Harvard Road Project

GREENHOUSE GAS ANALYSIS

COUNTY OF SAN BERNARDINO

PREPARED BY:

Haseeb Qureshi
hqureshi@urbanxroads.com
(949) 336-5987

Alyssa Tamase
atamase@urbanxroads.com

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LIST OF ABBREVIATED TERMS

(1)	Reference
ARB	California Air Resources Board
CAA	Federal Clean Air Act
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resource Board
CAT	Climate Action Team
CBSC	California Building Standards Commission
CEC	California Energy Commission
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CFC	Chlorofluorocarbons
CFR	Code of Federal Regulations
CH4	Methane
CO	Carbon Monoxide
CO2	Carbon Dioxide
CO2e	Carbon Dioxide Equivalent
CPUC	California Public Utilities Commission
EPA	Environmental Protection Agency
EPS	Emission Performance Standard
GCC	Global Climate Change
GHGA	Greenhouse Gas Analysis
GWP	Global Warming Potential
HFC	Hydrofluorocarbons
LCA	Life-Cycle Analysis
MMs	Mitigation Measures
MMTCO2e	Million Metric Ton of Carbon Dioxide Equivalent
MTCO2e	Metric Ton of Carbon Dioxide Equivalent
N20	Nitrogen Dioxide
NIOSH	National Institute for Occupational Safety and Health
NOx	Oxides of Nitrogen
PFC	Perfluorocarbons
PM10	Particulate Matter 10 microns in diameter or less
PM2.5	Particulate Matter 2.5 microns in diameter or less
PPM	Parts Per Million

Project	Harvard Road Project
RTP	Regional Transportation Plan
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
UNFCCC	United Nations' Framework Convention on Climate Change
VOC	Volatile Organic Compounds

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EXECUTIVE SUMMARY

GHG Impact #1: The Project would not generate direct or indirect greenhouse gas emission that would result in a significant impact on the environment.

The County of San Bernardino adopted the Greenhouse Gas Reduction Plan (GHG Plan) in September 2011, which provides guidance on how to analyze greenhouse gas (GHG) emissions and determine significance during the CEQA review of proposed development projects within the County of San Bernardino (County) (1).

The County includes a GHG Development Review Process (DRP) that specifies a two-step approach in quantifying GHG emissions (2). First, a screening threshold of 3,000 MT (metric tons) CO2e (carbon dioxide equivalents) per year is used to determine if additional analysis is required. Projects that exceed the 3,000 MTCO2e per year will be required to either achieve a minimum 100 points per the Screening Tables or a 31% reduction over 2007 emissions levels. Consistent with CEQA guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions.

As shown in Table ES-1, the Project will result in approximately 2,011.84 MTCO2e per year; the proposed project would not exceed the screening threshold of 3,000 MTCO2e per year. Therefore, the project's impact on greenhouse gas emissions is less than significant.

TABLE ES-1: PROJECT-RELATED GREENHOUSE GAS EMISSIONS

Emission Source	Emissions (metric tons per year)			
	CO_2	CH_4	N_2O	Total CO_2E
Annual construction-related emissions amortized over 30 years	64.63	0.01	0.00	64.90
Area	3.60E-04	0.00	0.00	3.80E-04
Energy	29.85	1.21E-03	2.60E-04	29.96
Mobile Sources	1,907.70	0.31	0.00	1,915.37
Waste	0.00	0.00	0.00	0.00
Water Usage	1.39	6.98E-03	1.70E-04	1.61
Total CO_2E (All Sources)	**2,011.84**			
Screening Threshold	**3,000**			
Significant?	**NO**			

Source: CalEEMod™ model output, See Appendix 3.1 for detailed model outputs.
Note: Totals obtained from CalEEMod™ and may not total 100% due to rounding.

GHG Impact #2: The Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

Consistency with AB 32

AB 32 requires California to reduce its GHG emissions by approximately 28.5% when compared to GHG emissions produced under a Business as Usual scenario (6). CARB identified reduction measures to achieve this goal as set forth in the CARB Scoping Plan. Thus, projects that are consistent with the CARB Scoping Plan are also consistent with the 28.5% reduction below business as usual required by AB 32.

The Project would generate GHG emissions from a variety of sources which would all emit Carbon Dioxide (CO2), Methane (CH4) and N2O. GHGs could also be indirectly generated by incremental electricity consumption and waste generation from the Project.

As stated previously, the CARB Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32. The CARB Scoping Plan recommendations serve as statewide measures to reduce GHG emissions levels. The Project would be consistent with the applicable measures established in the Scoping Plan, as detailed in Section 3.7.

Consistency with SB 32

Senate Bill 32 (SB 32) requires the state to reduce statewide greenhouse gas 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 of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide greenhouse gas reduction target of 80% below 1990 levels by 2050 (7) (8).

According to research conducted by the Lawrence Berkeley National Laboratory and supported by the CARB, California, under its existing and proposed GHG reduction policies, is on track to meet the 2020 reduction targets under AB 32 and could achieve the 2030 goals under SB 32. (9) (10).

The Project reduces its GHG emissions to the maximum extent feasible as discussed in this document. Additionally, the project applicant would not actively interfere with any future County-mandated, state-mandated, or federally-mandated retrofit obligations enacted or promulgated to legally require development County-wide, state-wide, or nation-wide to assist in meeting state-adopted greenhouse gas emissions reduction targets, including that established under Executive Order S-3-05, Executive Order B-30-15, or SB 32.

The Project does not interfere with the state's implementation of (i) Executive Order B-30-15 and SB 32's target of reducing statewide GHG emissions to 40% below 1990 levels by 2030 or (ii) Executive Order S-3-05's target of reducing statewide GHG emissions to 80% below 1990 levels by 2050 because it does not interfere with the state's implementation of GHG reduction plans described in the CARB's Updated Scoping Plan, including the state providing for 12,000 MW of renewable distributed generation by 2020, the California Building Commission mandating net zero energy homes in the building code after 2020, or existing building retrofits

under AB 758. Therefore, the project's impacts on greenhouse gas emissions in the 2030 and 2050 horizon years are less than significant.

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1 INTRODUCTION

This report presents the results of the greenhouse gas analysis (GHGA) prepared by Urban Crossroads, Inc., for the proposed Harvard Road Project (referred to as "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 project is located at the southwest corner of Harvard Road and Hacienda Road in an unincorporated community in County of San Bernardino.

The Project site is currently vacant. It is bound to the north and west by Hacienda Road and undeveloped land, to the east by Harvard Road and undeveloped land, and the Interstate 15 (I-15) Freeway to the south.

1.2 PROJECT DESCRIPTION

The Project is proposed to consist of a truck and gas station with 20 fueling stations, and a convenience store, as shown on Exhibit 1-A. For the purposes of this analysis, it has been assumed that the Project will be developed in one phase with an anticipated Opening Year of 2018.

1.3 REGULATORY REQUIREMENTS

The Project would be required to comply with all mandates imposed by the State of California and the South Coast Air Quality Management District aimed at the reduction of air quality emissions. Those that are applicable to the Project and that would assist in the reduction of greenhouse gas emissions are:

- Global Warming Solutions Act of 2006 (AB32) (3)
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (SB 375) (4)
- Pavley Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles (5).
- Title 24 California Code of Regulations (California Building Code). Establishes energy efficiency requirements for new construction (6).
- Title 20 California Code of Regulations (Appliance Energy Efficiency Standards). Establishes energy efficiency requirements for appliances (7).
- Title 17 California Code of Regulations (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020 (8).
- California Water Conservation in Landscaping Act of 2006 (AB1881). Requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or equivalent by January 1, 2010 to ensure efficient landscapes in new development and reduced water waste in existing landscapes (9).

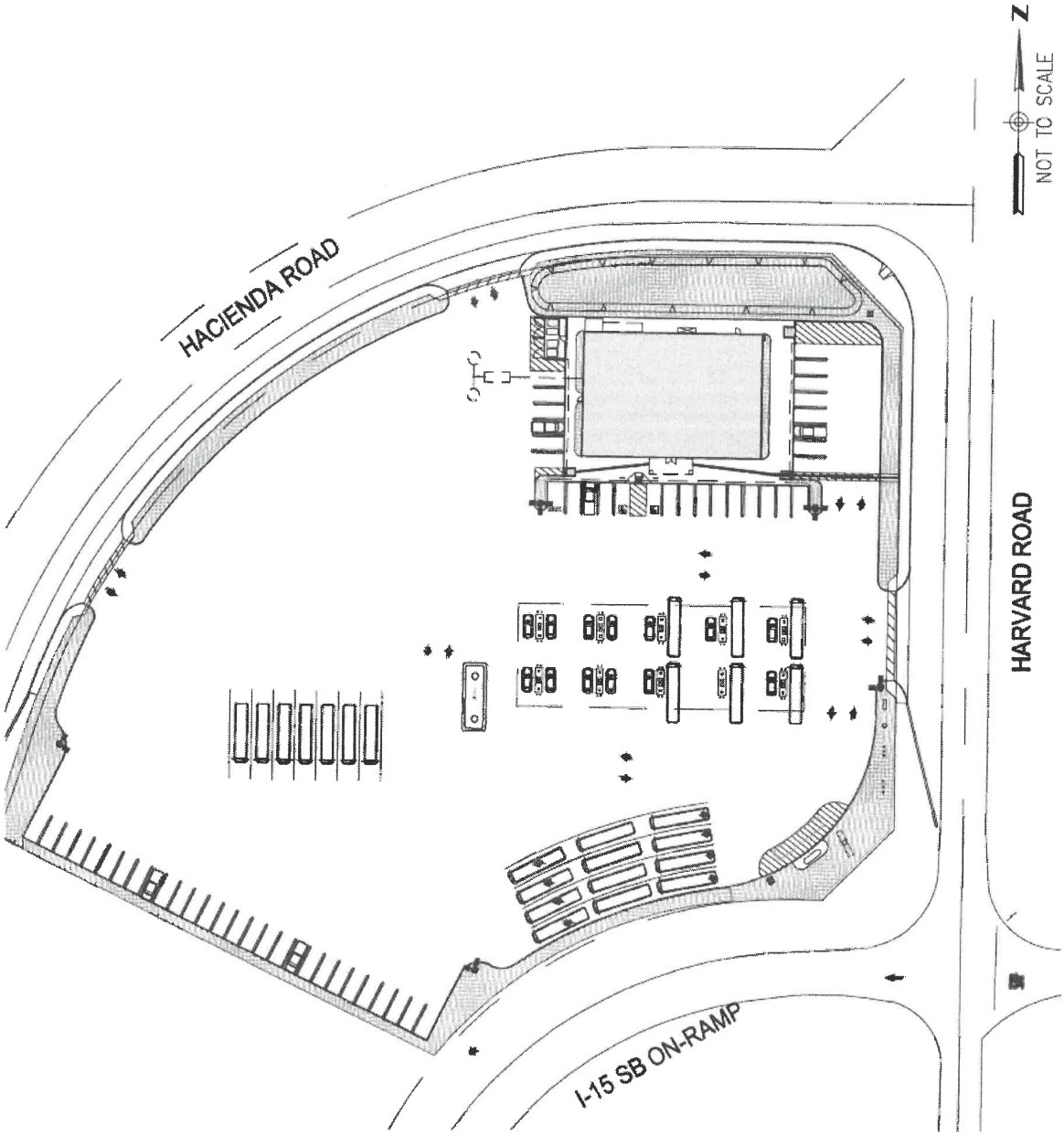
- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions (10).
- Renewable Portfolio Standards (SB 1078). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2010 and 33 percent by 2020 (11).
- Senate Bill 32 (SB 32). Requires the state to reduce statewide greenhouse gas emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15 (12) (13).

Promulgated regulations that will affect the Project's emissions are accounted for in the Project's GHG calculations provided in this report. In particular, the Pavley Standards, Low Carbon Fuel Standards, and Renewable Portfolio Standards (RPS) will be in effect for the AB 32 target year of 2020, and therefore are accounted for in the Project's emission calculations.

1.4 Construction and Operational -Source Mitigation Measures

The Project would not result in a significant impact with respect to GHG emissions. Therefore, no mitigation measures are required.

EXHIBIT 1-A: SITE PLAN



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2 BACKGROUND

2.1 INTRODUCTION TO GLOBAL CLIMATE CHANGE

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. GCC is currently one of the most controversial environmental issues in the United States, and much debate exists within the scientific community about whether or not GCC is occurring naturally or as a result of human activity. Some data suggests that GCC has occurred in the past over the course of thousands or millions of years. These historical changes to the Earth's climate have occurred naturally without human influence, as in the case of an ice age. However, many scientists believe that the climate shift taking place since the industrial revolution (1900) is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of greenhouse gases in the earth's atmosphere, including carbon dioxide, methane, nitrous oxide, and fluorinated gases. Many scientists believe that this increased rate of climate change is the result of greenhouse gases resulting from human activity and industrialization over the past 200 years.

An individual project like the Project evaluated in this GHGA cannot generate enough greenhouse gas emissions to effect a discernible change in global climate. However, the Project may participate in the potential for GCC by its incremental contribution of greenhouse gasses combined with the cumulative increase of all other sources of greenhouse gases, which when taken together constitute potential influences on GCC. Because these changes may have serious environmental consequences, Section 3.0 evaluates the potential for the 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

Global Climate Change (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 (Carbon Dioxide), N2O (Nitrous Oxide), CH4 (Methane), hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. 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 radioactive heat from escaping, thus warming the Earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages. According to the California Air Resources Board (CARB), the climate change since the industrial revolution differs from previous climate changes in both rate and magnitude (14).

Gases that trap heat in the atmosphere are often referred to as greenhouse gases. Greenhouse gases are released into the atmosphere by both natural and anthropogenic (human) activity. Without the natural greenhouse gas effect, the Earth's average temperature would be

approximately 61° Fahrenheit (F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature.

Although California's rate of growth of greenhouse gas emissions is slowing, the state is still a substantial contributor to the U.S. emissions inventory total. In 2004, California is estimated to have produced 492 million gross metric tons of CO2e greenhouse gas emissions. Despite a population increase of 16 percent between 1990 and 2004, California has significantly slowed the rate of growth of greenhouse gas emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls (15).

2.3 GREENHOUSE GAS EMISSIONS INVENTORIES

Global

Worldwide anthropogenic (man-made) GHG emissions are tracked by the Intergovernmental Panel on Climate Change for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Man-made GHG emissions data for Annex I nations are available through 2012. For the Year 2012 the sum of these emissions totaled approximately 28,865,994 Gg CO2e[1] (16) (17). The GHG emissions in more recent years may differ from the inventories presented in Table 2-1; however, the data is representative of currently available inventory data.

United States

As noted in Table 2-1, the United States, as a single country, was the number two producer of GHG emissions in 2012. The primary greenhouse gas emitted by human activities in the United States was CO2, representing approximately 80.9 percent of total greenhouse gas emissions (18). Carbon dioxide from fossil fuel combustion is the largest source of US greenhouse gas emissions.

TABLE 2-1: TOP GHG PRODUCER COUNTRIES AND THE EUROPEAN UNION[2]

Emitting Countries	GHG Emissions (Gg CO2e)
China	10,975,500
United States	6,665,700
European Union (27 member countries)	4,544,224
Russian Federation	2,322,220
India	3,013,770
Japan	1,344,580
Total	**28,865,994**

[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 2005 data, the UNFCCC data for the most recent year were used. United Nations Framework Convention on Climate Change, "Annex I Parties – GHG total without LULUCF,"

[2] Used http://unfccc.int data for Annex I countries. Consulted the CAIT Climate Data Explorer http://www.wri.org site to reference Non-Annex I countries such as China and India.

State of California

CARB compiles GHG inventories for the State of California. CARB GHG inventory data indicates that in 2014 (the most recent inventory of record) California GHG emissions totaled approximately 441.5 Million Metric Tons of Carbon Dioxide Equivalent (MMTCO2e) (9). "In 2010, California accounted for 6.8 percent of all emissions in the country [United States], and ranked second highest among the states with total emissions of 453 MMTCO2e, only behind Texas with 763 MMTCO2e. From a per capita standpoint, California has the 45th lowest emissions with 12.1 MMTCO2e /person in 2010."[3]

2.4 GREENHOUSE GASES

For the purposes of this analysis, emissions of carbon dioxide, methane, and nitrous oxide were evaluated (see Table 3-2 later in this report) because these gasses are the primary contributors to GCC from development projects. Although other substances such as fluorinated gases also contribute to GCC, sources of fluorinated gases are not well-defined and no accepted emissions factors or methodology exist to accurately calculate these gases.

Water Vapor: Water vapor (H20) is the most abundant, important, and variable greenhouse gas 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. A 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 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 also condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the Earth's surface and heat it up).

There are no human health effects from water vapor itself; however, when some pollutants come in contact with water vapor, they can dissolve and the water vapor can then act as a pollutant-carrying agent. The main source of water vapor is evaporation from the oceans (approximately 85 percent). Other sources include: evaporation from other water bodies,

3 California Environmental Protection Agency. Air Resources Board. California's Greenhouse Gas Emission Inventory - 2014 Edition (May 2014), p. 28.

sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves.

Carbon Dioxide: Carbon dioxide (CO2) is an odorless and colorless GHG. Outdoor levels of carbon dioxide are not high enough to result in negative health effects. Carbon dioxide 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. Carbon dioxide is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks (12).

Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO2 concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30 percent. Left unchecked, the concentration of carbon dioxide in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources (13).

Methane: Methane (CH4) is an extremely effective absorber of radiation, though its atmospheric concentration is less than carbon dioxide and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs.

Methane has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other anthropocentric sources include fossil-fuel combustion and biomass burning.

Nitrous Oxide: Nitrous oxide (N2O), also known as laughing gas, is a colorless greenhouse gas. Nitrous oxide 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) (14).

Concentrations of nitrous oxide also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb). Nitrous oxide 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 used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. Nitrous oxide can be transported into the stratosphere, be deposited on the Earth's surface, and be converted to other compounds by chemical reaction

Chlorofluorocarbons: Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C2H6) with chlorine and/or fluorine atoms. CFCs are

nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs are no longer being used; therefore, it is not likely that health effects would be experienced. Nonetheless, 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.

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.

Hydrofluorocarbons: Hydrofluorocarbons (HFCs) are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the greenhouse gases, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF3), HFC-134a (CF3CH2F), and HFC-152a (CH3CHF2). Prior to 1990, the only significant emissions were of HFC-23. HFC-134a emissions are increasing due to its use as a refrigerant. The U.S. EPA estimates that concentrations of HFC-23 and HFC-134a are now about 10 parts per trillion (ppt) each; and that concentrations of HFC-152a are about 1 ppt (15). No health effects are known to result from exposure to HFCs, which are manmade for applications such as automobile air conditioners and refrigerants.

Perfluorocarbons: Perfluorocarbons (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 (CF4) and hexafluoroethane (C2F6). The U.S. EPA estimates that concentrations of CF4 in the atmosphere are over 70 ppt.

No health effects are known to result from exposure to PFCs. The two main sources of PFCs are primary aluminum production and semiconductor manufacture.

Sulfur Hexafluoride: Sulfur hexafluoride (SF6) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (22,800). The U.S. EPA indicates that concentrations in the 1990s were about 4 ppt. In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.

Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

Greenhouse gases have varying global warming potential values; Global Warming Potential (GWP) values represent the potential of a gas to trap heat in the atmosphere. Carbon dioxide is utilized as the reference gas for GWP, and thus has a GWP of 1.

The atmospheric lifetime and GWP of selected greenhouse gases are summarized at Table 2-2. As shown in the table below, GWP for the SAR range from 1 for carbon dioxide to 23,900 for sulfur hexafluoride and GWP for the AR4 range from 1 for carbon dioxide to 22,800 for sulfur hexafluoride.

TABLE 2-2: GLOBAL WARMING POTENTIAL AND ATMOSPHERIC LIFETIME OF SELECT GHGS

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100 year time horizon)	
		Second Assessment Report (SAR)	4th Assessment Report (AR4)
Carbon Dioxide	50-200	1	1
Methane	12 ± 3	21	25
Nitrous Oxide	120	310	298
HFC-23	264	11,700	14,800
HFC-134a	14.6	1,300	1,430
HFC-152a	1.5	140	124
Sulfur Hexafluoride (SF6)	3,200	23,900	22,800

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

2.5 EFFECTS OF CLIMATE CHANGE IN CALIFORNIA

The California Environmental Protection Agency (CalEPA) published a report titled "Scenarios of Climate Change in California: An Overview" (Climate Scenarios report) in February 2006 (California Climate Change Center 2006), that while not adequate for a CEQA project-specific or cumulative analysis, is generally instructive about the statewide impacts of global warming.

The Climate Scenarios report uses a range of emissions scenarios developed by the Intergovernmental Panel on Climate Change (IPCC) to project a series of potential warming ranges (i.e., temperature increases) that may occur in California during the 21st century: lower warming range (3.0-5.5°F); medium warming range (5.5-8.0°F); and higher warming range (8.0-10.5°F). The Climate Scenarios report then presents an analysis of future climate in California under each warming range, that while uncertain, present a picture of the impacts of global climate change trends in California.

In addition, most recently on August 5, 2009, the State's Natural Resources Agency released a public review draft of its "California Climate Adaptation Strategy" report that details many vulnerabilities arising from climate change with respect to matters such as temperature extremes, sea level rise, wildfires, floods and droughts and precipitation changes. This report responds to the Governor's Executive Order S-13-2008 that called on state agencies to develop California's strategy to identify and prepare for expected climate impacts

According to the reports, substantial temperature increases arising from increased GHG emissions potentially could result in a variety of impacts to the people, economy, and

environment of California associated with a projected increase in extreme conditions, with the severity of the impacts depending upon actual future emissions of GHGs and associated warming. Under the emissions scenarios of the Climate Scenarios report, the impacts of global warming in California have the potential to include, but are not limited to, the following areas:

Air Quality/General Thermal Effects

According to Cal EPA, 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 percent under the lower warming range to 75 to 85 percent under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become difficult 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. The Climate Scenarios report indicates that large wildfires could become more frequent if GHG emissions are not significantly reduced.

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 large 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.

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

The State's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused

by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta – a major fresh water supply.

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 percent of the water supply they need. 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 O3 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 global climate change 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 global climate change could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates.

Forests and Landscapes

Global climate change 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 percent, 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 will not be uniform throughout the state. In contrast, wildfires in northern California could increase by up to 90 percent due to decreased precipitation.

Moreover, continued global climate change 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 percent 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 global climate change.

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 salt water, 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.

2.6 HUMAN HEALTH EFFECTS

The potential health effects related directly to the emissions of carbon dioxide, methane, and nitrous oxide as they relate to development projects such as the Project are still being debated in the scientific community. Their cumulative effects to global climate change 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 would likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas (24). Exhibit 2-A presents the potential impacts of global warming.

Specific health effects associated with directly emitted GHG emissions are as follows:

Water Vapor: 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.

Carbon Dioxide: According to the National Institute for Occupational Safety and Health (NIOSH) high concentrations of carbon dioxide 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 carbon dioxide in the earth's atmosphere are estimated to be approximately 370 parts per million (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 (25).

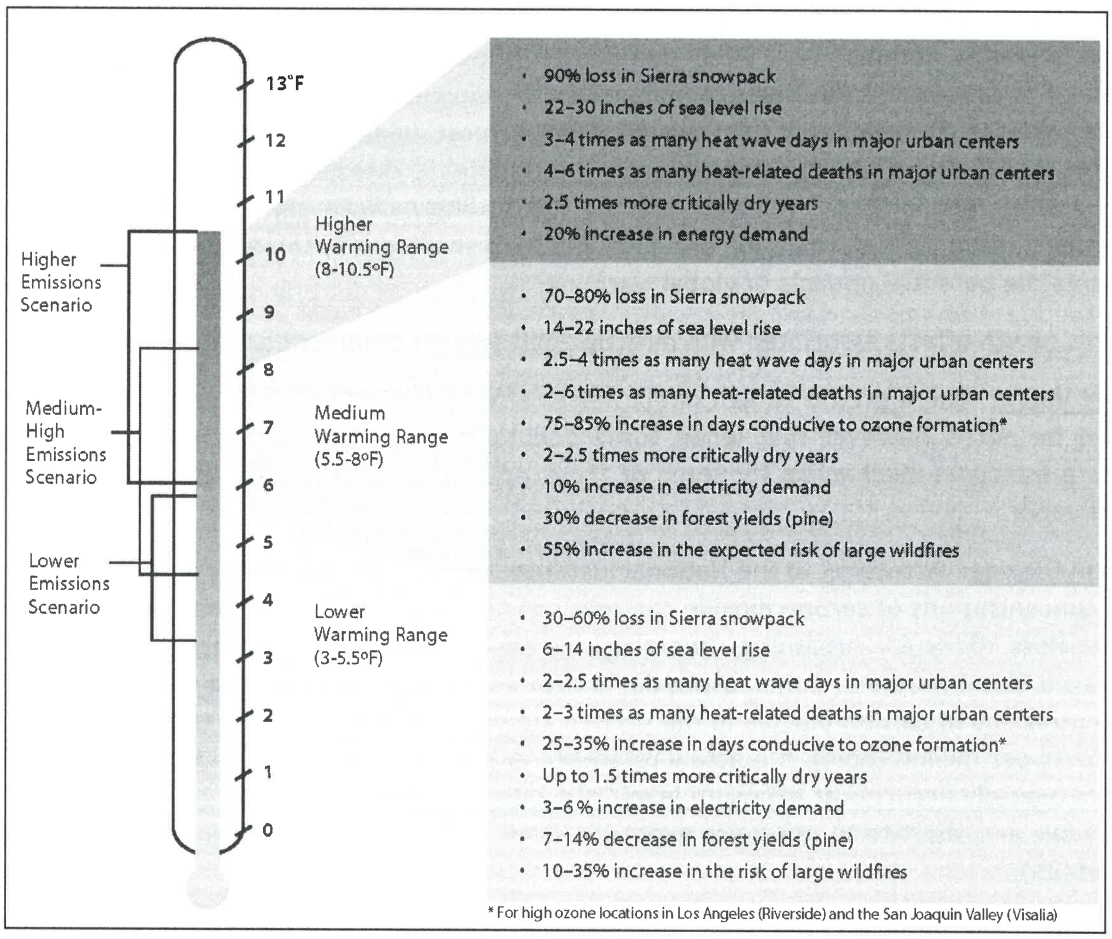
Methane: Methane is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Methane is also an asphyxiant and may displace oxygen in an enclosed space (26).

Nitrous Oxide: Nitrous Oxide is often referred to as laughing gas; it is a colorless greenhouse gas. The health effects associated with exposure to elevated concentrations of nitrous oxide include dizziness, euphoria, slight hallucinations, and in extreme cases of elevated concentrations nitrous oxide can also cause brain damage (26).

Fluorinated Gases: High concentrations of fluorinated gases can also result in adverse health effects such as asphyxiation, dizziness, headache, cardiovascular disease, cardiac disorders, and in extreme cases, increased mortality (25).

Aerosols: The health effects of aerosols are similar to that of other fine particulate matter. Thus aerosols can cause elevated respiratory and cardiovascular diseases as well as increased mortality (27).

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



2.7 REGULATORY SETTING

International Regulation and the Kyoto Protocol:

In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate

Change Action Plan was developed to address the reduction of GHGs in the United States. The Plan currently consists of more than 50 voluntary programs for member nations to adopt.

The Kyoto protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Kyoto protocol are met, global GHG emissions could be reduced an estimated five percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the United States is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the United States is not bound by the Protocol's commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Kyoto.

Climate Action Plan

On June 25, 2013, President Obama announced the Climate Action Plan, a national plan for tackling climate change. This marked a historic turning point, as the President used his executive authority to push forward a climate change agenda. The plan, divided in to three sections, outlines the steps to cut carbon pollution in the United States, including standards for both new and existing power plants, action to prepare the US for the impacts of climate change, and plans to lead international efforts to address global climate change (21).

Clean Power Plan

In June 2014, the Environmental Protection Agency (EPA) proposed the Clean Power Plan – the first-ever carbon pollution standards for existing power plants that will protect the health of our children and put our nation on the path toward a 30 percent reduction in carbon pollution from the power sector by 2030. Power plants are the largest single source of carbon pollution, accounting for about one-third of all domestic greenhouse gas emissions. The Clean Power Plan will set standards for carbon pollution from power plants, just as we have set limits on power plant emissions of arsenic, mercury, sulfur dioxide, nitrogen oxides, and soot.

In November 2014, in a historic joint announcement with China, President Obama laid out an ambitious but achievable target to reduce greenhouse gas emissions in the United States in the range of 26 to 28 percent below 2005 levels by 2025, while China announced its intent to peak carbon emissions around 2030 and to double its share of zero-carbon energy to 20 percent. The announcement was a historic step for climate change action and for the U.S.-China relationship, as the world's two largest economies, energy consumers, and carbon emitters came together to demonstrate leadership on an issue that affects the entire world (22).

2015 United Nations Paris Climate Change Conference

On December 12, 2015, which marks the 11th meeting of the Parties to the Kyoto Protocol, 195 nations, including the United States and China, agreed upon a strategy for combatting global climate change to be in effect in 2020. This historic meeting, known as the 21st annual Conference of the Parties (COP21), focused on five key elements: mitigation, a transparency system and global stock-take, adaptation, loss and damage, and support.

In mitigating global climate change, COP 21 participating nations agreed upon a universal long-term goal of keeping the global temperature to well below 2°C or 3.6°F well above pre-industrial levels. The agreement also encouraged participating nations to limit temperature increases even further to 1.5°C or 2.7°F above pre-industrial levels. In addition to that, nations agreed to peak their GHG emissions as soon as possible, with the recognition that developing countries may take longer than developed countries. Thereafter, nations are to undergo rapid reductions in accordance to best available technological advances. The nations are to submit national climate action plans that detail future objectives to address climate change.

In supporting a transparency system and global stock-take, the participating nations agreed to meet every 5 years to set more ambitious targets on global climate change as technologically feasible. The nations are to report to each other and to the public on their progress towards implementing targets and goals through a transparency and accountability system.

In adaptation, participating nations are to strengthen the ability of nations to deal with climate impacts and provide continued international support for adaptation to developing countries.

In supporting loss and damage, participating nations understand the importance of minimizing and addressing the loss and damage associated with adverse effects of global climate change. These nations acknowledge the need to cooperate with each other and support each other through safeguards, such as early warning systems, emergency preparedness, and risk insurance.

Participating nations are to support each other in their efforts to fight against global climate change. Developed countries within the COP21 are to continue their existing collective goal of utilizing 100 billion per year in support of the poorest and most vulnerable participating nations, known as climate finance, until 2025, when a new collective goal will be set (30) (31)

In accordance with Article 21, paragraph 1, of the Paris Agreement, the Agreement shall enter into force on the thirtieth day after the date on which at least 55 Parties to the COP21 accounting in total for at least an estimated 55% of the total global greenhouse gas emissions have deposited their instruments of ratification, acceptance, approval, or accession with the Depositary.

On October 5, 2016, the threshold for entry into force of the Paris Agreement was achieved. The Paris Agreement entered into force on November 4, 2016 (32).

<u>Federal Regulation and the Clean Air Act:</u>

Coinciding 2009 meeting in Copenhagen, on December 7, 2009, the U.S. Environmental Protection Agency (EPA) issued an Endangerment Finding under Section 202(a) of the Clean Air Act, opening the door to federal regulation of GHGs. The Endangerment Finding notes that GHGs threaten public health and welfare and are subject to regulation under the Clean Air Act. To date, the EPA has not promulgated regulations on GHG emissions, but it has already begun to develop them.

Previously the EPA had not regulated GHGs under the Clean Air Act (33) because it asserted that the Act did not authorize it to issue mandatory regulations to address global climate

change and that such regulation would be unwise without an unequivocally established causal link between GHGs and the increase in global surface air temperatures. In Massachusetts v. Environmental Protection Agency et al. (127 S. Ct. 1438 (2007), however, the U.S. Supreme Court held that GHGs are pollutants under the Clean Air Act and directed the EPA to decide whether the gases endangered public health or welfare. The EPA had also not moved aggressively to regulate GHGs because it expected Congress to make progress on GHG legislation, primarily from the standpoint of a cap-and-trade system. However, proposals circulated in both the House of Representative and Senate have been controversial and it may be some time before the U.S. Congress adopts major climate change legislation. The EPA's Endangerment Finding paves the way for federal regulation of GHGs with or without Congress.

Although global climate change did not become an international concern until the 1980s, efforts to reduce energy consumption began in California in response to the oil crisis in the 1970s, resulting in the unintended reduction of greenhouse gas emissions. In order to manage the state's energy needs and promote energy efficiency, AB 1575 created the California Energy Commission (CEC) in 1975.

Title 24 Energy Standards:

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (34) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. With the adoption of the Energy Commission's most recent standard, 2016 Building Energy Efficiency Standard, California is one step closer to the state's 2020 zero net energy goal, in which buildings produce as much energy as it consumes. The 2016 Standard is 28 percent more efficient for residential construction and 5 percent more efficient for nonresidential construction than previous standards. The Standards, which took effect on January 1, 2017, focus on three key areas: updating residential requirements to move closer to California's zero net energy goals, updating nonresidential and high-rise residential requirements, and improving the clarity and consistency of existing regulations. Some improved measures in the Standards include (28):

Residential:

- High performance attics: extra insulation at the roof deck ceiling insulation to reduce attic temperature during hot summer days.
- High performance walls to reduce heating and cooling needs year-round.
- Lighting: Installation of high quality lighting that will require half the energy needs.
- Water Heating: Installation of tankless water heaters that reduce use by about 35 percent.

Nonresidential:

- Envelope: Revision of outer building (building envelope) requirements for all nonresidential and high-rise residential buildings.
- Lighting: Update power for lights to align with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) standards.
- Elevators: Require lights and fans to shut off when elevator is empty.
- Escalators and moving walkways in transit areas to be run at a lower, less energy-consuming speed when not in use.
- Windows and doors: Require lockout sensors that turn off cooling and heating systems if a door or window if left open for more than five minutes.

CALGreen:

Part 11 of the Title 24 Building Standards Code is referred to as the California Green Building Standards Code (CALGreen Code) (36). The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). The CBSC has released the 2010 California Green Building Standards Code on its Web site. Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code.

CALGreen contains both mandatory and voluntary measures, for Non-Residential land uses there are 39 mandatory measures including, but not limited to: exterior light pollution reduction, wastewater reduction by 20%, and commissioning of projects over 10,000 sf. There are two tiers of voluntary measures for Non-Residential land uses for a total of 36 additional elective measures.

The 2016 CALGreen includes additions and amendments to the construction waste reduction, disposal and recycling, and new requirements for photovoltaic systems and electric vehicle chargers (30). The 2016 CALGreen has also been rewritten to clarify and definitively identify the requirements and applicability for residential and nonresidential buildings.

California Assembly Bill No. 1493 (AB 1493):

AB 1493 requires CARB to develop and adopt the nation's first greenhouse gas emission standards for automobiles. The Legislature declared in AB 1493 that global warming was a matter of increasing concern for public health and environment in California (38). Further, the legislature stated that technological solutions to reduce greenhouse gas emissions would stimulate the California economy and provide jobs.

To meet the requirements of AB 1493, ARB approved amendments to the California Code of Regulations (CCR) adding GHG emission standards to California's existing motor vehicle

emission standards in 2004. Amendments to CCR Title 13 Sections 1900 (CCR 13 1900) and 1961 (CCR 13 1961) and adoption of Section 1961.1 (CCR 13 1961.1) require automobile manufacturers to meet fleet average GHG emission limits for all passenger cars, light-duty trucks within various weight criteria, and medium-duty passenger vehicle weight classes beginning with the 2009 model year. Emission limits are further reduced each model year through 2016.

In December 2004, a group of car dealerships, automobile manufacturers, and trade groups representing automobile manufacturers filed suit against ARB to prevent enforcement of CCR 13 1900 and CCR 13 1961 as amended by AB 1493 and CCR 13 1961.1 (Central Valley Chrysler-Jeep et al. v. Catherine E. Witherspoon, in her official capacity as Executive Director of the California Air Resources Board, et al.). The suit, heard in the U.S. District Court for the Eastern District of California, contended that California's implementation of regulations that in effect regulate vehicle fuel economy violates various federal laws, regulations, and policies. In January 2007, the judge hearing the case accepted a request from the State Attorney General's office that the trial be postponed until a decision is reached by the U.S. Supreme Court on a separate case addressing GHGs. In the Supreme Court Case, Massachusetts vs. EPA, the primary issue in question is whether the federal CAA provides authority for USEPA to regulate CO2 emissions. In April 2007, the U.S. Supreme Court ruled in Massachusetts' favor, holding that GHGs are air pollutants under the CAA. On December 11, 2007, the judge in the Central Valley Chrysler-Jeep case rejected each plaintiff's arguments and ruled in California's favor. On December 19, 2007, the USEPA denied California's waiver request. California filed a petition with the Ninth Circuit Court of Appeals challenging USEPA's denial on January 2, 2008.

The Obama administration subsequently directed the USEPA to re-examine their decision. On May 19, 2009, challenging parties, automakers, the State of California, and the federal government reached an agreement on a series of actions that would resolve these current and potential future disputes over the standards through model year 2016. In summary, the USEPA and the U.S. Department of Transportation agreed to adopt a federal program to reduce GHGs and improve fuel economy, respectively, from passenger vehicles in order to achieve equivalent or greater greenhouse gas benefits as the AB 1493 regulations for the 2012–2016 model years. Manufacturers agreed to ultimately drop current and forego similar future legal challenges, including challenging a waiver grant, which occurred on June 30, 2009. The State of California committed to (1) revise its standards to allow manufacturers to demonstrate compliance with the fleet-average GHG emission standard by "pooling" California and specified State vehicle sales; (2) revise its standards for 2012–2016 model year vehicles so that compliance with USEPA-adopted GHG standards would also comply with California's standards; and (3) revise its standards, as necessary, to allow manufacturers to use emissions data from the federal CAFE program to demonstrate compliance with the AB 1493 regulations (CARB 2009, http://www.arb.ca.gov/regact/2009/ghgpv09/ghgpvisor.pdf) both of these programs are aimed at light-duty auto and light-duty trucks.

Executive Order S-3-05:

Executive Order S-3-05, which was signed by Governor Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change (39). It declares that increased

temperatures could reduce the Sierra's snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established total greenhouse gas emission targets. Specifically, emissions are to be reduced to the 1990 level by 2020, and to 80% below the 1990 level by 2050. The Executive Order directed the Secretary of the California Environmental Protection Agency (CalEPA) to coordinate a multi-agency effort to reduce greenhouse gas emissions to the target levels. The Secretary also is required to submit biannual reports to the Governor and state Legislature describing: (1) progress made toward reaching the emission targets; (2) impacts of global warming on California's resources; and (3) mitigation and adaptation plans to combat these impacts. To comply with the Executive Order, the Secretary of the CalEPA created a Climate Action Team (CAT) made up of members from various state agencies and commission. CAT released its first report in March 2006. The report proposed to achieve the targets by building on voluntary actions of California businesses, local government and community actions, as well as through state incentive and regulatory programs.

California Assembly Bill 32 (AB 32):

In September 2006, Governor Arnold Schwarzenegger signed AB 32, the California Climate Solutions Act of 2006. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by the year 2020 (40). This reduction will be accomplished through an enforceable statewide cap on GHG emissions that will be phased in starting in 2012. To effectively implement the cap, AB 32 directs CARB to develop and implement regulations to reduce statewide GHG emissions from stationary sources. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

AB 32 requires that CARB adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrives at the cap; institute a schedule to meet the emissions cap; and develop tracking, reporting, and enforcement mechanisms to ensure that the state achieves reductions in GHG emissions necessary to meet the cap. AB 32 also includes guidance to institute emissions reductions in an economically efficient manner and conditions to ensure that businesses and consumers are not unfairly affected by the reductions.

In November 2007, CARB completed its estimates of 1990 GHG levels. Net emission 1990 levels were estimated at 427 MMTs (emission sources by sector were: transportation – 35 percent; electricity generation – 26 percent; industrial – 24 percent; residential – 7 percent; agriculture – 5 percent; and commercial – 3 percent). Accordingly, 427 MMTs of CO2 equivalent was established as the emissions limit for 2020. For comparison, CARB's estimate for baseline GHG emissions was 473 MMT for 2000 and 532 MMT for 2010. "Business as usual" conditions (without the 28.4 percent reduction to be implemented by CARB regulations) for 2020 were projected to be 596 MMTs.

In December 2007, CARB approved a regulation for mandatory reporting and verification of GHG emissions for major sources. This regulation covered major stationary sources such as

cement plants, oil refineries, electric generating facilities/providers, and co-generation facilities, which comprise 94 percent of the point source CO2 emissions in the State.

On December 11, 2008, CARB adopted a scoping plan to reduce GHG emissions to 1990 levels. The Scoping Plan's recommendations for reducing GHG emissions to 1990 levels by 2020 include emission reduction measures, including a cap-and-trade program linked to Western Climate Initiative partner jurisdictions, green building strategies, recycling and waste-related measures, as well as Voluntary Early Actions and Reductions. Implementation of individual measures must begin no later than January 1, 2012, so that the emissions reduction target can be fully achieved by 2020.

Table 2-3 shows the proposed reductions from regulations and programs outlined in the Scoping Plan. While local government operations were not accounted for in achieving the 2020 emissions reduction, local land use changes are estimated to result in a reduction of 5 MMTons of CO2e, which is approximately 3 percent of the 2020 GHG emissions reduction goal. In recognition of the critical role local governments will play in successful implementation of AB 32, CARB is recommending GHG reduction goals of 15 percent of 2006 levels by 2020 to ensure that municipal and community-wide emissions match the state's reduction target. According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles by approximately 2 percent through land use planning, resulting in a potential GHG reduction of 2 MMTons tons of CO2e (or approximately 1.2 percent of the GHG reduction target).

Overall, CARB determined that achieving the 1990 emission level in 2020 would require a reduction in GHG emissions of approximately 28.5 percent in the absence of new laws and regulations (referred to as "Business-As-Usual" [BAU]). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and California Climate Action Team early actions and additional GHG reduction measures, identifies additional measures to be pursued as regulations, and outlines the role of the cap-and-trade program.

In connection with its preparation of the August 2011 Final Supplement to the Scoping Plan's Functional Equivalent Document, CARB released revised estimates of the 2020 emissions level projection in light of the economic recession and the availability of updated information from development of measure-specific regulations. Based on the new economic data, CARB determined the 2020 emissions level projection in the BAU condition would be reduced from 596 metric tons of CO2 equivalent (MTCO2e) to 545 MTCO2e. (34) Under this scenario, achieving the 1990 emissions level in 2020 would require a reduction of GHG emissions of 118 MTCO2e, or 21.7 percent (down from 28.5 percent), from the BAU condition.

TABLE 2-3: SCOPING PLAN GHG REDUCTION MEASURES TOWARDS 2020 TARGET

Recommended Reduction Measures	*Reductions Counted toward 2020 Target of 169 MMT CO2e*	*Percentage of Statewide 2020 Target*
Cap and Trade Program and Associated Measures		
California Light-Duty Vehicle GHG Standards	31.7	19%
Energy Efficiency	26.3	16%
Renewable Portfolio Standard (33 percent by 2020)	21.3	13%
Low Carbon Fuel Standard	15	9%
Regional Transportation-Related GHG Targets[1]	5	3%
Vehicle Efficiency Measures	4.5	3%
Goods Movement	3.7	2%
Million Solar Roofs	2.1	1%
Medium/Heavy Duty Vehicles	1.4	1%
High Speed Rail	1.0	1%
Industrial Measures	0.3	0%
Additional Reduction Necessary to Achieve Cap	34.4	20%
Total Cap and Trade Program Reductions	146.7	87%
Uncapped Sources/Sectors Measures		
High Global Warming Potential Gas Measures	20.2	12%
Sustainable Forests	5	3%
Industrial Measures (for sources not covered under cap and trade program)	1.1	1%
Recycling and Waste (landfill methane capture)	1	1%
Total Uncapped Sources/Sectors Reductions	27.3	16%
Total Reductions Counted toward 2020 Target	174	100%
Other Recommended Measures – Not Counted toward 2020 Target		
State Government Operations	1.0 to 2.0	1%
Local Government Operations	To Be Determined[2]	NA
Green Buildings	26	15%
Recycling and Waste	9	5%
Water Sector Measures	4.8	3%
Methane Capture at Large Dairies	1	1%
Total Other Recommended Measures – Not Counted toward 2020 Target	42.8	NA

Source: CARB. 2008, MMTons CO2e: million metric tons of CO2e
[1]Reductions represent an estimate of what may be achieved from local land use changes. It is not the SB 375 regional target.
[2]According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles by approximately 2 percent through land use planning, resulting in a potential GHG reduction of 2 million metric tons of CO2e (or approximately 1.2 percent of the GHG reduction target). However, these reductions were not included in the Scoping Plan reductions to achieve the 2020 Target

When the 2020 emissions level projection also was updated to account for implemented regulatory measures, including Pavley (vehicle model-years 2009 - 2016) and the renewable portfolio standard (12% - 20%), the 2020 projection in the BAU condition was reduced further to 507 MTCO2e. As a result, based on the updated economic and regulatory data, CARB determined that achieving the 1990 emissions level in 2020 would now only require a reduction

of GHG emissions of 80 MTCO2e, or approximately 16 percent (down from 28.5 percent), from the BAU condition. (34) (35)

On February 10, 2014, CARB released a Draft Proposed First Update of the Scoping Plan. The draft recalculates 1990 GHG emissions using new global warming potentials identified in the IPCC Fourth Assessment Report released in 2007. Using those GWPs, the 427 MTCO2e 1990 emissions level and 2020 GHG emissions limit identified in the 2008 Scoping Plan would be slightly higher, at 431 MTCO2e. (36) Based on the revised 2020 emissions level projection identified in the 2011 Final Supplement and the updated 1990 emissions levels identified in the discussion draft of the First Update, achieving the 1990 emissions level in 2020 would require a reduction of 78 MTCO2e (down from 509 MTCO2e), or approximately 15.3 percent (down from 28.5 percent), from the BAU condition. (34) (35) (36)

On January 20, 2017, ARB released the proposed Second Update to the Scoping Plan, which identifies the State's post-2020 reduction strategy (37). The Second Update would reflect the 2030 target of a 40 percent 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 Low Carbon Fuel Standard, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce methane emissions from agricultural and other wastes. It should be noted the proposed Second Update is undergoing a review period and has not yet been adopted.

California Senate Bill No. 1368 (SB 1368):

In 2006, the State Legislature adopted Senate Bill 1368 ("SB 1368"), which was subsequently signed into law by the Governor (45). SB 1368 directs the California Public Utilities Commission ("CPUC") to adopt a greenhouse gas emission performance standard ("EPS") for the future power purchases of California utilities. SB 1368 seeks to limit carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. Due to the carbon content of its fuel source, a coal-fired plant cannot meet this standard because such plants emit roughly twice as much carbon as natural gas, combined cycle plants.

Accordingly, the new law will effectively prevent California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. Thus, SB 1368 will lead to dramatically lower greenhouse gas emissions associated with California energy demand, as SB 1368 will effectively prohibit California utilities from purchasing power from out of state producers that cannot satisfy the EPS standard required by SB 1368.

Senate Bill 97 (SB 97):

Pursuant to the direction of SB 97, OPR released preliminary draft CEQA Guideline amendments for greenhouse gas emissions on January 8, 2009, and submitted its final proposed guidelines to the Secretary for Natural Resources on April 13, 2009 (39). The Natural Resources Agency adopted the Guideline amendments and they became effective on March 18, 2010.

Of note, the new guidelines state that a lead agency shall have discretion to determine whether to use a quantitative model or methodology, or in the alternative, rely on a qualitative analysis or performance based standards. CEQA Guideline § 15064.4(a)"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."

Also amended were CEQA Guidelines Sections 15126.4 and 15130, which address mitigation measures and cumulative impacts respectively. Greenhouse gas mitigation measures are referenced in general terms, but no specific measures are championed. The revision to the cumulative impact discussion requirement (Section 15130) simply directs agencies to analyze greenhouse gas emissions in an EIR when a Project's incremental contribution of emissions may be cumulatively considerable, however it does not answer the question of when emission are cumulatively considerable.

Section 15183.5 permits programmatic greenhouse gas analysis and later project-specific tiering, as well as the preparation of Greenhouse Gas Reduction Plans. Compliance with such plans can support determination that a Project's cumulative effect is not cumulatively considerable, according to proposed Section 15183.5(b).

CEQA emphasizes that the effects of greenhouse gas emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis. (See CEQA Guidelines Section 15130(f)).

Section 15064.4(b) of the CEQA Guidelines provides direction for lead agencies for assessing the significance of impacts of greenhouse gas emissions:

1. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; or
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 include specific requirements that reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The CEQA Guideline amendments do not identify a threshold of significance for greenhouse gas emissions, nor do they prescribe assessment methodologies or specific mitigation measures. Instead, they call for a "good-faith effort, based on available information, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." The

amendments encourage lead agencies to consider many factors in performing a CEQA analysis and preserve lead agencies' discretion to make their own determinations based upon substantial evidence. The amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. Specific GHG language incorporated in the Guidelines' suggested Environmental Checklist (Guidelines Appendix G) is as follows:

VII. GREENHOUSE GAS EMISSIONS

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Executive Order S-01-07:

On January 18, 2007 California Governor Arnold Schwarzenegger, through Executive Order S-01-07, mandated a statewide goal to reduce the carbon intensity of California's transportation fuel by at least ten percent by 2020 (40). The order also requires that a California specific Low Carbon Fuel Standard be established for transportation fuels.

Senate Bills 1078 and 107 and Executive Order S-14-08:

SB 1078 (Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20% of their supply from renewable sources by 2017 (48). SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010 (40). In November 2008 Governor Schwarzenegger signed Executive Order S-14-08, which expands the state's Renewable Energy Standard to 33% renewable power by 2020 (49).

Executive Order B-30-15:

In January 2015, Governor Brown, in his inaugural address and annual report to the Legislature, established supplementary goals which would further reduce GHG emissions over the next 15 years. These goals include an increase in California's renewable energy portfolio from 33% to 50%, a reduction in vehicle petroleum use for cars and trucks by up to 50% measures to double the efficiency of existing buildings, and decreasing emissions associated with heating fuels.

On April 29, 2015 California Governor Jerry Brown, through Executive Order B-30-15 ("BEO") states a new statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030.

The BEO sets an ambitious new Statewide GHG emissions reduction target of 40% below 1990 levels by 2030 as a "mid-term" benchmark needed to achieve the 80% below 1990 levels by 2050 (43).

Senate Bill 32:

On September 8, 2016, Governor Jerry Brown signed the Senate Bill (SB) 32 and its companion bill, Assembly Bill (AB) 197. SB 32 requires the state to reduce statewide greenhouse gas 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 of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide greenhouse gas reduction target of 80% below 1990 levels by 2050 (6).

Senate Bill 375:

SB 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation (51). SB 375 requires metropolitan planning organizations (MPOs) to adopt a sustainable communities strategy (SCS) or alternative planning strategy (APS) that will prescribe land use allocation in that MPO's regional transportation plan. ARB, in consultation with MPOs, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035.

These reduction targets will be updated every 8 years but can be updated every 4 years if advancements in emissions technologies affect the reduction strategies to achieve the targets. ARB is also charged with reviewing each MPO's SCS or APS for consistency with its assigned targets. If MPOs do not meet the GHG reduction targets, transportation projects will not be eligible for funding programmed after January 1, 2012.

This law also extends the minimum time period for the regional housing needs allocation cycle from 5 years to 8 years for local governments located within an MPO that meets certain requirements. City or county land use policies (including general plans) are not required to be consistent with the regional transportation plan (and associated SCS or APS). However, new provisions of CEQA would incentivize (through streamlining and other provisions) qualified projects that are consistent with an approved SCS or APS, categorized as "transit priority projects."

The Southern California Association of Governments (SCAG) is required by law to update the Southern California Regional Transportation Plan (RTP) every four years. The 2012 draft plan has been released, this draft plan differs from past plans because it includes development of a SCS. The RTP/SCS incorporates land use and housing policies to meet the greenhouse gas emissions targets established by the California Air Resource Board (CARB) for 2020 (8% reduction) and 2035 (13% reduction). On April 4, 2012, the Regional Council of the Southern California Association of Governments (SCAG) adopted the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): Towards a Sustainable Future.

CARB's Preliminary Draft Staff Proposal for Interim Significance Thresholds:

Separate from its Scoping Plan approved in December of 2008 (52), CARB issued a Staff Proposal in October 2008, as its first step toward developing recommended statewide interim thresholds of significance for GHGs that may be adopted by local agencies for their own use.

CARB staff's objective in this proposal is to develop a threshold of significance that will result in the vast majority (approximately 90 percent statewide) of GHG emissions from new industrial projects being subject to CEQA's requirement to impose feasible mitigation. The proposal does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that, collectively, are responsible for substantial GHG emissions – specifically, industrial, residential, and commercial projects. CARB is developing these thresholds in these sectors to advance climate objectives, streamline project review, and encourage consistency and uniformity in the CEQA analysis of GHG emissions throughout the state. These draft thresholds are under revision in response to comments. There is currently no timetable for finalized thresholds at this time.

As currently proposed by CARB, a quantitative threshold of 7,000 metric tons (MT) of CO2e per year for operational emissions (excluding transportation), and performance standards yet to be defined for construction and transportation emissions are under consideration. However, CARB's proposal is not yet final, and thus cannot be applied to the Project.

<u>South Coast Air Quality Management District Recommendations for Significance Thresholds:</u>

In April 2008, the South Coast Air Quality Management District (SCAQMD), in order to provide guidance to local lead agencies on determining the significance of GHG emissions identified in CEQA documents, convened a "GHG CEQA Significance Threshold Working Group." The goal of the working group is to develop and reach consensus on an acceptable CEQA significance threshold for GHG emissions that would be utilized on an interim basis until CARB (or some other state agency) develops statewide guidance on assessing the significance of GHG emissions under CEQA.

Initially, SCAQMD staff presented the working group with a significance threshold that could be applied to various types of projects—residential; non-residential; industrial; etc. (53). However, the threshold is still under development. In December 2008, staff presented the SCAQMD Governing Board with a significance threshold for stationary source projects where it is the lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 metric tons of carbon dioxide equivalent (MTCO2e) as a screening numerical threshold for stationary sources. More importantly it should be noted that when setting the 10,000 MTCO2e threshold, the SCAQMD did not consider mobile sources (vehicular travel), rather the threshold is based mainly on stationary source generators such as boilers, refineries, power plants, etc. Therefore it would be misleading to apply a threshold that was developed without consideration for mobile sources to a Project where the majority of emissions are related to mobile sources. Thus there is no SCAQMD threshold that can be applied to this Project.

In September 2010 (47), the Working Group released additional revisions that consist of the following recommended tiered approach:

- Tier 1 consists of evaluating whether or not the Project qualifies for applicable CEQA exemptions.
- Tier 2 consists of determining whether or not a Project is consistent with a greenhouse gas reduction plan. If a Project is consistent with a greenhouse gas reduction plan, it would not have a significant impact.

- Tier 3 consists of screening values at the discretion of the lead agency; however they should be consistent for all projects within its jurisdiction. Project-related construction emissions should be amortized over 30 years and should be added back the Project's operational emissions. The following thresholds are proposed for consideration:
    - 3,000 MTCO2e per year for all land use types

      or
    - 3,500 MTCO2e per year for residential; 1,400 MTCO2e per year for commercial; or 3,000 MTCO2e per year for mixed-use projects
- Tier 4 has the following options:
    - Option 1: Reduce emissions from business as usual by a certain percentage (currently undefined)
    - Option 2: Early implementation of applicable AB 32 Scoping Plan measures
    - Option 3: A project-level efficiency target of 4.8 MTCO2e per service population as a 2020 target and 3.0 MTCO2e per service population as a 2035 target. The recommended plan-level target for 2020 is 6.6 MTCO2e and the plan level target for 2035 is 4.1 MTCO2e
- Tier 5 involves mitigation offsets to achieve target significance thresholds

The SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG reductions. However, these rules address boilers and process heater, forestry, and manure management projects, none of which are required by the Project. The SCAQMD has not adopted any threshold that would be applicable to the Project therefore it would be misleading to compare the Project's emissions to draft thresholds that have not been adopted and may never be adopted. Thus there is no SCAQMD threshold that can be applied to this Project.

2.8 Discussion on Establishment of Significance Thresholds

<u>County of San Bernardino Greenhouse Gas Emissions Reduction Plan</u>

The County of San Bernardino adopted a Greenhouse Gas Emissions Reduction Plan (Reduction Plan) in September 2011. The CAP contains further guidance on the County of San Bernardino's GHG Inventory reduction goals, policies, guidelines, and implementation programs. The purpose of the Reduction Plan is to provide guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County of San Bernardino (1). To address the state's requirement to reduce GHG emissions, the County prepared its Reduction Plan with the goal of reducing GHG emissions within the County by 15% below 2007 levels by the year 2020. The County's target is consistent with the AB 32 target and ensures that the County of Ontario will be providing GHG reductions locally that will complement state efforts to reduce GHG emissions.

As part of the Reduction Plan, the County of San Bernardino published a guidance document titled "Greenhouse Gas Emissions Development Review Processes" (March 2015). As part of this guidance, the County determined the size of development that is too small to be able to provide the level of GHG emission reductions expected from the Screening Tables or alternate emissions analysis method. The County's analysis determined that the 3,000 $MTCO_2e$ per year

value be used in defining small projects that are considered less than significant and do not need to use the Screening Tables or alternative calculations.

If the project exceeds the 3,000 $MTCO_2e$ per year threshold, then project emissions would need to be reduced by 31 percent from year 2007 emissions levels or alternatively the Project would need to achieve a minimum of 100 points pursuant to the CAP Screening Tables. The screening tables also allow developers to tailor their mitigation measures to the project's needs, rather than have them be subject to one-size fits all mitigation measures that may be too stringent for them.

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3 PROJECT GREENHOUSE GAS IMPACT

3.1 CALIFORNIA EMISSIONS ESTIMATOR MODEL™ (CALEEMOD™) EMPLOYED TO ESTIMATE GHG EMISSIONS

On October 14, 2016, the SCAQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the California Emissions Estimator Model™ (CalEEMod™) v2016.3.1. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (NO_x, VOC, PM_{10}, $PM_{2.5}$, SO_x, and CO) and greenhouse gas (GHG) emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures (57). Accordingly, the latest version of CalEEMod™ has been used for this Project to determine construction and operational air quality emissions. Output from the model runs for both construction and operational activity are provided in Appendix 3.2.

3.2 CONSTRUCTION AND OPERATIONAL LIFE-CYCLE ANALYSIS NOT REQUIRED

A full life-cycle analysis (LCA) for construction and operational activity is not included in this analysis due to the lack of consensus guidance on LCA methodology at this time (58). Life-cycle analysis (i.e., assessing economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in the project development, infrastructure and on-going operations) depends on emission factors or econometric factors that are not well established for all processes. At this time a LCA would be extremely speculative and thus has not been prepared.

Additionally, the MDAQMD recommends analyzing direct and indirect project GHG emissions generated within California and not life-cycle emissions because the life-cycle effects from a project could occur outside of California, might not be very well understood or documented, and would be challenging to mitigate (59). Additionally, the science to calculate life cycle emissions is not yet established or well defined, therefore SCAQMD has not recommended, and is not requiring, life-cycle emissions analysis.

3.3 EXISTING PROJECT SITE GREENHOUSE GAS EMISSIONS

The Project site is generally level and currently vacant. Thus the site is currently not generating a quantifiable amount of GHG emissions.

3.4 PROJECT RELATED GREENHOUSE GAS EMISSIONS

3.4.1 CONSTRUCTION EMISSIONS

Construction activities associated with the Project would result in emissions of CO2 and CH4 from construction activities. The report Harvard Road Project Air Quality Impact Analysis Report, Urban Crossroads, Inc. (2017) contains detailed information regarding construction activity (60).

For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total greenhouse gas emissions for the construction activities, dividing it by a 30-year project life then adding that number to the annual operational phase GHG emissions (61). As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions.

3.5 Operational Emissions

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

- Building Energy Use (combustion emissions associated with natural gas and electricity)
- Water Supply, Treatment and Distribution
- Solid Waste
- Mobile Source Emissions

3.5.1 Building Energy Use

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. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Unless otherwise noted, CalEEMod default parameters were used.

3.5.2 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.

3.5.3 Solid Waste

Retail commercial land uses would result in the generation and disposal of solid waste. A large 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 with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the Project were calculated using CalEEMod default parameters.

3.5.4 Mobile Source Emissions

GHG emissions will also result from mobile sources associated with the Project. These mobile source emissions will result from the typical daily operation of motor vehicles by visitors, employees, and customers.

Project mobile source emissions are dependent on both overall daily vehicle trip generation. Trip characteristics available from the report, Harvard Road Project Traffic Impact Analysis (David Evans and Associates, Inc.) 2017 were utilized in this analysis (62).

3.6 Emissions Summary

The annual GHG emissions associated with the operation of the proposed Project are estimated to be 2,011.84 MTCO2e per year as summarized in Table 3-1. Direct and indirect operational emissions associated with the Project are compared with the County's screening threshold of 3,000 MTCO2e per year (63). As shown, the proposed Project would result in a less than significant impact with respect to GHG emissions.

TABLE 3-1: TOTAL PROJECT GREENHOUSE GAS EMISSIONS (ANNUAL)

Emission Source	Emissions (metric tons per year)			
	CO_2	CH_4	N_2O	Total CO_2E
Annual construction-related emissions amortized over 30 years	64.63	0.01	0.00	64.90
Area	3.60E-04	0.00	0.00	3.80E-04
Energy	29.85	1.21E-03	2.60E-04	29.96
Mobile Sources	1,907.70	0.31	0.00	1,915.37
Waste	0.00	0.00	0.00	0.00
Water Usage	1.39	6.98E-03	1.70E-04	1.61
Total CO_2E (All Sources)	**2,011.84**			
Screening Threshold	**3,000**			
Significant?	**NO**			

Source: CalEEMod™ model output, See Appendix 3.1 for detailed model outputs.
Note: Totals obtained from CalEEMod™ and may not total 100% due to rounding.
Table results include scientific notation. *e* is used to represent *times ten raised to the power of* (which would be written as x $10^{b''}$) and is followed by the value of the exponent

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4 SUMMARY OF FINDINGS

GHG Impact #1: The Project would not generate direct or indirect greenhouse gas emission that would result in a significant impact on the environment.

The County of San Bernardino adopted the GHG Plan in September 2011, which provides guidance on how to analyze greenhouse gas (GHG) emissions and determine significance during the CEQA review of proposed development projects within the County of San Bernardino (County) (1).

The County includes a GHG DRP that specifies a two-step approach in quantifying GHG emissions (2). First, a screening threshold of 3,000 MT CO2e per year is used to determine if additional analysis is required. Projects that exceed the 3,000 MTCO2e per year will be required to either achieve a minimum 100 points per the Screening Tables or a 31% reduction over 2007 emissions levels. Consistent with CEQA guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions.

As shown in Table 4-1, the Project will result in approximately 2,011.84 MTCO2e per year; the proposed project would not exceed the screening threshold of 3,000 MTCO2e per year. Therefore, the project's impact on greenhouse gas emissions is less than significant.

TABLE 4-1: PROJECT-RELATED GREENHOUSE GAS EMISSIONS

Emission Source	Emissions (metric tons per year)			
	CO_2	CH_4	N_2O	Total CO_2E
Annual construction-related emissions amortized over 30 years	64.63	0.01	0.00	64.90
Area	3.60E-04	0.00	0.00	3.80E-04
Energy	29.85	1.21E-03	2.60E-04	29.96
Mobile Sources	1,907.70	0.31	0.00	1,915.37
Waste	0.00	0.00	0.00	0.00
Water Usage	1.39	6.98E-03	1.70E-04	1.61
Total CO_2E (All Sources)	**2,011.84**			
Screening Threshold	**3,000**			
Significant?	**NO**			

Source: CalEEMod™ model output, See Appendix 3.1 for detailed model outputs.
Note: Totals obtained from CalEEMod™ and may not total 100% due to rounding.

GHG Impact #2: The Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

Consistency with AB 32

AB 32 requires California to reduce its GHG emissions by approximately 28.5% when compared to GHG emissions produced under a Business as Usual scenario (6). CARB identified reduction measures to achieve this goal as set forth in the CARB Scoping Plan. Thus, projects that are consistent with the CARB Scoping Plan are also consistent with the 28.5% reduction below business as usual required by AB 32.

The Project would generate GHG emissions from a variety of sources which would all emit Carbon Dioxide (CO2), Methane (CH4) and N2O. GHGs could also be indirectly generated by incremental electricity consumption and waste generation from the Project.

As stated previously, the CARB Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32. The CARB Scoping Plan recommendations serve as statewide measures to reduce GHG emissions levels. The Project would be consistent with the applicable measures established in the Scoping Plan, as detailed in Section 3.7.

Consistency with SB 32

Senate Bill 32 (SB 32) requires the state to reduce statewide greenhouse gas 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 of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide greenhouse gas reduction target of 80% below 1990 levels by 2050 (7) (8).

According to research conducted by the Lawrence Berkeley National Laboratory and supported by the CARB, California, under its existing and proposed GHG reduction policies, is on track to meet the 2020 reduction targets under AB 32 and could achieve the 2030 goals under SB 32. (9) (10).

The Project reduces its GHG emissions to the maximum extent feasible as discussed in this document. Additionally, the project applicant would not actively interfere with any future County-mandated, state-mandated, or federally-mandated retrofit obligations enacted or promulgated to legally require development County-wide, state-wide, or nation-wide to assist in meeting state-adopted greenhouse gas emissions reduction targets, including that established under Executive Order S-3-05, Executive Order B-30-15, or SB 32.

The Project does not interfere with the state's implementation of (i) Executive Order B-30-15 and SB 32's target of reducing statewide GHG emissions to 40% below 1990 levels by 2030 or (ii) Executive Order S-3-05's target of reducing statewide GHG emissions to 80% below 1990 levels by 2050 because it does not interfere with the state's implementation of GHG reduction plans described in the CARB's Updated Scoping Plan, including the state providing for 12,000 MW of renewable distributed generation by 2020, the California Building Commission mandating net zero energy homes in the building code after 2020, or existing building retrofits

under AB 758. Therefore, the project's impacts on greenhouse gas emissions in the 2030 and 2050 horizon years are less than significant.

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5 REFERENCES

1. **County of San Bernardino.** Greenhouse Gas Emissions Reduction Plan. [Online] September 2011. http://www.sbcounty.gov/Uploads/lus/GreenhouseGas/FinalGHGFull.pdf.
2. —. Greenhouse Gas Emissions Development Review Processes. [Online] March 2015. http://www.sbcounty.gov/Uploads/lus/GreenhouseGas/FinalGHGUpdate.pdf.
3. **Air Resources Board.** Assembly Bill 32: Global Warming Solutions Act. [Online] 2006. [Cited: November 13, 2013.] http://www.arb.ca.gov/cc/ab32/ab32.htm.
4. **California Legislative Information.** Senate Bill No. 32. [Online] September 8, 2016. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB32.
5. **Policy Matters Journal: A Student Publication from the Goldman School of Public Policy.** New California Emissions Targets Spell Next Step in the State's Fight against Climate Change. [Online] September 1, 2016. http://www.policymattersjournal.org/sb32.html.
6. **Lawrence Berkeley National Laboratory.** California's Policies Can Significantly Cut Greenhouse Gas Emissions through 2030. *Lawrence Berkeley National Laboratory.* [Online] January 22, 2015. http://newscenter.lbl.gov/2015/01/22/californias-policies-can-significantly-cut-greenhouse-gas-emissions-2030/.
7. **Ernest Orlando Lawrence Berkeley National Laboratory.** Modeling California policy impacts on greenhouse gas emissions. [Online] 2015. https://eetd.lbl.gov/sites/all/files/lbnl-7008e.pdf.
8. **Air Resources Board.** Sustainable Communities. [Online] 2008. [Cited: November 13, 2013.] http://www.arb.ca.gov/cc/sb375/sb375.htm.
9. —. Clean Car Standards - Pavley, Assembly Bill 1493. [Online] September 24, 2009. [Cited: November 13, 2013.] http://www.arb.ca.gov/cc/ccms/ccms.htm.
10. **Building Standards Commission.** California Building Standards Code (Title 24, California Code of Regulations). [Online] [Cited: 13 2013, November.] http://www.bsc.ca.gov/codes.aspx.
11. **California Energy Commission.** California Code of Regulations, TITLE 20, Division 2. [Online] September 3, 2013. [Cited: November 13, 2013.] http://www.energy.ca.gov/reports/title20/index.html.
12. **Air Resources Board.** Title 17 - California Code of Regulation. [Online] 2010. [Cited: November 13, 2013.] http://www.arb.ca.gov/regs/regs-17.htm.
13. **Department of Water Resources.** Updated Model Water Efficient Landscape Ordinance AB 1881. [Online] 2006. [Cited: November 13, 2013.] http://www.water.ca.gov/wateruseefficiency/landscapeordinance/updatedOrd_history.cfm.
14. **California Energy Commission.** SB 1368 Emission Performance Standards. [Online] September 29, 2006. [Cited: November 13, 2013.] http://www.energy.ca.gov/emission_standards/.
15. —. Renewables Portfolio Standard (RPS) . [Online] 2002. [Cited: November 13, 2013.] http://www.energy.ca.gov/portfolio/.
16. **Air Resources Board.** Reducing Climate Change Emissions From Motor Vehicles. [Online] [Cited: September 17, 2014.] http://www.arb.ca.gov/cc/factsheets/ccfactsheet.pdf.
17. **World Resources Institute.** Climate Analysis Indicator Tool (CAIT). [Online] [Cited: September 2014, 2014.] http://cait.wri.org.

18. **United Nations.** Flexible GHG Data Queries. [Online] [Cited: September 17, 2014.] http://unfccc.int/ghg_data/ghg_data_unfccc/time_series_annex_i/items/3841.php.
19. **World Resources Institute.** CAIT Climate Data Explorer. [Online] http://cait.wri.org/historical/Country%20GHG%20Emissions?indicator[]=Total%20GHG%20Emissions%20Excluding%20Land-Use%20Change%20and%20Forestry&indicator[]=Total%20GHG%20Emissions%20Including%20Land-Use%20Change%20and%20Forestry&year[]=2012&chartType=geo.
20. **Environmental Protection Agency.** Inventory of U.S. Greenhouse Gas Emissions and Sinks. [Online] Apri 15, 2016. https://www.epa.gov/sites/production/files/2016-04/documents/us-ghg-inventory-2016-main-text.pdf.
21. **California Air Resources Board.** California Greenhouse Gas Emission Inventory- 2016 Edition. *CARB.* [Online] June 17, 2016. https://www.arb.ca.gov/cc/inventory/data/data.htm.
22. *The Carbon Cycle and Climate Change.* **Bennington, Bret J.** 1, s.l. : Brooks/Cole. ISBN 1 3: 978-0-495-73855-8.
23. *Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report.* **International Panel on Climate Change.** 4, 2007.
24. *Occupational Safety and Health Guideline for Nitrous Oxide.* **U.S. Department of Labor.**
25. **Environmental Protection Agency.** Overview of Greenhouse Gases. [Online] https://www.epa.gov/ghgemissions/overview-greenhouse-gases.
26. **American Lung Association.** Climate Change. [Online] 2013. [Cited: November 13, 2013.] http://www.lung.org/associations/states/california/advocacy/climate-change/.
27. **The National Institute for Occupational Safety and Health.** [Online] [Cited: November 13, 2013.] http://www.cdc.gov/niosh/.
28. **Occupational Health and Safety Administration.** [Online] [Cited: November 13, 2013.] https://www.osha.gov/.
29. **Hardin, Mary and Kahn, Ralph.** Aerosols & Climate Change. *Earth Observatory.* [Online] http://earthobservatory.nasa.gov/Features/Aerosols/.
30. **President Obama.** *Climate Action PLan.* 2014.
31. **The White House.** Climate Change and President Obama's Action Plan. [Online] 2014. https://obamawhitehouse.archives.gov/the-press-office/2014/11/11/us-china-joint-announcement-climate-change.
32. **European Commission.** Climate Action- Paris Agreement. [Online] http://ec.europa.eu/clima/policies/international/negotiations/paris_en.
33. **United Nations Framework Convention on Climate Change (UNFCCC).** Historic Paris Agreement on Climate Change. [Online] http://newsroom.unfccc.int/unfccc-newsroom/finale-cop21/.
34. **United Nations Framework Convention on Climate Change.** The Paris Agreement. [Online] 2016. http://unfccc.int/resource/docs/2015/cop21/eng/l09r01.pdf.
35. **Environmental Protection Agency.** Air Pollution and the Clean Air Act. [Online] [Cited: September 17, 2014.] http://www.epa.gov/air/caa/.
36. **Building Standards Commission.** California Building Standards Code (Title 24, California Code of Regulations). [Online] [Cited: 17 2014, September.] http://www.bsc.ca.gov/codes.aspx.

37. **California Energy Commission.** Energy Commision Continues March Towrds Zero Net Energy With 2016 Building Energy Efficiency Standards. *California Energy Commission.* [Online] June 10, 2015. http://www.energy.ca.gov/releases/2015_releases/2015-06-10_building_standards_nr.html.

38. **Building Standards Commission.** CALGreen. [Online] 2010. [Cited: September 17, 2014.] http://www.bsc.ca.gov/home/calgreen.aspx.

39. **Green Technology.** California Department of Housing and Community Development presents the 2016 CALGreen. [Online] http://green-technology.org/gcsummit16/images/4-Triennial-Update.pdf.

40. **Air Resources Board.** Clean Car Standards - Pavley, Assembly Bill 1493. [Online] September 24, 2009. [Cited: September 17, 2014.] http://www.arb.ca.gov/cc/ccms/ccms.htm.

41. **State of California Office of Governor.** Executive Order S-03-05. [Online] https://www.gov.ca.gov/news.php?id=1861.

42. **Air Resources Board.** Assembly Bill 32: Global Warming Solutions Act. [Online] 2006. [Cited: September 17, 2014.] http://www.arb.ca.gov/cc/ab32/ab32.htm.

43. —. Status of Scoping Plan Recommended Measures. [Online] July 25, 2011. [Cited: September 23, 2014.] https://www.arb.ca.gov/cc/scopingplan/status_of_scoping_plan_measures.pdf.

44. —. Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document. [Online] August 19, 2011. [Cited: September 23, 2014.] http://www.arb.ca.gov/cc/scopingplan/document/final_supplement_to_sp_fed.pdf.

45. —. Climate Change Scoping Plan First Update, Discussion Draft for Public Review and Comment. [Online] May 22, 2014. [Cited: September 23, 2014.] http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

46. **California Air Resources Board.** The 2017 Climate Change Scoping Plan Update. [Online] January 20, 2017. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf.

47. **California Energy Commission.** SB 1368 Emission Performance Standards. [Online] September 29, 2006. [Cited: September 17, 2014.] http://www.energy.ca.gov/emission_standards/.

48. **State of California.** Senate Bill No. 97. [Online] [Cited: September 17, 2014.] http://opr.ca.gov/docs/SB_97_bill_20070824_chaptered.pdf.

49. —. California Climate Change Executive Orders. [Online] http://www.climatechange.ca.gov/state/executive_orders.html.

50. —. Senate Bill No. 1078. [Online] 2002. http://www.energy.ca.gov/portfolio/documents/documents/SB1078.PDF.

51. —. EXECUTIVE ORDER S-14-08. [Online] [Cited: September 17, 2014.] http://gov.ca.gov/news.php?id=11072.

52. **Office of Governor Edmund G. Brown Jr.** Governor Brown Estalbished Most Ambitious Greenhouse Gas Reduction Target in North America. [Online] April 29, 2015. https://www.gov.ca.gov/news.php?id=18938.

53. **Air Resources Board.** Sustainable Communities. [Online] 2008. [Cited: September 17, 2014.] http://www.arb.ca.gov/cc/sb375/sb375.htm.

54. **California Air Resources Board.** Preliminary Draft Staff Proposal. [Online] October 24, 2008. [Cited: November 13, 2013.] https://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf.

55. **South Coast Air Quality Management District.** Greenhouse Gases (GHG) CEQA Significance Thresholds. [Online] [Cited: September 17, 2014.] http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds.

56. *Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group Meeting #15.* **South Coast Air Quality Management District.** Diamond Bar : s.n., 2010.

57. **California Air Pollution Control Officers Association (CAPCOA).** California Emissions Estimator Model (CalEEMod). [Online] September 2016. www.caleemod.com.

58. **California Natural Resources Agency.** Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97. [Online] December 2009.

59. *Minutes for the GHG CEQA Significance.* **South Coast Air Quality Managment District.** 2008.

60. **Urban Crossroads, Inc.** *Sierra Highway Gas Station Air Quality Impact Analysis Report.* Costa Mesa : s.n., 2017.

61. **South Coast Air Quality Management District.** *Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group #13.* [Powerpoint] Diamond Bar : s.n., 2009.

62. **David Evans and Associates, Inc.** *Pinon Hills Gas Station Traffic Impact Analysis.* Ontario : s.n., 2017.

63. **South Coast Air Quality Management District.** Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans. [Online] http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-8/ghg-meeting-8-minutes.pdf?sfvrsn=2.

6 CERTIFICATION

The contents of this greenhouse gas study report represent an accurate depiction of the greenhouse gas impacts associated with the proposed Harvard Road Project Project. The information contained in this greenhouse gas report is based on the best available data at the time of preparation. If you have any questions, please contact me directly at (949) 336-5987.

Haseeb Qureshi
Senior Associate
URBAN CROSSROADS, INC.
260 E. Baker Street, Suite 200
Costa Mesa, CA 92626
(949) 336-5987
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

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

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APPENDIX 3.1:

CALEEMOD EMISSIONS MODEL OUTPUTS

Harvard Road Project

Mojave Desert AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Convenience Market With Gas Pumps	20.00	Pump	0.06	7,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.6	**Precipitation Freq (Days)**	30
Climate Zone	10			**Operational Year**	2018
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Square footage from site plan

Construction Phase -

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Grading -

Construction Off-road Equipment Mitigation -

Vehicle Trips - Trip Generation Rates from the Traffic Impact Analysis are utilized

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	40	0
tblLandUse	BuildingSpaceSquareFeet	2,823.50	7,000.00
tblLandUse	LandUseSquareFeet	2,823.50	7,000.00
tblVehicleTrips	ST_TR	204.47	162.78
tblVehicleTrips	SU_TR	166.88	162.78
tblVehicleTrips	WD_TR	542.60	162.78

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2017	0.0277	0.2738	0.1747	2.6000e-004	1.5800e-003	0.0182	0.0198	5.9000e-004	0.0168	0.0173	0.0000	23.6398	23.6398	6.9000e-003	0.0000	23.8125
2018	0.1174	0.3619	0.2604	3.9000e-004	1.0500e-003	0.0229	0.0240	2.8000e-004	0.0212	0.0214	0.0000	35.8859	35.8859	0.0106	0.0000	36.1501
Maximum	**0.1174**	**0.3619**	**0.2604**	**3.9000e-004**	**1.5800e-003**	**0.0229**	**0.0240**	**5.9000e-004**	**0.0212**	**0.0214**	**0.0000**	**35.8859**	**35.8859**	**0.0106**	**0.0000**	**36.1501**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2017	0.0277	0.2738	0.1747	2.6000e-004	9.5000e-004	0.0182	0.0191	3.2000e-004	0.0168	0.0171	0.0000	23.6398	23.6398	6.9000e-003	0.0000	23.8124
2018	0.1174	0.3619	0.2604	3.9000e-004	1.0500e-003	0.0229	0.0240	2.8000e-004	0.0212	0.0214	0.0000	35.8858	35.8858	0.0106	0.0000	36.1501
Maximum	**0.1174**	**0.3619**	**0.2604**	**3.9000e-004**	**1.0500e-003**	**0.0229**	**0.0240**	**3.2000e-004**	**0.0212**	**0.0214**	**0.0000**	**35.8858**	**35.8858**	**0.0106**	**0.0000**	**36.1501**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**23.95**	**0.00**	**1.42**	**31.03**	**0.00**	**0.70**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	11-1-2017	1-31-2018	0.4423	0.4423
2	2-1-2018	4-30-2018	0.3348	0.3348
		Highest	0.4423	0.4423

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0355	0.0000	1.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.6000e-004	3.6000e-004	0.0000	0.0000	3.8000e-004
Energy	8.0000e-005	7.7000e-004	6.4000e-004	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	29.8499	29.8499	1.2100e-003	2.6000e-004	29.9586
Mobile	1.1253	8.6852	7.1652	0.0205	0.6680	0.0149	0.6829	0.1791	0.0141	0.1932	0.0000	1,907.7019	1,907.7019	0.3067	0.0000	1,915.3684
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0664	1.3215	1.3878	6.8700e-003	1.7000e-004	1.6109
Total	**1.1609**	**8.6859**	**7.1660**	**0.0205**	**0.6680**	**0.0150**	**0.6830**	**0.1791**	**0.0141**	**0.1933**	**0.0664**	**1,938.8735**	**1,938.9399**	**0.3147**	**4.3000e-004**	**1,946.9382**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0355	0.0000	1.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.6000e-004	3.6000e-004	0.0000	0.0000	3.8000e-004
Energy	8.0000e-005	7.7000e-004	6.4000e-004	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	29.8499	29.8499	1.2100e-003	2.6000e-004	29.9586
Mobile	1.1253	8.6852	7.1652	0.0205	0.6680	0.0149	0.6829	0.1791	0.0141	0.1932	0.0000	1,907.7019	1,907.7019	0.3067	0.0000	1,915.3684
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0664	1.3215	1.3878	6.8700e-003	1.7000e-004	1.6109
Total	**1.1609**	**8.6859**	**7.1660**	**0.0205**	**0.6680**	**0.0150**	**0.6830**	**0.1791**	**0.0141**	**0.1933**	**0.0664**	**1,938.8735**	**1,938.9399**	**0.3147**	**4.3000e-004**	**1,946.9382**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	11/1/2017	11/1/2017	5	1	
2	Grading	Grading	11/2/2017	11/3/2017	5	2	
3	Building Construction	Building Construction	11/4/2017	3/23/2018	5	100	
4	Paving	Paving	3/24/2018	3/30/2018	5	5	
5	Architectural Coating	Architectural Coating	3/31/2018	4/6/2018	5	5	

Acres of Grading (Site Preparation Phase): 0.5

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 10,500; Non-Residential Outdoor: 3,500; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Rubber Tired Dozers	1	1.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Paving	Cement and Mortar Mixers	4	6.00	9	0.56
Paving	Pavers	1	7.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	2	5.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	2.00	1.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	7	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Site Preparation - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.7000e-004	0.0000	2.7000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.3000e-004	5.2600e-003	2.1800e-003	0.0000		2.4000e-004	2.4000e-004		2.2000e-004	2.2000e-004	0.0000	0.4534	0.4534	1.4000e-004	0.0000	0.4569
Total	**4.3000e-004**	**5.2600e-003**	**2.1800e-003**	**0.0000**	**2.7000e-004**	**2.4000e-004**	**5.1000e-004**	**3.0000e-005**	**2.2000e-004**	**2.5000e-004**	**0.0000**	**0.4534**	**0.4534**	**1.4000e-004**	**0.0000**	**0.4569**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0000e-005	1.0000e-005	1.1000e-004	0.0000	2.0000e-005	0.0000	2.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0188	0.0188	0.0000	0.0000	0.0189
Total	**1.0000e-005**	**1.0000e-005**	**1.1000e-004**	**0.0000**	**2.0000e-005**	**0.0000**	**2.0000e-005**	**1.0000e-005**	**0.0000**	**1.0000e-005**	**0.0000**	**0.0188**	**0.0188**	**0.0000**	**0.0000**	**0.0189**

3.2 Site Preparation - 2017

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.0000e-004	0.0000	1.0000e-004	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.3000e-004	5.2600e-003	2.1800e-003	0.0000		2.4000e-004	2.4000e-004		2.2000e-004	2.2000e-004	0.0000	0.4534	0.4534	1.4000e-004	0.0000	0.4569
Total	**4.3000e-004**	**5.2600e-003**	**2.1800e-003**	**0.0000**	**1.0000e-004**	**2.4000e-004**	**3.4000e-004**	**1.0000e-005**	**2.2000e-004**	**2.3000e-004**	**0.0000**	**0.4534**	**0.4534**	**1.4000e-004**	**0.0000**	**0.4569**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0000e-005	1.0000e-005	1.1000e-004	0.0000	2.0000e-005	0.0000	2.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0188	0.0188	0.0000	0.0000	0.0189
Total	**1.0000e-005**	**1.0000e-005**	**1.1000e-004**	**0.0000**	**2.0000e-005**	**0.0000**	**2.0000e-005**	**1.0000e-005**	**0.0000**	**1.0000e-005**	**0.0000**	**0.0188**	**0.0188**	**0.0000**	**0.0000**	**0.0189**

3.3 Grading - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					7.5000e-004	0.0000	7.5000e-004	4.1000e-004	0.0000	4.1000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.2100e-003	0.0105	7.9200e-003	1.0000e-005		7.3000e-004	7.3000e-004		7.0000e-004	7.0000e-004	0.0000	1.0699	1.0699	2.1000e-004	0.0000	1.0751
Total	**1.2100e-003**	**0.0105**	**7.9200e-003**	**1.0000e-005**	**7.5000e-004**	**7.3000e-004**	**1.4800e-003**	**4.1000e-004**	**7.0000e-004**	**1.1100e-003**	**0.0000**	**1.0699**	**1.0699**	**2.1000e-004**	**0.0000**	**1.0751**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.0000e-005	5.0000e-005	4.6000e-004	0.0000	8.0000e-005	0.0000	8.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0753	0.0753	0.0000	0.0000	0.0754
Total	**6.0000e-005**	**5.0000e-005**	**4.6000e-004**	**0.0000**	**8.0000e-005**	**0.0000**	**8.0000e-005**	**2.0000e-005**	**0.0000**	**2.0000e-005**	**0.0000**	**0.0753**	**0.0753**	**0.0000**	**0.0000**	**0.0754**

3.3 Grading - 2017

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.9000e-004	0.0000	2.9000e-004	1.6000e-004	0.0000	1.6000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.2100e-003	0.0105	7.9200e-003	1.0000e-005		7.3000e-004	7.3000e-004		7.0000e-004	7.0000e-004	0.0000	1.0699	1.0699	2.1000e-004	0.0000	1.0751
Total	**1.2100e-003**	**0.0105**	**7.9200e-003**	**1.0000e-005**	**2.9000e-004**	**7.3000e-004**	**1.0200e-003**	**1.6000e-004**	**7.0000e-004**	**8.6000e-004**	**0.0000**	**1.0699**	**1.0699**	**2.1000e-004**	**0.0000**	**1.0751**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.0000e-005	5.0000e-005	4.6000e-004	0.0000	8.0000e-005	0.0000	8.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0753	0.0753	0.0000	0.0000	0.0754
Total	**6.0000e-005**	**5.0000e-005**	**4.6000e-004**	**0.0000**	**8.0000e-005**	**0.0000**	**8.0000e-005**	**2.0000e-005**	**0.0000**	**2.0000e-005**	**0.0000**	**0.0753**	**0.0753**	**0.0000**	**0.0000**	**0.0754**

3.4 Building Construction - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0256	0.2552	0.1614	2.3000e-004		0.0172	0.0172		0.0158	0.0158	0.0000	21.1540	21.1540	6.4800e-003	0.0000	21.3161
Total	**0.0256**	**0.2552**	**0.1614**	**2.3000e-004**		**0.0172**	**0.0172**		**0.0158**	**0.0158**	**0.0000**	**21.1540**	**21.1540**	**6.4800e-003**	**0.0000**	**21.3161**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.0000e-004	2.6200e-003	7.8000e-004	1.0000e-005	1.3000e-004	2.0000e-005	1.5000e-004	4.0000e-005	2.0000e-005	6.0000e-005	0.0000	0.5671	0.5671	6.0000e-005	0.0000	0.5685
Worker	2.3000e-004	2.0000e-004	1.8300e-003	0.0000	3.2000e-004	0.0000	3.3000e-004	9.0000e-005	0.0000	9.0000e-005	0.0000	0.3013	0.3013	1.0000e-005	0.0000	0.3017
Total	**3.3000e-004**	**2.8200e-003**	**2.6100e-003**	**1.0000e-005**	**4.5000e-004**	**2.0000e-005**	**4.8000e-004**	**1.3000e-004**	**2.0000e-005**	**1.5000e-004**	**0.0000**	**0.8684**	**0.8684**	**7.0000e-005**	**0.0000**	**0.8702**

3.4 Building Construction - 2017

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0256	0.2552	0.1614	2.3000e-004		0.0172	0.0172		0.0158	0.0158	0.0000	21.1540	21.1540	6.4800e-003	0.0000	21.3161
Total	**0.0256**	**0.2552**	**0.1614**	**2.3000e-004**		**0.0172**	**0.0172**		**0.0158**	**0.0158**	**0.0000**	**21.1540**	**21.1540**	**6.4800e-003**	**0.0000**	**21.3161**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.0000e-004	2.6200e-003	7.8000e-004	1.0000e-005	1.3000e-004	2.0000e-005	1.5000e-004	4.0000e-005	2.0000e-005	6.0000e-005	0.0000	0.5671	0.5671	6.0000e-005	0.0000	0.5685
Worker	2.3000e-004	2.0000e-004	1.8300e-003	0.0000	3.2000e-004	0.0000	3.3000e-004	9.0000e-005	0.0000	9.0000e-005	0.0000	0.3013	0.3013	1.0000e-005	0.0000	0.3017
Total	**3.3000e-004**	**2.8200e-003**	**2.6100e-003**	**1.0000e-005**	**4.5000e-004**	**2.0000e-005**	**4.8000e-004**	**1.3000e-004**	**2.0000e-005**	**1.5000e-004**	**0.0000**	**0.8684**	**0.8684**	**7.0000e-005**	**0.0000**	**0.8702**

3.4 Building Construction - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0325	0.3310	0.2325	3.4000e-004		0.0213	0.0213		0.0196	0.0196	0.0000	31.2035	31.2035	9.7100e-003	0.0000	31.4464
Total	**0.0325**	**0.3310**	**0.2325**	**3.4000e-004**		**0.0213**	**0.0213**		**0.0196**	**0.0196**	**0.0000**	**31.2035**	**31.2035**	**9.7100e-003**	**0.0000**	**31.4464**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.3000e-004	3.6500e-003	1.0100e-003	1.0000e-005	2.0000e-004	2.0000e-005	2.2000e-004	6.0000e-005	2.0000e-005	8.0000e-005	0.0000	0.8482	0.8482	8.0000e-005	0.0000	0.8502
Worker	3.1000e-004	2.7000e-004	2.3700e-003	0.0000	4.8000e-004	0.0000	4.9000e-004	1.3000e-004	0.0000	1.3000e-004	0.0000	0.4393	0.4393	2.0000e-005	0.0000	0.4398
Total	**4.4000e-004**	**3.9200e-003**	**3.3800e-003**	**1.0000e-005**	**6.8000e-004**	**2.0000e-005**	**7.1000e-004**	**1.9000e-004**	**2.0000e-005**	**2.1000e-004**	**0.0000**	**1.2875**	**1.2875**	**1.0000e-004**	**0.0000**	**1.2900**

3.4 Building Construction - 2018

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0325	0.3310	0.2325	3.4000e-004		0.0213	0.0213		0.0196	0.0196	0.0000	31.2035	31.2035	9.7100e-003	0.0000	31.4463
Total	**0.0325**	**0.3310**	**0.2325**	**3.4000e-004**		**0.0213**	**0.0213**		**0.0196**	**0.0196**	**0.0000**	**31.2035**	**31.2035**	**9.7100e-003**	**0.0000**	**31.4463**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.3000e-004	3.6500e-003	1.0100e-003	1.0000e-005	2.0000e-004	2.0000e-005	2.2000e-004	6.0000e-005	2.0000e-005	8.0000e-005	0.0000	0.8482	0.8482	8.0000e-005	0.0000	0.8502
Worker	3.1000e-004	2.7000e-004	2.3700e-003	0.0000	4.8000e-004	0.0000	4.9000e-004	1.3000e-004	0.0000	1.3000e-004	0.0000	0.4393	0.4393	2.0000e-005	0.0000	0.4398
Total	**4.4000e-004**	**3.9200e-003**	**3.3800e-003**	**1.0000e-005**	**6.8000e-004**	**2.0000e-005**	**7.1000e-004**	**1.9000e-004**	**2.0000e-005**	**2.1000e-004**	**0.0000**	**1.2875**	**1.2875**	**1.0000e-004**	**0.0000**	**1.2900**

3.5 Paving - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	2.3000e-003	0.0219	0.0181	3.0000e-005		1.2800e-003	1.2800e-003		1.1800e-003	1.1800e-003	0.0000	2.4270	2.4270	6.8000e-004	0.0000	2.4441
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**2.3000e-003**	**0.0219**	**0.0181**	**3.0000e-005**		**1.2800e-003**	**1.2800e-003**		**1.1800e-003**	**1.1800e-003**	**0.0000**	**2.4270**	**2.4270**	**6.8000e-004**	**0.0000**	**2.4441**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.3000e-004	2.0000e-004	1.7800e-003	0.0000	3.6000e-004	0.0000	3.7000e-004	1.0000e-004	0.0000	1.0000e-004	0.0000	0.3295	0.3295	1.0000e-005	0.0000	0.3298
Total	**2.3000e-004**	**2.0000e-004**	**1.7800e-003**	**0.0000**	**3.6000e-004**	**0.0000**	**3.7000e-004**	**1.0000e-004**	**0.0000**	**1.0000e-004**	**0.0000**	**0.3295**	**0.3295**	**1.0000e-005**	**0.0000**	**0.3298**

3.5 Paving - 2018

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	2.3000e-003	0.0219	0.0181	3.0000e-005		1.2800e-003	1.2800e-003		1.1800e-003	1.1800e-003	0.0000	2.4270	2.4270	6.8000e-004	0.0000	2.4441
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**2.3000e-003**	**0.0219**	**0.0181**	**3.0000e-005**		**1.2800e-003**	**1.2800e-003**		**1.1800e-003**	**1.1800e-003**	**0.0000**	**2.4270**	**2.4270**	**6.8000e-004**	**0.0000**	**2.4441**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.3000e-004	2.0000e-004	1.7800e-003	0.0000	3.6000e-004	0.0000	3.7000e-004	1.0000e-004	0.0000	1.0000e-004	0.0000	0.3295	0.3295	1.0000e-005	0.0000	0.3298
Total	**2.3000e-004**	**2.0000e-004**	**1.7800e-003**	**0.0000**	**3.6000e-004**	**0.0000**	**3.7000e-004**	**1.0000e-004**	**0.0000**	**1.0000e-004**	**0.0000**	**0.3295**	**0.3295**	**1.0000e-005**	**0.0000**	**0.3298**

3.6 Architectural Coating - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0811					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.5000e-004	5.0100e-003	4.6400e-003	1.0000e-005		3.8000e-004	3.8000e-004		3.8000e-004	3.8000e-004	0.0000	0.6383	0.6383	6.0000e-005	0.0000	0.6398
Total	**0.0819**	**5.0100e-003**	**4.6400e-003**	**1.0000e-005**		**3.8000e-004**	**3.8000e-004**		**3.8000e-004**	**3.8000e-004**	**0.0000**	**0.6383**	**0.6383**	**6.0000e-005**	**0.0000**	**0.6398**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

3.6 Architectural Coating - 2018

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0811					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.5000e-004	5.0100e-003	4.6400e-003	1.0000e-005		3.8000e-004	3.8000e-004		3.8000e-004	3.8000e-004	0.0000	0.6383	0.6383	6.0000e-005	0.0000	0.6398
Total	**0.0819**	**5.0100e-003**	**4.6400e-003**	**1.0000e-005**		**3.8000e-004**	**3.8000e-004**		**3.8000e-004**	**3.8000e-004**	**0.0000**	**0.6383**	**0.6383**	**6.0000e-005**	**0.0000**	**0.6398**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.1253	8.6852	7.1652	0.0205	0.6680	0.0149	0.6829	0.1791	0.0141	0.1932	0.0000	1,907.7019	1,907.7019	0.3067	0.0000	1,915.3684
Unmitigated	1.1253	8.6852	7.1652	0.0205	0.6680	0.0149	0.6829	0.1791	0.0141	0.1932	0.0000	1,907.7019	1,907.7019	0.3067	0.0000	1,915.3684

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Convenience Market With Gas Pumps	3,255.60	3,255.60	3255.60	1,746,318	1,746,318
Total	3,255.60	3,255.60	3,255.60	1,746,318	1,746,318

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Convenience Market With Gas	9.50	7.30	7.30	0.80	80.20	19.00	14	21	65

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Convenience Market With Gas Pumps	0.522654	0.039224	0.175067	0.121571	0.023330	0.006273	0.008529	0.087691	0.001433	0.002506	0.009615	0.000720	0.001388

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	29.0169	29.0169	1.2000e-003	2.5000e-004	29.1207
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	29.0169	29.0169	1.2000e-003	2.5000e-004	29.1207
NaturalGas Mitigated	8.0000e-005	7.7000e-004	6.4000e-004	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.8330	0.8330	2.0000e-005	2.0000e-005	0.8380
NaturalGas Unmitigated	8.0000e-005	7.7000e-004	6.4000e-004	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.8330	0.8330	2.0000e-005	2.0000e-005	0.8380

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Convenience Market With Gas Pumps	15610	8.0000e-005	7.7000e-004	6.4000e-004	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.8330	0.8330	2.0000e-005	2.0000e-005	0.8380
Total		**8.0000e-005**	**7.7000e-004**	**6.4000e-004**	**0.0000**		**6.0000e-005**	**6.0000e-005**		**6.0000e-005**	**6.0000e-005**	**0.0000**	**0.8330**	**0.8330**	**2.0000e-005**	**2.0000e-005**	**0.8380**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Convenience Market With Gas Pumps	15610	8.0000e-005	7.7000e-004	6.4000e-004	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.8330	0.8330	2.0000e-005	2.0000e-005	0.8380
Total		**8.0000e-005**	**7.7000e-004**	**6.4000e-004**	**0.0000**		**6.0000e-005**	**6.0000e-005**		**6.0000e-005**	**6.0000e-005**	**0.0000**	**0.8330**	**0.8330**	**2.0000e-005**	**2.0000e-005**	**0.8380**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Convenience Market With Gas Pumps	91070	29.0169	1.2000e-003	2.5000e-004	29.1207
Total		**29.0169**	**1.2000e-003**	**2.5000e-004**	**29.1207**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Convenience Market With Gas Pumps	91070	29.0169	1.2000e-003	2.5000e-004	29.1207
Total		**29.0169**	**1.2000e-003**	**2.5000e-004**	**29.1207**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0355	0.0000	1.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.6000e-004	3.6000e-004	0.0000	0.0000	3.8000e-004
Unmitigated	0.0355	0.0000	1.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.6000e-004	3.6000e-004	0.0000	0.0000	3.8000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	8.1100e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0273					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0000e-005	0.0000	1.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.6000e-004	3.6000e-004	0.0000	0.0000	3.8000e-004
Total	**0.0355**	**0.0000**	**1.9000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**3.6000e-004**	**3.6000e-004**	**0.0000**	**0.0000**	**3.8000e-004**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	8.1100e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0273					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0000e-005	0.0000	1.9000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	3.6000e-004	3.6000e-004	0.0000	0.0000	3.8000e-004
Total	**0.0355**	**0.0000**	**1.9000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**3.6000e-004**	**3.6000e-004**	**0.0000**	**0.0000**	**3.8000e-004**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	1.3878	6.8700e-003	1.7000e-004	1.6109
Unmitigated	1.3878	6.8700e-003	1.7000e-004	1.6109

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Convenience Market With Gas Pumps	0.209144 / 0.128185	1.3878	6.8700e-003	1.7000e-004	1.6109
Total		**1.3878**	**6.8700e-003**	**1.7000e-004**	**1.6109**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Convenience Market With Gas Pumps	0.209144 / 0.128185	1.3878	6.8700e-003	1.7000e-004	1.6109
Total		**1.3878**	**6.8700e-003**	**1.7000e-004**	**1.6109**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation