

## MEMORANDUM

**DATE:** October 27, 2023

**To:** Ruben Mamann, HRI Development

**FROM:** Amy Fischer, Executive Vice President  
Cara Carlucci, Associate

**SUBJECT:** Air Quality and Greenhouse Gas Technical Memorandum for the 42500 Washington Street Project in Riverside County, California

### INTRODUCTION

LSA has prepared this Air Quality and Greenhouse Gas Technical Memorandum to evaluate the impacts associated with construction and operation of the proposed 42500 Washington Street Project (project) located in the unincorporated Bermuda Dunes Community in Riverside County, California. This analysis was prepared using methods and assumptions recommended in the air quality impact assessment guidelines of the South Coast Air Quality Management District (SCAQMD) in its *CEQA Air Quality Handbook* (1993) and associated updates. This analysis includes an assessment of criteria pollutant emissions, an assessment of carbon monoxide (CO) hot-spot impacts, and an assessment of the project's greenhouse gas (GHG) emissions.

### PROJECT LOCATION AND DESCRIPTION

The 2.44-acre vacant project site is located on 42500 Washington Street in the unincorporated Bermuda Dunes Community in Riverside County, California. The project site is bounded to the north by commercial uses, to the east and south by residential uses, and to the west by a healthcare clinic and dental offices. Access to the project site is provided by Washington Street. The project location is shown on Figure 1 (attached).

The proposed project would construct 43 multifamily residential dwelling units and a child daycare/preschool building. The residential community will include approximately 7,357 square feet (sf) of open space, which would consist of courtyards and a community room. In addition, the proposed residential community would include approximately 5,723 sf of solar roof area. The child daycare/preschool will consist of a 9,990 sf building and 20,607 sf of open space, including a playground area. A total of 118 parking spaces will be provided, of which 20 would be designated for the child daycare/preschool, 90 would be designated for the residential community, 3 stalls would be Americans with Disabilities Act (ADA) compliant, and 5 stalls would be for electric vehicles. The proposed project would also include drought-tolerant plants and efficient irrigation systems for all landscaped areas. Once operational, the proposed project would generate approximately 969 average daily trips (ADT).

Construction would include site preparation, grading, building construction, and the installation of landscaping and irrigation, lighting, storm drain facilities, and underground utilities. Construction of the proposed project is anticipated to commence in May 2023 and would end approximately in June 2024. Site preparation, grading, and building activities would involve the use of standard earthmoving equipment such as large excavators, cranes, and other related equipment.

## EXISTING LAND USES IN THE PROJECT AREA

For the purpose of this analysis, sensitive receptors are areas of the population that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include residences, schools, daycare centers, hospitals, parks, and similar uses that are sensitive to air quality. Impacts on sensitive receptors are of particular concern because those receptors are the population most vulnerable to the effects of air pollution. The project site is surrounded primarily by residential and retail uses. The areas adjacent to the project site include the following uses: commercial uses to the north, residential uses to the east and south, and a healthcare clinic and dental offices to the west. The closest sensitive receptors to the project site include single-family residences immediately adjacent to the east boundary of the project site at approximately 10 feet. Other nearby sensitive receptors include apartments and a single-family residence located approximately 100 feet south of the project site.

## ENVIRONMENTAL SETTING

### Air Quality Background

Air quality is primarily a function of local climate, local sources of air pollution, and regional pollution transport. The amount of a given pollutant in the atmosphere is determined by the amount of the pollutant released and the atmosphere's ability to transport and dilute the pollutant. The major determinants of transport and dilution are wind, atmospheric stability, terrain, and sunshine (i.e., for photochemical pollutants).

A region's topographic features have a direct correlation with air pollution flow and therefore are used to determine the boundary of air basins. The proposed project is in Unincorporated Riverside County, and is within the jurisdiction of the SCAQMD, which regulates air quality in the Coachella Valley Planning Area which is part of the Salton Sea Air Basin (Basin).

The Salton Sea is located in a closed desert basin in Riverside and Imperial Counties in Southern California, south of Indio and north of El Centro. The Basin is more than 200 feet below sea level and has no natural outlet.

Both State and federal governments have established health-based ambient air quality standards for six criteria air pollutants: CO, ozone (O<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), lead (Pb), and suspended particulate matter. In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Two criteria pollutants (O<sub>3</sub> and NO<sub>2</sub>) are considered regional pollutants because they (or their precursors) affect air quality on a regional scale. Pollutants such as CO, SO<sub>2</sub>, and Pb are considered local pollutants that tend to accumulate in the air locally.

Air quality monitoring stations are located throughout the nation and are maintained by the local air districts and State air quality regulating agencies. Data collected at permanent monitoring stations are used by the United States Environmental Protection Agency (EPA) to identify regions as “attainment” or “nonattainment” depending on whether the regions meet the requirements stated in the applicable National Ambient Air Quality Standards (NAAQS). Nonattainment areas are imposed with additional restrictions as required by the EPA. In addition, different classifications of attainment (e.g., marginal, moderate, serious, severe, and extreme) are used to classify each air basin in the State on a pollutant-by-pollutant basis. The classifications are used as a foundation to create air quality management strategies to improve air quality and to comply with the NAAQS. As shown in Table A, the Basin is designated as severe-15 nonattainment at the State and federal level for the 8-hour O<sub>3</sub> standards. In addition, the basin is designated as serious nonattainment for particulate matter less than 10 microns in size (PM<sub>10</sub>) at the federal level and nonattainment by State standards for the 1-hour O<sub>3</sub> and PM<sub>10</sub>.

**Table A: Attainment Status of Criteria Pollutants in the Coachella Valley portion of the Salton Sea Air Basin**

Pollutant	State	Federal
O <sub>3</sub> 1-hour	Nonattainment	Attainment
O <sub>3</sub> 8-hour	Nonattainment	Severe Nonattainment
PM <sub>10</sub>	Nonattainment	Serious Nonattainment
PM <sub>2.5</sub>	Attainment	Unclassified/ Attainment
CO	Attainment	Unclassified/ Attainment
NO <sub>2</sub>	Attainment	Unclassified/Attainment (1-hour) Unclassified/ Attainment (Annual)
SO <sub>2</sub>	Attainment	Unclassified/Attainment
Lead	Attainment	Unclassified/Attainment
All Others	Attainment/Unclassified	Attainment/Unclassified

Source 1: NAAQS and CAAQS Attainment Status for the Coachella Valley portion of the Salton Sea Air Basin (SCAQMD AQMP 2016). Website: <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/chapter7.pdf>, accessed October 2023.

Source 2: Nonattainment Areas for Criteria Pollutants (Green Book) (EPA 2019). Website: <https://www.epa.gov/green-book>, accessed October 2023.

CAAQS = California Ambient Air Quality Standards  
 CO = carbon monoxide  
 EPA = United States Environmental Protection Agency  
 N/A = not applicable  
 NAAQS = National Ambient Air Quality Standards  
 NO<sub>2</sub> = nitrogen dioxide

O<sub>3</sub> = ozone  
 PM<sub>10</sub> = particulate matter less than 10 microns in diameter  
 PM<sub>2.5</sub> = particulate matter less than 2.5 microns in diameter  
 SCAQMD = South Coast Air Quality Management District  
 SO<sub>2</sub> = sulfur dioxide

O<sub>3</sub> levels, as measured by peak concentrations and the number of days over the State 1-hour standard, have declined substantially as a result of aggressive programs by SCAQMD and other regional, State, and federal agencies. The reduction of peak concentrations represents progress in improving public health; however, the Basin still exceeds the State standard for 1-hour and 8-hour O<sub>3</sub> levels. The EPA lowered the 1997 0.80 parts per million (ppm) national 8-hour ozone standard to 0.75 ppm in 2008 and then to 0.70 ppm on October 1, 2015. The Basin is classified as nonattainment for the 1-hour and 8-hour ozone standards at the State level and as Severe-15 nonattainment for the 8-hour ozone standard at the federal level. During the 2019–2021 period, the Indio Air

Monitoring Station located at 46-990 Jackson Street (the closest monitoring station to the project site) recorded the following exceedances of the State and federal 1-hour and 8-hour O<sub>3</sub> standards.<sup>1</sup> The federal 1-hour ozone standard had no exceedances in the 3-year period.

- The federal 8-hour ozone standard had 43 exceedances in 2019, 42 in 2020, and 18 in 2021.
- The State 8-hour ozone standard had 47 exceedances in 2019, 44 in 2020, and 24 in 2021.
- The State 1-hour ozone standard had 4 exceedances in 2019, 2 in 2020, and 2 in 2021.

National and State standards have also been established for PM<sub>2.5</sub> over 24-hour and yearly averaging periods. PM<sub>2.5</sub>, because of the small size of individual particles, can be especially harmful to human health. PM<sub>2.5</sub> is emitted by common combustion sources such as cars, trucks, buses, and power plants, in addition to ground-disturbing activities. On December 17, 2006, the EPA strengthened the 24-hour PM<sub>2.5</sub> NAAQS from 65 micrograms per cubic meter (µg/m<sup>3</sup>) to 35 µg/m<sup>3</sup>, and the Basin was subsequently designated as an attainment area for the PM<sub>2.5</sub> standard at the State and federal level. During the 2019–2021 time period, the Indio Air Monitoring Station recorded the following exceedances of the federal 24-hour PM<sub>2.5</sub> standards. The State 24-hour PM<sub>2.5</sub> standards had no exceedances in the 3-year period.

- The federal 24-hour PM<sub>2.5</sub> standard had no exceedances in 2019, 2 in 2020, and no exceedances in 2021.

The Basin is classified as a PM<sub>10</sub> serious nonattainment area at the State and federal level. . From 2019 to 2021, the Indio Air Monitoring Station recorded the following exceedances of the State 24-hour PM<sub>10</sub> standard. The federal 24-hour PM<sub>10</sub> standard had no exceedances in the 3-year period.

- The State 24-hour PM<sub>10</sub> standard had 4 exceedances in 2019, 2 in 2020, and 5 in 2021.

All areas of the Basin have continued to remain below the federal CO standards (35 ppm 1-hour and 9 ppm 8-hour) since 2003. The EPA redesignated the Basin to attainment of the federal CO standards, effective June 11, 2017. The Basin is also well below the State CO standards (20 ppm 1-hour CO and 9 ppm 8-hour CO).

### Greenhouse Gas and Global Climate Change Background

GHGs are present in the atmosphere naturally, are released by natural sources, or form from secondary reactions taking place in the atmosphere. Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, which is believed to be causing global warming. Although manmade GHGs include naturally occurring GHGs such as carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O), some gases like hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), nitrogen trifluoride (NF<sub>3</sub>), and sulfur hexafluoride (SF<sub>6</sub>) are completely new to the atmosphere.

<sup>1</sup> California Air Resources Board (CARB). 2020. iADAM Air Quality Data Statistics. Website: <https://www.arb.ca.gov/adam/topfour/topfour1.php>, accessed October 2023.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of global warming potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere (“atmospheric lifetime”). The GWP of each gas is measured relative to CO<sub>2</sub>, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO<sub>2</sub> over a specified time period. GHG emissions are typically measured in terms of pounds or tons of “CO<sub>2</sub> equivalents” (CO<sub>2</sub>e).

## REGULATORY SETTING

This section provides regulatory background information for air quality, GHG, and energy.

### Air Quality

Applicable federal, State, regional, and local air quality regulations are discussed below.

#### *Federal Regulations*

The 1970 federal Clean Air Act (CAA) authorized the establishment of national health-based air quality standards and set deadlines for their attainment. The CAA Amendments of 1990 changed deadlines for attaining national standards as well as the remedial actions required for areas of the nation that exceed the standards. Under the CAA, State and local agencies in areas that exceed the national standards are required to develop State Implementation Plans to demonstrate how they will achieve the national standards by specified dates.

#### *State Regulations*

In 1988, the California Clean Air Act (CCAA) required that all air districts in the State endeavor to achieve and maintain California Ambient Air Quality Standards (CAAQS) for CO, O<sub>3</sub>, SO<sub>2</sub>, and NO<sub>2</sub> by the earliest practical date. The CCAA provides districts with the authority to regulate indirect sources and mandates that air quality districts focus particular attention on reducing emissions from transportation and area-wide emission sources. Each nonattainment district is required to adopt a plan to achieve a 5 percent annual reduction, averaged over consecutive 3-year periods, in district-wide emissions of each nonattainment pollutant or its precursors. A Clean Air Plan shows how a district would reduce emissions to achieve air quality standards. Generally, the State standards for these pollutants are more stringent than the national standards.

The California Air Resources Board (CARB) is the State’s “clean air agency.” The CARB’s goals are to attain and maintain healthy air quality, protect the public from exposure to toxic air contaminants, and oversee compliance with air pollution rules and regulations.

### *Regional Regulations*

The proposed project would be required to comply with regional rules that assist in reducing short-term air pollutant emissions. SCAQMD Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emissions source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. SCAQMD Rule 1113 limits the volatile organic compound (VOC) content of architectural coatings. Applicable dust suppression techniques from SCAQMD Rule 403 and low VOC content in paints under SCAQMD Rule 1113 are summarized below. Implementation of these dust suppression techniques can reduce the fugitive dust generation (and thus the PM<sub>10</sub> component). Compliance with these rules would reduce impacts on nearby sensitive receptors.

- **South Coast Air Quality Management District Rule 403 Measures:**
  - Water active sites at least two times daily (locations where grading is to occur will be thoroughly watered prior to earthmoving).
  - All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard in accordance with the requirements of California Vehicle Code Section 23114 (freeboard means vertical space between the top of the load and top of the trailer).
  - Traffic speeds on all unpaved roads shall be reduced to 15 miles per hour (mph) or less.
- **South Coast Air Quality District Rule 445.** The purpose of this rule is to reduce the emission of particulate matter from wood-burning devices and establish contingency measures for applicable ozone standards for the reduction of volatile organic compounds.
- **South Coast Air Quality Management District Rule 1113 Measures:** SCAQMD Rule 1113 governs the sale, use, and manufacture of architectural coating and limits the VOC content in paints and paint solvents. This rule regulates the VOC content of paints available during construction and operation of the proposed project. Therefore, all paints and solvents used during construction and operation of the proposed project must comply with SCAQMD Rule 1113.

### *Local Regulations*

**Riverside County General Plan.** The County of Riverside (County) addresses air quality in its General Plan Air Quality Element.<sup>1</sup> The Air Quality Element includes goals and policies that work to improve air quality in Riverside County through local actions and multijurisdictional cooperation. The following policies are applicable to the proposed project:

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<sup>1</sup> County of Riverside. 2018. General Plan, Air Quality Element. July 17. Website: [https://planning.rctlma.org/Portals/14/genplan/general\\_plan\\_2018/elements/Ch09\\_AQE\\_071718.pdf](https://planning.rctlma.org/Portals/14/genplan/general_plan_2018/elements/Ch09_AQE_071718.pdf), accessed October 2023.

- AQ 2.2:** Require site plan designs to protect people and land uses sensitive to air pollution through the use of barriers and/or distance from emissions sources when possible.
- AQ 2.3:** Encourage the use of pollution control measures such as landscaping, vegetation and other materials, which trap particulate matter or control pollution.
- AQ 3.2:** Seek new cooperative relationships between employers and employees to reduce vehicle miles traveled.
- AQ 4.1:** Require the use of all feasible building materials/methods which reduce emissions.
- AQ 4.2:** Require the use of all feasible efficient heating equipment and other appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces and boiler units.
- AQ 4.4:** Require residential building construction to comply with energy use guidelines detailed in Part 6 (California Energy Code) and/or Part 11 (California Green Building Standards Code) of Title 24 of the California Code of Regulations.
- AQ 4.7:** To the greatest extent possible, require every project to mitigate any of its anticipated emissions which exceed allowable emissions as established by the SCAQMD, MDAQMD, SCAB, the Environmental Protection Agency and the California Air Resources Board.
- AQ 4.9:** Require compliance with SCAQMD Rules 403 and 403.1, and support appropriate future measures to reduce fugitive dust emanating from construction sites.
- AQ 5.4:** Encourage the incorporation of energy-efficient design elements, including appropriate site orientation and the use of shade and windbreak trees to reduce fuel consumption for heating and cooling.
- AQ 10.1:** Encourage trip reduction plans to promote alternative work schedules, ridesharing, telecommuting and work-at-home programs, employee education and preferential parking.
- AQ 17.1:** Reduce particulate matter from agriculture, construction, demolition, debris hauling, street cleaning, utility maintenance, railroad rights-of-way, and off-road vehicles to the extent possible.
- AQ 17.6:** Reduce emissions from building materials and methods that generate excessive pollutants, through incentives and/or regulations.

## Greenhouse Gas Emissions

This section describes regulations related to global climate change at the federal, State, and local level.

### *Federal Regulations*

The United States has historically had a voluntary approach to reducing GHG emissions. However, on April 2, 2007, the United States Supreme Court ruled that the EPA has the authority to regulate CO<sub>2</sub> emissions under the CAA.

Although there currently are no adopted federal regulations for the control or reduction of GHG emissions, the EPA commenced several actions in 2009 to implement a regulatory approach to global climate change, including the 2009 EPA final rule for mandatory reporting of GHGs from large GHG emission sources in the United States. Additionally, the EPA Administrator signed an endangerment finding action in 2009 under the CAA, finding that seven GHGs (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, NF<sub>3</sub>, PFCs, and SF<sub>6</sub>) constitute a threat to public health and welfare, and that the combined emissions from motor vehicles cause and contribute to global climate change, leading to national GHG emission standards.

### *State Regulations*

CARB is the lead agency for implementing climate change regulations in the State. Since its formation, CARB has worked with the public, the business sector, and local governments to find solutions to California's air pollution problems. Key efforts by the State are described below.

**Assembly Bill 32 (2006), California Global Warming Solutions Act.** California's major initiative for reducing GHG emissions is Assembly Bill (AB) 32, passed by the State legislature on August 31, 2006. This effort set a GHG emission reduction target to reduce GHG emissions to 1990 levels by 2020. The CARB has established the level of GHG emissions in 1990 at 427 million metric tons (MMT) of CO<sub>2</sub>e. The emissions target of 427 MMT requires the reduction of 169 MMT from the State's projected business-as-usual 2020 emissions of 596 MMT. AB 32 requires the CARB to prepare a Scoping Plan that outlines the main State strategies for meeting the 2020 deadline and to reduce GHGs that contribute to global climate change. The CARB approved the Scoping Plan on December 11, 2008. It contains the main strategies California will implement to achieve the reduction of approximately 169 MMT CO<sub>2</sub>e, or approximately 30 percent, from the State's projected 2020 emissions level of 596 MMT CO<sub>2</sub>e under a business-as-usual scenario (this is a reduction of 42 MMT CO<sub>2</sub>e, or almost 10 percent from the 2002–2004 average emissions). The Scoping Plan also includes CARB-recommended GHG reductions for each emissions sector of the State's GHG inventory. The Scoping Plan calls for the largest reductions in GHG emissions to be achieved by implementing the following measures and standards:

- Improved emissions standards for light-duty vehicles (estimated reduction of 31.7 MMT CO<sub>2</sub>e)
- The Low-Carbon Fuel Standard (15.0 MMT CO<sub>2</sub>e)
- Energy efficiency measures in buildings and appliances and the widespread development of combined heat and power systems (26.3 MMT CO<sub>2</sub>e)



- A renewable portfolio standard for electricity production (21.3 MMT CO<sub>2</sub>e)

The Scoping Plan identifies 18 emission reduction measures that address cap-and-trade programs, vehicle gas standards, energy efficiency, low carbon fuel standards, renewable energy, regional transportation-related GHG targets, vehicle efficiency measures, goods movement, solar roof programs, industrial emissions, high-speed rail, green building strategies, recycling, sustainable forests, water, and air. The measures would result in a total reduction of 174 MMT CO<sub>2</sub>e by 2020.

On August 24, 2011, the CARB unanimously approved both the new supplemental assessment and reapproved its Scoping Plan, which provides the overall roadmap and rule measures to carry out AB 32. The CARB also approved a more robust California Environmental Quality Act (CEQA) equivalent document supporting the supplemental analysis of the cap-and-trade program. The cap-and-trade took effect on January 1, 2012, with an enforceable compliance obligation that began January 1, 2013.

The CARB approved the First Update to the Climate Change Scoping Plan on May 22, 2014. The First Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. The First Update defines CARB climate change priorities until 2020 and sets the groundwork to reach long-term goals set forth in Executive Orders (EOs) S-3-05 and B-16-2012. The First Update highlights California's progress toward meeting the "near-term" 2020 GHG emission reduction goals as defined in the initial Scoping Plan. It also evaluates how to align the State's "longer-term" GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use. The CARB released a second update to the Scoping Plan, the 2017 Scoping Plan,<sup>1</sup> to reflect the 2030 target that was set by EO B-30-15 and codified by Senate Bill (SB) 32.

The Draft 2022 Scoping Plan Update<sup>2</sup> assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan Update focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

**Senate Bill 375 (2008).** Signed into law on October 1, 2008, SB 375 supplements GHG reductions from new vehicle technology and fuel standards with reductions from more efficient land use patterns and improved transportation. Under the law, the CARB-approved GHG reduction targets in February 2011 for California's 18 federally designated regional planning bodies, known as Metropolitan Planning Organizations (MPOs). The CARB may update the targets every 4 years and must update them every 8 years. MPOs, in turn, must demonstrate how their plans, policies, and transportation investments meet the targets set by the CARB through Sustainable Community Strategies (SCSs). The SCSs are included with the Regional Transportation Plan (RTP), a report required by State law. However, if an MPO finds that its SCS will not meet the GHG reduction

<sup>1</sup> California Air Resources Board (CARB). 2017. *California's 2017 Climate Change Scoping Plan*. November.

<sup>2</sup> California Air Resources Board (CARB). 2021. *Draft 2022 Scoping Plan Update*. May 10. Website: <https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp.pdf>, accessed October 2023.

targets, it may prepare an Alternative Planning Strategy. The Alternative Planning Strategy identifies the impediments to achieving the targets.

**Executive Order B-30-15 (2015).** Governor Jerry Brown signed EO B-30-15 on April 29, 2015, which added the immediate target of:

- GHG emissions should be reduced to 40 percent below 1990 levels by 2030.

All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. The CARB was directed to update the AB 32 Scoping Plan to reflect the 2030 target and, therefore, is moving forward with the update process. The mid-term target is critical to help frame the suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure needed to continue reducing emissions.

**Senate Bill 350 (2015) Clean Energy and Pollution Reduction Act.** SB 350, signed by Governor Jerry Brown on October 7, 2015, updates and enhances AB 32 by introducing the following set of objectives in clean energy, clean air, and pollution reduction for 2030:

- Raise California's renewable portfolio standard from 33 percent to 50 percent.
- Increase energy efficiency in buildings by 50 percent by the year 2030.

The 50 percent renewable energy standard will be implemented by the California Public Utilities Commission (CPUC) for the private utilities and by the California Energy Commission (CEC) for municipal utilities. Each utility must submit a procurement plan showing it will purchase clean energy to displace other nonrenewable resources. The 50 percent increase in energy efficiency in buildings must be achieved through the use of existing energy efficiency retrofit funding and regulatory tools already available to State energy agencies under existing law. The addition made by this legislation requires State energy agencies to plan for and implement those programs in a manner that achieves the energy efficiency target.

**Senate Bill 32, California Global Warming Solutions Act of 2016, and Assembly Bill 197.** In summer 2016 the Legislature passed, and the Governor signed, SB 32 and AB 197. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Governor Brown's April 2015 EO B-30-15. SB 32 builds on AB 32 and keeps us on the path toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels, consistent with an Intergovernmental Panel on Climate Change analysis of the emission trajectory that would stabilize atmospheric GHG concentrations at 450 ppm CO<sub>2</sub>e and reduce the likelihood of catastrophic impacts from climate change.

AB 197, the companion bill to SB 32, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 meant to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

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

**Executive Order B-55-18.** EO B-55-18, signed September 10, 2018, sets a goal “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.” EO B-55-18 directs CARB to work with relevant State agencies to ensure that future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO<sub>2</sub>e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

**Title 24, Building Efficiencies Standards, and the California Green Building Standards Code.** In November 2008, the California Building Standards Commission established the California Green Building Standards Code (CALGreen Code) (California Code of Regulations, Title 24, Part 11), which sets performance standards for residential and nonresidential development to reduce environmental impacts and to encourage sustainable construction practices. The CALGreen Code addresses energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code is updated every 3 years and was most recently updated in 2022 to include new mandatory measures for residential as well as non-residential uses; the new measures took effect on January 1, 2023. .

### *Regional Regulations*

**Southern California Association of Governments.** The Southern California Association of Governments (SCAG) is a regional council consisting of the following six counties: Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. In total, the SCAG region encompasses 191 cities and over 38,000 sq mi within Southern California. SCAG is the MPO serving the region under federal law and serves as the Joint Powers Authority, the Regional Transportation Planning Agency, and the Council of Governments under State law. As the Regional Transportation Planning Agency, SCAG prepares long-range transportation plans for the Southern California region, including the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the 2008 Regional Comprehensive Plan (RCP).

On September 3, 2020, SCAG adopted Connect SoCal: The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS).<sup>1</sup> In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce vehicle miles traveled (VMT) from automobiles and light-duty trucks and thereby reduce GHG emissions from these sources. For the SCAG region, CARB has set GHG reduction targets at 8 percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035. The RTP/SCS lays out a strategy for the region to meet these targets. Overall, the SCS is meant to provide growth strategies that will achieve the regional GHG emissions reduction targets. Land use strategies to achieve the region’s targets include planning for new growth around high-quality transit areas and livable corridors, and creating neighborhood mobility areas to integrate land use and transportation and plan for more active lifestyles.<sup>2</sup> However, the SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the SCS; instead, it provides incentives to governments and developers for consistency.

**South Coast Air Quality Management District.** In 2008, the SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAQMD. The Working Group developed several different options that are contained in the SCAQMD 2008 draft guidance document titled *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* (2008) that could be applied by lead agencies. On September 28, 2010, SCAQMD Working Group Meeting No. 15 provided further guidance, including a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency. SCAQMD has not presented a finalized version of these thresholds to the governing board.

SCAQMD identifies the emissions level for which a project would not be expected to substantially conflict with any State legislation adopted to reduce statewide GHG emissions. As such, the utilization of a service population represents the rates of emissions needed to achieve a fair share of the State’s mandated emissions reductions. Overall, SCAQMD identifies a GHG efficiency level that, when applied statewide or to a defined geographic area, would meet the 2020 and post-2020 emission targets as required by AB 32 and SB 32. If projects are able to achieve targeted rates of emissions per the service population, the State would be able to accommodate expected population growth and achieve economic development objectives while also abiding by AB 32’s emissions target and future post-2020 targets. The SCAQMD has established a flow chart for evaluating GHG significance and indicates that when a project is exempt from CEQA, no further analysis is required.

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<sup>1</sup> Southern California Association of Governments (SCAG). 2020. *Connect SoCal: The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments*. Website: [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan\\_0.pdf?1606001176](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176), accessed October 2023.

<sup>2</sup> Ibid.

### Local Regulations

**Riverside County Climate Action Plan Update.** The County of Riverside 2019 Climate Action Plan (CAP)<sup>1</sup> Update was approved in December 2019. The CAP Update refines the County’s efforts to meet GHG reduction targets, specifically by the years 2035 and 2050. This CAP Update assesses the previous GHG reduction targets identified in the 2015 CAP and proposes new targets that are consistent with the State policies in order to meet the requirements of SB 32. The State recommends a 15 percent reduction below 2005–2008 baseline levels by 2020, a 49 percent reduction below 2008 levels by 2030, and an 80 percent reduction below 2008 levels by 2050. To that end, the County has implemented a number of sustainability and conservation efforts and seeks to continue those efforts through local planning and partnerships. The following GHG emissions reduction strategies are applicable to the proposed project:

- **Transportation**
  - Create a “bike to work day” or “car-free zone day” and other County-sponsored events to promote bicycling and other non-motorized transportation.
  - Promote ride-sharing and facilitate air district incentives for ride-sharing.
  - Provide reserved preferential parking spaces for ride-sharing, carpooling, and ultra-low- or zero-emission vehicles.
  - Require all new residential development to include electric vehicle (EV) chargers in the garages of residential units.
  - Promote Neighborhood Electric Vehicles (NEVs).
- **Energy Efficiency**
  - Promote Tier 1 and Tier 2 green building ratings such as Leadership in Energy and Environmental Design (LEED), Build It Green, or Energy Star®-certified buildings.
  - Comply with State Title 24 energy efficiency requirements on new residential buildings, such as zero net energy homes that require all new residential construction projects to achieve zero net-energy use by 2020.
- **Clean Energy**
  - Require solar panel installation on new residential buildings (per conditions of the Settlement agreement described above).
- **Advanced Measures**
  - Develop and promote a County tree-planting program for new development at plan check.
  - Comply with Title 24 requirements on installing enhanced cool roofs.

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<sup>1</sup> County of Riverside. 2019. *County of Riverside Climate Action Plan Update*. November. Website: [https://planning.rctlma.org/Portals/14/CAP/2019/2019\\_CAP\\_Update\\_Full.pdf](https://planning.rctlma.org/Portals/14/CAP/2019/2019_CAP_Update_Full.pdf), accessed October 2023.

- **Solid Waste**

- Comply with Statewide waste reduction, recycling, and composting requirements.
- Promote community clean-up days by providing commercial containers for trash and recycling.

## METHODOLOGY

### Construction Emissions

Construction activities can generate a substantial amount of air pollution. Construction activities are considered temporary; however, short-term impacts can contribute to exceedances of air quality standards. Construction activities include site preparation, earthmoving, and general construction. The emissions generated from these common construction activities include fugitive dust from soil disturbance, fuel combustion from mobile heavy-duty, diesel- and gasoline-powered equipment, portable auxiliary equipment, and worker commute trips.

The California Emissions Estimator Model version 2022.1 (CalEEMod) computer program was used to calculate emissions from on-site construction equipment and emissions from worker and vehicle trips to the site. This analysis assumes that construction would begin in May 2023 and would end in June 2024.<sup>1</sup> This analysis also assumes that the proposed project would comply with SCAQMD Rule 403 measures. Site preparation, grading, and building activities would involve the use of standard earthmoving equipment such as large excavators, cranes, and other related equipment. All other construction details are not yet known; therefore, default assumptions (e.g., construction equipment, construction worker and truck trips, and fleet activities) from CalEEMod were used.

### Operational Emissions

This air quality analysis includes estimating emissions associated with long-term operation of the project. Indirect emissions of criteria pollutants with regional impacts would be emitted by project-generated vehicle trips. In addition, localized air quality impacts (i.e., higher carbon monoxide concentrations or “hot-spots”) near intersections or roadway segments in the project vicinity would also potentially occur due to project-generated vehicle trips.

Consistent with SCAQMD guidance for estimating emissions associated with land use development projects, the CalEEMod computer program was used to calculate the long-term operational emissions associated with the project. As previously discussed in the Project Location and Description section, the proposed project would construct 43 multifamily dwelling units and a 9,990 sf child daycare/preschool facility. The proposed project analysis was conducted using land use codes *Day Care Center*, *Apartments Mid Rise*, *City Park*, and *Parking Lot*. Trip generation rates

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<sup>1</sup> The CalEEMod analysis evaluated project construction emissions with a start date of May 2023 and a duration of approximately 13 months. The proposed project’s construction schedule has since been modified that project construction would begin later; however, project construction would still occur over a 13-month duration. This minimal modification to the project construction schedule would not result in more severe air quality or greenhouse gas impacts than what is described within.

used in CalEEMod for the project were based on the project's trip generation analysis, which identifies that the project would generate approximately 969 ADT.

In addition, consistent with the project design plans, this CalEEMod analysis incorporates selections to reflect only natural gas hearth (no wood burning) consistent with SCAQMD Rule 445 and use of water efficient landscape materials. Other amenities such as the community room are incorporated into the overall site acreage and building square footage used in CalEEMod. When project-specific data were not available, default assumptions from CalEEMod were used to estimate project emissions.

### Greenhouse Gas Emissions

GHG emissions associated with the project would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust. There would also be long-term GHG emissions associated with project-related vehicular trips. Recognizing that the field of global climate change analysis is rapidly evolving, the approaches advocated most recently indicate that, for determining a project's contribution to GHG emissions, lead agencies should calculate, or estimate, emissions from vehicular traffic, energy consumption, water conveyance and treatment, waste generation, construction activities, and any other significant source of emissions within the project area. The CalEEMod results were used to quantify GHG emissions generated by the project.

### THRESHOLDS OF SIGNIFICANCE

The *State CEQA Guidelines* indicate that a project would normally have a significant adverse air quality impact if project-generated pollutant emissions would do any of the following:

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

Certain air districts (e.g., SCAQMD) have created guidelines and requirements to conduct air quality analysis. The SCAQMD's current guidelines, the *CEQA Air Quality Handbook*<sup>1</sup> with associated updates, were followed in this assessment of air quality impacts for the proposed project.

### Regional Emissions Thresholds

SCAQMD has established daily emission thresholds for construction and operation of proposed projects. The emission thresholds were established based on the attainment status of the air basins

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<sup>1</sup> South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook*. Website: [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)), accessed October 2023.

within the SCAQMD with regard to air quality standards for specific criteria pollutants. Because the concentration standards were set at a level that protects public health with an adequate margin of safety, these emission thresholds are regarded as conservative and would overstate an individual project's contribution to health risks. Table B lists the CEQA significance thresholds for construction and operational emissions established for the SCAQMD.



**Table B: Regional Thresholds for Construction and Operational Emissions**

Emissions Source	Pollutant Emissions Threshold (lbs/day)					
	VOCs	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>x</sub>
Construction	75	100	550	150	55	150
Operations	55	55	550	150	55	150

Source: South Coast Air Quality Management District (SCAQMD). 2019. Air Quality Significance Thresholds. Website: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>, accessed October 2023.

CO = carbon monoxide

lbs/day = pounds per day

NO<sub>x</sub> = nitrogen oxides

PM<sub>2.5</sub> = particulate matter less than 2.5 microns in size

PM<sub>10</sub> = particulate matter less than 10 microns in size

SO<sub>x</sub> = sulfur oxides

VOCs = volatile organic compound

Projects in the SCAQMD with construction- or operations-related emissions that exceed any of their respective emission thresholds would be considered significant under SCAQMD guidelines. These thresholds, which the SCAQMD developed and that apply throughout the SCAQMD, apply as both project and cumulative thresholds. If a project exceeds these standards, it is considered to have a project-specific and cumulative impact.

### Local Microscale Concentration Standards

The significance of localized project impacts under CEQA depends on whether ambient CO levels in the vicinity of the project are above or below State and federal CO standards. Because ambient CO levels are below the standards throughout the SCAQMD, a project would be considered to have a significant CO impact if project emissions result in an exceedance of one or more of the 1-hour or 8-hour standards. The following are applicable local emission concentration standards for CO:

- California State 1-hour CO standard of 20 ppm
- California State 8-hour CO standard of 9 ppm

### Localized Impacts Analysis

The SCAQMD published its *Final Localized Significance Threshold Methodology* in July 2008, recommending that all air quality analyses include an assessment of air quality impacts to nearby sensitive receptors.<sup>1</sup> This guidance was used to analyze potential localized air quality impacts associated with construction of the proposed project. Localized significance thresholds (LSTs) are developed based on the size or total area of the emission source, the ambient air quality in the Source Receptor Area (SRA), and the distance to the project. Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to adverse air quality.

LSTs are based on the ambient concentrations of that pollutant within the project’s SRA and the distance to the nearest sensitive receptor. For the proposed project, the appropriate SRA for the LST is the Coachella Valley area (SRA 30). The SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances. As identified above, the closest sensitive receptors

<sup>1</sup> South Coast Air Quality Management District (SCAQMD). 2008. *Final Localized Significance Threshold Methodology*. July.

to the project site include the single-family residences located immediately adjacent to the east boundary of the project site at approximately 10 feet. An LST analysis was completed to show the construction and operational impacts at a distance of 25 meters (82 feet) to the nearest sensitive receptors. Based on the anticipated construction equipment, it is assumed that the maximum daily disturbed acreage would be 1.5 acres for construction of the proposed project. The project site is 2.44 acres; therefore the maximum daily disturbed acreage during operation of the proposed project would be 2.44 acres.<sup>1</sup> Table C lists the emissions thresholds that apply during project construction and operation.

**Table C: SCAQMD Localized Significance Thresholds**

Emissions Source	Pollutant Emissions Threshold (lbs/day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Construction (1.5 acres, 25-meter distance)	162.0	1,089.0	5.5	4.0
Operations (2.44 acres, 25-meter distance)	208.0	1,445.0	2.3	2.0

Source: South Coast Air Quality Management District (SCAQMD). 2008. *Final Localized Significance*

*Threshold Methodology*. July.

CO = carbon monoxide

lbs/day = pounds per day

LST = localized significance threshold

NO<sub>x</sub> = nitrogen oxides

PM<sub>10</sub> = particulate matter less than 10 microns in size

PM<sub>2.5</sub> = particulate matter less than 2.5 microns in size

### Global Climate Change

Section 15064.4 of the *State CEQA Guidelines* states “A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project.” In performing that analysis, the lead agency has discretion to determine whether to use a model or methodology to quantify GHG emissions, or to rely on a qualitative analysis or performance-based standards. In making a determination as to the significance of potential impacts, the lead agency then considers the extent to which the project may increase or reduce GHG emissions compared to the existing environmental setting, whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project, and the extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Therefore, consistent with the *State CEQA Guidelines*, Section 15183.5, if a project is consistent with an adopted qualified Greenhouse Gas Reduction Strategy that meets the standards, it can be presumed that the project would not have significant GHG emission impacts. The County of Riverside CAP meets the requirements of *State CEQA Guidelines*, Section 15183.5; therefore, the proposed project will be evaluated for consistency with the County’s CAP.

<sup>1</sup> South Coast Air Quality Management District (SCAQMD). Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Website: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf>, accessed October 2023.

The County's CAP<sup>1</sup> uses a threshold of 3,000 MT CO<sub>2</sub>e to define small projects that, when combined with modest efficiency measures, are considered less than significant and do not need to use the Screening Tables or alternative GHG mitigation analysis. The efficiency measures required of small projects are summarized below:

- Energy efficiency matching or exceeding the Title 24 requirements in effect as of January 2017
- Water conservation measures that match the California Green Building Standards Code in effect as of January 2017

Development projects that are determined to be above the 3,000 MT CO<sub>2</sub>e emissions level shall quantify and disclose the anticipated GHG emissions of the proposed development.

## IMPACT ANALYSIS

This section identifies potential air quality and GHG impacts associated with implementation of the proposed project.

### Air Quality Impacts

Air pollutant emissions associated with the project would occur over the short term from construction activities and over the long term from project-related vehicular trips and due to energy consumption (e.g., electricity and natural gas usage) by the proposed land uses.

#### *Consistency with Applicable Air Quality Plans*

A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the air quality plans. A consistency determination fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of the project under consideration at a stage early enough to ensure that air quality concerns are addressed. Only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review due to the air quality plan strategy being based on projections from local General Plans.

The proposed project would include 43 multifamily dwelling units and a 9,990 sf child daycare/preschool facility. The proposed project is not considered a project of statewide, regional, or area-wide significance (e.g., large-scale projects such as airports, electrical generating facilities, petroleum and gas refineries, residential development of more than 500 dwelling units, shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 sf of floor space) as defined in the California Code of Regulations (Title 14, Division 6, Chapter 3, Article 13, §15206(b)). Because the proposed project would not be defined as a regionally significant project under CEQA, it does not meet the SCAG Intergovernmental Review criteria.

The County's General Plan is consistent with the SCAG Regional Comprehensive Plan Guidelines and the SCAQMD Air Quality Management Plan (AQMP). Pursuant to the methodology provided in the

<sup>1</sup> County of Riverside. 2019. *County of Riverside Climate Action Plan Update*. November. Website: [https://planning.rctlma.org/Portals/14/CAP/2019/2019\\_CAP\\_Update\\_Full.pdf](https://planning.rctlma.org/Portals/14/CAP/2019/2019_CAP_Update_Full.pdf), accessed October 2023.

SCAQMD *CEQA Air Quality Handbook*, consistency with the Basin 2022 AQMP is affirmed when a project (1) would not increase the frequency or severity of an air quality standards violation or cause a new violation, and (2) is consistent with the growth assumptions in the AQMP. Consistency review is presented as follows:

1. The project would result in short-term construction and long-term operational pollutant emissions that are all less than the CEQA significance emissions thresholds established by SCAQMD, as demonstrated below; therefore, the project in would not result in an increase in the frequency or severity of an air quality standards violation or cause a new air quality standard violation.
2. The *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities; therefore, the proposed project is not defined as significant. However, the project site is currently designated High Density Residential and Medium Density Residential and zoned General Residential (R-3-2000) and One-Family Dwelling (R-1-12000). The project site would require a rezoning to Mixed-Use (MU) and a general plan amendment (GPA) to change land use designation to Mixed Use Area.

The proposed multifamily housing development would include 43 dwelling units, which would introduce up to 102 residents to the project site<sup>1</sup>. This number is a conservative estimate, and the actual number of residents at the project site is expected to be lower based on the unit mix and floor plans of the proposed apartment units, as well as the limited parking space proposed for the facility. An increase of 102 residents would represent a negligible population increase of approximately 0.004 percent in Riverside County based on existing population (2,458,395 individuals)<sup>2</sup>, and would also represent a negligible increase of approximately 0.003 percent in the County's projected 2040 population as presented in the jurisdictional growth forecasts in SCAG's 2020-2045 RTP/SCS (estimated to be 3,252,200 individuals).

In addition, the employment-to-housing ratio of the SCAG region was forecast to be approximately 1.33 jobs for every household in 2020 in SCAG's 2020-2045 RTP/SCS. This standard is used because most residents of the region are employed somewhere in the SCAG region. A City or sub-region with a jobs-to-housing ratio lower than the overall standard of 1.33 jobs for every household would be considered a "jobs poor" area, indicating that many of the residents must commute to places of employment outside the sub-region and additional jobs would be needed to balance the ratio. Appendix F-1 of the Riverside County General Plan "Population and Employment Forecasts" forecasts that the employment-to-housing ratio in the incorporated and unincorporated Western Coachella Valley area for 2020 is of 0.84 and 0.59 respectively, indicating a "jobs poor" condition in Western Coachella Valley. These employment-

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<sup>1</sup> Based on United States Census Bureau "persons per household" ratio of 2.37 for Bermuda Dunes CDP, California [2016-2020].

<sup>2</sup> Based on United States Census Bureau "Population Estimates" for Riverside County [July 1, 2021 (V2021)].

to-housing ratios indicate that Western Coachella Valley trends towards a “jobs poor” scenario compared to the SCAG region, and that there is more housing than jobs in this area. Since the project would provide employment opportunities in a sub-region of SCAG that is considered “jobs poor,” the project would contribute towards the balance of the jobs-to-housing ration and would not create the need for new housing.

Because the project falls within the previously assumed growth projections for the County, the additional units from the proposed project would not interfere with SCAQMD’s goals for improving air quality in the region because they would house growth that SCAQMD already projected for the County. Therefore, the proposed project would not conflict with the 2022 AQMP and, as such, would not jeopardize attainment of the CAAQS and NAAQS in the area under the jurisdiction of the SCAQMD.

Based on the consistency analysis presented above, the proposed project would be consistent with the regional AQMP.

#### *Criteria Pollutant Analysis*

The Basin is currently designated nonattainment for the federal and State standards for the 8-hour O<sub>3</sub> and PM<sub>10</sub>. The Basin is also nonattainment for the State 1-hour O<sub>3</sub>. The Basin’s nonattainment status is attributed to the region’s development history. Past, present, and future development projects contribute to the region’s adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of an ambient air quality standard. Instead, a project’s individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project’s contribution to the cumulative impact is considerable, then the project’s impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, SCAQMD considered the emission levels for which a project’s individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region’s existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is not necessary. The following analysis assesses the potential project-level air quality impacts associated with construction and operation of the proposed project.

**Construction Emissions.** During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by grading, building construction, paving, and other activities. Emissions from construction equipment are also anticipated and would include CO, nitrogen oxides (NO<sub>x</sub>), VOCs, directly emitted PM<sub>2.5</sub> or PM<sub>10</sub>, and toxic air contaminants such as diesel exhaust particulate matter.

Project construction activities would include grading, site preparation, building construction, architectural coating, and paving activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions.

Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries.  $PM_{10}$  emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions.  $PM_{10}$  emissions would depend on soil moisture, silt content of soil, wind speed, and amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. SCAQMD has established Rule 403: Fugitive Dust, which would require the applicant to implement measures that would reduce the amount of particulate matter generated during the construction period. The Rule 403 measures that were incorporated in this analysis include:

- Water active sites at least twice daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving).
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 mph or less.

In addition to dust-related  $PM_{10}$  emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides ( $SO_x$ ),  $NO_x$ , VOCs, and some soot particulate ( $PM_{2.5}$  and  $PM_{10}$ ) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the project using CalEEMod and are summarized in Table D. (CalEEMod output sheets are provided as an attachment.)

**Table D: Short-Term Regional Construction Emissions**

Construction Phase	Maximum Daily Regional Pollutant Emissions (lbs/day)							
	VOCs	NO <sub>x</sub>	CO	SO <sub>x</sub>	Fugitive PM <sub>10</sub>	Exhaust PM <sub>10</sub>	Fugitive PM <sub>2.5</sub>	Exhaust PM <sub>2.5</sub>
Site Preparation	1.4	13.7	12.5	<0.1	0.7	0.6	0.1	0.6
Grading	1.8	17.6	17.4	<0.1	2.9	0.8	1.4	0.8
Building Construction	1.6	12.2	16.1	<0.1	0.5	0.5	0.1	0.5
Architectural Coating	2.9	1.0	1.9	<0.1	0.1	<0.1	<0.1	<0.1
Paving	1.1	6.5	9.8	<0.1	0.2	0.3	<0.1	0.3
<b>Peak Daily Emissions</b>	<b>4.5</b>	<b>17.6</b>	<b>18.0</b>	<b>&lt;0.1</b>	<b>3.7</b>		<b>2.2</b>	
<b>SCAQMD Threshold</b>	<b>75.0</b>	<b>100.0</b>	<b>550.0</b>	<b>150.0</b>	<b>150.0</b>		<b>55.0</b>	
<b>Significant?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>		<b>No</b>	

Source: Compiled by LSA (October 2023).

Note: Maximum emissions of VOCs and CO occurred during the overlapping building construction and architectural coating phases.

CO = carbon monoxide

lbs/day = pounds per day

NO<sub>x</sub> = nitrogen oxides

PM<sub>2.5</sub> = particulate matter less than 2.5 microns in size

PM<sub>10</sub> = particulate matter less than 10 microns in size

SCAQMD = South Coast Air Quality Management District

SO<sub>x</sub> = sulfur oxides

VOCs = volatile organic compounds

The results shown in Table D indicate the proposed project would not exceed the significance criteria for daily VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> emissions. Therefore, construction of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under applicable federal or State ambient air quality standards.

**Operational Air Quality Impacts.** Long-term air pollutant emissions associated with operation of the proposed project include emissions from area, energy, and mobile sources. Area-source emissions include architectural coatings, consumer products, and landscaping. Energy-source emissions result from activities in buildings that use natural gas. Mobile-source emissions are from vehicle trips associated with operation of the project.

PM<sub>10</sub> emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Entrainment of PM<sub>10</sub> occurs when vehicle tires pulverize small rocks and pavement, and the vehicle wakes generate airborne dust. The contribution of tire and brake wear is small compared to the other PM emission processes. Gasoline-powered engines have small rates of particulate matter emissions compared with diesel-powered vehicles.

Energy-source emissions result from activities in buildings that use natural gas. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the emission factor of the fuel source. The primary sources of energy demand for the proposed project would include building mechanical systems such as water and space heating. Greater building or appliance efficiency reduces the amount of energy for a given activity and thus lowers the resultant emissions.

Area-source emissions consist of direct sources of air emissions at the project site, including architectural coatings, consumer products, and use of landscape maintenance equipment.

Long-term operational emissions associated with the proposed project were calculated using CalEEMod. Table E provides the estimated existing emission estimates and the proposed project's estimated operational emissions. (CalEEMod output sheets are provided as an attachment.)

**Table E: Project Operational Emissions**

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area Sources	1.5	<0.1	2.9	<0.1	<0.1	<0.1
Energy Sources	<0.1	0.2	0.1	<0.1	<0.1	<0.1
Mobile Sources	4.1	4.1	37.0	0.1	6.2	1.6
<b>Total Project Emissions</b>	<b>5.6</b>	<b>4.3</b>	<b>40.0</b>	<b>0.1</b>	<b>6.2</b>	<b>1.6</b>
SCAQMD Threshold	55.0	55.0	550.0	150.0	150.0	55.0
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: Compiled by LSA (October 2023).

Note: Some values may not appear to add correctly due to rounding.

CO = carbon monoxide

lbs/day = pounds per day

NO<sub>x</sub> = nitrogen oxides

PM<sub>2.5</sub> = particulate matter less than 2.5 microns in size

PM<sub>10</sub> = particulate matter less than 10 microns in size

SCAQMD = South Coast Air Quality Management District

SO<sub>x</sub> = sulfur oxides

VOCs = volatile organic compounds

The results shown in Table E indicate the proposed project would not exceed the significance criteria for daily VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under applicable federal or State ambient air quality standards.

**Long-Term Microscale (CO Hot Spot) Analysis.** Vehicular trips associated with the proposed project would contribute to congestion at intersections and along roadway segments in the vicinity of the proposed project site. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, thereby affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients).

Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate project vicinity are not available. Ambient CO levels monitored at the Palm Springs Monitoring Station located at Fs-590 Racquet Club Avenue (the closest station to the project site monitoring CO), showed a highest recorded 1-hour concentration of 1.3 ppm (the State standard is 20 ppm) and a highest 8-hour concentration of 0.7 ppm (the State standard is 9 ppm) from 2019 to 2021. The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under



peak traffic conditions represent a worst-case analysis. Reduced speeds and vehicular congestion at intersections result in increased CO emissions.

The proposed project is expected to generate 969 average daily trips, with 157 trips occurring in the a.m. peak hour and 153 trips occurring in the p.m. peak hour. Therefore, given the extremely low level of CO concentrations in the project area and the lack of traffic impacts at any intersections, project-related vehicles are not expected to result in CO concentrations exceeding the State or federal CO standards. No CO hot spots would occur, and the project would not result in any project-related impacts on CO concentrations.

*Health Risk on Nearby Sensitive Receptors*

Sensitive receptors are defined as people who have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential dwelling units. As discussed above, the closest sensitive receptors to the project site include single-family residences immediately adjacent to the east boundary of the project site at approximately 10 feet. An LST analysis was completed to show the construction and operational impacts at 25 meters (82 feet) to the nearest sensitive receptors to the project site in SRA 30, based on a 1.5-acre daily disturbance area for construction and 2.44 acres for operation. Table F shows the results of the LST analysis during project construction and operation.

**Table F: Project Localized Construction and Operational Emissions**

Source	Pollutant Emissions (lbs/day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Construction Emissions</b>				
On-Site Emissions	17.5	16.3	3.6	2.1
<b>Localized Significance Threshold</b>	<b>162.0</b>	<b>1,089.0</b>	<b>5.5</b>	<b>4.0</b>
<b>Significant?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Operational Emissions</b>				
On-Site Emissions	<1.0	4.9	<1.0	<1.0
<b>Localized Significance Threshold</b>	<b>208.0</b>	<b>1,445.0</b>	<b>2.3</b>	<b>2.0</b>
<b>Significant?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: Compiled by LSA (October 2023).

Note: Source Receptor Area 30, based on a 1.5-acre construction disturbance daily area and a 2.44 acre disturbance area for operation, at a distance of 25 meters from the project boundary.

CO = carbon monoxide

PM<sub>2.5</sub> = particulate matter less than 2.5 microns in size

lbs/day = pounds per day

PM<sub>10</sub> = particulate matter less than 10 microns in size

NO<sub>x</sub> = nitrogen oxides

As detailed in Table F, the emission levels indicate that the project would not exceed SCAQMD LSTs during project construction or operation. During construction, construction contractors would be required to implement measures to reduce or eliminate emissions by implementing SCAQMD Rule 403 dust control measures. In addition, the maximum daily emissions associated with project construction emissions are identified in Table D and indicate the project would not exceed the significance criteria for VOCs, NO, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> emissions. Therefore, the emissions associated with construction of the proposed project would not be expected to exceed the most

stringent applicable federal or State ambient air quality standards. It should be noted that the ambient air quality standards are developed and represent levels at which the most susceptible persons (children and the elderly) are protected. In other words, the ambient air quality standards are purposefully set low to protect children, the elderly, and those with existing respiratory problems. Therefore, given the temporary nature of short-term construction impacts, and the absence of any exceeded threshold of significance related to construction impacts, construction of the proposed project would not exceed SCAQMD thresholds and would not expose nearby sensitive receptors to substantial pollutant concentrations. No significant health risk would occur from Project construction emissions.

Similarly, as indicated in Table E, operation of the proposed project would not exceed the significance criteria for VOCs, NO, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> emissions.

The SCAQMD's numeric regional mass daily emissions thresholds are based in part on Section 180 (e) of the federal Clean Air Act. It should be noted that the numeric regional mass daily emissions thresholds have not changed since their adoption as part of SCAQMD's *CEQA Air Quality Handbook* published in 1993 (over 20 years ago). The numeric regional mass daily emission thresholds are also intended to provide a means of consistency in significance determination within the environmental review process.

As noted in the Brief of Amicus Curiae by the SCAQMD<sup>1</sup>, the SCAQMD has acknowledged that for criteria pollutants, it would be extremely difficult, if not impossible, to quantify health impacts for various reasons, including modeling limitations as well as where in the atmosphere air pollutants interact and form.

Additionally, the SCAQMD acknowledges that health effects quantification from O<sub>3</sub>, as an example, is correlated with the increases in ambient levels of O<sub>3</sub> in the air (concentration) that an individual person breathes. The SCAQMD goes on to state that it would take a large amount of additional emissions to result in a modeled increase in ambient O<sub>3</sub> levels over the entire region. The SCAQMD states that based on its own modeling in its 2012 AQMP, a reduction of 432 tons (864,000 pounds) per day of NO<sub>x</sub> and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce O<sub>3</sub> levels at the highest monitored site by only 9 parts per billion (ppb). As such, the SCAQMD concludes that it is not currently possible to accurately quantify O<sub>3</sub>-related health impacts caused by NO<sub>x</sub> or VOC emissions from relatively small projects (defined as projects that are not regional in scope) due to photochemistry and regional model limitations (see page 11 of the SCAQMD Brief of Amicus Curiae).

To underscore this point, the SCAQMD goes on to state that it has only been able to correlate potential health outcomes for very large emissions sources. As part of its rulemaking activity, specifically 6,620 pounds per day (lbs/day) of NO<sub>x</sub> and 89,180 lbs/day of VOCs were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to O<sub>3</sub>. As

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<sup>1</sup> SCAQMD. 2015. *Amicus Curiae Brief of South Coast Air Quality Management District*, April. Website: [www.courts.ca.gov/documents/9-s219783-ac-south-coast-air-quality-mgt-dist-041315.pdf](http://www.courts.ca.gov/documents/9-s219783-ac-south-coast-air-quality-mgt-dist-041315.pdf) (accessed October 2023).

identified in Tables D and E, NO<sub>x</sub> and VOC emissions during project construction and operation would be well below 6,620 lbs/day of NO<sub>x</sub> and 89,180 lbs/day of VOCs.

Due to the small size of the proposed project in relation to the overall Basin, the level of emissions is not sufficiently high to use a regional modeling program to correlate health effects on a Basin-wide level. On a regional scale, the quantity of emissions from the project is incrementally minor. Because the SCAQMD has not identified any other methods to quantify health impacts from small projects and due to the size of the project, it is speculative to assign any specific health effects to small project-related emissions. However, based on this localized analysis, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, the project would not expose sensitive receptors to substantial levels of pollutant concentrations.

### *Odors*

Heavy-duty equipment on the project site during construction would emit odors, primarily from equipment exhaust. However, the construction activity would cease after individual construction is completed. No other sources of objectionable odors have been identified for the proposed project.

SCAQMD Rule 402 regarding nuisances states: “A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.” The proposed uses are not anticipated to emit any objectionable odors. Therefore, the proposed project would not result in other emissions (e.g., those leading to odors) adversely affecting a substantial number of people.

### **Greenhouse Gas Emission Impacts**

The following sections describe the proposed project’s construction- and operation-related GHG impacts and consistency with applicable GHG reduction plans.

#### *Generation of Greenhouse Gas Emissions*

This section describes the proposed project’s construction- and operation-related GHG emissions and contribution to global climate change. The SCAQMD has not addressed emission thresholds for construction in its *CEQA Air Quality Handbook*; however, SCAQMD requires quantification and disclosure. Thus, this section discusses construction emissions.

**Construction Greenhouse Gas Emissions.** Construction activities associated with the proposed project would produce combustion emissions from various sources. Construction would emit GHGs through the operation of construction equipment and from worker and builder supply vendor vehicles for the duration of the approximately 6-month construction period. The combustion of fossil-based fuels creates GHGs such as CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O. Furthermore, the fueling of heavy equipment emits CH<sub>4</sub>. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

As indicated above, SCAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are required to quantify and disclose GHG emissions that would occur during construction. The SCAQMD then requires the construction GHG emissions to be amortized over the life of the project, which is defined as 30 years, added to the operational emissions, and compared to the applicable interim GHG significance threshold tier. Based on CalEEMod, it is estimated that the project would generate 400.3 metric tons (MT) of CO<sub>2</sub>e during construction of the project. When amortized over the 30-year life of the project, annual emissions would be 13.3 MT CO<sub>2</sub>e.

**Operational Greenhouse Gas Emissions.** Long-term operation of the proposed project would generate GHG emissions from area, mobile, waste, and water sources as well as indirect emissions from sources associated with energy consumption. Mobile-source GHG emissions would include project-generated vehicle trips associated with trips to the proposed project. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site and other sources. Waste source emissions generated by the proposed project include energy generated by landfilling and other methods of disposal related to transporting and managing project-generated waste. In addition, water source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

GHG emissions were estimated using CalEEMod. Table G shows the estimated operational GHG emissions for the proposed project. Motor vehicle emissions are the largest source of GHG emissions for the project at approximately 86 percent of the project total. Energy sources are the next largest category at approximately 12 percent. Waste and water sources are about 1 percent and less than 1 percent of the total emissions respectively. Area source emissions are also about less than 1 percent of the total emissions.

**Table G: Greenhouse Gas Emissions**

Emission Type	Operational Emissions (MT/yr)				Percentage of Total
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e	
Area Source	0.7	<0.1	<0.1	0.7	<1
Energy Source	135.2	<0.1	<0.1	135.7	12
Mobile Source	959.3	<0.1	0.1	977.0	86
Waste Source	4.0	0.4	0.0	14.0	1
Water Source	3.0	0.1	<0.1	5.3	<1
<b>Total Operational Emissions</b>				<b>1,132.7</b>	<b>100.0</b>
Amortized Construction Emissions				13.3	—
<b>Total Annual Emissions</b>				<b>1,146.0</b>	<b>—</b>
<b>Riverside County CAP Update GHG Numerical Screening Threshold</b>				<b>3,000</b>	
<b>Exceedance?</b>				<b>No</b>	

Source: Compiled by LSA (October 2023).  
 CAP = Climate Action Plan  
 CH<sub>4</sub> = methane  
 CO<sub>2</sub> = carbon dioxide  
 CO<sub>2</sub>e = carbon dioxide equivalent

GHG = greenhouse gas  
 MT/CO<sub>2</sub>e = metric tons of carbon dioxide equivalent  
 MT/yr = metric tons per year  
 N<sub>2</sub>O = nitrous oxide

As discussed above, a project would have less than significant GHG emissions if it would result in operational-related GHG emissions of less than the County’s CAP threshold of 3,000 MT CO<sub>2</sub>e per

year. Based on the analysis results, the proposed project would generate approximately 1,146.0 CO<sub>2</sub>e per year. Therefore, operation of the proposed project would not generate significant GHG emissions that would have a significant effect on the environment.

#### *Consistency with Greenhouse Gas Reduction Plans*

**Riverside County CAP Update.** As demonstrated above, the proposed project would not exceed the GHG numerical screening threshold of 3,000 MT CO<sub>2</sub>e established by the County’s CAP. The proposed project would also be required to meet the latest Title 24 standards, regarding energy conservation and green building standards and reduction of wastewater and water use. As such, the proposed project would be consistent with the CAP measures and would not be required to use the Screening Tables or alternative GHG mitigation analysis. Therefore, the proposed project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions.

The following discussion evaluates the proposed project according to the goals of the 2022 Scoping Plan, EO B-30-15, SB 32, AB 197, and SCAG’s 2020–2045 RTP/SCS.

**2022 Scoping Plan.** EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reduction target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. The CARB released the 2017 Scoping Plan to reflect the 2030 target set by EO B-30-15 and codified by SB 32.<sup>1</sup> SB 32 builds on AB 32 and keeps us on the path toward achieving the State’s 2050 objective of reducing emissions to 80 percent below 1990 levels. AB 197, the companion bill to SB 32, provides additional direction to the CARB that is related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 that is intended to provide easier public access to air emission data collected by the CARB was posted in December 2016.

In addition, the 2022 Scoping Plan<sup>2</sup> assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State’s long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels,

<sup>1</sup> California Air Resources Board (CARB). *2022 Scoping Plan for Achieving Carbon Neutrality*. December. Website: <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf> (accessed October 2023)

<sup>2</sup> California Air Resources Board (CARB). 2017. *California’s 2017 Climate Change Scoping Plan*. November.

including adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California will be zero-emission by 2035, and all other fleets will have transitioned to zero-emission as fully possible by 2045, which will reduce the percentage of fossil fuel combustion vehicles.

- **Energy-efficient measures** are intended to maximize energy-efficiency building and appliance standards, pursue additional efficiency efforts including new technologies and new policy and implementation mechanisms, and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California’s new and existing inventory of buildings. As identified above, the proposed project would comply with the 2022 CALGreen Code standards regarding energy conservation and green building standards. The project would also include solar roof areas. Therefore, the proposed project would comply with applicable energy measures.
- **Water conservation and efficiency measures** are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the project would be required to comply with the 2022 CALGreen Code standards, which includes a variety of different measures, including reduction of wastewater and water use. In addition, the proposed project would be required to comply with the California Model Water Efficient Landscape Ordinance. The project would include drought-tolerant landscape plants and efficient irrigation systems. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.
- The goal of **transportation and motor vehicle measures** is to develop regional GHG emission reduction targets for passenger vehicles. Specific regional emission targets for transportation emissions would not directly apply to the proposed project. However, vehicles traveling to the project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program. The second phase of Pavley standards will reduce GHG emissions from new cars by 34 percent from 2016 levels by 2025, resulting in a 3 percent decrease in average vehicle emissions for all vehicles by 2020. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

The proposed project would comply with existing State regulations adopted to achieve the overall GHG emission reduction goals identified in the 2022 Scoping Plan, EO B-30-15, SB 32, and AB 197.

**SCAG’s Regional Transportation Plan/Sustainable Communities Strategy.** SCAG’s 2020–2045 RTP/SCS, which was adopted September 3, 2020, identifies land use strategies that focus on new housing and job growth in areas served by high-quality transit and other opportunity areas, and would be consistent with a land use development pattern that supports and complements the proposed transportation network. The core vision in the 2020–2045 RTP/SCS is to better manage the existing transportation system through design management strategies, integrate land use decisions and technological advancements, create complete streets that are safe to all roadway

users, preserve the transportation system, and expand transit and foster development in transit-oriented communities. The 2020–2045 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as a forecasted development pattern that is generally consistent with regional-level General Plan data. The forecasted development pattern, when integrated with the financially constrained transportation investments identified in the 2020–2045 RTP/SCS, would reach the regional target of reducing GHG emissions from autos and light-duty trucks by 8 percent per capita by 2020 and 19 percent by 2035 (compared to 2005 levels). The 2020–2045 RTP/SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the 2020–2045 RTP/SCS but provides incentives for consistency for governments and developers. Implementing SCAG’s RTP/SCS will greatly reduce the regional GHG emissions from transportation, helping to achieve statewide emission reduction targets. The proposed project would be consistent with following strategies from the SCAG RTP/SCS intended to support the implementation of the Sustainable Communities Strategies section:

- Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.
- Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.
- Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.
- Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space.

The proposed project is located near commercial and residential uses facilitating the access to potential job sites in the area. In addition, the proposed project would develop a day care facility adjacent to residential areas. Therefore, the proposed project would be consistent with the multimodal goal for facilitating access to work, educational, and other destinations, as well as the goal of reducing commute distances by providing housing near commercial areas. The proposed project would also include approximately 5,723 sf of solar ready rooftop and drought tolerant landscape areas. As such, the proposed project would also be consistent with policies that support renewable energy production and reduce the heat island effect. Furthermore, the proposed project would support and promote low emission technologies by including electric charging vehicle spaces. As such, the proposed project would not conflict with the stated goals of the RTP/SCS; therefore, the proposed project would not interfere with SCAG’s ability to achieve the region’s GHG reduction targets at 8 percent below 2005 per capita emissions levels by 2020 and 19 percent below 2005 per capita emissions levels by 2035, and it can be assumed that regional mobile emissions will decrease in line with the goals of the RTP/SCS. Furthermore, the proposed project is not regionally significant per *State CEQA Guidelines* Section 15206, and, as such, it would not conflict with the SCAG RTP/SCS targets because those targets were established and are applicable on a regional level.

The proposed project would include 43 multifamily dwelling units and a 9,990 sf child daycare/preschool facility. Based on the nature of the proposed project, it is anticipated that implementation

of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS. Therefore, the proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

## CONCLUSION

Based on the analysis presented above, construction and operation of the proposed project would not result in the generation of criteria air pollutants that would exceed SCAQMD thresholds of significance. Compliance with SCAQMD Rule 403: Fugitive Dust would further reduce construction dust impacts. The proposed project is not expected to produce significant emissions that would affect nearby sensitive receptors. The project would also be consistent with the 2022 AQMP. The project would also not result in objectionable odors affecting a substantial number of people. GHG emissions released during construction and operation of the project are estimated to be minimal and would not be cumulatively considerable. The proposed project would generally be consistent with both the CARB Scoping Plan and the SCAG RTP/SCS.

Attachments: Figure 1: Project Location  
CalEEMod Output Files