
Seneca Road

GREENHOUSE GAS ANALYSIS

CITY OF ADELANTO

PREPARED BY:

Haseeb Qureshi
hqureshi@urbanxroads.com

Ali Dadabhoy
adadabhoy@urbanxroads.com

Shannon Wong
swong@urbanxroads.com

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LIST OF ABBREVIATED TERMS

(1)	Reference
AB	Assembly Bill
CARB	California Air Resources Board
CAA	Federal Clean Air Act
CAFÉ	Corporate Average Fuel Economy
CalEEMod	California Emissions Estimator Model
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resource Board
CEC	California Energy Commission
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CFC	Chlorofluorocarbons
CH ₄	Methane
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
CPUC	California Public Utilities Commission
EPA	Environmental Protection Agency
GCC	Global Climate Change
GHGA	Greenhouse Gas Analysis
GWP	Global Warming Potential
HFC	Hydrofluorocarbons
MDAQMD	Mojave Desert Air Quality Management District
MMT CO ₂ e	Million Metric Ton of Carbon Dioxide Equivalent
MT CO ₂ e	Metric Ton of Carbon Dioxide Equivalent
N ₂ O	Nitrogen Dioxide
NHTSA	National Highway Traffic Safety Administration
NIOSH	National Institute for Occupational Safety and Health
NO _x	Oxides of Nitrogen
PFC	Perfluorocarbons
PM ₁₀	Particulate Matter 10 microns in diameter or less
PM _{2.5}	Particulate Matter 2.5 microns in diameter or less
PPM	Parts Per Million
SB	Senate Bill
WRI	The World Resources Institute

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EXECUTIVE SUMMARY

ES.1 SUMMARY OF FINDINGS

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

TABLE ES-1: SUMMARY OF CEQA SIGNIFICANCE FINDINGS

Analysis	Report Section	Significance Findings	
		Unmitigated	Mitigated
GHG Impact #1: Would the Project generate direct or indirect GHG emission that would result in a significant impact on the environment?	3.7	<i>Less Than Significant</i>	N/A
GHG Impact #2: Would the Project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?	3.7	<i>Less Than Significant</i>	N/A

ES.2 PROJECT REQUIREMENTS

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

- Global Warming Solutions Act of 2006 (AB 32) (2).
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (Senate Bill (SB) 375) (3).
- Pavley Fuel Efficiency Standards (AB 1493). Establishes fuel efficiency ratings for new vehicles (4).
- California Building Code (Title 24 California Code of Regulations (CCR)). Establishes energy efficiency requirements for new construction (5).
- Appliance Energy Efficiency Standards (Title 20 CCR). Establishes energy efficiency requirements for appliances (6).
- Low Carbon Fuel Standard (LCFS). Requires carbon content of fuel sold in California to be 20% less by 2030 (7).
- California Water Conservation in Landscaping Act of 2006 (AB 1881). Requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or equivalent to ensure efficient landscapes in new development and reduced water waste in existing landscapes (8).

- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions (9).
- Renewable Portfolio Standards (RPS). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 60 percent by 2030, with interim targets of 44 percent by 2024 and 52 percent by 2027 as well (10).
- Senate Bill 32 (SB 32). Requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15 (11).

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

1 INTRODUCTION

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

1.1 SITE LOCATION

The proposed Seneca Road Project is located at the southeast corner of Pearmain Street and Seneca Road (APN 3103-511-08) in the City of Adelanto as shown on Exhibit 1-A.

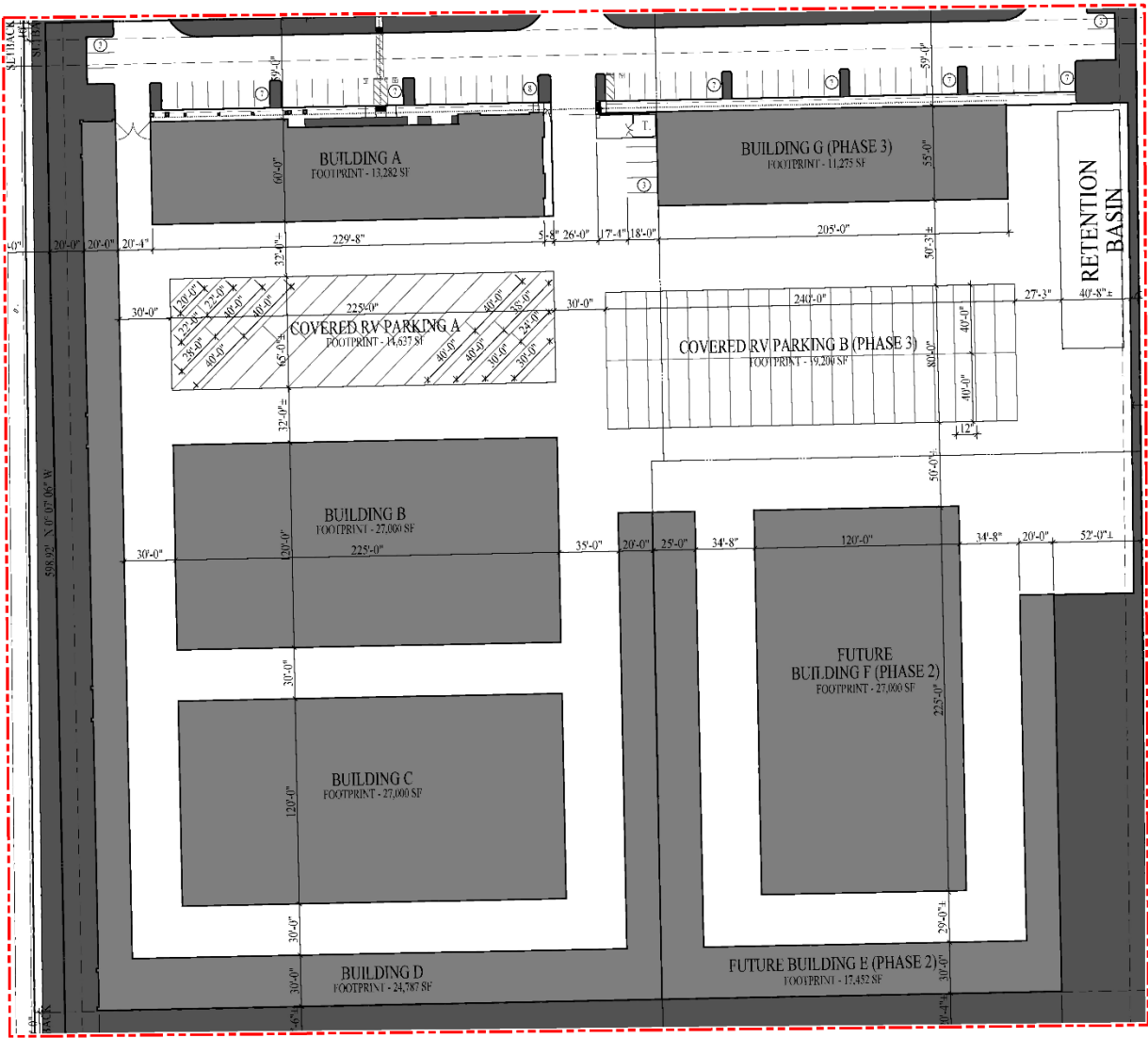
1.2 PROJECT DESCRIPTION

The proposed Project is to consist of a 4,700-sf strip retail plaza, a 4,700-sf office, a 139,000-sf self-storage building, and 68 RV parking spaces on approximately 8.75 acres, as shown in Exhibit 1-B. The Project is anticipated to have an Opening Year of 2026.

EXHIBIT 1-A: LOCATION MAP



EXHIBIT 1-B: SITE PLAN



LEGEND:

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 Site Boundary

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2 CLIMATE CHANGE SETTING

2.1 INTRODUCTION TO GLOBAL CLIMATE CHANGE (GCC)

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

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

2.2 GLOBAL CLIMATE CHANGE DEFINED

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

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative increased accumulation of these gases in the earth's atmosphere over the past 200 years is considered to be the cause for the observed increase in the earth's temperature.

2.3 GREENHOUSE GASES

2.3.1 GHGs AND HEALTH EFFECTS

GHGs trap heat in the atmosphere, creating a GHG effect that results in climate change. Many gases demonstrate these properties and as discussed in Table 2-1. For the purposes of this analysis, emissions of CO₂, CH₄, and N₂O were evaluated because these gases are the primary

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

TABLE 2-1: GREENHOUSE GASES

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

Greenhouse Gases	Description	Sources	Health Effects
	feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the earth's surface and heat it up) (12).		
CO ₂	CO ₂ is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO ₂ concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30%. Left unchecked, the concentration of CO ₂ in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources (13).	CO ₂ is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil, natural gas, and wood. CO ₂ is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks (14).	Outdoor levels of CO ₂ are not high enough to result in negative health effects. According to the National Institute for Occupational Safety and Health (NIOSH) high concentrations of CO ₂ can result in health effects such as: headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. It should be noted that current concentrations of CO ₂ in the earth's atmosphere are estimated to be approximately 370 ppm, the actual reference exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour workweek and short-term reference exposure levels of 30,000 ppm averaged over a 15 minute period (15).

Greenhouse Gases	Description	Sources	Health Effects
CH ₄	CH ₄ is an extremely effective absorber of radiation, although its atmospheric concentration is less than CO ₂ and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs.	CH ₄ has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of CH ₄ . Other anthropogenic sources include fossil-fuel combustion and biomass burning (16).	CH ₄ is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to high levels of CH ₄ can cause asphyxiation, loss of consciousness, headache and dizziness, nausea and vomiting, weakness, loss of coordination, and an increased breathing rate.
N ₂ O	N ₂ O, also known as laughing gas, is a colorless GHG. Concentrations of N ₂ O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb).	N ₂ O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant, i.e., in whipped cream bottles. It is also	N ₂ O can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage) (17).

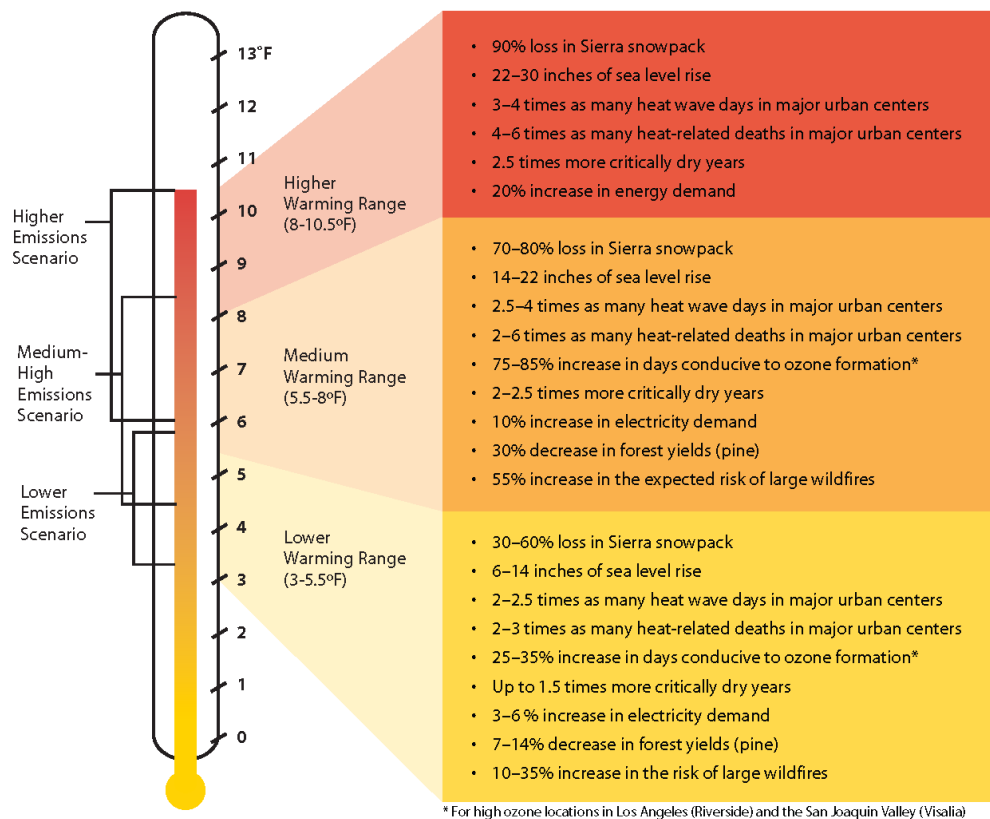
Greenhouse Gases	Description	Sources	Health Effects
		used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. N ₂ O can be transported into the stratosphere, be deposited on the earth's surface, and be converted to other compounds by chemical reaction (17).	
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in CH ₄ or ethane (C ₂ H ₆) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the earth's surface).	CFCs have no natural source but were first synthesized in 1928. They were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years (18).	In confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.

Greenhouse Gases	Description	Sources	Health Effects
HFCs	HFCs are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential (GWP). The HFCs with the largest measured atmospheric abundances are (in order), fluoroform (CHF_3), 1,1,1,2-tetrafluoroethane (CH_2FCF), and 1,1-difluoroethane (CH_3CF_2). Prior to 1990, the only significant emissions were of CHF_3 . CH_2FCF emissions are increasing due to its use as a refrigerant.	HFCs are manmade for applications such as automobile air conditioners and refrigerants.	No health effects are known to result from exposure to HFCs.
PFCs	PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above earth's surface, are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). The EPA estimates that concentrations of CF_4 in the atmosphere are over 70 parts per trillion (ppt).	The two main sources of PFCs are primary aluminum production and semiconductor manufacture.	No health effects are known to result from exposure to PFCs.
SF_6	SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900) (19). The EPA indicates that concentrations in the 1990s were about 4 ppt.	SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.	In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.

Greenhouse Gases	Description	Sources	Health Effects
Nitrogen Trifluoride (NF ₃)	NF ₃ is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that NF ₃ has a 100-year GWP of 17,200 (20).	NF ₃ is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display panels, types of solar panels, and chemical lasers.	Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis (21).

The potential health effects related directly to the emissions of CO₂, CH₄, and N₂O as they relate to development projects such as the proposed Project are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport that higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change will likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas (22). Exhibit 2-A presents the potential impacts of global warming (23).

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



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

2.4 GLOBAL WARMING POTENTIAL

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

The atmospheric lifetime and GWP of selected GHGs are summarized at Table 2-2. As shown in the table below, GWP for the 6th Assessment Report, the Intergovernmental Panel on Climate Change (IPCC)'s scientific and socio-economic assessment on climate change, range from 1 for CO₂ to 25,200 for SF₆ (24).

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

Gas	Atmospheric Lifetime (years)	GWP (100-year time horizon)
		6 th Assessment Report
CO ₂	Multiple	1
CH ₄	12 .4	28
N ₂ O	121	273
HFC-23	222	14,600
HFC-134a	13.4	1,526
HFC-152a	1.5	164
SF ₆	3,200	25,200

Source: IPCC Second Assessment Report, 1995 and IPCC Sixth Assessment Report, 2022

2.5 GREENHOUSE GAS EMISSIONS INVENTORIES

2.5.1 GLOBAL

Worldwide anthropogenic GHG emissions are tracked by the IPCC for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2021. Based on the latest available data, the sum of these emissions totaled approximately 28,272,941 gigagram (Gg) CO₂e¹ (25) (26) as summarized on Table 2-3.

2.5.2 UNITED STATES

As noted in Table 2-3, the United States, as a single country, was the number two producer of GHG emissions in 2021.

¹ The global emissions are the sum of Annex I and non-Annex I countries, without counting Land-Use, Land-Use Change and Forestry (LULUCF). For countries without 2021 data, the United Nations' Framework Convention on Climate Change (UNFCCC) data for the most recent year were used U.N. Framework Convention on Climate Change, "Annex I Parties – GHG total without LULUCF," The most recent GHG emissions for China and India are from 2014 and 2016, respectively.

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

Emitting Countries	GHG Emissions (Gg CO₂e)
China	12,300,200
United States	6,340,228
European Union (27-member countries)	3,468,394
India	2,839,425
Russian Federation	2,156,599
Japan	1,168,095
Total	28,272,941

2.5.3 STATE OF CALIFORNIA

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the United States (U.S.) emissions inventory total (27). The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2023 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2021 GHG emissions period, California emitted an average 381.3 million metric tons of CO₂e per year (MMTCO₂e/yr) or 381,300 Gg CO₂e (6.01% of the total United States GHG emissions) (28).

2.6 EFFECTS OF CLIMATE CHANGE IN CALIFORNIA

2.6.1 PUBLIC HEALTH

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35% under the lower warming range to 75 to 85% under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. Based on *Our Changing Climate Assessing the Risks to California by the California Climate Change Center*, large wildfires could become up to 55% more frequent if GHG emissions are not significantly reduced (29).

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a significant increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat.

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

2.6.2 WATER RESOURCES

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

If temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90%. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation.

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

2.6.3 AGRICULTURE

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

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

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

2.6.4 FORESTS AND LANDSCAPES

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

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

2.6.5 RISING SEA LEVELS

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

2.7 REGULATORY SETTING

2.7.1 INTERNATIONAL

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

IPCC

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

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

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

INTERNATIONAL CLIMATE CHANGE TREATIES

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

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

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

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

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

- Reaffirm the goal of limiting global temperature increase well below 2°C, while urging efforts to limit the increase to 1.5 degrees;
- Establish binding commitments by all parties to make “nationally determined contributions” (NDCs), and to pursue domestic measures aimed at achieving them;
- Commit all countries to report regularly on their emissions and “progress made in implementing and achieving” their NDCs, and to undergo international review;

- Commit all countries to submit new NDCs every five years, with the clear expectation that they would “represent a progression” beyond previous ones;
- Reaffirm the binding obligations of developed countries under the UNFCCC to support the efforts of developing countries, while for the first time encouraging voluntary contributions by developing countries too;
- Extend the current goal of mobilizing \$100 billion a year in support by 2020 through 2025, with a new, higher goal to be set for the period after 2025;
- Extend a mechanism to address “loss and damage” resulting from climate change, which explicitly would not “involve or provide a basis for any liability or compensation;”
- Require parties engaging in international emissions trading to avoid “double counting;” and
- Call for a new mechanism, similar to the Clean Development Mechanism under the Kyoto Protocol, enabling emission reductions in one country to be counted toward another country’s NDC (C2ES 2015a) (30).

2.7.2 NATIONAL

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

GHG ENDANGERMENT

In *Massachusetts v. Environmental Protection Agency* 549 U.S. 497 (2007), decided on April 2, 2007, the United States Supreme Court (Supreme Court) found that four GHGs, including CO₂, are air pollutants subject to regulation under Section 202(a)(1) of the Clean Air Act (CAA). The Supreme Court held that the EPA Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under section 202(a) of the CAA:

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

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles, as discussed in the section “Clean Vehicles” below. After a lengthy legal challenge, the Supreme Court declined to review an Appeals Court ruling that upheld the EPA Administrator’s findings (31).

CLEAN VEHICLES

Congress first passed the Corporate Average Fuel Economy law in 1975 to increase the fuel economy of cars and light duty trucks. The law has become more stringent over time. On May

19, 2009, President Obama put in motion a new national policy to increase fuel economy for all new cars and trucks sold in the U.S. On April 1, 2010, the EPA, and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) announced a joint final rule establishing a national program that would reduce GHG emissions and improve fuel economy for new cars and trucks sold in the U.S.

The first phase of the national program applies to passenger cars, light-duty trucks, and medium-duty (MD) passenger vehicles, covering model years 2012 through 2016. They require these vehicles to meet an estimated combined average emissions level of 250 grams of CO₂ per mile, equivalent to 35.5 miles per gallon (mpg) if the automobile industry were to meet this CO₂ level solely through fuel economy improvements. Together, these standards would cut CO₂ emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012–2016). The EPA and the NHTSA issued final rules on a second-phase joint rulemaking establishing national standards for light-duty vehicles for model years 2017 through 2025 in August 2012. The new standards for model years 2017 through 2025 apply to passenger cars, light-duty trucks, and MD passenger vehicles. The final standards are projected to result in an average industry fleetwide level of 163 grams/mile of CO₂ in model year 2025, which is equivalent to 54.5 mpg if achieved exclusively through fuel economy improvements.

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

On April 2, 2018, the EPA signed the Mid-term Evaluation Final Determination, which declared that the MY 2022-2025 GHG standards are not appropriate and should be revised (32). This Final Determination serves to initiate a notice to further consider appropriate standards for MY 2022-2025 light-duty vehicles. On August 2, 2018, the NHTSA in conjunction with the EPA, released a notice of proposed rulemaking, the *Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule). The SAFE Vehicles Rule was proposed to amend existing Corporate Average Fuel Economy (CAFE) and tailpipe CO₂ standards for passenger cars and light trucks and to establish new standards covering model years 2021 through 2026. As of March 31, 2020, the NHTSA and EPA finalized the SAFE Vehicle Rule which increased stringency of CAFE and CO₂ emissions standards by 1.5% each year through model year 2026 (33).

MANDATORY REPORTING OF GHGs

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

NEW SOURCE REVIEW

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

“This rulemaking is necessary because without it the Prevention of Significant Deterioration and Title V requirements would apply, as of January 2, 2011, at the 100 or 250 tons per year levels provided under the CAA, greatly increasing the number of required permits, imposing undue costs on small sources, overwhelming the resources of permitting authorities, and severely impairing the functioning of the programs. EPA is relieving these resource burdens by phasing in the applicability of these programs to GHG sources, starting with the largest GHG emitters. This rule establishes two initial steps of the phase-in. The rule also commits the agency to take certain actions on future steps addressing smaller sources but excludes certain smaller sources from Prevention of Significant Deterioration and Title V permitting for GHG emissions until at least April 30, 2016.”

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

STANDARDS OF PERFORMANCE FOR GHG EMISSIONS FOR NEW STATIONARY SOURCES: ELECTRIC UTILITY GENERATING UNITS

As required by a settlement agreement, the EPA proposed new performance standards for emissions of CO₂ for new, affected, fossil fuel-fired electric utility generating units on March 27, 2012. New sources greater than 25 megawatts (MW) would be required to meet an output-based standard of 1,000 pounds (lbs) of CO₂ per MW-hour (MWh), based on the performance of widely used natural gas combined cycle technology. It should be noted that on February 9, 2016, the Supreme Court issued a stay of this regulation pending litigation. Additionally, the current EPA Administrator has also signed a measure to repeal the Clean Power Plan, including the CO₂

standards. The Clean Power Plan was officially repealed on June 19, 2019, when the EPA issued the final Affordable Clean Energy rule (ACE). Under ACE, new state emission guidelines were established that provided existing coal-fired electric utility generating units with achievable standards.

CAP-AND-TRADE

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

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

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

SMARTWAY PROGRAM

The SmartWay Program is a public-private initiative between the EPA, large and small trucking companies, rail carriers, logistics companies, commercial manufacturers, retailers, and other federal and state agencies. Its purpose is to improve fuel efficiency and the environmental performance (reduction of both GHG emissions and air pollution) of the goods movement supply chains. SmartWay is comprised of four components (34):

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

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

Through the SmartWay Technology Program, the EPA has evaluated the fuel saving benefits of various devices through grants, cooperative agreements, emissions, and fuel economy testing, demonstration projects and technical literature review. As a result, the EPA has determined the following types of technologies provide fuel saving and/or emission reducing benefits when used properly in their designed applications, and has verified certain products:

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

EXECUTIVE ORDER 13990

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

2.7.3 CALIFORNIA

2.7.3.1 LEGISLATIVE ACTIONS TO REDUCE GHGs

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

conservation, but also provide GHG reductions. This section describes the major provisions of the legislation.

AB 1881

The Water Conservation in Landscaping Act of 2006 requires local agencies to adopt the updated DWR model ordinance or equivalent. AB 1881 also requires the CEC to consult with the DWR to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.

SB 1368

California SB 1368 adds Sections 8340 and 8341 to the Public Utilities Code (effective January 1, 2007) with the intent “to prevent long-term investments in power plants with GHG emissions in excess of those produced by a combined-cycle natural gas power plant” with the aim of “reducing emissions of GHGs from the state’s electricity consumption, not just the state’s electricity production.” SB 1368 provides a mechanism for reducing the GHG emissions of electricity providers, both in-state and out-of-state, thereby assisting CARB in meeting its mandate under AB 32, the Global Warming Solutions Act of 2006.

AB 32

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

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

SB 375

On September 30, 2008, SB 375 was signed by Governor Schwarzenegger. According to SB 375, the transportation sector is the largest contributor of GHG emissions, which emits over 40% of the total GHG emissions in California. SB 375 states, “Without improved land use and transportation policy,

³ Based upon the 2019 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2017 GHG emissions period, California emitted an average 424.1 MMTCO₂e (50). This is less than the 2020 emissions target of 431 MMTCO₂e.

California would not be able to achieve the goals of AB 32.” SB 375 does the following: it (1) requires metropolitan planning organizations (MPOs) to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, (2) aligns planning for transportation and housing, and (3) creates specified incentives for the implementation of the strategies.

SB 375 requires MPOs to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. Although SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.

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

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

AB 1493 - Pavley Fuel Efficiency Standards

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

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

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

package would also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California.

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

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

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

SB 32

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

2017 CARB SCOPING PLAN

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

The *2017 Scoping Plan* establishes a new emissions limit of 260 MMTCO₂e for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030 (35).

California's climate strategy would require contributions from all sectors of the economy, including the land base, and would include enhanced focus on zero and near-zero emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation

and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (CH₄, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries would further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the *2017 Scoping Plan* framework include:

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

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

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

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

According to research conducted by the Lawrence Berkeley National Laboratory (LBNL) and supported by CARB, California, under its existing and proposed GHG reduction policies, could achieve the 2030 goals under SB 32. The research utilized a new, validated model known as the California LBNL GHG Analysis of Policies Spreadsheet (CALGAPS), which simulates GHG and criteria pollutant emissions in California from 2010 to 2050 in accordance to existing and future GHG-reducing policies. The CALGAPS model showed that by 2030, emissions could range from 211 to 428 MTCO₂e per year (MTCO₂e/yr), indicating that “even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40% below the 1990 level [of SB 32].” CALGAPS analyzed emissions through 2050 even though it did not generally account for policies that might be put in place after 2030. Although the research indicated that the emissions would not meet the State’s 80% reduction goal by 2050, various combinations of policies could allow California’s cumulative emissions to remain very low through 2050 (36) (37).

2022 CARB SCOPING PLAN

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) (38). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to “deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor.” The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with CEQA Guidelines section 15183.5.

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

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

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

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

- Reimagine roadway projects that increase VMT in a way that meets community needs and reduces the need to drive.
- Double local transit capacity and service frequencies by 2030.

- Complete the High-Speed Rail (HSR) System and other elements of the intercity rail network by 2040.
- Expand and complete planned networks of high-quality active transportation infrastructure.
- Increase availability and affordability of bikes, e-bikes, scooters, and other alternatives to light-duty vehicles, prioritizing needs of underserved communities.
- Shift revenue generation for transportation projects away from the gas tax into more durable sources by 2030.
- Authorize and implement roadway pricing strategies and reallocate revenues to equitably improve transit, bicycling, and other sustainable transportation choices.
- Prioritize addressing key transit bottlenecks and other infrastructure investments to improve transit operational efficiency over investments that increase VMT.
- Develop and implement a statewide transportation demand management (TDM) framework with VMT mitigation requirements for large employers and large developments.
- Prevent uncontrolled growth of autonomous vehicle (AV) VMT, particularly zero-passenger miles.
- Channel new mobility services towards pooled use models, transit complementarity, and lower VMT outcomes.
- Establish an integrated statewide system for trip planning, booking, payment, and user accounts that enables efficient and equitable multimodal systems.
- Provide financial support for low-income and disadvantaged Californians' use of transit and new mobility services.
- Expand universal design features for new mobility services.
- Accelerate infill development in existing transportation-efficient places and deploy strategic resources to create more transportation-efficient locations.
- Encourage alignment in land use, housing, transportation, and conservation planning in adopted regional plans (RTP/SCS and RHNA) and local plans (e.g., general plans, zoning, and local transportation plans).
- Accelerate production of affordable housing in forms and locations that reduce VMT and affirmatively further fair housing policy objectives.
- Reduce or eliminate parking requirements (and/or enact parking maximums, as appropriate) and promote redevelopment of excess parking, especially in infill locations.
- Preserve and protect existing affordable housing stock and protect existing residents and businesses from displacement and climate risk.

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects, in fact CARB states in Appendix D (page 4): "...focuses primarily on climate action plans

(CAPs) and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting.”

Additionally on Page 21 in Appendix D, CARB states: “The recommendations outlined in this section apply only to residential and mixed-use development project types. California currently faces both a housing crisis and a climate crisis, which necessitates prioritizing recommendations for residential projects to address the housing crisis in a manner that simultaneously supports the State’s GHG and regional air quality goals. CARB plans to continue to explore new approaches for other land use types in the future.” As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development.

CAP-AND-TRADE PROGRAM

The *2017 Scoping Plan* identifies a Cap-and-Trade Program as one of the key strategies for California to reduce GHG emissions. According to CARB, a cap-and-trade program would help put California on the path to meet its goal of achieving a 40% reduction in GHG emissions from 1990 levels by 2030. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap would be able to trade permits to emit GHGs within the overall limit.

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

Covered entities that emit more than 25,000 MTCO₂e/yr must comply with the Cap-and-Trade Program. Triggering of the 25,000 MTCO₂e/yr “inclusion threshold” is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of GHG Emissions (Mandatory Reporting Rule or “MRR”).

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender “compliance instruments” for each MTCO₂e of GHG they emit. There also are requirements to surrender compliance instruments covering 30% of the prior year’s compliance obligation by November of each year (39).

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

“The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced. In other words, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program if there is a reduction in GHG emissions from other covered entities. Such a focus on aggregate GHG emissions is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative.” (40)

The Cap-and-Trade Program covers approximately 80% of California’s GHG emissions (35). The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects’ electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program’s first compliance period. The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported.

2.7.3.2 EXECUTIVE ORDERS RELATED TO GHG EMISSIONS

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

EXECUTIVE ORDER S-3-05

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

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

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

EXECUTIVE ORDER S-01-07 (LCFS)

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

The LCFS was challenged in the U.S. District Court in Fresno in 2011. The court's ruling issued on December 29, 2011, included a preliminary injunction against CARB's implementation of the rule. The Ninth Circuit Court of Appeals stayed the injunction on April 23, 2012, pending final ruling on appeal, allowing CARB to continue to implement and enforce the regulation. The Ninth Circuit Court's decision, filed September 18, 2013, vacated the preliminary injunction. In essence, the court held that LCFS adopted by CARB were not in conflict with federal law. On August 8, 2013, the Fifth District Court of Appeal (California) ruled CARB failed to comply with CEQA and the Administrative Procedure Act when adopting regulations for LCFS. In a partially published opinion, the Court of Appeal reversed the trial court's judgment and directed issuance of a writ of mandate setting aside Resolution 09-31 and two executive orders of CARB approving LCFS regulations promulgated to reduce GHG emissions. However, the court tailored its remedy to protect the public interest by allowing the LCFS regulations to remain operative while CARB complies with the procedural requirements it failed to satisfy.

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

In 2018, CARB approved amendments to the regulation, which included strengthening the carbon intensity benchmarks through 2030 in compliance with the SB 32 GHG emissions reduction target for 2030. The amendments included crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector (41).

EXECUTIVE ORDER S-13-08

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

EXECUTIVE ORDER B-30-15

On April 29, 2015, Governor Brown issued an executive order to establish a California GHG reduction target of 40% below 1990 levels by 2030. The Governor's executive order aligned California's GHG reduction targets with those of leading international governments ahead of the U.N. Climate Change Conference in Paris late 2015. The Order sets a new interim statewide GHG emission reduction target to reduce GHG emissions to 40% below 1990 levels by 2030 in order

to ensure California meets its target of reducing GHG emissions to 80% below 1990 levels by 2050 and directs CARB to update the *2017 Scoping Plan* to express the 2030 target in terms of MMTCO₂e. The Order also requires the state's climate adaptation plan to be updated every three years, and for the State to continue its climate change research program, among other provisions. As with Executive Order S-3-05, this Order is not legally enforceable as to local governments and the private sector. Legislation that would update AB 32 to make post 2020 targets and requirements a mandate is in process in the State Legislature.

EXECUTIVE ORDER B-55-18 AND SB 100

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

EXECUTIVE ORDER N-79-20 AND ADVANCED CLEAN CARS II

On August 25, 2022 CARB approved the Advanced Clean Cars II rule, which codifies the goals set out in Executive Order N-79-20 and establishes a year-by-year roadmap such that by 2035, 100% of new cars and light trucks sold in California will be zero-emission vehicles. Under this regulation, automakers are required to accelerate deliveries of zero-emission light-duty vehicles, beginning with model year 2026. CARB estimates that the regulation would reduce GHG emissions from light-duty vehicles by 50% by 2040, and that from 2026 to 2040, GHG emissions would be reduced by a cumulative 395 million metric tons.

2.7.3.3 CALIFORNIA REGULATIONS AND BUILDING CODES

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

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

The Appliance Efficiency Regulations regulate the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. 23 categories of appliances are included in the scope of these

regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles (RV) or other mobile equipment (CEC 2012).

TITLE 24 CCR PART 6 – CALIFORNIA ENERGY CODE

The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California’s energy consumption.

The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods.

TITLE 24 CCR PART 11 – CALIFORNIA GREEN BUILDING STANDARDS CODE

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

The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission.

CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective on January 1, 2023. The CEC anticipates that the 2022 energy code will provide \$1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons (42). The Project would be required to comply with the applicable standards in place at the time plan check submittals are made. These require, among other items (43):

NONRESIDENTIAL MANDATORY MEASURES

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors’ entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty EV supply equipment for warehouses, grocery stores, and retail stores.

- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
 - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
 - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
 - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- Outdoor potable water uses in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).

- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

CARB REFRIGERANT MANAGEMENT PROGRAM

CARB adopted a regulation in 2009 to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is set forth in sections 95380 to 95398 of Title 17, CCR. The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with refrigeration systems with more than 50 pounds of a high GWP refrigerant. The refrigerant management program is designed to (1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and (3) verify GHG emission reductions.

TRACTOR-TRAILER GHG REGULATION

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

PHASE 1 AND 2 HEAVY-DUTY VEHICLE GHG STANDARDS

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

CARB staff has worked jointly with the EPA and the NHTSA on the next phase of federal GHG emission standards for medium-duty trucks (MDT) and HDT vehicles, called federal Phase 2. The federal Phase 2 standards were built on the improvements in engine and vehicle efficiency

required by the Phase 1 emission standards and represent a significant opportunity to achieve further GHG reductions for 2018 and later MY HDT vehicles, including trailers. The EPA and NHTSA have proposed to roll back GHG and fuel economy standards for cars and light-duty trucks, which suggests a similar rollback of Phase 2 standards for MDT and HDT vehicles may be pursued.

SB 97 AND THE CEQA GUIDELINES UPDATE

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

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

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

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

Section 15064.4 was added to the *CEQA Guidelines* and states that in determining the significance of a project’s GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project’s emissions to the effects of climate change. A project’s incremental contribution may be cumulatively considerable even if it appears relatively insignificant compared to statewide, national, or global emissions. The agency’s analysis should consider a timeframe that is appropriate for the project. The agency’s analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. Additionally, a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project’s incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use (44).

2.6.3 REGIONAL/SAN BERNARDINO COUNTY

MDAQMD CEQA Guidelines

According to the MDAQMD's *CEQA and Federal Conformity Guidelines*, a project is significant if it triggers or exceeds the most appropriate evaluation criteria. The MDAQMD states that in general, for GHG emissions, the significance emission threshold of 100,000 Tons CO₂e (90,718.5 MT CO₂e) per year is sufficient (45). A significant project must incorporate mitigation sufficient to reduce its impact to a level that is not significant. A project that cannot be mitigated to a level that is not significant must incorporate all feasible mitigation.

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3 PROJECT GREENHOUSE GAS IMPACT

3.1 INTRODUCTION

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

3.2 STANDARDS OF SIGNIFICANCE

The criteria used to determine the significance of potential Project-related GHG impacts are taken from the Initial Study Checklist in Appendix G of the State *CEQA Guidelines* (14 California Code of Regulations §§15000, et seq.). Based on these thresholds, a project would result in a significant impact related to GHG if it would (44):

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

The evaluation of an impact under CEQA requires measuring data from a project against both existing conditions and a “threshold of significance.” For establishing significance thresholds, the Office of Planning and Research’s amendments to the CEQA Guidelines Section 15064.7(c) state “[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.”

CEQA Guidelines Section 15064.4(a) further states, “. . . A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use . . . ; or (2) Rely on a qualitative analysis or performance-based standards.”

CEQA Guidelines Section 15064.4 provides that a lead agency should consider the following factors, among others, in assessing the significance of impacts from greenhouse gas emissions:

- **Consideration #1:** The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
- **Consideration #2:** Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- **Consideration #3:** 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 greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project’s incremental contribution of greenhouse gas emissions. In determining the significance of impacts, the lead agency may consider a project’s consistency with the State’s long-term climate goals or strategies, provided that substantial evidence supports the agency’s analysis of how those goals or strategies

address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

3.2.1 THRESHOLDS OF SIGNIFICANCE

The City of Adelanto has not adopted its own numeric threshold of significance for determining impacts with respect to greenhouse (GHG) emissions, thus the MDAQMD threshold of 90,718.5 MTCO₂e per year will be utilized. If Project-related GHG emissions do not exceed the 90,718.5 MTCO₂e per year threshold, then Project-related GHG emissions would clearly have a less-than-significant impact pursuant to Threshold GHG-1. On the other hand, if Project-related GHG emissions exceed 90,718.5 MTCO₂e per year, the Project would be considered a substantial source of GHG emissions.

3.3 MODELS EMPLOYED TO ANALYZE GREENHOUSE GASES EMISSIONS

Land uses such as the Project affect GHGs through construction-source and operational-source emissions.

3.3.1 CALIFORNIA EMISSIONS ESTIMATOR MODEL™

In May 2022 California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including MDAQMD, released the latest version of CalEEMod version 2022.1. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation (46). Accordingly, the latest version of CalEEMod has been used for this Project to determine construction and operational air quality emissions. CalEEMod output for both construction and operational scenarios is provided in Appendix 3.1.

3.4 CONSTRUCTION EMISSIONS

Project construction activities would generate CO₂ and CH₄ emissions. The report *Seneca Road Air Quality Impact Analysis Report* (Urban Crossroads, Inc.) (AQIA) contains detailed information regarding Project construction activities (47). As discussed in the AQIA, Construction related emissions are expected from the following construction activities:

- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

3.4.1 CONSTRUCTION DURATION

Construction is expected to commence in April 2025 and will last through December 2026. The construction schedule utilized in the analysis, shown in Table 3-1, represents a “worst-case” analysis scenario should construction occur any time after the respective dates since emission

factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.⁴ The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per *CEQA guidelines* (48).

TABLE 3-1: CONSTRUCTION DURATION

Construction Activity	Start Date	End Date	Days
Site Preparation	4/1/2025	4/24/2025	18
Grading	4/25/2025	6/13/2025	36
Building Construction	6/16/2025	12/30/2026	403
Paving	11/10/2026	12/30/2026	37
Architectural Coating	11/10/2026	12/30/2026	37

Source: Construction schedule based on CalEEMod default parameters.

3.4.2 CONSTRUCTION EQUIPMENT

Site specific construction fleet may vary due to specific project needs at the time of construction. The equipment list is generally based on CalEEMod default parameters and confirmed with the Project Applicant. A detailed summary of construction equipment assumptions by phase is provided at Table 3-2. Please refer to specific detailed modeling inputs/outputs contained in Appendix 3.1.

TABLE 3-2: CONSTRUCTION EQUIPMENT ASSUMPTIONS

Construction Activity	Equipment ¹	Amount	Hours Per Day
Site Preparation	Rubber Tired Dozers	3	8
	Crawler Tractors	4	8
Grading	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Crawler Tractors	2	8
Building Construction	Cranes	1	8
	Forklifts	3	8
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	8

⁴ As shown in the California Emissions Estimator Model (CalEEMod) User's Guide Version, Section 4.3 "OFFROAD Equipment" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

Construction Activity	Equipment ¹	Amount	Hours Per Day
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

¹ In order to account for fugitive dust emissions, Crawler Tractors were used in lieu of Tractors/Loaders/Backhoes during the site preparation and grading phases of Project construction.

3.4.3 CONSTRUCTION EMISSIONS SUMMARY

To evaluate Project construction emissions, GHGs are quantified and amortized over the life of the Project and added to the operations emissions. MDAQMD follows the SCAQMD recommendation in calculating the total GHG emissions for construction activities by amortizing the emissions over the life of the Project by dividing it by a 30-year project life then adding that number to the annual operational phase GHG emissions (45). As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 3-3.

TABLE 3-3: CONSTRUCTION GHG EMISSIONS

Year	Emissions (MT/yr)				
	CO ₂	CH ₄	N ₂ O	Refrigerants	Total CO ₂ e ⁵
2025	368.13	0.01	0.01	0.15	371.68
2026	516.20	0.02	0.02	0.25	521.94
Total GHG Emissions	884.33	0.03	0.03	0.40	893.62
Amortized Construction Emissions	29.48	9.73E-04	9.13E-04	1.33E-02	29.79

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

3.5 OPERATIONAL EMISSIONS

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

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions
- Water Supply, Treatment and Distribution
- Solid Waste

⁵ CalEEMod reports the most common GHGs emitted which include CO₂, CH₄, N₂O and R. These GHGs are then converted into the CO₂e by multiplying the individual GHG by the GWP.

- Refrigerants

3.5.1 AREA SOURCE EMISSIONS

LANDSCAPE MAINTENANCE EQUIPMENT

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. It should be noted that as October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by 2024, which is now in effect. For purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod.

3.5.2 ENERGY SOURCE EMISSIONS

COMBUSTION EMISSIONS ASSOCIATED WITH NATURAL GAS AND ELECTRICITY

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO₂ and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building; the building energy use emissions do not include street lighting⁶. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Electricity and natural gas usage associated with the Project were calculated by CalEEMod using default parameters.

3.5.3 MOBILE SOURCE EMISSIONS

The Project related GHG emissions derive primarily from vehicle trips generated by the Project, including employee trips to and from the site associated with the proposed uses. Trip characteristics available from the *Seneca Road Traffic Analysis* were utilized in this analysis (49).

3.6.4 WATER SUPPLY, TREATMENT AND DISTRIBUTION

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

3.6.5 SOLID WASTE

Residential and commercial land uses would result in the generation and disposal of solid waste. A percentage of this waste would be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. GHG emissions from landfills are associated

⁶ The CalEEMod emissions inventory model does not include indirect emission related to street lighting. Indirect emissions related to street lighting are expected to be negligible and cannot be accurately quantified at this time as there is insufficient information as to the number and type of street lighting that would occur.

with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by CalEEMod using default parameters.

3.6.6 REFRIGERANTS

Air conditioning (A/C) and refrigeration equipment associated with the buildings are anticipated to generate GHG emissions. CalEEMod automatically generates a default A/C and refrigeration equipment inventory for each project land use subtype based on industry data from the USEPA (2016b). CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate. Note that CalEEMod does not quantify emissions from the disposal of refrigeration and A/C equipment at the end of its lifetime. Per 17 CCR 95371, new facilities with refrigeration equipment containing more than 50 pounds of refrigerant are prohibited from utilizing refrigerants with a GWP of 150 or greater as of January 1, 2022. Additionally, Beginning 1 January 2025, all new air conditioning equipment may not use refrigerants with a GWP of 750 or greater. GHG emissions associated with refrigerants were calculated by CalEEMod using default parameters.

3.6 EMISSIONS SUMMARY

The annual GHG emissions associated with the Project are summarized in Table 3-4. As shown in Table 3-4, construction and operation of the Project would generate a total of 1,632.60 MTCO₂e/yr.

TABLE 3-4: PROJECT GHG EMISSIONS SUMMARY

Emission Source	Emissions (MT/yr)				
	CO ₂	CH ₄	N ₂ O	Refrigerants	Total CO ₂ e
Amortized Construction Emissions	29.48	9.73E-04	9.13E-04	1.33E-02	29.79
Mobile Source	828.63	0.03	0.04	1.31	842.95
Area Source	2.17	0.00	0.00	0.00	2.17
Energy Source	619.54	0.06	0.01	0.00	622.51
Water	41.36	1.09	0.03	0.00	76.32
Waste	16.21	1.62	0.00	0.00	56.71
Refrigerants	0.00	0.00	0.00	2.15	2.15
Total CO₂e (All Sources)	1,632.60				

Source: CalEEMod, Appendix 3.1

-- = Emission factor only provided in MT CO₂e

3.7 FINDINGS AND CONCLUSIONS

GHG -1: Would the Project generate GHG emissions either directly or indirectly, that may have a significant impact on the environment?

The City of Adelanto has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. The MDAQMD states that in general, for GHG emissions, the significance emission threshold of 100,000 Tons CO₂e (90,718.5 MTFCO₂e) per year is sufficient to determine if additional analysis is required (45).

As shown in Table 3-4, the Project will result in approximately 1,632.60 MTCO₂e/yr; the proposed project would not exceed the screening threshold of 90,718.5 MTCO₂e/yr. Thus, project-related emissions would not have a significant direct or indirect impact on GHG, and climate change and no mitigation or further analysis is required.

GHG-2: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

As previously stated, pursuant to 15604.4 of the *CEQA Guidelines*, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions (44). As such, the Project's consistency with the 2022 Scoping Plan, is discussed below. It should be noted that the Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 and 2017 Scoping Plan is not necessary, since both of these plans have been superseded by the 2022 Scoping Plan. For reasons outlined herein, the proposed Project would result in a less than significant impact with respect to GHG emissions for GHG Impact #2.

2022 SCOPING PLAN CONSISTENCY

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

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5 CERTIFICATION

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

Haseeb Qureshi
Principal
Urban Crossroads, Inc.
hqureshi@urbanxroads.com

EDUCATION

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

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

PROFESSIONAL AFFILIATIONS

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

PROFESSIONAL CERTIFICATIONS

Environmental Site Assessment – American Society for Testing and Materials • June, 2013
Planned Communities and Urban Infill – Urban Land Institute • June, 2011
Indoor Air Quality and Industrial Hygiene – EMSL Analytical • April, 2008
Principles of Ambient Air Monitoring – California Air Resources Board • August, 2007
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APPENDIX 3.1:

CALEEMOD EMISSIONS MODEL OUTPUTS

15092 - Seneca Road Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	15092 - Seneca Road
Construction Start Date	4/1/2025
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.80
Precipitation (days)	1.40
Location	34.51325, -117.402923
County	San Bernardino-Mojave Desert
City	Adelanto
Air District	Mojave Desert AQMD
Air Basin	Mojave Desert
TAZ	5180
EDFZ	10
Electric Utility	Southern California Edison
Gas Utility	Southwest Gas Corp.
App Version	2022.1.1.21

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
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Strip Mall	4.70	1000sqft	0.11	4,700	43,992	—	—	—
General Office Building	4.70	1000sqft	0.11	4,700	0.00	—	—	—
Parking Lot	68.0	Space	0.78	0.00	0.00	—	—	RV Parking
Industrial Park	139	1000sqft	3.19	139,000	0.00	—	—	Self Storage
Parking Lot	59.0	Space	0.53	0.00	0.00	—	—	—
Other Asphalt Surfaces	4.03	Acre	4.03	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.93	4.15	37.6	33.9	0.05	1.93	5.90	7.83	1.78	2.74	4.52	—	5,815	5,815	0.23	0.14	5.10	5,840
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.93	23.2	20.1	30.4	0.05	0.77	1.34	2.11	0.71	0.32	1.03	—	6,098	6,098	0.19	0.17	0.15	6,153
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.34	3.23	9.17	14.1	0.02	0.39	0.92	1.31	0.36	0.32	0.69	—	3,118	3,118	0.09	0.10	1.48	3,153
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	0.24	0.59	1.67	2.57	< 0.005	0.07	0.17	0.24	0.07	0.06	0.13	—	516	516	0.02	0.02	0.25	522
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2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	4.93	4.15	37.6	33.9	0.05	1.93	5.90	7.83	1.78	2.74	4.52	—	5,815	5,815	0.23	0.14	5.10	5,840
2026	1.73	1.47	11.6	19.1	0.03	0.42	0.98	1.40	0.39	0.24	0.62	—	4,163	4,163	0.14	0.14	4.63	4,214
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.78	1.51	12.4	17.9	0.03	0.48	0.98	1.46	0.44	0.24	0.68	—	4,093	4,093	0.15	0.14	0.13	4,139
2026	2.93	23.2	20.1	30.4	0.05	0.77	1.34	2.11	0.71	0.32	1.03	—	6,098	6,098	0.19	0.17	0.15	6,153
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	1.22	1.03	8.73	10.8	0.02	0.39	0.92	1.31	0.36	0.32	0.69	—	2,224	2,224	0.08	0.06	0.92	2,245
2026	1.34	3.23	9.17	14.1	0.02	0.33	0.74	1.07	0.31	0.18	0.49	—	3,118	3,118	0.09	0.10	1.48	3,153
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.22	0.19	1.59	1.97	< 0.005	0.07	0.17	0.24	0.07	0.06	0.13	—	368	368	0.01	0.01	0.15	372
2026	0.24	0.59	1.67	2.57	< 0.005	0.06	0.13	0.20	0.06	0.03	0.09	—	516	516	0.02	0.02	0.25	522

2.4. Operations Emissions Compared Against Thresholds

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

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

Unmit.	5.00	8.02	4.02	33.9	0.07	0.14	5.01	5.15	0.13	1.27	1.41	162	10,029	10,190	16.9	0.45	33.8	10,782
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.42	6.53	4.19	21.7	0.06	0.13	5.01	5.14	0.13	1.27	1.40	162	9,471	9,633	16.9	0.46	13.5	10,208
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.63	6.72	3.92	24.0	0.06	0.13	4.43	4.55	0.12	1.12	1.25	162	8,946	9,108	16.9	0.43	20.9	9,681
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.66	1.23	0.72	4.38	0.01	0.02	0.81	0.83	0.02	0.20	0.23	26.8	1,481	1,508	2.80	0.07	3.46	1,603

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	3.74	3.51	2.90	26.6	0.06	0.05	5.01	5.06	0.04	1.27	1.32	—	6,074	6,074	0.22	0.26	20.8	6,179
Area	1.15	4.46	0.05	6.45	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.5	26.5	< 0.005	< 0.005	—	26.6
Energy	0.12	0.06	1.07	0.90	0.01	0.08	—	0.08	0.08	—	0.08	—	3,742	3,742	0.35	0.03	—	3,760
Water	—	—	—	—	—	—	—	—	—	—	—	63.9	186	250	6.57	0.16	—	461
Waste	—	—	—	—	—	—	—	—	—	—	—	97.9	0.00	97.9	9.79	0.00	—	343
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	13.0	13.0
Total	5.00	8.02	4.02	33.9	0.07	0.14	5.01	5.15	0.13	1.27	1.41	162	10,029	10,190	16.9	0.45	33.8	10,782
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	3.30	3.07	3.12	20.8	0.05	0.05	5.01	5.06	0.04	1.27	1.32	—	5,543	5,543	0.23	0.27	0.54	5,632

Area	—	3.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.12	0.06	1.07	0.90	0.01	0.08	—	0.08	0.08	—	0.08	—	3,742	3,742	0.35	0.03	—	3,760
Water	—	—	—	—	—	—	—	—	—	—	—	63.9	186	250	6.57	0.16	—	461
Waste	—	—	—	—	—	—	—	—	—	—	—	97.9	0.00	97.9	9.79	0.00	—	343
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	13.0	13.0
Total	3.42	6.53	4.19	21.7	0.06	0.13	5.01	5.14	0.13	1.27	1.40	162	9,471	9,633	16.9	0.46	13.5	10,208
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.94	2.74	2.83	19.9	0.05	0.04	4.43	4.47	0.04	1.12	1.16	—	5,005	5,005	0.21	0.25	7.92	5,091
Area	0.57	3.92	0.03	3.18	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	13.1	13.1	< 0.005	< 0.005	—	13.1
Energy	0.12	0.06	1.07	0.90	0.01	0.08	—	0.08	0.08	—	0.08	—	3,742	3,742	0.35	0.03	—	3,760
Water	—	—	—	—	—	—	—	—	—	—	—	63.9	186	250	6.57	0.16	—	461
Waste	—	—	—	—	—	—	—	—	—	—	—	97.9	0.00	97.9	9.79	0.00	—	343
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	13.0	13.0
Total	3.63	6.72	3.92	24.0	0.06	0.13	4.43	4.55	0.12	1.12	1.25	162	8,946	9,108	16.9	0.43	20.9	9,681
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.54	0.50	0.52	3.64	0.01	0.01	0.81	0.82	0.01	0.20	0.21	—	829	829	0.03	0.04	1.31	843
Area	0.10	0.72	< 0.005	0.58	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.17	2.17	< 0.005	< 0.005	—	2.17
Energy	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	620	620	0.06	0.01	—	623
Water	—	—	—	—	—	—	—	—	—	—	—	10.6	30.8	41.4	1.09	0.03	—	76.3
Waste	—	—	—	—	—	—	—	—	—	—	—	16.2	0.00	16.2	1.62	0.00	—	56.7
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.15	2.15
Total	0.66	1.23	0.72	4.38	0.01	0.02	0.81	0.83	0.02	0.20	0.23	26.8	1,481	1,508	2.80	0.07	3.46	1,603

3. Construction Emissions Details

3.1. Site Preparation (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.82	4.05	37.5	32.4	0.05	1.93	—	1.93	1.78	—	1.78	—	5,528	5,528	0.22	0.04	—	5,547
Dust From Material Movement	—	—	—	—	—	—	5.66	5.66	—	2.69	2.69	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.24	0.20	1.85	1.60	< 0.005	0.10	—	0.10	0.09	—	0.09	—	273	273	0.01	< 0.005	—	274
Dust From Material Movement	—	—	—	—	—	—	0.28	0.28	—	0.13	0.13	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.04	0.34	0.29	< 0.005	0.02	—	0.02	0.02	—	0.02	—	45.1	45.1	< 0.005	< 0.005	—	45.3
Dust From Material Movement	—	—	—	—	—	—	0.05	0.05	—	0.02	0.02	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.10	0.08	1.45	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	255	255	0.01	0.01	0.93	259
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	31.9	31.9	< 0.005	< 0.005	0.09	33.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.5	11.5	< 0.005	< 0.005	0.02	11.6
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.57	1.57	< 0.005	< 0.005	< 0.005	1.64
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.90	1.90	< 0.005	< 0.005	< 0.005	1.93
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.26	0.26	< 0.005	< 0.005	< 0.005	0.27
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Grading (2025) - Unmitigated

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

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

Off-Road Equipment	2.73	2.30	20.6	19.6	0.03	1.15	—	1.15	1.05	—	1.05	—	3,134	3,134	0.13	0.03	—	3,145
Dust From Material Movement	—	—	—	—	—	—	2.26	2.26	—	0.94	0.94	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.27	0.23	2.04	1.93	< 0.005	0.11	—	0.11	0.10	—	0.10	—	309	309	0.01	< 0.005	—	310
Dust From Material Movement	—	—	—	—	—	—	0.22	0.22	—	0.09	0.09	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.37	0.35	< 0.005	0.02	—	0.02	0.02	—	0.02	—	51.2	51.2	< 0.005	< 0.005	—	51.4
Dust From Material Movement	—	—	—	—	—	—	0.04	0.04	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.07	1.25	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	219	219	0.01	0.01	0.80	222

Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	63.7	63.7	< 0.005	0.01	0.17	66.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	19.7	19.7	< 0.005	< 0.005	0.03	19.9
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.29	6.29	< 0.005	< 0.005	0.01	6.55
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.26	3.26	< 0.005	< 0.005	0.01	3.30
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.04	1.04	< 0.005	< 0.005	< 0.005	1.08
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2025) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.45	1.21	11.3	14.1	0.03	0.47	—	0.47	0.43	—	0.43	—	2,630	2,630	0.11	0.02	—	2,639
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.45	1.21	11.3	14.1	0.03	0.47	—	0.47	0.43	—	0.43	—	2,630	2,630	0.11	0.02	—	2,639

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.56	0.47	4.41	5.51	0.01	0.18	—	0.18	0.17	—	0.17	—	1,024	1,024	0.04	0.01	—	1,028
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.09	0.80	1.01	< 0.005	0.03	—	0.03	0.03	—	0.03	—	170	170	0.01	< 0.005	—	170
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.37	0.34	0.30	5.10	0.00	0.00	0.80	0.80	0.00	0.19	0.19	—	895	895	0.04	0.03	3.27	909
Vendor	0.03	0.03	0.68	0.30	0.01	0.01	0.18	0.19	0.01	0.05	0.06	—	669	669	< 0.005	0.09	1.83	698
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.31	0.27	0.33	3.42	0.00	0.00	0.80	0.80	0.00	0.19	0.19	—	793	793	0.04	0.03	0.08	803
Vendor	0.03	0.02	0.72	0.30	0.01	0.01	0.18	0.19	0.01	0.05	0.06	—	670	670	< 0.005	0.09	0.05	696
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.11	0.14	1.49	0.00	0.00	0.31	0.31	0.00	0.07	0.07	—	318	318	0.02	0.01	0.55	322
Vendor	0.01	0.01	0.28	0.12	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	261	261	< 0.005	0.03	0.31	271
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.02	0.02	0.03	0.27	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	52.6	52.6	< 0.005	< 0.005	0.09	53.4
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	43.1	43.1	< 0.005	0.01	0.05	44.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.38	1.16	10.7	14.1	0.03	0.41	—	0.41	0.38	—	0.38	—	2,630	2,630	0.11	0.02	—	2,639
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.38	1.16	10.7	14.1	0.03	0.41	—	0.41	0.38	—	0.38	—	2,630	2,630	0.11	0.02	—	2,639
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.98	0.82	7.60	10.0	0.02	0.29	—	0.29	0.27	—	0.27	—	1,873	1,873	0.08	0.02	—	1,880
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	1.39	1.83	< 0.005	0.05	—	0.05	0.05	—	0.05	—	310	310	0.01	< 0.005	—	311

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.32	0.29	0.27	4.74	0.00	0.00	0.80	0.80	0.00	0.19	0.19	—	878	878	0.04	0.03	2.97	891
Vendor	0.03	0.03	0.65	0.28	0.01	0.01	0.18	0.19	0.01	0.05	0.06	—	656	656	< 0.005	0.09	1.65	684
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.29	0.26	0.30	3.15	0.00	0.00	0.80	0.80	0.00	0.19	0.19	—	777	777	0.01	0.03	0.08	787
Vendor	0.03	0.02	0.69	0.29	0.01	0.01	0.18	0.19	0.01	0.05	0.06	—	657	657	< 0.005	0.09	0.04	683
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.21	0.19	0.23	2.53	0.00	0.00	0.57	0.57	0.00	0.13	0.13	—	570	570	0.01	0.02	0.91	578
Vendor	0.02	0.02	0.49	0.20	< 0.005	0.01	0.13	0.13	0.01	0.04	0.04	—	467	467	< 0.005	0.06	0.51	487
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.04	0.46	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	94.4	94.4	< 0.005	< 0.005	0.15	95.6
Vendor	< 0.005	< 0.005	0.09	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	77.4	77.4	< 0.005	0.01	0.08	80.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2026) - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.76	7.12	9.94	0.01	0.32	—	0.32	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Paving	—	0.38	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.08	0.72	1.01	< 0.005	0.03	—	0.03	0.03	—	0.03	—	153	153	0.01	< 0.005	—	154
Paving	—	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.13	0.18	< 0.005	0.01	—	0.01	0.01	—	0.01	—	25.4	25.4	< 0.005	< 0.005	—	25.4
Paving	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.07	0.77	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	190	190	< 0.005	0.01	0.02	192
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	19.8	19.8	< 0.005	< 0.005	0.03	20.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.28	3.28	< 0.005	< 0.005	0.01	3.32
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.19	0.16	1.14	1.51	< 0.005	0.03	—	0.03	0.03	—	0.03	—	178	178	0.01	< 0.005	—	179
Architect ural Coatings	—	20.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.02	0.02	0.12	0.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	18.0	18.0	< 0.005	< 0.005	—	18.1
Architectural Coatings	—	2.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.99	2.99	< 0.005	< 0.005	—	3.00
Architectural Coatings	—	0.38	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.06	0.63	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	155	155	< 0.005	0.01	0.02	157
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	16.2	16.2	< 0.005	< 0.005	0.03	16.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.69	2.69	< 0.005	< 0.005	< 0.005	2.72

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

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	1.25	1.18	0.86	7.74	0.02	0.01	1.40	1.41	0.01	0.36	0.37	—	1,708	1,708	0.07	0.08	5.80	1,738
General Office Building	0.35	0.33	0.29	2.67	0.01	< 0.005	0.51	0.52	< 0.005	0.13	0.13	—	619	619	0.02	0.03	2.12	630
Parking Lot	0.85	0.80	0.70	6.45	0.01	0.01	1.24	1.25	0.01	0.31	0.32	—	1,494	1,494	0.05	0.06	5.12	1,520
Industrial Park	1.29	1.20	1.05	9.72	0.02	0.02	1.86	1.88	0.02	0.47	0.49	—	2,253	2,253	0.08	0.10	7.72	2,291
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	3.74	3.51	2.90	26.6	0.06	0.05	5.01	5.06	0.04	1.27	1.32	—	6,074	6,074	0.22	0.26	20.8	6,179
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	1.10	1.03	0.92	6.18	0.02	0.01	1.40	1.41	0.01	0.36	0.37	—	1,559	1,559	0.07	0.08	0.15	1,585

General Office Building	0.31	0.29	0.31	2.08	0.01	< 0.005	0.51	0.52	< 0.005	0.13	0.13	—	565	565	0.02	0.03	0.06	574
Parking Lot	0.76	0.70	0.75	5.02	0.01	0.01	1.24	1.25	0.01	0.31	0.32	—	1,363	1,363	0.05	0.07	0.13	1,385
Industrial Park	1.14	1.06	1.14	7.56	0.02	0.02	1.86	1.88	0.02	0.47	0.49	—	2,055	2,055	0.08	0.10	0.20	2,088
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	3.30	3.07	3.12	20.8	0.05	0.05	5.01	5.06	0.04	1.27	1.32	—	5,543	5,543	0.23	0.27	0.54	5,632
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	0.18	0.17	0.15	1.07	< 0.005	< 0.005	0.22	0.23	< 0.005	0.06	0.06	—	232	232	0.01	0.01	0.36	236
General Office Building	0.04	0.04	0.04	0.31	< 0.005	< 0.005	0.07	0.07	< 0.005	0.02	0.02	—	71.0	71.0	< 0.005	< 0.005	0.11	72.3
Parking Lot	0.14	0.13	0.14	0.99	< 0.005	< 0.005	0.23	0.23	< 0.005	0.06	0.06	—	231	231	0.01	0.01	0.37	235
Industrial Park	0.18	0.16	0.18	1.27	< 0.005	< 0.005	0.29	0.29	< 0.005	0.07	0.08	—	295	295	0.01	0.01	0.47	300
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.54	0.50	0.52	3.64	0.01	0.01	0.81	0.82	0.01	0.20	0.21	—	829	829	0.03	0.04	1.31	843

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	43.4	43.4	< 0.005	< 0.005	—	43.6
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	77.8	77.8	0.01	< 0.005	—	78.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	47.4	47.4	< 0.005	< 0.005	—	47.7
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	2,301	2,301	0.22	0.03	—	2,314
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,469	2,469	0.24	0.03	—	2,484
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	43.4	43.4	< 0.005	< 0.005	—	43.6
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	77.8	77.8	0.01	< 0.005	—	78.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	47.4	47.4	< 0.005	< 0.005	—	47.7
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	2,301	2,301	0.22	0.03	—	2,314
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,469	2,469	0.24	0.03	—	2,484
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	7.18	7.18	< 0.005	< 0.005	—	7.22

General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	12.9	12.9	< 0.005	< 0.005	—	13.0
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	7.86	7.86	< 0.005	< 0.005	—	7.90
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	381	381	0.04	< 0.005	—	383
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	409	409	0.04	< 0.005	—	411

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.88	8.88	< 0.005	< 0.005	—	8.90
General Office Building	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	41.3	41.3	< 0.005	< 0.005	—	41.4
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Industrial Park	0.11	0.06	1.02	0.86	0.01	0.08	—	0.08	0.08	—	0.08	—	1,222	1,222	0.11	< 0.005	—	1,226
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.12	0.06	1.07	0.90	0.01	0.08	—	0.08	0.08	—	0.08	—	1,273	1,273	0.11	< 0.005	—	1,276
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Strip Mall	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.88	8.88	< 0.005	< 0.005	—	8.90
General Office Building	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	41.3	41.3	< 0.005	< 0.005	—	41.4
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Industrial Park	0.11	0.06	1.02	0.86	0.01	0.08	—	0.08	0.08	—	0.08	—	1,222	1,222	0.11	< 0.005	—	1,226
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.12	0.06	1.07	0.90	0.01	0.08	—	0.08	0.08	—	0.08	—	1,273	1,273	0.11	< 0.005	—	1,276
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.47	1.47	< 0.005	< 0.005	—	1.47
General Office Building	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.84	6.84	< 0.005	< 0.005	—	6.86
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Industrial Park	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	202	202	0.02	< 0.005	—	203
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.02	0.01	0.19	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01	—	211	211	0.02	< 0.005	—	211

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	3.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.15	1.06	0.05	6.45	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.5	26.5	< 0.005	< 0.005	—	26.6
Total	1.15	4.46	0.05	6.45	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.5	26.5	< 0.005	< 0.005	—	26.6
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	3.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.21	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	3.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.10	0.10	< 0.005	0.58	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.17	2.17	< 0.005	< 0.005	—	2.17
Total	0.10	0.72	< 0.005	0.58	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.17	2.17	< 0.005	< 0.005	—	2.17

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.67	5.82	6.48	0.07	< 0.005	—	8.71
General Office Building	—	—	—	—	—	—	—	—	—	—	—	1.60	4.56	6.16	0.16	< 0.005	—	11.5
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	61.6	176	237	6.33	0.15	—	441
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	63.9	186	250	6.57	0.16	—	461
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.67	5.82	6.48	0.07	< 0.005	—	8.71
General Office Building	—	—	—	—	—	—	—	—	—	—	—	1.60	4.56	6.16	0.16	< 0.005	—	11.5
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	61.6	176	237	6.33	0.15	—	441

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	63.9	186	250	6.57	0.16	—	461
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.11	0.96	1.07	0.01	< 0.005	—	1.44
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.27	0.76	1.02	0.03	< 0.005	—	1.90
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	10.2	29.1	39.3	1.05	0.03	—	73.0
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	10.6	30.8	41.4	1.09	0.03	—	76.3

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	2.66	0.00	2.66	0.27	0.00	—	9.31
General Office Building	—	—	—	—	—	—	—	—	—	—	—	2.36	0.00	2.36	0.24	0.00	—	8.24
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Industrial Park	—	—	—	—	—	—	—	—	—	—	—	92.9	0.00	92.9	9.28	0.00	—	325
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	97.9	0.00	97.9	9.79	0.00	—	343
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	2.66	0.00	2.66	0.27	0.00	—	9.31
General Office Building	—	—	—	—	—	—	—	—	—	—	—	2.36	0.00	2.36	0.24	0.00	—	8.24
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	92.9	0.00	92.9	9.28	0.00	—	325
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	97.9	0.00	97.9	9.79	0.00	—	343
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.44	0.00	0.44	0.04	0.00	—	1.54
General Office Building	—	—	—	—	—	—	—	—	—	—	—	0.39	0.00	0.39	0.04	0.00	—	1.36
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	15.4	0.00	15.4	1.54	0.00	—	53.8
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	16.2	0.00	16.2	1.62	0.00	—	56.7

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	13.0	13.0
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	13.0	13.0
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	13.0	13.0
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	13.0	13.0
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005

Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.15	2.15
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.15	2.15

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

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

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

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

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

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

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequest ered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequest ered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequest ered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	4/1/2025	4/24/2025	5.00	18.0	10
Grading	Grading	4/25/2025	6/13/2025	5.00	36.0	20
Building Construction	Building Construction	6/16/2025	12/30/2026	5.00	403	230
Paving	Paving	11/10/2026	12/30/2026	5.00	37.0	20
Architectural Coating	Architectural Coating	11/10/2026	12/30/2026	5.00	37.0	20

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Crawler Tractors	Diesel	Average	4.00	8.00	87.0	0.43
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Crawler Tractors	Diesel	Average	3.00	8.00	87.0	0.43
Building Construction	Cranes	Diesel	Average	1.00	8.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20

Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	8.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	1.00	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	2.00	10.2	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	61.4	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	21.0	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT

Paving	—	—	—	—
Paving	Worker	15.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	12.3	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	222,600	74,200	13,970

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	—	63.0	0.00	—
Grading	—	—	90.0	0.00	—
Paving	0.00	0.00	0.00	0.00	5.34

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	3	74%	74%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Strip Mall	0.00	0%
General Office Building	0.00	0%
Parking Lot	0.78	100%
Industrial Park	0.00	0%
Parking Lot	0.53	100%
Other Asphalt Surfaces	4.03	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	349	0.03	< 0.005
2026	0.00	346	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMt/Weekday	VMt/Saturday	VMt/Sunday	VMt/Year
Strip Mall	256	198	96.0	82,030	1,985	1,533	745	636,340
General Office Building	67.6	10.4	3.29	18,346	726	112	35.3	196,949

Parking Lot	163	163	163	59,568	1,752	1,752	1,752	639,477
Industrial Park	202	246	209	76,247	2,164	2,641	2,238	818,535
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	222,600	74,200	13,970

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Strip Mall	45,723	346	0.0330	0.0040	27,709

General Office Building	82,024	346	0.0330	0.0040	128,968
Parking Lot	29,764	346	0.0330	0.0040	0.00
Industrial Park	2,425,812	346	0.0330	0.0040	3,814,162
Parking Lot	20,262	346	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	346	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Strip Mall	348,141	973,919
General Office Building	835,349	0.00
Parking Lot	0.00	0.00
Industrial Park	32,143,750	0.00
Parking Lot	0.00	0.00
Other Asphalt Surfaces	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Strip Mall	4.94	—
General Office Building	4.37	—
Parking Lot	0.00	—
Industrial Park	172	—
Parking Lot	0.00	—
Other Asphalt Surfaces	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Strip Mall	Other commercial A/C and heat pumps	User Defined	750	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	User Defined	150	0.04	1.00	0.00	1.00
Strip Mall	Walk-in refrigerators and freezers	User Defined	150	< 0.005	7.50	7.50	20.0
General Office Building	Household refrigerators and/or freezers	User Defined	150	0.02	0.60	0.00	1.00
General Office Building	Other commercial A/C and heat pumps	User Defined	750	< 0.005	4.00	4.00	18.0
Industrial Park	Other commercial A/C and heat pumps	User Defined	750	0.30	4.00	4.00	18.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

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

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

Equipment Type	Fuel Type
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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

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

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

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

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	33.2	annual days of extreme heat
Extreme Precipitation	1.05	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

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

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about $\frac{3}{4}$ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

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

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

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

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	4	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

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

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

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

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	4	1	1	4
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

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

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

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

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	88.7
AQ-PM	20.8
AQ-DPM	9.43
Drinking Water	8.47
Lead Risk Housing	35.8

Pesticides	0.00
Toxic Releases	17.6
Traffic	35.5
Effect Indicators	—
CleanUp Sites	0.00
Groundwater	0.00
Haz Waste Facilities/Generators	16.6
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	87.3
Cardio-vascular	99.6
Low Birth Weights	85.6
Socioeconomic Factor Indicators	—
Education	81.1
Housing	96.0
Linguistic	52.5
Poverty	82.1
Unemployment	95.9

7.2. Healthy Places Index Scores

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

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	6.197869883
Employed	3.131015013
Median HI	16.70730142

Education	—
Bachelor's or higher	10.61208777
High school enrollment	100
Preschool enrollment	12.83202874
Transportation	—
Auto Access	76.73553189
Active commuting	20.39009367
Social	—
2-parent households	38.63723855
Voting	21.53214423
Neighborhood	—
Alcohol availability	97.0101373
Park access	2.194276915
Retail density	19.196715
Supermarket access	16.7842936
Tree canopy	2.643397921
Housing	—
Homeownership	57.6799692
Housing habitability	16.50198896
Low-inc homeowner severe housing cost burden	16.95110997
Low-inc renter severe housing cost burden	2.65622995
Uncrowded housing	22.82817914
Health Outcomes	—
Insured adults	41.85807776
Arthritis	0.0
Asthma ER Admissions	6.8
High Blood Pressure	0.0

Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	11.1
Cognitively Disabled	33.5
Physically Disabled	10.8
Heart Attack ER Admissions	0.7
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	1.3
Elderly	78.6
English Speaking	68.7
Foreign-born	41.3
Outdoor Workers	59.0

Climate Change Adaptive Capacity	—
Impervious Surface Cover	81.7
Traffic Density	49.8
Traffic Access	23.0
Other Indices	—
Hardship	92.4
Other Decision Support	—
2016 Voting	23.2

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	40.0
Healthy Places Index Score for Project Location (b)	9.00
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Taken from client data Building Construction, Paving, and Architectural Coating overlap to present a conservative analysis
Construction: Off-Road Equipment	T/L/B replaced with Crawler Tractor to accurately calculate disturbance for Site Preparation and Grading phases. Standard 8 hours work days
Construction: Trips and VMT	Vendor Trips adjusted based on CalEEMod defaults for Building Construction and number of days for Site Preparation, Grading, and Building Construction
Operations: Vehicle Data	Trip characteristics based on information from Trip Generation 28% Pass-by trips accounted for strip mall
Operations: Refrigerants	As of 1 January 2022, new commercial refrigeration equipment may not use refrigerants with a GWP of 150 or greater. Further, R-404A (the CalEEMod default) is unacceptable for new supermarket and cold storage systems as of 1 January 2019 and 2023, respectively. Beginning 1 January 2025, all new air conditioning equipment may not use refrigerants with a GWP of 750 or greater.
Land Use	Taken from site plan