buyers. The Project will include a sales building, service building, Final Quality Control /auction building, a non-public carwash, private fuel tank/dispenser, automobile sales display area (retail), vehicle staging areas (reconditions, sales, inspection by wholesale auction buyers and pick-up/drop-off), public parking lots, driveways and associated landscaped areas. The parking area would be located on the eastern and southern side of the site. In addition to passenger vehicle parking, four car-carrier loading spaces would be provided in the southwestern portion of the lot. A paved and striped area known as the vehicle sales display area would be located along the northeast portion of the property and surrounded by a low guardrail system for security purposes. This sales display area is facility’s “outdoor showroom” for vehicles available for retail purchase; refer to [Exhibit 3: Conceptual site Plan](#).¹

Store management will set operating hours closer to the opening date; however, the showroom (retail sales) areas are typically open to the public Monday through Saturday from 9:00 a.m. to 9:00 p.m. with more limited hours on Sundays, if permitted by local law. Associates will be present at the store several hours before and after the public operating hours. Service operations will be up to 24 hours a day, 7 days a week. Please note that this facility will support facility’s operations only and will not be open to the general public. Landscaping will be incorporated into the public parking lot, around the perimeter of the site. Landscaping will include deciduous trees and shrubs, evergreen shrubs, sod, wood mulch, and rock mulch. All landscaping will be designed to meet the City’s Water Efficient Landscape requirements.

The General Plan land use designation for the Project site is Commercial/Industrial and the zoning designation is General Commercial (EV/CG). The Project’s proposed commercial uses are permitted within

¹ It should be noted that there is vacant land in the northeastern portion of the Project site that is not planned for development as part of the proposed Project. This area is available for future parking needs and potential for vehicle staging expansion; however, this is not a component of the proposed Project and therefore is not included in this technical report.

the existing land use designation and zoning classification. Construction is anticipated to occur over an approximately 18-month period beginning in 2023.

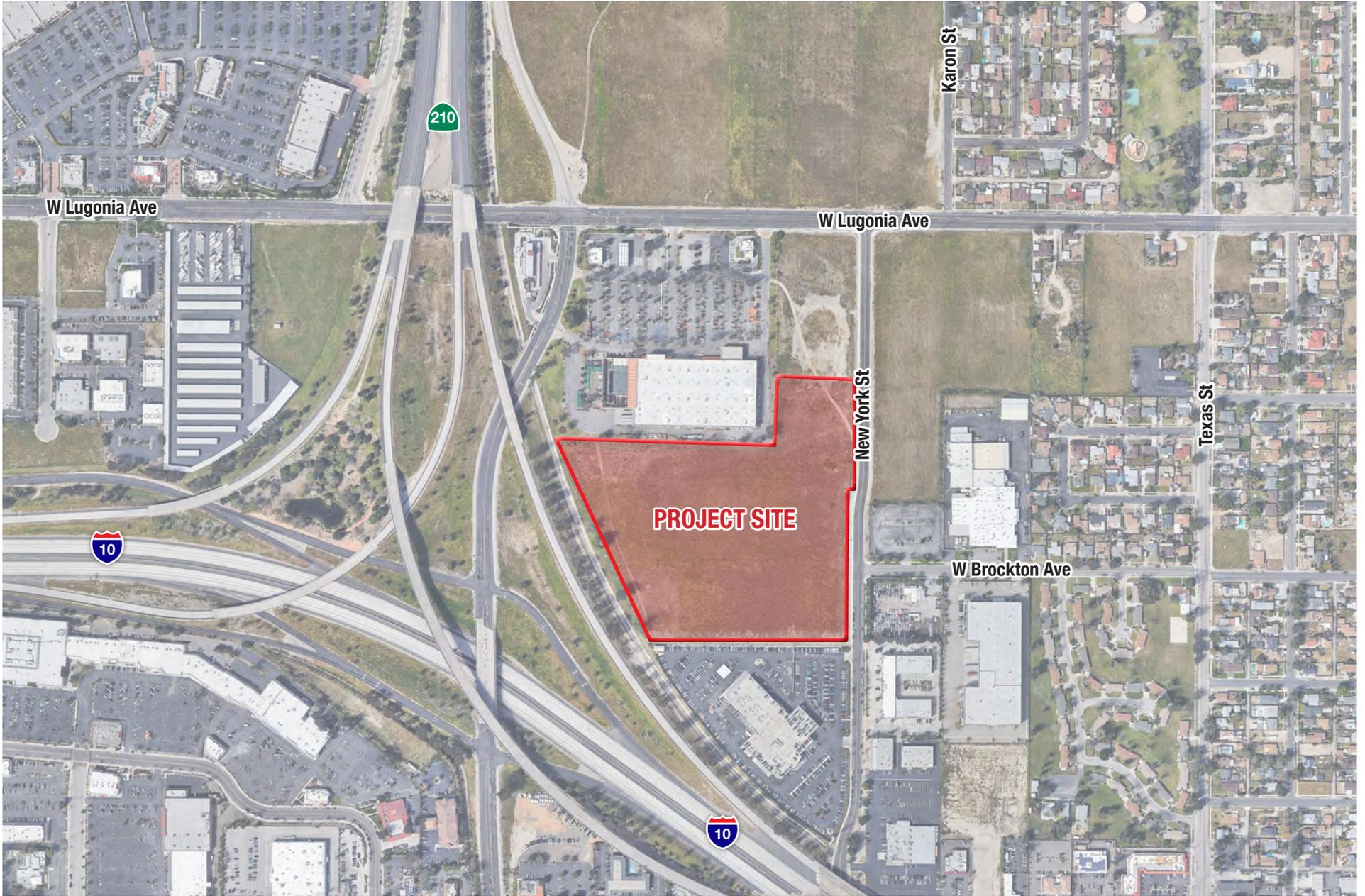
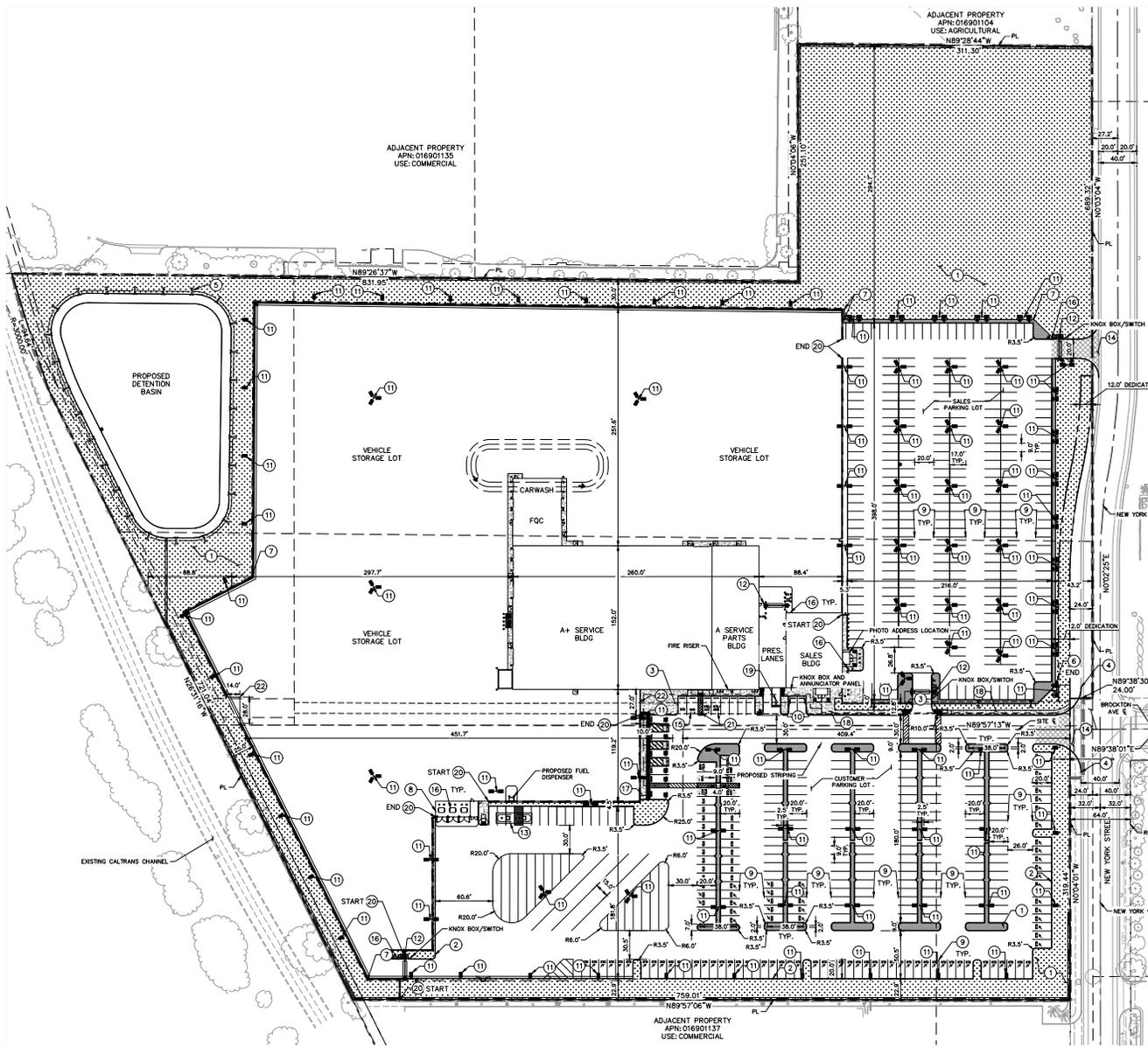


EXHIBIT 2: Site Vicinity Map
Redlands Used Automobile Sales and Service Facility Project
City of Redlands





- LEGEND:**
- CENTER LINE
 - PROJECT PROPERTY LINE / RIGHT-OF-WAY
 - DIVIDING PARCEL LINE LINE
 - EASEMENT LINE / SETBACK LINE
 - APPROXIMATE LIMIT OF WORK LINE

- LANDSCAPE/PLANTER AREA
- DETECTABLE WARNING SYSTEM
- GRAVEL AREA
- CONCRETE AREA
- ACCESSIBLE ROUTE (LOCATION PURPOSES ONLY, DO NOT PAINT)
- ACCESSIBLE PARKING SPACE
- SITE LIGHTING
- STD STANDARD EV STALL
- STD/F STANDARD EV/FUTURE STALL

CONSTRUCTION NOTES:

1. INSTALL LANDSCAPE/PLANTER AREA
2. CONSTRUCT CONCRETE CURB.
3. CONSTRUCT ACCESSIBLE RAMP WITH DETECTABLE WARNING PER DETAIL 8, SHEET C6.3.
4. JOIN EXISTING CURB, CURB & GUTTER, SIDEWALK.
5. INSTALL WROUGHT IRON FENCE FOR SECURITY SCREENING AROUND BASIN.
6. INSTALL GUARD RAIL PER DETAIL 18, SHEET C6.2.
7. INSTALL GUARD RAIL CORNER PER DETAIL 35, SHEET C6.2.
8. INSTALL DUMPSTER ENCLOSURE AND TIRE STORAGE PER DETAIL 1, SHEET C6.4.
9. CONSTRUCT STANDARD 90° PARKING STALL STRIPING.
10. INSTALL WHEELSTOP PER DETAIL 25, SHEET C6.3.
11. INSTALL SITE LIGHTING.
12. INSTALL DROP BEAM GATE.
13. INSTALL UNDERGROUND TANK.
14. CONSTRUCT NEW COMMERCIAL DRIVEWAY APPROACH.
15. CONSTRUCT ACCESSIBLE PARKING STALL PER DETAIL 9, SHEET C6.3.
16. INSTALL BOLLARD PER DETAIL 22, SHEET C6.1.
17. CONSTRUCT SIDEWALK PER DETAIL 10, SHEET C6.3.
18. CONSTRUCT SIDEWALK WITH CURB PER DETAIL 18, SHEET C6.3.
19. INSTALL DIRECTIONAL SIGNAGE PER DETAIL 13, SHEET C6.3.
20. INSTALL CMU WALL. SEE TYPICAL SECTIONS ON SHEETS C4.1 AND C4.2 FOR HEIGHT, MATERIAL, THICKNESS.
21. INSTALL EVCS ACCESSIBLE STALLS PER DETAIL 9, SHEET C6.3.
22. CONSTRUCT GBRALTAR 0-6331 G-FORCE M30 P1 POST AND BEAM SYSTEM OVER SANITARY SEWER EASEMENT. SIZE PER PLAN.

GENERAL NOTES

1. TOTAL CUSTOMER/EMPLOYEE PARKING SPACES: REQUIRED = 83 SPACES PER JURISDICTION PROVIDED = 304 SPACES
2. PARKING SPACE SIZE: REQUIREMENT (PER JURISDICTION) = 9' X 19' PROVIDED = 9' X 20'
3. PARCEL I.D. NO. = 0169-011-38 & 0169-011-39 ST. REDLAND, CA 92374
4. SITE ZONING = LIGHT INDUSTRIAL
5. SITE ADDRESS = WEST BROCKTON AVE. & NEW YORK
6. TOTAL SITE ACREAGE = 18.56 ACRES.
7. TOTAL DISTURBED ACREAGE = 16.41 ACRES.
8. AREA BREAKDOWN: BUILDING = 1.24 AC = 6.7 % PAVEMENT/IMPERVIOUS = 11.92 AC = 65.2 % LANDSCAPE/GRASSED AREA = 5.40 AC = 28.1 % TOTAL = 18.56 AC
9. SITE IS NOT LOCATED IN A FLOOD PLAIN AS PER FIRM MAP 06071C8704H.

EXHIBIT 3: Conceptual Site Plan
 Redlands Used Automobile Sales and Service Facility Project
 City of Redlands



2 ENVIRONMENTAL SETTING

2.1 Greenhouse Gases and Climate Change

Certain gases in the earth's atmosphere classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of a GHG molecule is dependent on multiple variables and cannot be pinpointed, more CO₂ is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms of carbon sequestration. Of the total annual human-caused CO₂ emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO₂ emissions remains stored in the atmosphere.² [Table 1: Description of Greenhouse Gases](#) describes the primary GHGs attributed to global climate change, including their physical properties.

² Intergovernmental Panel on Climate Change, Carbon and Other Biogeochemical Cycles. In: Climate Change 2013: The Physical Science Basis, Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, 2013. http://www.climatechange2013.org/images/report/WG1AR5_ALL_FINAL.pdf.

Table 1: Description of Greenhouse Gases	
Greenhouse Gas	Description
Carbon Dioxide (CO ₂)	CO ₂ is a colorless, odorless gas that is emitted naturally and through human activities. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood. The largest source of CO ₂ emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. The atmospheric lifetime of CO ₂ is variable because it is readily exchanged in the atmosphere. CO ₂ is the most widely emitted GHG and is the reference gas (Global Warming Potential of 1) for determining Global Warming Potentials for other GHGs.
Nitrous Oxide (N ₂ O)	N ₂ O is largely attributable to agricultural practices and soil management. Primary human-related sources of N ₂ O include agricultural soil management, sewage treatment, combustion of fossil fuels, and adipic and nitric acid production. N ₂ O is produced from biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N ₂ O is approximately 120 years. The Global Warming Potential of N ₂ O is 298.
Methane (CH ₄)	CH ₄ , a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Methane is the major component of natural gas, about 87 percent by volume. Human-related sources include fossil fuel production, animal husbandry, rice cultivation, biomass burning, and waste management. Natural sources of CH ₄ include wetlands, gas hydrates, termites, oceans, freshwater bodies, non-wetland soils, and wildfires. The atmospheric lifetime of CH ₄ is about 12 years and the Global Warming Potential is 25.
Hydrofluorocarbons (HFCs)	HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is increasing, as the continued phase out of CFCs and HCFCs gains momentum. The 100-year Global Warming Potential of HFCs range from 124 for HFC-152 to 14,800 for HFC-23.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Global Warming Potentials range from 6,500 to 9,200.
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. They are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. The Montreal Protocol on Substances that Deplete the Ozone Layer prohibited their production in 1987. Global Warming Potentials for CFCs range from 3,800 to 14,400.
Sulfur Hexafluoride (SF ₆)	SF ₆ is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas. The Global Warming Potential of SF ₆ is 23,900.
Hydrochlorofluorocarbons (HCFCs)	HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, HCFCs are subject to a consumption cap and gradual phase out. The United States is scheduled to achieve a 100 percent reduction to the cap by 2030. The 100-year Global Warming Potentials of HCFCs range from 90 for HCFC-123 to 1,800 for HCFC-142b.
Nitrogen Trifluoride (NF ₃)	NF ₃ was added to Health and Safety Code section 38505(g)(7) as a GHG of concern. This gas is used in electronics manufacture for semiconductors and liquid crystal displays. It has a high global warming potential of 17,200.
Source: Compiled from U.S. EPA, <i>Overview of Greenhouse Gases</i> , (https://www.epa.gov/ghgemissions/overview-greenhouse-gases), accessed May 2023; U.S. EPA, <i>Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021</i> ; Intergovernmental Panel on Climate Change, <i>Climate Change 2007: The Physical Science Basis</i> , 2007; National Research Council, <i>Advancing the Science of Climate Change</i> , 2010; U.S. EPA, <i>Methane and Nitrous Oxide Emission from Natural Sources</i> , April 2010.	

3 REGULATORY SETTING

3.1 Federal

To date, national standards have not been established for nationwide GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level. Various efforts have been promulgated at the federal level to improve fuel economy and energy efficiency to address climate change and its associated effects.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, requires the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

U.S. Environmental Protection Agency Endangerment Finding

The U.S. Environmental Protection Agency (U.S. EPA) authority to regulate GHG emissions stems from the U.S. Supreme Court decision in *Massachusetts v. U.S. EPA* (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Federal Clean Air Act (FCAA) and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the U.S. EPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing FCAA and the U.S. EPA's assessment of the scientific evidence that form the basis for the U.S. EPA's regulatory actions.

Federal Vehicle Standards

In response to the U.S. Supreme Court ruling discussed above, Executive Order 13432 was issued in 2007 directing the EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and in 2010, the U.S. EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, an Executive Memorandum was issued directing the Department of Transportation, Department of Energy, U.S. EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG

reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the U.S. EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO₂ in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the U.S. EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO₂ emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the U.S. EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.

In August 2016, the U.S. EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program applies to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards lower CO₂ emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to two billion barrels over the lifetime of the vehicles sold under the program.³

On September 27, 2019, the U.S. EPA and the NHTSA published the “Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program.” (84 Fed. Reg. 51,310 (Sept. 27, 2019).)⁴ The SAFE Rule (Part One) revoked California’s authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. On March 31, 2020, the U.S. EPA and NHTSA finalized rulemaking for SAFE Part Two sets CO₂ emissions standards and corporate average fuel economy (CAFE) standards for passenger vehicles and light duty trucks, covering model years 2021-2026. The current U.S. EPA administration repealed SAFE Rule Part One, effective January 28, 2022, and is reconsidering Part Two.

In December 2021, the U.S. EPA finalized federal GHG emissions standards for passenger cars and light trucks for Model Years 2023 through 2026. These standards are the strongest vehicle emissions standards ever established for the light-duty vehicle sector and are based on sound science and grounded in a rigorous assessment of current and future technologies. The updated standards will result in avoiding more than three billion tons of GHG emissions through 2050.⁵

³ U.S. EPA and NHTSA, *Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium and Heavy-Duty Engines and Vehicles – Phase 2*, 2016. Available at: <https://www.govinfo.gov/content/pkg/FR-2016-10-25/pdf/2016-21203.pdf>. Accessed April 2023.

⁴ U.S. EPA and NHTSA, Federal Register, Vol. 84, No. 188, *The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program*, September 27, 2019. Available at: <https://www.govinfo.gov/content/pkg/FR-2019-09-27/pdf/2019-20672.pdf>. Accessed April 2023.

⁵ U.S. EPA, *Final Rule to Revise Existing National GHG Emissions Standards for Passenger Cars and Light Trucks Through Model Year 2026*, 2021. Available at: <https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-revise-existing-national-ghg-emissions>. Accessed April 2023.

3.2 State of California

California Air Resources Board

The California Air Resources Board (CARB) is responsible for the coordination and oversight of State and local air pollution control programs in California. Various statewide and local initiatives to reduce California's contribution to GHG emissions have raised awareness about climate change and its potential for severe long-term adverse environmental, social, and economic effects. California is a significant emitter of CO₂ equivalents (CO₂e) in the world and produced 369 gross million metric tons (MMT) of CO₂e in 2020.⁶ The transportation sector is the State's largest emitter of GHGs, followed by industrial operations such as manufacturing and oil and gas extraction.

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation, such as the landmark Assembly Bill (AB) 32, *California Global Warming Solutions Act of 2006*, was specifically enacted to address GHG emissions. Other legislation, such as Title 24 building efficiency standards and Title 20 appliance energy standards, were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions. This section describes the legislation's major provisions.

Assembly Bill 32 (California Global Warming Solutions Act of 2006)

AB 32 instructs the CARB to develop and enforce regulations for the reporting and verifying of statewide GHG emissions. AB 32 also directed CARB to set a GHG emissions limit based on 1990 levels, to be achieved by 2020. It set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

California Air Resource Board Scoping Plan

CARB adopted the Scoping Plan to achieve the AB 32 goals. The Scoping Plan establishes an overall framework for the measures that would be adopted to reduce California's GHG emissions. CARB determined that achieving the 1990 emissions level would require a reduction of GHG emissions of approximately 29 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as "business-as-usual")⁷. The Scoping Plan evaluates opportunities for sector-specific reductions, integrates early actions and additional GHG reduction measures by both CARB and the State's Climate Action Team, identifies additional measures to be pursued as regulations, and outlines the adopted role of a cap-and-trade program⁸. Additional development of these measures and adoption of the appropriate regulations occurred through the end of 2013. Key Scoping Plan elements include:

⁶ California Air Resources Board, *Current California GHG Emissions Inventory Data, 2000-2020 GHG inventory (2022 Edition)*, <https://ww2.arb.ca.gov/ghg-inventory-data>, accessed April 2023.

⁷ CARB defines business-as-usual (BAU) in its Scoping Plan as emissions levels that would occur if California continued to grow and add new GHG emissions but did not adopt any measures to reduce emissions. Projections for each emission-generating sector were compiled and used to estimate emissions for 2020 based on 2002–2004 emissions intensities. Under CARB's definition of BAU, new growth is assumed to have the same carbon intensities as was typical from 2002 through 2004.

⁸ The Climate Action Team, led by the secretary of the California Environmental Protection Agency, is a group of State agency secretaries and heads of agencies, boards, and departments. Team members work to coordinate statewide efforts to implement global warming emissions reduction programs and the State's Climate Adaptation Strategy.

- Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards.
- Achieving a statewide renewables energy mix of 33 percent by 2020.
- Developing a California cap-and-trade program that links with other programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions (adopted in 2011).
- Establishing targets for transportation-related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets (several sustainable community strategies have been adopted).
- Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, heavy-duty truck measures, the Low Carbon Fuel Standard (amendments to the Pavley Standard adopted 2009; Advanced Clean Car standard adopted 2012), goods movement measures, and the Low Carbon Fuel Standard (adopted 2009).
- Creating targeted fees, including a public goods charge on water use, fees on gasses with high global warming potential, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.
- The California Sustainable Freight Action Plan was developed in 2016 and provides a vision for California's transition to a more efficient, more economically competitive, and less polluting freight transport system. This transition of California's freight transport system is essential to supporting the State's economic development in coming decades while reducing pollution.
- CARB's Mobile Source Strategy demonstrates how the State can simultaneously meet air quality standards, achieve GHG emission reduction targets, decrease health risk from transportation emissions, and reduce petroleum consumption over the next fifteen years. The mobile Source Strategy includes increasing ZEV buses and trucks.

In 2012, CARB released revised estimates of the expected 2020 emissions reductions. The revised analysis relied on emissions projections updated in light of current economic forecasts that accounted for the economic downturn since 2008, reduction measures already approved and put in place relating to future fuel and energy demand, and other factors. This update reduced the projected 2020 emissions from 596 MMTCO₂e to 545 MMTCO₂e. The reduction in forecasted 2020 emissions means that the revised business-as-usual reduction necessary to achieve AB 32's goal of reaching 1990 levels by 2020 is now 21.7 percent, down from 29 percent. CARB also provided a lower 2020 inventory forecast that incorporated State-led GHG emissions reduction measures already in place. When this lower forecast is considered, the necessary reduction from business-as-usual needed to achieve the goals of AB 32 is approximately 16 percent.

CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan summarizes the most recent science related to climate change, including anticipated impacts to California and the levels of GHG emissions reductions necessary to likely avoid risking irreparable damage. It identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. By 2016, California had reduced GHG emissions below 1990 levels, achieving AB 32's 2020 goal four years ahead of schedule.

In 2016, the Legislature passed Senate Bill (SB) 32, which codifies a 2030 GHG emissions reduction target of 40 percent below 1990 levels. With SB 32, the Legislature passed companion legislation, AB 197, which provides additional direction for developing the Scoping Plan. On December 14, 2017 CARB adopted a second update to the Scoping Plan⁹. The 2017 Scoping Plan details how the State will reduce GHG emissions to meet the 2030 target set by Executive Order B-30-15 and codified by SB 32. Other objectives listed in the 2017 Scoping Plan are to provide direct GHG emissions reductions; support climate investment in disadvantaged communities; and support the Clean Power Plan and other Federal actions.

Adopted December 15, 2022, CARB's *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., Climate Action Plan) consistent with CEQA Guidelines section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California's single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place.

Included in the 2022 Scoping Plan is a set of Local Actions (2022 Scoping Plan Appendix D) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects.¹⁰ CARB specifically states that Appendix D does not address other land uses (e.g., industrial).¹¹ However, CARB plans to explore new approaches for other land use types in the future.¹²

As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development.

⁹ California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, Accessed May 9, 2018.

¹⁰ California Air Resources Board, *2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions*.

¹¹ Ibid.

¹² Ibid.

Senate Bill 32 (California Global Warming Solutions Act of 2006: Emissions Limit)

Signed into law in September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

SB 375 (The Sustainable Communities and Climate Protection Act of 2008)

Signed into law on September 30, 2008, SB 375 provides a process to coordinate land use planning, regional transportation plans, and funding priorities to help California meet AB 32's GHG reduction goals established. SB 375 requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, aligns planning for transportation and housing, and creates specified incentives for the implementation of the strategies.

AB 1493 (Pavley Regulations and Fuel Efficiency Standards)

AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the U.S. EPA's denial of an implementation waiver. The U.S. EPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011. The regulations establish one set of emission standards for passenger vehicle and light duty truck model years 2009–2016 and a second set of emissions standards for model years 2017 to 2025. By 2025, when all rules will be fully implemented, new passenger vehicles are anticipated to emit 34 percent fewer CO₂e emissions and 75 percent fewer smog-forming emissions.

SB 1368 (Emission Performance Standards)

SB 1368, which is AB 32's companion bill, directs the California Public Utilities Commission (CPUC) to adopt a performance standard for GHG emissions for the future power purchases of California utilities. SB 1368 limits carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than 5 years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. The new law effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. The CPUC adopted the regulations required by SB 1368 on August 29, 2007. The regulations implementing SB 1368 establish a standard for baseload generation owned by, or under long-term contract to publicly owned utilities, for 1,100 pounds of CO₂ per megawatt-hour.

SB 1078, SB 107, and SBX1-2 (Renewable Electricity Standards)

SB 1078 (2002) required California to generate 20 percent of its electricity from renewable energy by 2017. SB 107 (2006) changed the due date to 2010 instead of 2017. On November 17, 2008, Governor Arnold Schwarzenegger signed Executive Order S-14-08, which established a Renewable Portfolio Standard target for California requiring that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. Executive Order S-21-09 also directed CARB to adopt a regulation by July 31, 2010, requiring the State's load serving entities to meet a 33 percent renewable energy target by 2020. CARB approved the Renewable Electricity Standard on September 23, 2010 by Resolution 10-23. SBX1-2 (2011) codified the 33 percent by 2020 goal.

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

Signed into law on October 7, 2015, SB 350 implements Executive Order B-30-15's goal. The SB 350 objectives are to increase the procurement of electricity from renewable sources from 33 percent to 50 percent (with interim targets of 40 percent by 2024, and 25 percent by 2027) and to double the energy efficiency savings in electricity and natural gas end uses of retail customers through energy efficiency and conservation. SB 350 also reorganizes the Independent System Operator to develop more regional electricity transmission markets and improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

AB 398 (Market-Based Compliance Mechanisms)

Signed on July 25, 2017, AB 398 extended the duration of the Cap-and-Trade program from 2020 to 2030. AB 398 required CARB to update the Scoping Plan and for all GHG rules and regulations adopted by the State. It also designated CARB as the statewide regulatory body responsible for ensuring that California meets its statewide carbon pollution reduction targets, while retaining local air districts' responsibility and authority to curb toxic air contaminants and criteria pollutants from local sources that severely impact public health. AB 398 also decreased free carbon allowances over 40 percent by 2030 and prioritized Cap-and-Trade spending to various programs including reducing diesel emissions in impacted communities.

SB 150 (Regional Transportation Plans)

Signed on October 10, 2017, SB 150 aligns local and regional GHG reduction targets with State targets (i.e., 40 percent below their 1990 levels by 2030). SB 150 creates a process to include communities in discussions on how to monitor their regions' progress on meeting these goals. The bill also requires the CARB to regularly report on that progress, as well as on the successes and the challenges regions experience associated with achieving their targets. SB 150 provides for accounting of climate change efforts and GHG reductions and identify effective reduction strategies.

SB 100 (California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases)

Signed into law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

AB 1346 (Air Pollution: Small Off-Road Engines)

Signed into Law in October 2021, AB 1346 requires CARB, to adopt cost-effective and technologically feasible regulations to prohibit engine exhaust and evaporative emissions from new small off-road engines, consistent with federal law, by July 1, 2022. The bill requires CARB to identify and, to the extent feasible, make available funding for commercial rebates or similar incentive funding as part of any updates to existing applicable funding program guidelines to local air pollution control districts and air quality management districts to implement to support the transition to zero-emission small off-road equipment operations.

AB 1279 (The California Climate Crisis Act)

AB 1279 establishes the policy of the State to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO² removal solutions and carbon capture, utilization, and storage technologies.

SB 1020 (100 Percent Clean Electric Grid)

Signed on September 16, 2022, SB 1020 provides additional goals for the path to the 2045 goal of 100 percent clean electricity retail sales. It creates a target of 90 percent clean electricity retail sales by 2035 and 95 percent clean electricity retail sales by 2040.

SB 905 (Carbon Sequestration Program)

Signed on September 16, 2022, SB 905 establishes regulatory framework and policies that involve carbon removal, carbon capture, utilization, and sequestration. It also prohibits the injecting of concentrated carbon dioxide fluid into a Class II injection well for the purpose of enhanced oil recovery.

AB 1757 (Nature-Based Solutions)

Signed on September 16, 2022, AB 1757 requires State agencies to develop a range of targets for natural carbon sequestration and nature-based climate solutions that reduce GHG emissions to meet the 2030, 2038, and 2045 goals which would be integrated into a scoping plan addressing natural and working lands.

Executive Orders Related to GHG Emissions

California's Executive Branch has taken several actions to reduce GHGs using executive orders. Although not regulatory, they set the tone for the State and guide the actions of State agencies.

Executive Order S-3-05. Executive Order S-3-05 was issued on June 1, 2005, which established the following GHG emissions reduction targets:

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

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

Executive Order S-01-07. Issued on January 18, 2007, Executive Order S 01-07 mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. The executive order established a Low Carbon Fuel Standard (LCFS) and directed the Secretary for Environmental Protection to coordinate the actions of the California Energy Commission,

CARB, the University of California, and other agencies to develop and propose protocols for measuring the “life-cycle carbon intensity” of transportation fuels. CARB adopted the LCFS on April 23, 2009.

Executive Order S-13-08. Issued on November 14, 2008, Executive Order S-13-08 facilitated the California Natural Resources Agency development of the 2009 California Climate Adaptation Strategy. Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order S-14-08. Issued on November 17, 2008, Executive Order S-14-08 expands the State’s Renewable Energy Standard to 33 percent renewable power by 2020. Additionally, Executive Order S-21-09 (signed on September 15, 2009) directs CARB to adopt regulations requiring 33 percent of electricity sold in the State come from renewable energy by 2020. CARB adopted the Renewable Electricity Standard on September 23, 2010, which requires 33 percent renewable energy by 2020 for most publicly owned electricity retailers.

Executive Order S-21-09. Issued on July 17, 2009, Executive Order S-21-09 directs CARB to adopt regulations to increase California's Renewable Portfolio Standard (RPS) to 33 percent by 2020. This builds upon SB 1078 (2002), which established the California RPS program, requiring 20 percent renewable energy by 2017, and SB 107 (2006), which advanced the 20 percent deadline to 2010, a goal which was expanded to 33 percent by 2020 in the 2005 Energy Action Plan II.

Executive Order B-30-15. Issued on April 29, 2015, Executive Order B-30-15 established a California GHG reduction target of 40 percent below 1990 levels by 2030 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of MMTCO_{2e}. The 2030 target acts as an interim goal on the way to achieving reductions of 80 percent below 1990 levels by 2050, a goal set by Executive Order S-3-05. The executive order also requires the State’s climate adaptation plan to be updated every three years and for the State to continue its climate change research program, among other provisions. With the enactment of SB 32 in 2016, the Legislature codified the goal of reducing GHG emissions by 2030 to 40 percent below 1990 levels.

Executive Order B-55-18. Issued on September 10, 2018, Executive Order B-55-18 establishes a goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. This goal is in addition to the existing statewide targets of reducing GHG emissions. The executive order requires CARB to work with relevant State agencies to develop a framework for implementing this goal. It also requires CARB to update the Scoping Plan to identify and recommend measures to achieve carbon neutrality. The executive order also requires State agencies to develop sequestration targets in the Natural and Working Lands Climate Change Implementation Plan.

Executive Order N-79-20. Signed in September 2020, Executive Order N-79-20 establishes as a goal that where feasible, all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, will be zero-emission by 2035. The executive order sets a similar goal requiring that all medium and heavy-duty vehicles will be zero-emission by 2045 where feasible. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment “requiring increasing volumes” of new zero emission vehicles (ZEVs) “towards the target of 100 percent.” The executive order directs the California Environmental Protection Agency, the California Geologic Energy Management Division (CalGEM), and the California Natural Resources Agency to transition and repurpose oil production

facilities with a goal toward meeting carbon neutrality by 2045. Executive Order N-79-20 builds upon the CARB Advanced Clean Trucks regulation, which was adopted by CARB in July 2020.

California Regulations and Building Codes

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

Title 20 Appliance Efficiency Regulations. The appliance efficiency regulations (California Code of Regulations [CCR] Title 20, Sections 1601-1608) include standards for new appliances. Twenty-three categories of appliances are included in the scope of these regulations. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Title 24 Building Energy Efficiency Standards. California's Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The California Energy Commission (CEC) adopted the 2022 Energy Code on August 11, 2021, which was subsequently approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2022 Title 24 standards will result in less energy use, thereby reducing air pollutant emissions associated with energy consumption across California. For example, the 2022 Title 24 standards will require efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards.

Title 24 California Green Building Standards Code. The California Green Building Standards Code (CCR Title 24, Part 11 code) commonly referred to as the CALGreen Code, is a statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. The CALGreen standards require new residential and commercial buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in the five green building topics. Updates to the 2019 CALGreen Code took effect on January 1, 2023 (2022 CALGreen). The 2022 CALGreen standards has improved upon the 2019 standards for new construction of, and additions and alterations to, residential and nonresidential buildings.

CARB Advanced Clean Truck Regulation. CARB adopted the Advanced Clean Truck Regulation in June 2020 requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California is required to be zero-emission. This rule directly addresses disproportionate risks and health and pollution burdens and puts California on the path for an all zero-emission short-haul drayage fleet in ports and railyards by 2035, and zero-emission "last-mile" delivery trucks and vans by 2040. The Advanced Clean Truck Regulation accelerates the transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8. The regulation has two components including a manufacturer sales requirement, and a reporting requirement:

- **Zero-Emission Truck Sales:** Manufacturers who certify Class 2b through 8 chassis or complete vehicles with combustion engines are required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales need to be 55 percent of Class 2b – 3 truck sales, 75 percent of Class 4 – 8 straight truck sales, and 40 percent of truck tractor sales.
- **Company and Fleet Reporting:** Large employers including retailers, manufacturers, brokers and others would be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations. This information would help identify future strategies to ensure that fleets purchase available zero-emission trucks and place them in service where suitable to meet their needs.

3.3 Regional

South Coast Air Quality Management District Rule 2305 (Warehouse Indirect Source Rule)

Rule 2305 was adopted by the SCAQMD Governing Board on May 7, 2021 to reduce NO_x and particulate matter emissions associated with warehouses and mobile sources attracted to warehouses. However, Rule 2305 would also reduce GHG emissions. This rule applies to all existing and proposed warehouses over 100,000 square feet located in the SCAQMD. Rule 2305 requires warehouse operators to track annual vehicle miles traveled associated with truck trips to and from the warehouse. These trip miles are used to calculate the warehouses WAIRE (Warehouse Actions and Investments to Reduce Emissions) Points Compliance Obligation. WAIRE Points are earned based on emission reduction measures and warehouse operators are required to submit an annual WAIRE Report which includes truck trip data and emission reduction measures. Reduction strategies listed in the WAIRE menu include acquire zero emission (ZE) or near zero emission (NZE) trucks; require ZE/NZE truck visits; require ZE yard trucks; install on-site ZE charging/fueling infrastructure; install onsite energy systems; and install filtration systems in residences, schools, and other buildings in the adjacent community. Warehouse operators that do not earn a sufficient number of WAIRE points to satisfy the WAIRE Points Compliance Obligation would be required to pay a mitigation fee. Funds from the mitigation fee will be used to incentivize the purchase of cleaner trucks and charging/fueling infrastructure in communities nearby.

South Coast Air Quality Management District Thresholds

The South Coast Air Quality Management District (SCAQMD) formed a GHG California Environmental Quality Act (CEQA) Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. This working group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research, CARB, the Attorney General's Office, a variety of city and county planning departments in the SCAB, various utilities such as sanitation and power companies throughout the SCAB, industry groups, and environmental and professional organizations. The Working Group has proposed a tiered approach to evaluating GHG emissions for development projects where SCAQMD is not the lead agency, wherein projects are evaluated sequentially through a series of "tiers" to determine whether the project is likely to result in a potentially significant impact due to GHG emissions.

With the tiered approach, a project is compared against the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. The SCAQMD has adopted a threshold of 10,000 MTCO₂e per year for industrial projects and a 3,000 MTCO₂e threshold was proposed for non-industrial projects but has not been adopted. The SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact.

Tier 4 consists of three decision tree options. Under the Tier 4 first option, SCAQMD initially outlined that a project would be excluded if design features and/or mitigation measures resulted in emissions 30 percent lower than business as usual emissions. However, the Working Group did not provide a recommendation for this approach. The Working Group folded the Tier 4 second option into the third option. Under the Tier 4 third option, a project would be excluded if it was below an efficiency-based threshold of 4.8 MTCO₂e per service population per year. Tier 5 would exclude projects that implement offsite mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

Tier 3 Screening Thresholds

When the tiered approach is applied to a proposed project, and the project is found not to comply with Tier 1 or Tier 2, the project's emissions are compared against a screening threshold, as described above, for Tier 3. The screening threshold formally adopted by SCAQMD is an "interim" screening threshold for stationary source industrial projects where the SCAQMD is the lead agency under CEQA. The threshold was termed "interim" because, at the time, SCAQMD anticipated that CARB would be adopting a statewide significance threshold that would inform and provide guidance to SCAQMD in its adoption of a final threshold. However, no statewide threshold was ever adopted, and the interim threshold remains in effect.

For projects for which SCAQMD is not a lead agency, no screening thresholds have been formally adopted. However, the SCAQMD Working Group has recommended a threshold of 10,000 MTCO₂e/year for industrial projects and 3,000 MTCO₂e/year for residential and commercial projects. SCAQMD determined that these thresholds would "capture" 90 percent of GHG emissions from these sectors, "capture" meaning that 90 percent of total emissions from all new projects would be subject to some type of CEQA analysis (i.e., found potentially significant).¹³

Southern California Association of Governments

On September 3, 2020, SCAG's Regional Council adopted Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy [2020 RTP/SCS]). The RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The strategy was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations,

¹³ SCAQMD, "Staff Report: Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans," December 5, 2008, Attachment E: "Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold," October 2008, p. 3-2.

businesses and local stakeholders within the counties of Orange, Los Angeles, Imperial, Riverside, San Bernardino, and Ventura. The RTP/SCS is a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals. The SCAG region strives toward sustainability through integrated land use and transportation planning. The SCAG region must achieve specific federal air quality standards and is required by State law to lower regional GHG emissions.

3.4 Local

City of Redlands General Plan 2035

Chapter 7, Healthy Community, and Chapter 8, Sustainable Community, of the City of Redlands General Plan (Redlands General Plan) includes the following policies that relate to climate change:

Chapter 7 - Healthy Community:

- Action 7-A.44: Support the use of clean fuel and “climate friendly” vehicles in order to reduce energy use, energy costs, and greenhouse gas emissions by residents, businesses, and City government activities.

Chapter 8 - Sustainable Community:

Principle 8-P.8: Promote sustainability by reducing the community’s greenhouse gas (GHG) emissions and fostering green development patterns – including buildings, sites, and landscapes.

Action 8-A.39: Continue implementation and enforcement of the California Building and Energy codes to promote energy efficient building design and construction.

Action 8-A.40: Promote the Leadership in Energy and Environmental Design (LEED) certification program for the design, operation, and construction of high-performance green buildings.

Action 8-A.41: Promote energy conservation and retrofitting of existing buildings through:

- Encouraging point-of-sale residential energy and water efficiency audits. Provide information on upgrading requirements and/or incentives if necessary;
- Providing financial incentives and low-cost financing products and programs that encourage investment in energy efficiency and renewable energy within existing residential buildings; and
- Educating residents about the availability of free home energy audit programs and encouraging the implementation of audit findings.

Action 8-A.42: Adopt a construction and demolition waste recycling ordinance that requires, except in unusual circumstances, all construction, demolition and renovation projects that meet a certain size or dollar value to divert from landfills 100 percent of all cement concrete and asphalt concrete, and an average of at least 75 percent of all remaining non-hazardous debris.

- Action 8-A.43: Decrease the need for artificial cooling, heating, and lighting, and promote outdoor lifestyles in Redlands' moderate climate by:
- Updating the Zoning Ordinance to provide for adequate private and common open spaces as part of multi-family developments; and
 - Encouraging residential and office buildings to have windows that open to the outside in all habitable rooms and maximize the use of daylight.

Action 8-A.44: Prepare a Landscape Manual or enhance landscape standards in the Municipal Code to mitigate urban heat island effects through maximum tree canopy coverage and minimum asphalt and paving coverage – particularly for denser areas like Downtown, Transit Villages, shopping centers, and industrial and other areas with expansive surface parking. Consider the reflectance of stone and rock ground cover in heat generation.

Principle 8-P.9: Undertake initiatives to enhance sustainability by reducing the community's GHG emissions.

Principle 8-P.10: Demonstrate leadership by reducing the use of energy and fossil fuel consumption in municipal operations, including transportation, waste reduction, and recycling, and by promoting efficient building design and use.

Action 8-A.45: Prepare a Climate Action Plan to ensure that the Planning Area complies with State-mandated GHG emissions.

Action 8-A.46: Continue to monitor the City's compliance with State-mandated GHG emissions, as provided for in the Climate Action Plan. Make timely adjustments to City policies as required to continue meeting State GHG targets, and as changes in technology, federal and State programs, or other circumstances warrant.

Action 8-A.47: Demonstrate City leadership by giving preference to or providing incentives for climate-friendly purchasing.

Action 8-A.48: Support a regional approach to study the feasibility of establishing Community Choice Aggregation (CCA) or another program that increases the renewable energy supply and maintains the reliability and sustainability of the electrical grid.

City of Redlands Climate Action Plan

The City approved and adopted the City of Redlands Climate Action Plan (Redlands CAP or CAP) on December 5, 2017. It is a long-range plan to reduce local GHG emissions while providing Redlands with a strategy to grow in a sustainable way to keep the city vibrant and livable by allowing public and private development and redevelopment. The Redlands CAP implements strategies and measures related to transportation and land use, energy, solid waste, and community education and outreach to achieve GHG emissions targets. The CAP identifies how the GHG reduction measures will be implemented and monitored by the City to ensure that progress is being made toward the GHG reduction target.

4 SIGNIFICANCE CRITERIA AND METHODOLOGY

4.1 Thresholds and Significance Criteria

Based upon the criteria derived from State CEQA Guidelines Appendix G, a project normally would have a significant effect on the environment if it would:

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

The Appendix G thresholds for GHG emissions do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA.

Addressing GHG emissions generation impacts requires an agency to determine what constitutes a significant impact. The amendments to the CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency is left to determine whether a project's GHG emissions will have a "significant" impact on the environment. The guidelines direct that agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissions.¹⁴

4.2 Methodology

Global climate change is, by definition, a cumulative impact of GHG emissions. Therefore, there is no project-level analysis. The baseline against which to compare potential impacts of the project includes the natural and anthropogenic drivers of global climate change, including world-wide GHG emissions from human activities which almost doubled between 1970 and 2010 from approximately 27 gigatonnes (Gt) of CO₂/year to nearly 49 GtCO₂/year.¹⁵ As such, the geographic extent of climate change and GHG emissions cumulative impact discussion is worldwide.

The Project's construction and operational emissions were calculated using the California Emissions Estimator Model (CalEEMod). Details of the modeling assumptions and emission factors are provided in Appendix A: Greenhouse Gas Emissions Data.

¹⁴ 14 California Code of Regulations, Section 15064.4a

¹⁵ Intergovernmental Panel on Climate Change, *Climate Change 2014 Mitigation of Climate Change Working Group III Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2014.

Construction

CalEEMod calculates construction emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. Construction GHG emissions were forecasted based on the proposed construction schedule and applying the emissions factors derived from CalEEMod. The Project's construction-related GHG emissions would be generated from off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. in 2023.

Operations

The Project's operational GHG emissions would be generated by vehicular traffic, area sources (e.g., landscaping maintenance, consumer products), energy consumption (electricity and natural gas), water supply and wastewater treatment, and solid waste. These emissions categories are discussed below.

- **Area Sources.** Area source emissions occur from hearths, architectural coatings, landscaping equipment, and consumer products. The Project involves an automobile sales and service facility and would not include hearths. Landscaping and consumer products would be limited. Additionally, the primary emissions from architectural coatings are volatile organic compounds, which are relatively insignificant as direct GHG emissions.
- **Energy Consumption.** Energy consumption consists of emissions from project consumption of electricity and natural gas. Primary uses of electricity and natural gas by the Project would be for miscellaneous equipment, space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. Energy emissions are calculated based on consumption rates and emissions factors in CalEEMod.
- **Solid Waste.** Solid waste releases GHG emissions in the form of methane when these materials decompose. Solid waste emissions are calculated based on generation rates and emissions factors in CalEEMod.
- **Water and Wastewater.** Project GHG emissions would be generated from energy consumption associated with water and wastewater conveyance and treatment. Water and wastewater emissions are calculated based on consumption rates and emissions factors in CalEEMod. No changes were made to the default water/wastewater usage consumption rates or emissions factors.
- **Emergency Backup Generators.** Backup generators would only be used in the event of a power failure and would not be part of the Project's normal daily operations. Nonetheless, emissions associated with this equipment were included to be conservative. Emissions from an emergency backup generator for the facility's building were calculated separately from CalEEMod; refer to [Appendix A](#). However, CalEEMod default emissions rates were used. If backup generators are required, the end user would be required to obtain a permit from the SCAQMD prior to installation. Emergency backup generators must meet SCAQMD's Best Available Control Technology (BACT) requirements and comply with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines), which would minimize emissions.

- **Mobile Sources.** Mobile sources are emissions from motor vehicles. The Project's generated traffic was obtained from the *Scoping Letter Agreement for Traffic Study for the Proposed Used Automobile Sales and Service Facility Project in the City of Redlands* prepared by Kimley-Horn (May 2023) (Traffic Scoping Agreement). Project's trip generation from the Traffic Study is based on the 11th Edition of the Institute of Transportation Engineers (ITE) land use category and the Project would generate up to 715 daily trips.

5 POTENTIAL IMPACTS AND MITIGATION

5.1 Greenhouse Gas Emissions

Threshold 5.1 Would the Project generate GHG emissions, either directly or indirectly, that could have a significant impact on the environment?

Short-Term Construction Greenhouse Gas Emissions

Project construction activities would generate direct CO₂, N₂O, and CH₄ emissions from construction equipment, transport of materials, and construction workers commuting to and from the Project site. Total GHG emissions generated during all construction phases were combined and are presented in [Table 2: Construction-Related Greenhouse Gas Emissions](#).

Category	MTCO ₂ e
2023 Construction	292
2024 Construction	179
Total Construction	471
30-Year Amortized Construction	15.70

Source: CalEEMod version 2022.1 Refer to [Appendix A](#) for model outputs.

As indicated in [Table 2](#), the Project would result in the generation of approximately 471 MTCO₂e over the course of construction. Construction GHG emissions are typically summed and amortized over a 30-year period, then added to the operational emissions.¹⁶ The amortized Project construction emissions would be 15.70 MTCO₂e per year. Once construction is complete, construction-related GHG emissions would cease.

Long-Term Operational Greenhouse Gas Emissions

Operational or long-term emissions occur over the life of the Project. GHG emissions would result from direct emissions such as Project generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, the emissions associated with solid waste generated from the Project, and any fugitive refrigerants from air conditioning or refrigerators.

Total GHG emissions associated with the Project are summarized in [Table 3: Project Greenhouse Gas Emissions](#). As shown in [Table 3](#), the Project would generate approximately 2,823.70 MTCO₂e annually from both construction and operations activities which is below the SCAQMD's 3,000 MTCO₂/year GHG

¹⁶ The amortization period is 30 years per the South Coast Air Quality Management District (South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13*, August 26, 2009).

threshold. Therefore, the proposed Project would not generate significant GHG emissions, and the impacts would be less than significant.

Emissions Source	MTCO₂e per Year
Construction Amortized Over 30 Years	15.70
Area Source	1
Energy	242
Mobile	1,010
Stationary Source – Generator ¹	20
Waste	54
Water and Wastewater	18
Refrigeration	1,463
Total	2,823.70
<i>SCAQMD Threshold</i>	<i>3,000</i>
Exceeds Threshold?	No
Notes:	
1. One emergency backup generator has been assumed for the proposed Project.	
Source: CalEEMod version 2022.1. Refer to Appendix A for model outputs.	

Laws, Ordinances, and Regulations:

Laws, Ordinances, and Regulations (LOR) are existing requirements that are based on local, state, or federal regulations or laws that are frequently required independently of CEQA review. Typical LORs and requirements include compliance with the provisions of the Building Code, SCAQMD Rules, etc. The City may impose additional conditions during the approval process, as appropriate. Because LORs are neither Project specific nor a result of development of the Project, they are not considered to be either Project Design Features or Mitigation Measures.

LOR GHG-1 Require diesel powered construction equipment to turn off when not in use per Title 13 of the California Code of Regulations, Section 2449.

LOR GHG-2 Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls and sensors for landscaping according to the City’s Water Efficient Landscape requirements (Chapter 15.54 of the City’s Municipal Code).

LOR GHG-3 The Project shall be designed in accordance with the applicable Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations [CCR], Title 24, Part 6). These standards are updated, nominally every three years, to incorporate improved energy efficiency technologies and methods. The Building Official, or designee shall ensure compliance prior to the issuance of each building permit. The Title 24 Energy Efficiency Standards (Section 110.10(b)1) require all buildings to be designed to have a total area of at least 15 percent (after subtracting any skylights) “solar ready” zone on the roof top that will structurally accommodate later installation of

rooftop solar panels. The installation of the solar panels is specific to the end use and will be determined at the time the specific projects are developed. If future building operators pursue providing rooftop solar panels, they will submit plans for solar panels prior to occupancy.

LOR GHG-4 The Project shall be designed in accordance with the applicable California Green Building Standards (CALGreen) Code (24 CCR, Part 11). The Building Official, or designee shall ensure compliance prior to the issuance of each building permit. These requirements include, but are not limited to:

- Design buildings to be water-efficient. Install water-efficient fixtures in accordance with Section 4.303 (residential) and Section 5.303 (nonresidential) of the California Green Building Standards Code Part 11.
- Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 4.408.1 (residential) and Section 5.408.1 (nonresidential) of the California Green Building Standards Code Part 11.
- Provide storage areas for recyclables and green waste and adequate recycling containers located in readily accessible areas in accordance with Section 4.410 (residential) and Section 5.410 (nonresidential) of the California Green Building Standards Code Part 11.
- To facilitate future installation of electric vehicle supply equipment (EVSE), residential construction shall comply with Section 4.106.4 (residential electric vehicle charging) of the California Green Building Standards Code Part 11 and nonresidential construction shall comply with Section 5.106.5.3 (nonresidential electric vehicle charging) of the California Green Building Standards Code Part 11.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

5.2 Greenhouse Gas Reduction Plan Compliance

Threshold 5.2 Would the Project conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions?

Regional Transportation Plan/Sustainable Communities Strategy Consistency

On September 3, 2020, SCAG's Regional Council adopted Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy [2020 RTP/SCS]). The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. SCAG's RTP/SCS establishes GHG emissions goals for automobiles and light-duty

trucks for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15.

The RTP/SCS contains over 4,000 transportation projects, ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs and replacement bridges. These future investments were included in county plans developed by the six county transportation commissions and seek to reduce traffic bottlenecks, improve the efficiency of the region’s network, and expand mobility choices for everyone. The RTP/SCS is an important planning document for the region, allowing project sponsors to qualify for federal funding.

The plan accounts for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness. The RTP/SCS is also supported by a combination of transportation and land use strategies that help the region achieve state GHG emissions reduction goals and Federal Clean Air Act (FCAA) requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry, and utilize resources more efficiently. GHG emissions resulting from development-related mobile sources are the most potent source of emissions, and therefore Project comparison to the RTP/SCS is an appropriate indicator of whether the Project would inhibit the post-2020 GHG reduction goals promulgated by the state. The Project’s consistency with the RTP/SCS goals is analyzed in detail in Table 4: Regional Transportation Plan/Sustainable Communities Strategy Consistency.

SCAG Goals	Compliance
GOAL 1: Encourage regional economic prosperity and global competitiveness.	N/A: This is not a Project-specific policy and is therefore not applicable. However, the Project is located on a vacant site and development of the site would contribute to regional economic prosperity.
GOAL 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	Consistent: Although this Project is not a transportation improvement project, the Project is located near existing transit routes of I-10 and SR-210.
GOAL 3: Enhance the preservation, security, and resilience of the regional transportation system.	N/A: This is not a transportation improvement project and is therefore not applicable.
GOAL 4: Increase person and goods movement and travel choices within the transportation system.	N/A: This is not a transportation improvement project and is therefore not applicable.
GOAL 5: Reduce greenhouse gas emissions and improve air quality.	Consistent: The Project site is located within an urban area in proximity to existing transit routes, freeways, and residential development. Locating an employment center in close proximity to existing residential uses would potentially reduce trip lengths required for existing residents to travel to work and/or commercial services. Reduction of trip lengths would result in reduced GHG and air quality emissions.
GOAL 6: Support healthy and equitable communities	Consistent: As discussed in the Air Quality Assessment, the Project would not exceed thresholds or result in health impacts. The Project does not violate any air quality standards or contribute substantially to an existing or projected air quality violation. The Project would not conflict with the surrounding community’s ability to access healthy food or parks.

Table 4: Regional Transportation Plan/Sustainable Communities Strategy Consistency	
SCAG Goals	Compliance
GOAL 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.	N/A: This is not a project-specific policy and is therefore not applicable.
GOAL 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	N/A: This is not a project-specific policy and is therefore not applicable. However, the Project is located in a developed area in proximity to existing truck routes and freeways. Location of the Project within a developed area would reduce trip lengths, which would result in more efficient travel.
GOAL 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	Consistent: The Project involves development of an automobile sales and service facility and does not include housing.
GOAL 10: Promote conservation of natural and agricultural lands and restoration of habitats.	N/A: This Project is located within an urban area and is not located on agricultural or habitat lands.
Source: Southern California Association of Governments, <i>Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy, 2020</i> .	

The goals stated in the RTP/SCS were used to determine consistency with the planning efforts previously stated. As shown in [Table 4](#), the Project would be consistent with the stated goals of the RTP/SCS. Therefore, the Project would not result in any significant impacts or interfere with SCAG’s ability to achieve the region’s post-2020 mobile source GHG reduction targets.

California Air Resource Board Scoping Plan Consistency

As previously noted, the 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The transportation, electricity, and industrial sectors are the largest GHG contributors in the State. The 2022 Scoping Plan plans to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks). Additional GHG reductions are achieved through decarbonizing the electricity and industrial sectors.

Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II; and implementing the Advanced Clean Fleets regulation to deploy zero-electric vehicle buses and trucks. Additional transportation policies include the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The 2022 Scoping Plan would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology.

As indicated in [Table 3](#), approximately 44 percent of the Project's GHG emissions are from energy and mobile sources which would be further reduced by the 2022 Scoping Plan measures described above. It should be noted that the City has no control over vehicle emissions (approximately 36 percent of the Project's total emissions). However, these emissions would decline in the future due to Statewide measures discussed above, as well as cleaner technology and fleet turnover. Several of the State's plans and policies would contribute to a reduction in mobile source emissions from the Project. These include the following:

- **CARB's Advanced Clean Truck Regulation:** Adopted in June 2020, CARB's Advanced Clean Truck Regulation requires truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California is required to be zero-emission. The Advanced Clean Truck Regulation accelerates the transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8.
- **Executive Order N-79-20:** Executive Order N-79-20 establishes the goal for all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, will be zero-emission by 2035 and all medium and heavy-duty vehicles will be zero-emission by 2045. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment "requiring increasing volumes" of new ZEVs "towards the target of 100 percent."
- **CARB's Mobile Source Strategy:** CARB's Mobile Source Strategy takes an integrated planning approach to identify the level of transition to cleaner mobile source technologies needed to achieve all of California's targets by increasing the adoption of ZEV buses and trucks.
- **CARB's Sustainable Freight Action Plan:** The Sustainable Freight Action Plan which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks. This Plan applies to all trucks accessing the Project site and may include existing trucks or new trucks that are part of the statewide goods movement sector.
- **CARB's Emissions Reduction Plan for Ports and Goods Movement:** CARB's Emissions Reduction Plan for Ports and Goods Movement identifies measures to improve goods movement efficiencies such as advanced combustion strategies, friction reduction, waste heat recovery, and electrification of accessories.

Following compliance with all applicable regulations, the proposed Project would not conflict with the State's progress towards carbon neutrality under the 2022 Scoping Plan. While these measures are not directly applicable to the Project, any commercial activity associated with goods movement would be required to comply with these measures as adopted. It is also noted that the Project would not convert any Natural and Working Lands (NWL) and/or decrease the urban forest carbon stock in the State, which are areas of emphasis in the 2022 Scoping Plan. As such, the Project would not interfere with implementation of the 2022 Scoping Plan.

San Bernardino County Regional Greenhouse Gas Reduction Plan Consistency

The San Bernardino County Regional GHG Reduction Plan (County GHG Reduction Plan) presents greenhouse gas inventories, assesses the effectiveness of California initiatives to reduce GHG emissions, and identifies local GHG reduction strategies that were selected for 25 Partnership jurisdictions to reduce

local GHG emissions. The County GHG Reduction Plan presents the collective results of all local efforts to reduce GHG emissions consistent with statewide GHG targets expressed in Senate Bill (SB) 32, the “Global Warming Solutions Act of 2006,” and SB 375. The County GHG Reduction Plan identifies state measures applicable to every Partnership jurisdiction, as well as local measures selected by each jurisdiction that could reduce future GHG emissions within jurisdictional boundaries. The County GHG Reduction Plan is intended to serve as a foundation upon which the Partnership jurisdictions can develop individual jurisdiction-specific CAPs to be adopted and enacted according to their own internal procedures.¹⁷

The Project’s GHG emissions would not conflict with the County GHG Reduction Plan. The Project would be consistent with all the applicable Redlands General Plan policies that form the foundation for the City’s GHG emissions reduction measures outlined in the County GHG Reduction Plan. In addition, the Project would be required to implement all the laws, ordinances, and regulations that are based on local, state, or federal regulations which would also support the goals of the County GHG Reduction Plan. Therefore, the proposed Project would be consistent with the San Bernardino County Regional GHG Reduction Plan.

Redlands Climate Action Plan Consistency (CAP)

As described in the regulatory section, the City approved and adopted the City of Redlands Climate Action Plan (Redlands CAP or CAP) on December 5, 2017. The proposed Project would be consistent with the transportation and water utility goals of the CAP by providing EV charging stations for electric vehicles and complying with the City’s Water Efficient Landscape requirements. The proposed Project would also be consistent with the CAP’s energy efficiency goals by complying with the latest California Building Code (Title 24), including the latest CALGreen Code standards. Project construction would also comply with current local and State standards and CAP goals to increase diversion and reduction of waste by diverting construction waste from landfills to recycling. As such, the proposed project would be consistent with the applicable GHG reduction goals within the Redlands CAP.

Conclusion

As shown in [Table 3](#), approximately 44 percent of the Project’s GHG emissions are from energy and mobile sources which would be further reduced by the 2022 Scoping Plan goals described above (including achieve 100 percent clean electricity by 2045 [SB 100], achieving 100 percent zero emission vehicle sales in 2035 [Advanced Clean Cars II], and implementing the Advanced Clean Fleets regulation [ZEV buses and trucks]). It should be noted that the City has no control over vehicle emissions. However, these emissions would decline in the future due to Statewide measures discussed above (including the reduction in fuels’ carbon content, CARB’s Advanced Clean Car Program, CARB’s Mobile Source Strategy, fuel efficiency standards, etc.), as well as cleaner technology and fleet turnover. SCAG’s 2020 RTP/SCS is also expected to help California reach its GHG reduction goals, with reductions in per capita transportation emissions of 19 percent by 2035. The Project would also comply with the goals of the Redlands CAP and would not inhibit its implementation or progress.

In conclusion, the Project does not conflict with the applicable plans that are discussed above and therefore, with respect to this particular threshold, the Project does not have a significant impact.

¹⁷ San Bernardino Council of Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, March 2021.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

5.3 Cumulative Setting, Impacts, and Mitigation Measures

Cumulative Setting

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and TACs, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about 1 day), GHGs have much longer atmospheric lifetimes of 1 year to several thousand years that allow them to be dispersed around the globe.

Cumulative Impacts

It is generally the case that an individual project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory.¹⁸ The State CEQA Guidelines generally address GHG emissions as a cumulative impact because of the global nature of climate change.¹⁹ As the California Supreme Court explained, “because of the global scale of climate change, any one project's contribution is unlikely to be significant by itself”.²⁰ As such, GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. In addition, the Project as well as other cumulative related projects would also be subject to all applicable regulatory requirements, which would further reduce GHG emissions. As discussed above, the Project would not conflict with the RTP/SCS, CARB Scoping Plan, San Bernardino GHG Reduction Plan, or the Redlands CAP and the Project-related GHG emissions would not exceed the SCAQMD’s 3,000 MTCO_{2e} threshold of significance. Therefore, the Project’s cumulative contribution of GHG emissions would be less than significant and the Project’s cumulative GHG impacts would also be less than cumulatively considerable.

Mitigation Measures: No mitigation is required.

Level of Significance: Less than significant impact.

¹⁸ California Air Pollution Control Officers Association, *CEQA and Climate Change White Paper*, 2008.

¹⁹ Pub. Resources Code, § 21083, subd. (b)(2)

²⁰ *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 512.

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Appendix A

Greenhouse Gas Emissions Data

Redlands Used Automobile Sales and Service Facility Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Redlands Used Automobile Sales and Service Facility
Construction Start Date	6/15/2023
Operational Year	2025
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.50
Precipitation (days)	24.0
Location	34.06723082095773, -117.19784045506401
County	San Bernardino-South Coast
City	Redlands
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5399
EDFZ	10
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.21

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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General Office Building	11.4	1000sqft	5.66	11,404	235,224	—	—	—
Other Asphalt Surfaces	6.70	Acre	6.70	0.00	0.00	—	—	—
Parking Lot	5.22	Acre	5.22	0.00	0.00	—	—	—
Automobile Care Center	42.6	1000sqft	0.98	42,610	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.	4.80	6.55	39.8	37.1	0.06	1.81	7.89	9.70	1.66	3.99	5.65	—	7,104	7,104	0.30	0.10	1.86	7,143
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.63	6.55	12.3	14.6	0.03	0.56	0.30	0.86	0.51	0.07	0.59	—	2,911	2,911	0.13	0.07	0.05	2,935
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.18	1.74	9.51	9.31	0.02	0.42	1.09	1.51	0.39	0.49	0.87	—	1,756	1,756	0.08	0.03	0.28	1,766
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.22	0.32	1.74	1.70	< 0.005	0.08	0.20	0.27	0.07	0.09	0.16	—	291	291	0.01	< 0.005	0.05	292

Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	100	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	75.0	100	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	4.80	4.04	39.8	37.1	0.06	1.81	7.89	9.70	1.66	3.99	5.65	—	7,104	7,104	0.30	0.10	1.86	7,143	
2024	1.57	6.55	11.6	14.7	0.03	0.50	0.30	0.80	0.46	0.07	0.54	—	2,924	2,924	0.13	0.07	1.77	2,950	
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	1.63	1.36	12.3	14.6	0.03	0.56	0.30	0.86	0.51	0.07	0.59	—	2,911	2,911	0.13	0.07	0.05	2,935	
2024	1.56	6.55	11.7	14.4	0.03	0.50	0.30	0.80	0.46	0.07	0.54	—	2,903	2,903	0.13	0.07	0.05	2,927	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	1.18	0.99	9.51	9.31	0.02	0.42	1.09	1.51	0.39	0.49	0.87	—	1,756	1,756	0.08	0.03	0.28	1,766	
2024	0.62	1.74	4.51	5.86	0.01	0.20	0.12	0.32	0.19	0.03	0.21	—	1,071	1,071	0.05	0.02	0.27	1,079	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2023	0.22	0.18	1.74	1.70	< 0.005	0.08	0.20	0.27	0.07	0.09	0.16	—	291	291	0.01	< 0.005	0.05	292
2024	0.11	0.32	0.82	1.07	< 0.005	0.04	0.02	0.06	0.03	0.01	0.04	—	177	177	0.01	< 0.005	0.05	179

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.	3.88	4.77	3.79	33.4	0.08	0.10	6.42	6.52	0.10	1.63	1.73	105	9,221	9,326	11.0	0.38	8,863	18,576
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.25	4.17	4.01	25.7	0.07	0.09	6.42	6.52	0.09	1.63	1.72	105	8,726	8,831	11.0	0.39	8,835	18,057
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.33	4.29	3.58	24.5	0.06	0.09	5.18	5.27	0.09	1.32	1.40	105	7,514	7,619	11.0	0.34	8,844	16,838
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.61	0.78	0.65	4.47	0.01	0.02	0.95	0.96	0.02	0.24	0.26	17.4	1,244	1,261	1.82	0.06	1,464	2,788
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—

Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
--------	---	----	----	----	----	---	---	----	---	---	----	---	---	---	---	---	---	---

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	3.40	3.04	3.19	30.6	0.08	0.05	6.42	6.48	0.05	1.63	1.68	—	7,699	7,699	0.33	0.34	28.8	7,837
Area	0.42	1.70	0.02	2.35	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.66	9.66	< 0.005	< 0.005	—	9.70
Energy	0.06	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	1,454	1,454	0.13	0.01	—	1,461
Water	—	—	—	—	—	—	—	—	—	—	—	11.6	58.4	70.0	1.19	0.03	—	108
Waste	—	—	—	—	—	—	—	—	—	—	—	93.4	0.00	93.4	9.34	0.00	—	327
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8,834	8,834
Total	3.88	4.77	3.79	33.4	0.08	0.10	6.42	6.52	0.10	1.63	1.73	105	9,221	9,326	11.0	0.38	8,863	18,576
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	3.18	2.83	3.44	25.3	0.07	0.05	6.42	6.48	0.05	1.63	1.68	—	7,213	7,213	0.35	0.35	0.75	7,327
Area	—	1.31	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.06	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	1,454	1,454	0.13	0.01	—	1,461
Water	—	—	—	—	—	—	—	—	—	—	—	11.6	58.4	70.0	1.19	0.03	—	108
Waste	—	—	—	—	—	—	—	—	—	—	—	93.4	0.00	93.4	9.34	0.00	—	327
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8,834	8,834
Total	3.25	4.17	4.01	25.7	0.07	0.09	6.42	6.52	0.09	1.63	1.72	105	8,726	8,831	11.0	0.39	8,835	18,057
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.98	2.68	2.99	22.4	0.06	0.04	5.18	5.22	0.04	1.32	1.36	—	5,994	5,994	0.31	0.30	10.2	6,101
Area	0.29	1.57	0.01	1.61	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.62	6.62	< 0.005	< 0.005	—	6.64

Energy	0.06	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	1,454	1,454	0.13	0.01	—	1,461
Water	—	—	—	—	—	—	—	—	—	—	—	11.6	58.4	70.0	1.19	0.03	—	108
Waste	—	—	—	—	—	—	—	—	—	—	—	93.4	0.00	93.4	9.34	0.00	—	327
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8,834	8,834
Total	3.33	4.29	3.58	24.5	0.06	0.09	5.18	5.27	0.09	1.32	1.40	105	7,514	7,619	11.0	0.34	8,844	16,838
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.54	0.49	0.55	4.09	0.01	0.01	0.95	0.95	0.01	0.24	0.25	—	992	992	0.05	0.05	1.68	1,010
Area	0.05	0.29	< 0.005	0.29	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.10	1.10	< 0.005	< 0.005	—	1.10
Energy	0.01	0.01	0.10	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	241	241	0.02	< 0.005	—	242
Water	—	—	—	—	—	—	—	—	—	—	—	1.91	9.67	11.6	0.20	< 0.005	—	17.9
Waste	—	—	—	—	—	—	—	—	—	—	—	15.5	0.00	15.5	1.55	0.00	—	54.1
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,463	1,463
Total	0.61	0.78	0.65	4.47	0.01	0.02	0.95	0.96	0.02	0.24	0.26	17.4	1,244	1,261	1.82	0.06	1,464	2,788

3. Construction Emissions Details

3.1. Site Preparation (2023) - 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	4.70	3.95	39.7	35.5	0.05	1.81	—	1.81	1.66	—	1.66	—	5,295	5,295	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—	—	—	—

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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
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.39	0.32	3.27	2.92	< 0.005	0.15	—	0.15	0.14	—	0.14	—	435	435	0.02	< 0.005	—	437	
Dust From Material Movement	—	—	—	—	—	—	0.63	0.63	—	0.32	0.32	—	—	—	—	—	—	—	
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	0.07	0.06	0.60	0.53	< 0.005	0.03	—	0.03	0.02	—	0.02	—	72.1	72.1	< 0.005	< 0.005	—	72.3	
Dust From Material Movement	—	—	—	—	—	—	0.11	0.11	—	0.06	0.06	—	—	—	—	—	—	—	
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	0.09	1.62	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	257	257	0.01	0.01	1.10	261	
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	0.01	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	19.6	19.6	< 0.005	< 0.005	0.04	19.9
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	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.25	3.25	< 0.005	< 0.005	0.01	3.30
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. Grading (2023) - 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	4.43	3.72	37.3	31.4	0.06	1.59	—	1.59	1.47	—	1.47	—	6,598	6,598	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	3.59	3.59	—	1.43	1.43	—	—	—	—	—	—	—
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	0.42	0.36	3.58	3.01	0.01	0.15	—	0.15	0.14	—	0.14	—	633	633	0.03	0.01	—	635

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Dust From Material Movement:	—	—	—	—	—	—	0.34	0.34	—	0.14	0.14	—	—	—	—	—	—	—
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	0.08	0.07	0.65	0.55	< 0.005	0.03	—	0.03	0.03	—	0.03	—	105	105	< 0.005	< 0.005	—	105
Dust From Material Movement:	—	—	—	—	—	—	0.06	0.06	—	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	0.12	0.11	0.11	1.85	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	294	294	0.01	0.01	1.26	298
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	0.03	< 0.005	0.27	0.15	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	212	212	0.02	0.03	0.44	223
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.14	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	26.2	26.2	< 0.005	< 0.005	0.05	26.5
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	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	20.4	20.4	< 0.005	< 0.005	0.02	21.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.33	4.33	< 0.005	< 0.005	0.01	4.40
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.37	3.37	< 0.005	< 0.005	< 0.005	3.54
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3.5. Building Construction (2023) - 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	1.50	1.26	11.8	13.2	0.02	0.55	—	0.55	0.51	—	0.51	—	2,397	2,397	0.10	0.02	—	2,406
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	1.50	1.26	11.8	13.2	0.02	0.55	—	0.55	0.51	—	0.51	—	2,397	2,397	0.10	0.02	—	2,406
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	0.32	0.27	2.52	2.81	< 0.005	0.12	—	0.12	0.11	—	0.11	—	511	511	0.02	< 0.005	—	513
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	0.46	0.51	< 0.005	0.02	—	0.02	0.02	—	0.02	—	84.7	84.7	< 0.005	< 0.005	—	85.0
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.10	0.09	1.60	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	254	254	0.01	0.01	1.09	258
Vendor	0.03	0.01	0.33	0.18	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	281	281	0.02	0.04	0.77	294
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	0.11	1.20	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	233	233	0.01	0.01	0.03	236
Vendor	0.03	0.01	0.35	0.18	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	281	281	0.02	0.04	0.02	294
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.27	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	50.3	50.3	< 0.005	< 0.005	0.10	51.0
Vendor	0.01	< 0.005	0.07	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	59.9	59.9	0.01	0.01	0.07	62.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.33	8.33	< 0.005	< 0.005	0.02	8.45
Vendor	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	9.91	9.91	< 0.005	< 0.005	0.01	10.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
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	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
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	0.36	0.30	2.83	3.31	0.01	0.13	—	0.13	0.12	—	0.12	—	605	605	0.02	< 0.005	—	607
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	0.07	0.06	0.52	0.60	< 0.005	0.02	—	0.02	0.02	—	0.02	—	100	100	< 0.005	< 0.005	—	101
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.08	1.46	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	249	249	0.01	0.01	0.99	253
Vendor	0.03	0.01	0.32	0.17	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	278	278	0.02	0.04	0.77	291
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	0.09	0.09	0.10	1.10	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	228	228	0.01	0.01	0.03	231

Vendor	0.03	0.01	0.33	0.17	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	278	278	0.02	0.04	0.02	291
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.29	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	58.4	58.4	< 0.005	< 0.005	0.11	59.2
Vendor	0.01	< 0.005	0.08	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	70.1	70.1	0.01	0.01	0.08	73.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.67	9.67	< 0.005	< 0.005	0.02	9.80
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	11.6	11.6	< 0.005	< 0.005	0.01	12.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (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	1.01	0.85	7.81	10.0	0.01	0.39	—	0.39	0.36	—	0.36	—	1,512	1,512	0.06	0.01	—	1,517
Paving	—	0.48	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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Off-Road Equipment	0.18	0.15	1.39	1.79	< 0.005	0.07	—	0.07	0.06	—	0.06	—	269	269	0.01	< 0.005	—	270
Paving	—	0.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.25	0.33	< 0.005	0.01	—	0.01	0.01	—	0.01	—	44.6	44.6	< 0.005	< 0.005	—	44.7
Paving	—	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	0.09	0.08	0.07	1.27	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	216	216	0.01	0.01	0.86	219
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	0.01	0.01	0.02	0.18	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	35.7	35.7	< 0.005	< 0.005	0.07	36.3
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	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.92	5.92	< 0.005	< 0.005	0.01	6.00
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

3.11. Architectural Coating (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	0.17	0.14	0.91	1.15	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architect ural Coatings	—	6.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	0.91	1.15	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architect ural Coatings	—	6.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.03	0.02	0.16	0.20	< 0.005	0.01	—	0.01	0.01	—	0.01	—	23.8	23.8	< 0.005	< 0.005	—	23.9
Architect ural Coatings	—	1.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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

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Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	< 0.005	0.03	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.94	3.94	< 0.005	< 0.005	—	3.95
Architectural Coatings	—	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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	0.29	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	49.8	49.8	< 0.005	< 0.005	0.20	50.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.22	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	45.6	45.6	< 0.005	< 0.005	0.01	46.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.24	8.24	< 0.005	< 0.005	0.02	8.35
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	—	1.36	1.36	< 0.005	< 0.005	< 0.005	1.38
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	1.47	1.32	1.38	13.2	0.03	0.02	2.78	2.80	0.02	0.71	0.73	—	3,327	3,327	0.14	0.15	12.4	3,387
Other Asphalt Surfaces	1.93	1.73	1.81	17.4	0.04	0.03	3.65	3.68	0.03	0.93	0.95	—	4,372	4,372	0.19	0.19	16.3	4,450
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
Automobile Care Center	0.00	0.00	0.00	0.00	0.00	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	3.40	3.04	3.19	30.6	0.08	0.05	6.42	6.48	0.05	1.63	1.68	—	7,699	7,699	0.33	0.34	28.8	7,837
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	1.38	1.22	1.48	10.9	0.03	0.02	2.78	2.80	0.02	0.71	0.73	—	3,117	3,117	0.15	0.15	0.32	3,166
Other Asphalt Surfaces	1.81	1.61	1.95	14.3	0.04	0.03	3.65	3.68	0.03	0.93	0.95	—	4,096	4,096	0.20	0.20	0.42	4,160

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
Automobile Care Center	0.00	0.00	0.00	0.00	0.00	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	3.18	2.83	3.44	25.3	0.07	0.05	6.42	6.48	0.05	1.63	1.68	—	7,213	7,213	0.35	0.35	0.75	7,327
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	0.25	0.22	0.28	2.07	0.01	< 0.005	0.50	0.50	< 0.005	0.13	0.13	—	521	521	0.02	0.03	0.89	531
Other Asphalt Surfaces	0.29	0.27	0.27	2.02	0.01	< 0.005	0.45	0.45	< 0.005	0.11	0.12	—	471	471	0.03	0.02	0.80	480
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
Automobile Care Center	0.00	0.00	0.00	0.00	0.00	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	0.54	0.49	0.55	4.09	0.01	0.01	0.95	0.95	0.01	0.24	0.25	—	992	992	0.05	0.05	1.68	1,010

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	190	190	0.02	< 0.005	—	191

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Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	190	190	0.02	< 0.005	—	191
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	—	—	388	388	0.04	< 0.005	—	390
Total	—	—	—	—	—	—	—	—	—	—	—	—	769	769	0.07	0.01	—	773
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	190	190	0.02	< 0.005	—	191
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	190	190	0.02	< 0.005	—	191
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	—	—	388	388	0.04	< 0.005	—	390
Total	—	—	—	—	—	—	—	—	—	—	—	—	769	769	0.07	0.01	—	773
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	31.5	31.5	< 0.005	< 0.005	—	31.7
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	31.5	31.5	< 0.005	< 0.005	—	31.7

Automob Care Center	—	—	—	—	—	—	—	—	—	—	—	—	64.3	64.3	0.01	< 0.005	—	64.6
Total	—	—	—	—	—	—	—	—	—	—	—	—	127	127	0.01	< 0.005	—	128

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	0.01	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	100	100	0.01	< 0.005	—	101
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
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
Automob ile Care Center	0.05	0.03	0.49	0.41	< 0.005	0.04	—	0.04	0.04	—	0.04	—	586	586	0.05	< 0.005	—	587
Total	0.06	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	686	686	0.06	< 0.005	—	688
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	0.01	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	100	100	0.01	< 0.005	—	101
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

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
Automobile Care Center	0.05	0.03	0.49	0.41	< 0.005	0.04	—	0.04	0.04	—	0.04	—	586	586	0.05	< 0.005	—	587
Total	0.06	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	686	686	0.06	< 0.005	—	688
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	16.6	16.6	< 0.005	< 0.005	—	16.6
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
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
Automobile Care Center	0.01	< 0.005	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	97.0	97.0	0.01	< 0.005	—	97.2
Total	0.01	0.01	0.10	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	114	114	0.01	< 0.005	—	114

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	—	1.20	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architect Coatings	—	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.42	0.39	0.02	2.35	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.66	9.66	< 0.005	< 0.005	—	9.70
Total	0.42	1.70	0.02	2.35	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.66	9.66	< 0.005	< 0.005	—	9.70
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	1.20	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	1.31	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.22	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.05	0.05	< 0.005	0.29	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.10	1.10	< 0.005	< 0.005	—	1.10
Total	0.05	0.29	< 0.005	0.29	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.10	1.10	< 0.005	< 0.005	—	1.10

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)

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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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	3.88	32.3	36.2	0.40	0.01	—	49.2
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	—	7.68	26.1	33.7	0.79	0.02	—	59.2
Total	—	—	—	—	—	—	—	—	—	—	—	11.6	58.4	70.0	1.19	0.03	—	108
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	3.88	32.3	36.2	0.40	0.01	—	49.2
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	—	7.68	26.1	33.7	0.79	0.02	—	59.2
Total	—	—	—	—	—	—	—	—	—	—	—	11.6	58.4	70.0	1.19	0.03	—	108
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.64	5.35	6.00	0.07	< 0.005	—	8.14
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	—	1.27	4.32	5.59	0.13	< 0.005	—	9.80
Total	—	—	—	—	—	—	—	—	—	—	—	1.91	9.67	11.6	0.20	< 0.005	—	17.9

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	5.72	0.00	5.72	0.57	0.00	—	20.0
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	—	87.7	0.00	87.7	8.77	0.00	—	307

Total	—	—	—	—	—	—	—	—	—	—	—	93.4	0.00	93.4	9.34	0.00	—	327
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	5.72	0.00	5.72	0.57	0.00	—	20.0
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	—	87.7	0.00	87.7	8.77	0.00	—	307
Total	—	—	—	—	—	—	—	—	—	—	—	93.4	0.00	93.4	9.34	0.00	—	327
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.95	0.00	0.95	0.09	0.00	—	3.31
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	—	14.5	0.00	14.5	1.45	0.00	—	50.8
Total	—	—	—	—	—	—	—	—	—	—	—	15.5	0.00	15.5	1.55	0.00	—	54.1

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8,834	8,834
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8,834	8,834
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8,834	8,834
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8,834	8,834
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Automobile Care Center	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,463	1,463
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,463	1,463

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

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

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	6/15/2023	7/26/2023	5.00	30.0	—
Grading	Grading	7/27/2023	9/13/2023	5.00	35.0	—
Building Construction	Building Construction	9/14/2023	5/8/2024	5.00	170	—
Paving	Paving	5/9/2024	8/7/2024	5.00	65.0	—
Architectural Coating	Architectural Coating	8/8/2024	11/6/2024	5.00	65.0	—

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
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
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	3.00	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	1.00	8.00	46.0	0.45
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	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
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	2.97	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	17.3	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	8.85	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	3.46	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	80,700	26,900	35,911

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	—	45.0	0.00	—
Grading	830	—	105	0.00	—
Paving	0.00	0.00	0.00	0.00	11.9

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
General Office Building	0.00	0%
Other Asphalt Surfaces	6.70	100%
Parking Lot	5.22	100%
Automobile Care Center	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2023	0.00	349	0.03	< 0.005
2024	0.00	349	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
General Office Building	309	309	309	112,785	3,915	3,915	3,915	1,428,815
Other Asphalt Surfaces	406	406	406	148,190	2,847	5,143	5,143	1,278,583
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Automobile Care Center	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	80,700	26,900	35,911

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)
General Office Building	199,021	349	0.0330	0.0040	312,926
Other Asphalt Surfaces	0.00	349	0.0330	0.0040	0.00
Parking Lot	199,188	349	0.0330	0.0040	0.00
Automobile Care Center	406,402	349	0.0330	0.0040	1,827,377

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
General Office Building	2,026,876	3,777,491
Other Asphalt Surfaces	0.00	0.00
Parking Lot	0.00	0.00
Automobile Care Center	4,008,834	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
General Office Building	10.6	—
Other Asphalt Surfaces	0.00	—
Parking Lot	0.00	—
Automobile Care Center	163	—

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
Automobile Care Center	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Automobile Care Center	Supermarket refrigeration and condensing units	R-404A	3,922	26.5	16.5	16.5	18.0

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
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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
—	—

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	26.6	annual days of extreme heat
Extreme Precipitation	4.20	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	6.46	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	3	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A

Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	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	0	0	0	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	3	1	1	3
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
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	1	1	1	2

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	100
AQ-PM	57.1
AQ-DPM	94.0
Drinking Water	60.9
Lead Risk Housing	84.7
Pesticides	40.3
Toxic Releases	42.8
Traffic	80.0
Effect Indicators	—
CleanUp Sites	44.0
Groundwater	71.1
Haz Waste Facilities/Generators	96.4
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	64.2
Cardio-vascular	59.7
Low Birth Weights	72.9
Socioeconomic Factor Indicators	—
Education	80.3
Housing	79.6

Linguistic	64.8
Poverty	92.7
Unemployment	89.9

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	11.09970486
Employed	6.03105351
Median HI	7.930193764
Education	—
Bachelor's or higher	10.07314256
High school enrollment	25.13794431
Preschool enrollment	35.60887976
Transportation	—
Auto Access	29.74464263
Active commuting	30.97651739
Social	—
2-parent households	13.44796612
Voting	11.13820095
Neighborhood	—
Alcohol availability	34.98011036
Park access	81.35506224
Retail density	68.304889
Supermarket access	77.21031695
Tree canopy	16.21968433

Housing	—
Homeownership	20.18478121
Housing habitability	18.91441037
Low-inc homeowner severe housing cost burden	36.50712178
Low-inc renter severe housing cost burden	39.72796099
Uncrowded housing	19.18388297
Health Outcomes	—
Insured adults	23.55960477
Arthritis	26.6
Asthma ER Admissions	47.9
High Blood Pressure	36.7
Cancer (excluding skin)	66.1
Asthma	10.9
Coronary Heart Disease	23.5
Chronic Obstructive Pulmonary Disease	13.3
Diagnosed Diabetes	14.5
Life Expectancy at Birth	10.7
Cognitively Disabled	32.0
Physically Disabled	67.1
Heart Attack ER Admissions	41.6
Mental Health Not Good	12.8
Chronic Kidney Disease	20.1
Obesity	13.4
Pedestrian Injuries	90.2
Physical Health Not Good	12.8
Stroke	17.3
Health Risk Behaviors	—

Binge Drinking	69.8
Current Smoker	13.3
No Leisure Time for Physical Activity	16.7
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	5.3
Elderly	61.3
English Speaking	34.8
Foreign-born	34.1
Outdoor Workers	40.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	66.1
Traffic Density	74.9
Traffic Access	23.0
Other Indices	—
Hardship	89.7
Other Decision Support	—
2016 Voting	24.0

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	94.0
Healthy Places Index Score for Project Location (b)	8.00
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
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	Based on the site plan
Construction: Construction Phases	Per project's construction schedule
Construction: Architectural Coatings	SCAQMD Rule 1113
Operations: Vehicle Data	Per project's traffic study
Operations: Architectural Coatings	SCAQMD Rule 1113
Operations: Refrigerants	No individual refrigeration for the office.