Gilman Springs Mine

GREENHOUSE GAS ANALYSIS

COUNTY OF RIVERSIDE

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TABLE OF CONTENTS

APPENDICES

LIST OF EXHIBITS

LIST OF TABLES

LIST OF ABBREVIATED TERMS

(1)	Reference
°F	Degrees Fahrenheit
AB	Assembly Bill
AB 32	Global Warming Solutions Act of 2006
AB 1493	Pavley Regulations and Fuel Efficiency Standards
APA	Administrative Procedure Act
AQIA	Air Quality Impact Analysis
BAU	Business As Usual
C_2F_6	Hexafluoroethane
C_2H_6	Ethane
CAA	Federal Clean Air Act
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALFIRE	California Department of Forestry and Fire Protection
CALGAPS	California LBNL GHG Analysis of Policies Spreadsheet
CALGreen	California Green Building Standards Code
CALSTA	California State Transportation Agency
CALTRANS	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resource Board
CAP	Climate Action Plan
CBSC	California Building Standards Commission
CEC	California Energy Commission
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CDFA	California Department of Food and Agriculture
CF_4	Tetrafluoromethane
CFC	Chlorofluorocarbons
CH_2FCF	Hydrofluorocarbons-134a
CH_3CF_2	Hydrofluorocarbons-152a
CH_4	Methane
CHF_3	Hydrofluorocarbons-23
CNRA	California Natural Resources Agency
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
COP	Conference of the Parties

COUNTY	County of Riverside
CPUC	California Public Utilities Commission
CTC	California Transportation Commission
DOF	Department of Finance
EMFAC	Emission Factor Model
EPA	Environmental Protection Agency
FED	Functional Equivalent Document
GCC	Global Climate Change
GHGA	Greenhouse Gas Analysis
GOBIZ	Governor's Office of Business and Economic Development
GWP	Global Warming Potential
H_2O	Water
HFC	Hydrofluorocarbons
HP	Horsepower
I-215	Interstate 215
IBANK	California Infrastructure and Economic Development Bank
IPCC	Intergovernmental Panel on Climate Change
ISO	Independent System Operator
LBNL	Lawrence Berkeley National Laboratory
LCA	Life-Cycle Analysis
LCFS	Low Carbon Fuel Standard
LDT	Light-Duty Trucks
LEV	Low-Emission Vehicle
MMR	Mandatory Reporting Rule
$MMTCO_2e$	Million Metric Ton of Carbon Dioxide Equivalent
MPG	Miles Per Gallon
MPO	Metropolitan Planning Organizations
MT/YR	Metric Tons Per Year
$MTCO_2e$	Metric Ton of Carbon Dioxide Equivalent
MWH	Megawatt Hours
NHTSA	National Highway Traffic Safety Administration
N_2O	Nitrogen Dioxide/Nitrous Oxide
NDC	Nationally Determined Contributions
NF_3	Nitrogen Trifluoride
NIOSH	National Institute for Occupational Safety and Health
NO_X	Nitrogen Oxides
OPR	Office of Planning and Research
PFC	Perfluorocarbons

PM_{10}	Particulate Matter 10 microns in diameter or less
$PM_{2.5}$	Particulate Matter 2.5 microns in diameter or less
PPB	Parts Per Million
PPM	Parts Per Million
PPT	Parts Per Trillion
Project	Gilman Springs Mine
RPS	Renewable Portfolio Standards
RTP	Regional Transportation Plan
SAR	Second Assessment Report
SB	Senate Bill
SB 32	California Global Warming Solutions Act of 2006
SB 375	The Sustainable Communities and Climate Protection Act of 2008
SCAQMD	South Coast Air Quality Management District
SF_6	Sulfur Hexaflouride
SGC	Strategic Growth Council
SLPS	Short-Lived Climate Pollutant Strategy
SP	Service Population
SR-60	State Route 60
SR-79	State Route 79
TIA	Traffic Impact Analysis
TITLE 20	Appliance Energy Efficiency Standards
TITLE 24	Building Energy Efficiency Standards
TPD	Tons Per Day
TPY	Tons Per Year
UNFCCC	United Nations' Framework Convention on Climate Change
VMT	Vehicle Miles Traveled
WRI	World Resources Institute
ZE/NZE	Zero and Near-Zero Emissions

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EXECUTIVE SUMMARY

ES.1 SUMMARY OF FINDINGS

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

TABLE ES-1: SUMMARY OF CEQA SIGNIFICANCE FINDINGS

Analysis	Report Section	Significance Findings	
		Unmitigated	Mitigated
GHG Impact #1: Would the Project generate direct or indirect GHG emission that would result in a significant impact on the environment?	3.8	*Potentially Significant*	*Significant and Unavoidable*
GHG Impact #2: Would the Project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?	3.8	*Potentially Significant*	*Significant and Unavoidable*

ES.2 MITIGATION MEASURES

The Project would have a significant and unavoidable impact with respect to GHG emissions. It is important to note that more than 50 percent of the Project's GHG emissions are derived from vehicle usage. Since neither the Project Applicant nor the County have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce GHG emissions to levels that are less-than-significant. Thus, GHG emissions are considered significant and unavoidable.

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1 INTRODUCTION

This report presents the results of the GHGA prepared by Urban Crossroads, Inc., for the proposed Gilman Springs Mine (Project). The purpose of this GHGA is to evaluate Project-related operational emissions and determine the level of GHG impacts as a result of constructing and operating the proposed Project.

1.1 SITE LOCATION

The proposed Gilman Springs Mine Project is located on the northeast side of Gilman Springs Road and south of Bridge Street in unincorporated County of Riverside, as shown on Exhibit 1-A. State Route 79 (SR-79) is located approximately 1.1 miles southeast of the Project site, State Route 60 (SR-60) is located approximately 3.0 miles north of the Project site, and Interstate 215 (I-215) is located approximately 11.5 miles west of the Project site. Existing agricultural uses are located west and south of the Project site; vacant land is located north of the Project site; and the Lamb Canyon Landfill is located roughly 1.5 miles east of the Project site.

1.2 PROJECT DESCRIPTION

The Project's historic tonnage average is 377,675 tons per year (TPY) based on a 15-year average of historical data. The Project is proposing a permit that would allow up to 1,000,000 TPY. For impact calculations that rely on annual tonnage, the net increase over the baseline (i.e., 377,675 TPY) will be evaluated as part of the analysis. When compared to the proposed permitted maximum annual production quantity of the 1.0 million tons per year (MTPY), the Project results in a net increase of 622,235 TPY, or a 62.22-percent share of the total permitted annual production quantity. As such, the high-end estimate of daily tonnage at the site is approximately 4,000 tons per day (TPD), with approximately 1,511 TPD associated with the mine's existing operations (i.e., baseline) and 2,489 TPD attributable to the proposed Project (62.22-percent of 4,000 TPD). The Project is anticipated to be in operation by the end of 2019.

Exhibit 1-B shows the proposed Project mining operations and physical disturbance boundaries. The on-site Project-related emissions sources are expected to include: On-Site Equipment, Mobile Source (Passenger Cars and Truck Traffic) Emissions and blasting. This analysis is intended to describe emissions associated with the expected typical operational activities at the Project site.

1.3 PROJECT TRIP GENERATION

According to the *Gilman Springs Mine Traffic Impact Analysis* (TIA) prepared by Urban Crossroads, Inc. the Project is expected to generate a net total of approximately 218 two-way trips per day (109 inbound and 109 outbound). The Project trip generation includes 199 two-way truck trips per day and 19 two-way passenger vehicles per day (2).

EXHIBIT 1-A: LOCATION MAP

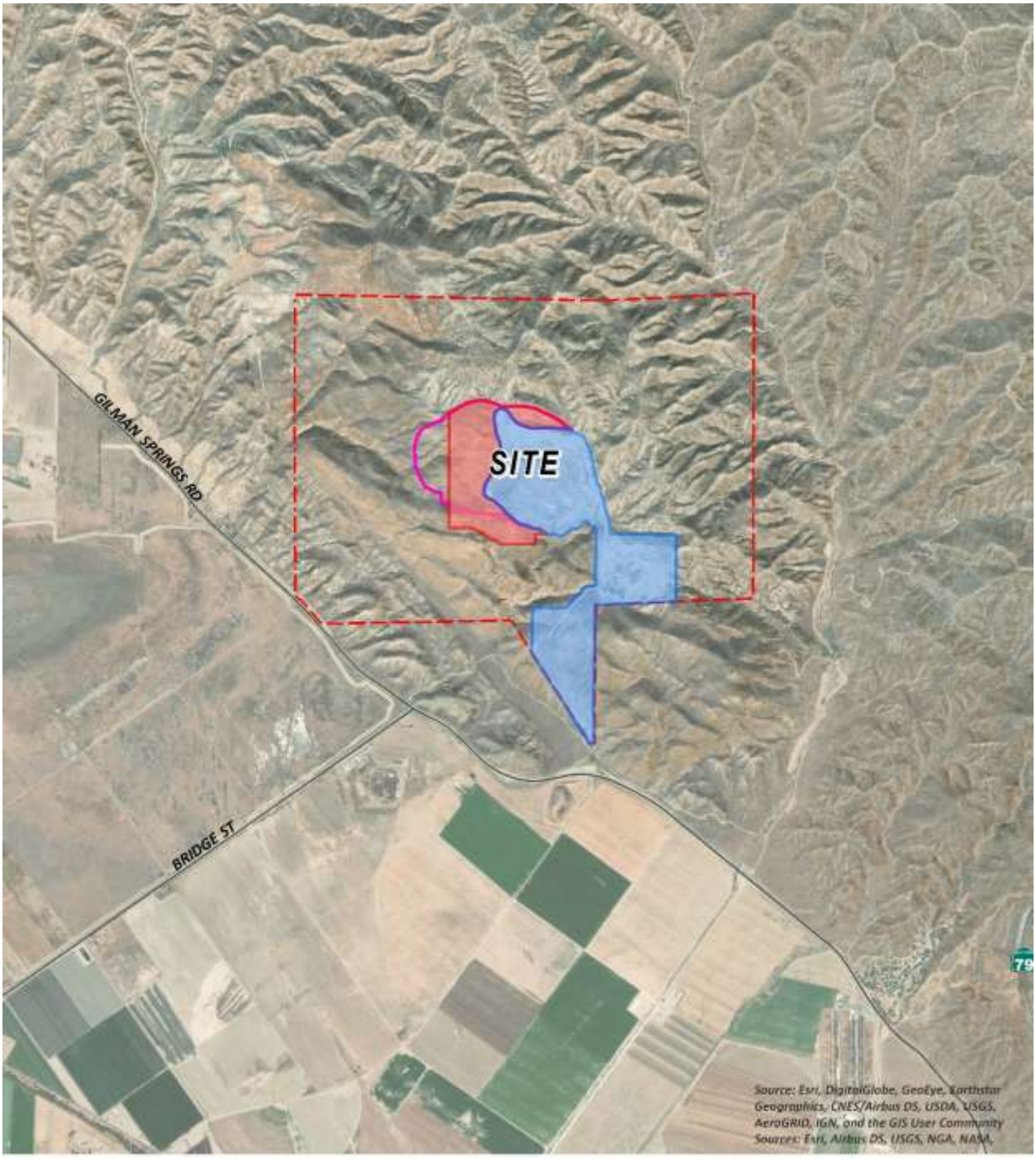
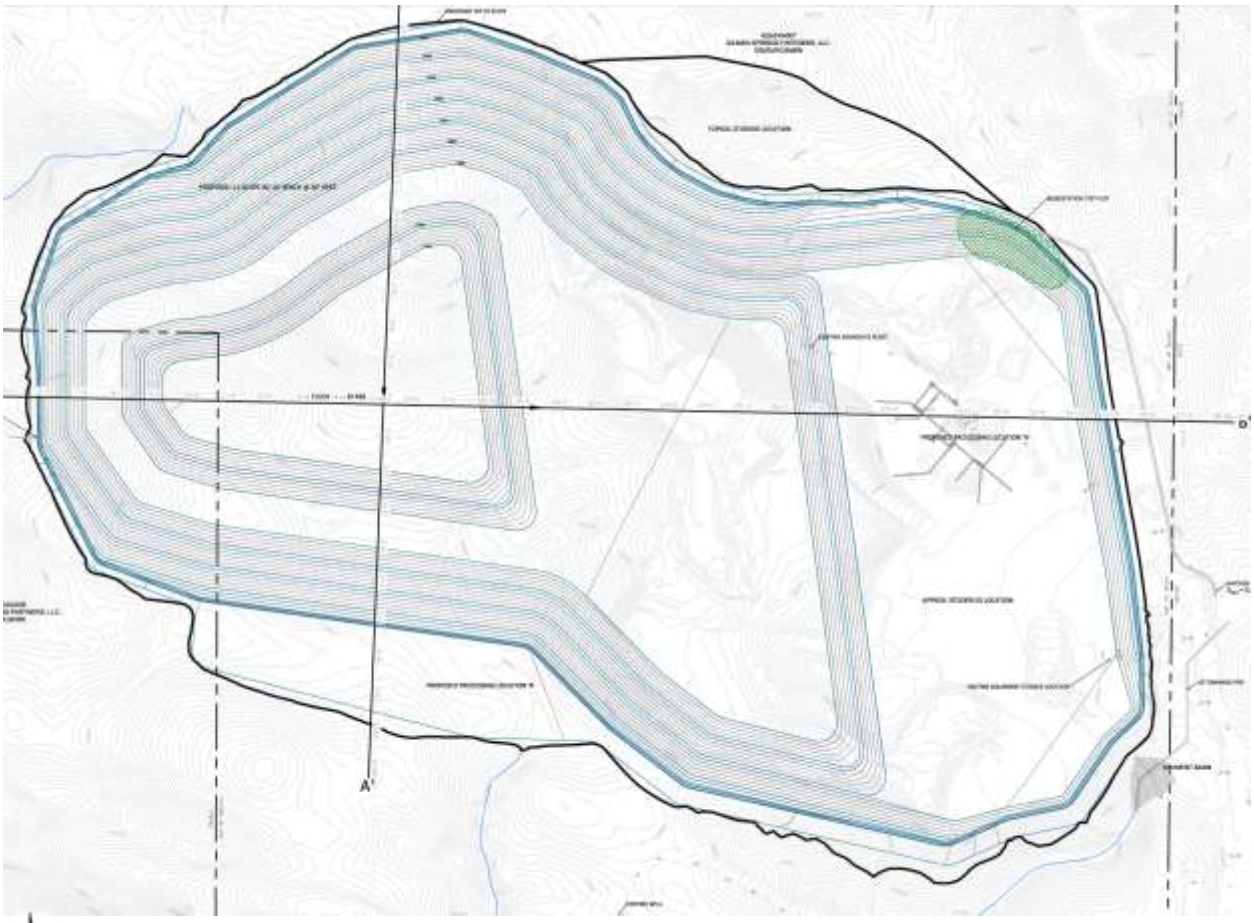


EXHIBIT 1-B: PROPOSED PHYSICAL DISTURBANCE PLAN



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2 CLIMATE CHANGE SETTING

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. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years.

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

2.2 GLOBAL CLIMATE CHANGE DEFINED

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water (H_2O) vapor, CO_2, N_2O, CH_4, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). 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.

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

2.3 GREENHOUSE GASES

GREENHOUSE GASES AND HEALTH EFFECTS

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. Many gases demonstrate these properties and as discussed in Table 2-1. For the purposes of this analysis, emissions of CO_2, CH_4, and N_2O were evaluated (see Table 3-1

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

TABLE 2-1: GREENHOUSE GASES

Greenhouse Gases	Description	Sources	Health Effects
H_2O	H_2O is the most abundant, important, and variable GHG in the atmosphere. H_2O 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 H_2O is involved is critically important to projecting future climate change. As the temperature of the atmosphere rises, more H_2O 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 H_2O when it is warmer), leading to more H_2O vapor in the atmosphere. As a GHG, the higher concentration of H_2O 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 H_2O 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	The main source of H_2O vapor is evaporation from the oceans (approximately 85 percent). Other sources include evaporation from other H_2O bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves.	There are no known direct health effects related to H_2O vapor at this time. It should be noted however that when some pollutants react with H_2O vapor, the reaction forms a transport mechanism for some of these pollutants to enter the human body through H_2O vapor.

Greenhouse Gases	Description	Sources	Health Effects
	dynamics that hold the positive feedback loop in check. As an example, when H_2O vapor increases in the atmosphere, more of it will eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the earth's surface and heat it up) (3).		
CO_2	CO_2 is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO_2 concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30 percent. Left unchecked, the concentration of CO_2 in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources (4).	CO_2 is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil, natural gas, and wood. CO_2 is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks (5).	Outdoor levels of CO_2 are not high enough to result in negative health effects. According to the National Institute for Occupational Safety and Health (NIOSH) high concentrations of CO_2 can result in health effects such as: headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. It should be noted that current concentrations of CO_2 in the earth's atmosphere are estimated to be approximately 370 ppm, the actual reference exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour workweek and short-term reference exposure levels of 30,000 ppm averaged over a 15 minute period (6).

Greenhouse Gases	Description	Sources	Health Effects
CH_4	CH_4 is an extremely effective absorber of radiation, although its atmospheric concentration is less than CO_2 and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs.	CH_4 has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of CH_4. Other anthropocentric sources include fossil-fuel combustion and biomass burning (7).	CH_4 is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to high levels of CH_4 can cause asphyxiation, loss of consciousness, headache and dizziness, nausea and vomiting, weakness, loss of coordination, and an increased breathing rate.
N_2O	N_2O, also known as laughing gas, is a colorless GHG. Concentrations of N_2O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb).	N_2O is produced by microbial processes in soil and H_2O, 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	N_2O 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) (8).

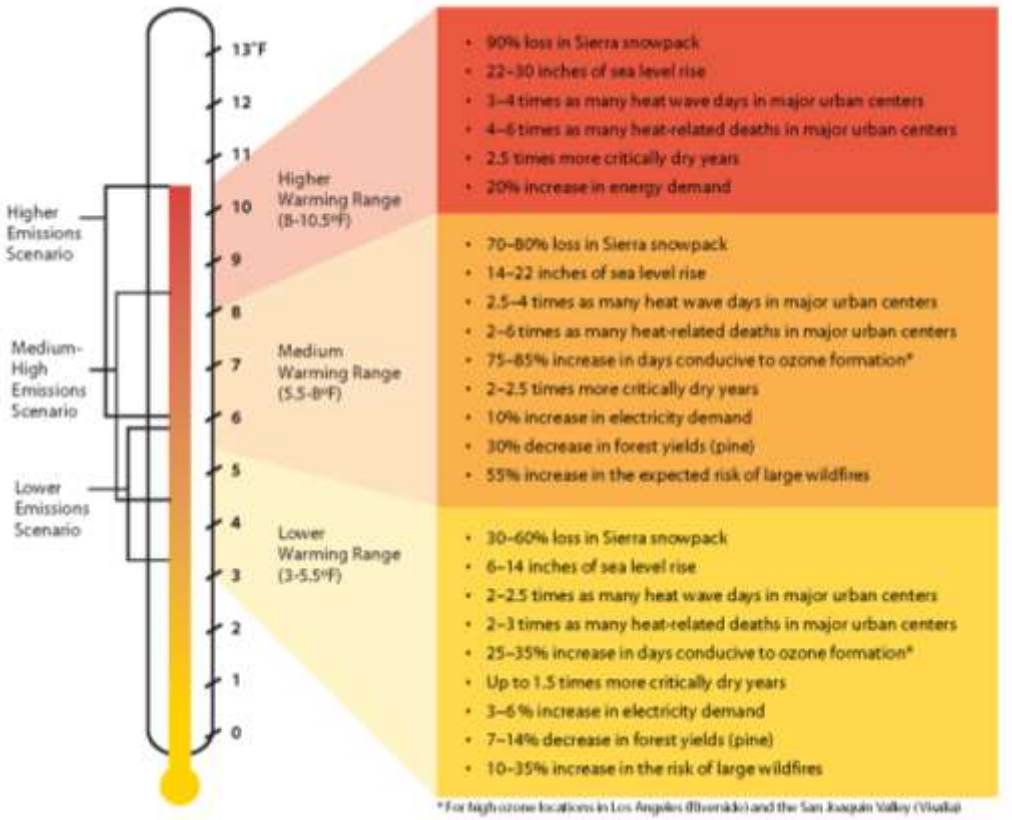
Greenhouse Gases	Description	Sources	Health Effects
		bags to keep chips fresh. It is used in rocket engines and in race cars. N_2O can be transported into the stratosphere, be deposited on the earth's surface, and be converted to other compounds by chemical reaction (8).	
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the earth's surface).	CFCs have no natural source but were first synthesized in 1928. They were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years (9).	In confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.

Greenhouse Gases	Description	Sources	Health Effects
HFCs	HFCs are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential (GWP). The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF_3), HFC-134a (CH_2FCF), and HFC-152a (CH_3CF_2). Prior to 1990, the only significant emissions were of HFC-23. HFC-134a emissions are increasing due to its use as a refrigerant.	HFCs are manmade for applications such as automobile air conditioners and refrigerants.	No health effects are known to result from exposure to HFCs.
PFCs	PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above earth's surface, are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF_4) and hexafluoroethane (C_2F_6). The EPA estimates that concentrations of CF_4 in the atmosphere are over 70 parts per trillion (ppt).	The two main sources of PFCs are primary aluminum production and semiconductor manufacture.	No health effects are known to result from exposure to PFCs.
SF_6	SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900) (10). The EPA indicates that concentrations in the 1990s were about 4 ppt.	SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.	In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.
Nitrogen Trifluoride (NF_3)	NF_3 is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that NF_3 has a 100-year	NF_3 is used in industrial processes and is produced in the manufacturing of semiconductors, LCD	Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis (12).

Greenhouse Gases	Description	Sources	Health Effects
	GWP of 17,200 (11).	(Liquid Crystal Display) panels, types of solar panels, and chemical lasers.	

The potential health effects related directly to the emissions of CO_2, CH_4, and N_2O as they relate to development projects such as the Project are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport that higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change will likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas (13). Exhibit 2-A presents the potential impacts of global warming (14).

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



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

2.4 GLOBAL WARMING POTENTIAL

GHGs have varying GWP values. GWP of a GHG indicates the amount of warming a gas causes over a given period of time and represents the potential of a gas to trap heat in the atmosphere. CO_2 is utilized as the reference gas for GWP, and thus has a GWP of 1. Carbon

dioxide equivalent (CO_2e) is a term used for describing the difference GHGs in a common unit. CO_2e signifies the amount of CO_2 which would have the equivalent GWP.

The atmospheric lifetime and GWP of selected GHGs are summarized at Table 2-2. As shown in the table below, GWP for the Second Assessment Report (SAR), the Intergovernmental Panel on Climate Change (IPCC)'s scientific and socio-economic assessment on climate change, range from 1 for CO_2 to 23,900 for SF_6 and GWP for the IPCC's 5th Assessment Report range from 1 for CO_2 to 23,500 for SF_6 (15).

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

Gas	Atmospheric Lifetime (years)	GWP (100-year time horizon)	
		SAR	5th Assessment Report
CO_2	See*	1	1
CH_4	12 .4	21	28
N_2O	121	310	265
HFC-23	222	11,700	12,400
HFC-134a	13.4	1,300	1,300
HFC-152a	1.5	140	138
SF_6	3,200	23,900	23,500

*As per Appendix 8.A. of IPCC's 5th Assessment Report, no single lifetime can be given.
Source: Table 2.14 of the IPCC Fourth Assessment Report, 2007

2.5 GREENHOUSE GAS EMISSIONS INVENTORIES

Global

Worldwide anthropogenic (human) GHG emissions are tracked by the IPCC for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2017. Based on the latest available data, the sum of these emissions totaled approximately 29,216,501 Gg CO_2e[1] (16) (17) as summarized on Table 2-3.

[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 2017 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," The most recent GHG emissions for China and India are from 2014.

United States

As noted in Table 2-3, the United States, as a single country, was the number two producer of GHG emissions in 2017.

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

Emitting Countries	GHG Emissions (Gg CO_2e)
China	11,911,710
United States	6,456,718
European Union (28-member countries)	4,323,163
India	3,079,810
Russian Federation	2,155,470
Japan	1,289,630
Total	**29,216,501**

Note: Gg – gigagram

State of California

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls, but is still a substantial contributor to the U.S. emissions inventory total (18). The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2019 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2017 GHG emissions period, California emitted an average 424.1 million metric tons of CO_2e ($MMTCO_2e$) per year (19).

2.6 EFFECTS OF CLIMATE CHANGE IN CALIFORNIA

Public Health

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation could increase from 25 to 35 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 impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. The Climate Scenarios report indicates that large wildfires could become up to 55 percent 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

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

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 needed. Although higher CO_2 levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth.

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

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

Forests and Landscapes

GCC has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55 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 GCC has the potential to alter natural ecosystems and biological diversity within the state. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80 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 GCC.

Rising Sea Levels

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

2.7 REGULATORY SETTING

INTERNATIONAL

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

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

United Nation's Framework Convention on Climate Change (UNFCCC). On March 21, 1994, the U.S. joined a number of countries around the world in signing the Convention. Under the Convention, governments gather and share information on GHG emissions, national policies, and best practices; launch national strategies for addressing GHG emissions and adapting to

expected impacts, including the provision of financial and technological support to developing countries; and cooperate in preparing for adaptation to the impacts of climate change.

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

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

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

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

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

- Reaffirm the goal of limiting global temperature increase well below 2 degrees Celsius, while urging efforts to limit the increase to 1.5 degrees;
- Establish binding commitments by all parties to make "nationally determined contributions" (NDCs), and to pursue domestic measures aimed at achieving them;

- Commit all countries to report regularly on their emissions and "progress made in implementing and achieving" their NDCs, and to undergo international review;
- Commit all countries to submit new NDCs every five years, with the clear expectation that they will "represent a progression" beyond previous ones;
- Reaffirm the binding obligations of developed countries under the UNFCCC to support the efforts of developing countries, while for the first time encouraging voluntary contributions by developing countries too;
- Extend the current goal of mobilizing $100 billion a year in support by 2020 through 2025, with a new, higher goal to be set for the period after 2025;
- Extend a mechanism to address "loss and damage" resulting from climate change, which explicitly will not "involve or provide a basis for any liability or compensation;"
- Require parties engaging in international emissions trading to avoid "double counting;" and
- Call for a new mechanism, similar to the Clean Development Mechanism under the Kyoto Protocol, enabling emission reductions in one country to be counted toward another country's NDC (C2ES 2015a) (20).

On June 2, 2017 President Donald Trump announced his intention to withdraw from the Paris Agreement. It should be noted that under the terms of the agreement, the United Sates cannot formally announce its resignation until November 4, 2019. Subsequently, withdrawal would be effective one year after notification in 2020.

NATIONAL

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

GHG Endangerment. In *Massachusetts v. Environmental Protection Agency (EPA)* 549 U.S. 497 (2007), decided on April 2, 2007, the Supreme Court found that four GHGs, including CO_2, are air pollutants subject to regulation under Section 202(a)(1) of the Federal Clean Air Act (CAA). The Court held that the EPA Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under section 202(a) of the CAA:

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs— CO_2, CH_4, N_2O, HFCs, PFCs, and sulfur hexafluoride—in the atmosphere threaten the public health and welfare of current and future generations.
- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles, as discussed in the section

"Clean Vehicles" below. After a lengthy legal challenge, the U.S. Supreme Court declined to review an Appeals Court ruling that upheld the EPA Administrator's findings (21).

Clean Vehicles. Congress first passed the Corporate Average Fuel Economy law in 1975 to increase the fuel economy of cars and light duty trucks. The law has become more stringent over time. On May 19, 2009, President Obama put in motion a new national policy to increase fuel economy for all new cars and trucks sold in the U.S. On April 1, 2010, the EPA and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) announced a joint final rule establishing a national program that would reduce GHG emissions and improve fuel economy for new cars and trucks sold in the U.S.

The first phase of the national program applies to passenger cars, light-duty trucks (LDT), and medium-duty (MD) passenger vehicles, covering model years 2012 through 2016. They require these vehicles to meet an estimated combined average emissions level of 250 grams of CO_2 per mile, equivalent to 35.5 miles per gallon (mpg) if the automobile industry were to meet this CO_2 level solely through fuel economy improvements. Together, these standards would cut CO_2 emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012–2016). The EPA and the NHTSA issued final rules on a second-phase joint rulemaking establishing national standards for light-duty vehicles for model years 2017 through 2025 in August 2012 (22). The new standards for model years 2017 through 2025 apply to passenger cars, LDTs, and MD passenger vehicles. The final standards are projected to result in an average industry fleetwide level of 163 grams/mile of CO_2 in model year 2025, which is equivalent to 54.5 mpg if achieved exclusively through fuel economy improvements.

The EPA and the U.S. Department of Transportation issued final rules for the first national standards to reduce GHG emissions and improve fuel efficiency of heavy-duty (HD) trucks and buses on September 15, 2011, effective November 14, 2011. For combination tractors, the agencies are proposing engine and vehicle standards that begin in the 2014 model year and achieve up to a 20 percent reduction in CO_2 emissions and fuel consumption by the 2018 model year. For HD pickup trucks and vans, the agencies are proposing separate gasoline and diesel truck standards, which phase in starting in the 2014 model year and achieve up to a 10-percent reduction for gasoline vehicles and a 15 percent reduction for diesel vehicles by the 2018 model year (12 and 17 percent respectively if accounting for air conditioning leakage). Lastly, for vocational vehicles, the engine and vehicle standards would achieve up to a 10 percent reduction in fuel consumption and CO_2 emissions from the 2014 to 2018 model years.

On April 2, 2018, the EPA signed the Mid-term Evaluation Final Determination, which finds that the model year 2022-2025 GHG standards are not appropriate and should be revised (23). This Final Determination serves to initiate a notice to further consider appropriate standards for model year 2022-2025 light-duty vehicles. On August 24, 2018, the EPA and NHTSA published a proposal to freeze the model year 2020 standards through model year 2026 and to revoke California's waiver under the CAA to establish more stringent standards (24).

Mandatory Reporting of GHGs. The Consolidated Appropriations Act of 2008, passed in December 2007, requires the establishment of mandatory GHG reporting requirements. On

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

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

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

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

Standards of Performance for GHG Emissions for New Stationary Sources: Electric Utility Generating Units. As required by a settlement agreement, the EPA proposed new performance standards for emissions of CO_2 for new, affected, fossil fuel-fired electric utility generating units on March 27, 2012. New sources greater than 25 megawatts would be required to meet an output-based standard of 1,000 pounds of CO_2 per megawatt-hour, based on the performance of widely used natural gas combined cycle technology. It should be noted that on February 9, 2016 the U.S. Supreme Court issued a stay of this regulation pending litigation. Additionally, the current EPA Administrator has also signed a measure to repeal the Clean Power Plan, including the CO_2 standards.

Cap-and-Trade. Cap-and-trade refers to a policy tool where emissions are limited to a certain amount and can be traded or provides flexibility on how the emitter can comply. Successful examples in the U.S. include the Acid Rain Program and the nitrogen oxides (NO_X) Budget

Trading Program and Clean Air Interstate Rule in the northeast. There is no federal GHG cap-and-trade program currently; however, some states have joined to create initiatives to provide a mechanism for cap-and-trade.

The Regional GHG Initiative is an effort to reduce GHGs among the states of Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont. Each state caps CO_2 emissions from power plants, auctions CO_2 emission allowances, and invests the proceeds in strategic energy programs that further reduce emissions, save consumers money, create jobs, and build a clean energy economy. The Initiative began in 2008.

The Western Climate Initiative partner jurisdictions have developed a comprehensive initiative to reduce regional GHG emissions to 15 percent below 2005 levels by 2020. The partners were originally California, British Columbia, Manitoba, Ontario, and Quebec. However, Manitoba and Ontario are not currently participating. California linked with Quebec's cap-and-trade system January 1, 2014, and joint offset auctions took place in 2015 (25).

SmartWay Program. The SmartWay Program is a public-private initiative between the EPA, large and small trucking companies, rail carriers, logistics companies, commercial manufacturers, retailers, and other federal and state agencies. Its purpose is to improve fuel efficiency and the environmental performance (reduction of both GHG emissions and air pollution) of the goods movement supply chains. SmartWay is comprised of four components (26):

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

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

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

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

CALIFORNIA

Legislative Actions to Reduce GHGs

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

AB 32. The California State Legislature enacted AB 32, which requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. "GHGs" as defined under AB 32 include CO_2, CH_4, N_2O, HFCs, PFCs, and sulfur hexafluoride. Since AB 32 was enacted, a seventh chemical, nitrogen trifluoride, has also been added to the list of GHGs. The CARB is the state agency charged with monitoring and regulating sources of GHGs. AB 32 states the following:

> *"Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems."* (27)

CARB approved the 1990 GHG emissions level of 427 $MMTCO_2e$ on December 6, 2007. Requiring emissions generated in California in 2020 to be equal to or less than 427 $MMTCO_2e$. Emissions in 2020 in a "business as usual" (BAU) scenario were estimated to be 596 $MMTCO_2e$, which do not account for reductions from AB 32 regulations. At that level, a 28.4 percent reduction was required to achieve the 427 $MMTCO_2e$ 1990 inventory. In October 2010, CARB

prepared an updated 2020 forecast to account for the recession and slower forecasted growth. The forecasted inventory without the benefits of adopted regulation is now estimated at 545 $MMTCO_2e$. Therefore, under the updated forecast, a 21.7 percent reduction from BAU is required to achieve 1990 levels (28).

Progress in Achieving AB 32 Targets and Remaining Reductions Required

The State has made steady progress in implementing AB 32 and achieving targets included in Executive Order S-3-05. The progress is shown in updated emission inventories prepared by CARB for 2000 through 2012 (CARB 2014a). The State has achieved the Executive Order S-3-05 target for 2010 of reducing GHG emissions to 2000 levels. As shown below, the 2010 emission inventory achieved this target.

- 1990: 427 $MMTCO_2e$ (AB 32 2020 target)
- 2000: 463 $MMTCO_2e$ (an average 8 percent reduction needed to achieve 1990 base)
- 2010: 450 $MMTCO_2e$ (an average 5 percent reduction needed to achieve 1990 base)

CARB has also made substantial progress in achieving its goal of achieving 1990 emissions levels by 2020. As described earlier in this section, CARB revised the 2020 BAU inventory forecast to account for new lower growth projections, which resulted in a new lower reduction from BAU to achieve the 1990 base. The previous reduction from 2020 BAU needed to achieve 1990 levels was 28.4 percent and the latest reduction from 2020 BAU is 21.7 percent.

- 2020: 545 $MMTCO_2e$ BAU (an average 21.7 percent reduction from BAU needed to achieve 1990 base)

CARB Scoping Plan. CARB's Climate Change Scoping Plan (Scoping Plan) contains measures designed to reduce the State's emissions to 1990 levels by the year 2020 to comply with AB 32 (CARB 2008). The Scoping Plan identifies recommended measures for multiple GHG emission sectors and the associated emission reductions needed to achieve the year 2020 emissions target—each sector has a different emission reduction target. Most of the measures target the transportation and electricity sectors. As stated in the Scoping Plan, the key elements of the strategy for achieving the 2020 GHG target include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
- Achieving a statewide renewables energy mix of 33 percent;
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system;
- Establishing targets for transportation related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets;
- Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard (LCFS); and

- Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State's long-term commitment to AB 32 implementation.

The CARB approved the First Update to the Scoping Plan (Update) on May 22, 2014. The Update identifies the next steps for California's climate change strategy. The Update shows how California continues on its path to meet the near-term 2020 GHG limit, but also sets a path toward long-term, deep GHG emission reductions. The report establishes a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050. The Update identifies progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and activities for the next several years. The Update does not set new targets for the State but describes a path that would achieve the long term 2050 goal of Executive Order S-05-03 for emissions to decline to 80 percent below 1990 levels by 2050 (29).

Forecasting the amount of emissions that would occur in 2020 if no actions are taken was necessary to assess the amount of reductions California must achieve to return to the 1990 emissions level by 2020 as required by AB 32. The no-action scenario is known as "business-as-usual" or BAU. The CARB originally defined the BAU scenario as emissions in the absence of any GHG emission reduction measures discussed in the Scoping Plan.

As part of CEQA compliance for the Scoping Plan, CARB prepared a Supplemental Functional Equivalent Document (FED) in 2011. The FED included an updated 2020 BAU emissions inventory projection based on current economic forecasts (i.e., as influenced by the economic downturn) and emission reduction measures already in place, replacing its prior 2020 BAU emissions inventory. CARB staff derived the updated emissions estimates by projecting emissions growth, by sector, from the state's average emissions from 2006–2008. The new BAU estimate includes emission reductions for the million-solar-roofs program, the AB 1493 motor vehicle GHG emission standards, and the LCFS. In addition, CARB factored into the 2020 BAU inventory emissions reductions associated with 33 percent Renewables Portfolio Standard (RPS) for electricity generation. The updated BAU estimate of 507 $MMTCO_2e$ by 2020 requires a reduction of 80 $MMTCO_2e$, or a 16 percent reduction below the estimated BAU levels to return to 1990 levels (i.e., 427 $MMTCO_2e$) by 2020.

In order to provide a BAU reduction that is consistent with the original definition in the Scoping Plan and with threshold definitions used in thresholds adopted by lead agencies for CEQA purposes and many CAPs, the updated inventory without regulations was also included in the Supplemental FED. The CARB 2020 BAU projection for GHG emissions in California was originally estimated to be 596 $MMTCO_2e$. The updated CARB 2020 BAU projection in the Supplemental FED is 545 $MMTCO_2e$. Considering the updated BAU estimate of 545 $MMTCO_2e$ by 2020, CARB estimates a 21.7 percent reduction below the estimated statewide BAU levels is necessary to return to 1990 emission levels (i.e., 427 $MMTCO_2e$) by 2020, instead of the approximate 28.4 percent BAU reduction previously reported under the original Climate Change Scoping Plan (30).

<u>2017 Climate Change Scoping Plan Update</u>

In November 2017, CARB released the final 2017 Scoping Plan Update, which identifies the State's post-2020 reduction strategy. The 2017 Scoping Plan Update reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by Senate Bill 32 (SB 32). Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the LCFS, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce CH_4 emissions from agricultural and other wastes.

The 2017 Scoping Plan establishes a new emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

California's climate strategy will require contributions from all sectors of the economy, including the land base, and will include enhanced focus on zero and near-zero-emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (CH_4, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries will further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the 2017 Scoping Plan framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing ZEV buses and trucks.
- LCFS, with an increased stringency (18 percent by 2030).
- Implementing SB 350, which expands the RPS to 50 percent RPS and doubles energy efficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of zero-emission vehicles (ZEV) trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing CH_4 and hydroflurocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by year 2030.
- Continued implementation of SB 375.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- 20 percent reduction in GHG emissions from refineries by 2030.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

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

> *"[a]chieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and*

the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA."

In addition to the statewide strategies listed above, the 2017 Scoping Plan also identifies local governments as essential partners in achieving the State's long-term GHG reduction goals and identifies local actions to reduce GHG emissions. As part of the recommended actions, CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 $MTCO_2e$ or less per capita by 2030 and 2 $MTCO_2e$ or less per capita by 2050. For CEQA projects, CARB states that lead agencies may develop evidenced-based bright-line numeric thresholds—consistent with the Scoping Plan and the State's long-term GHG goals—and projects with emissions over that amount may be required to incorporate on-site design features and mitigation measures that avoid or minimize project emissions to the degree feasible; or, a performance-based metric using a CAP or other plan to reduce GHG emissions is appropriate.

According to research conducted by the Lawrence Berkeley National Laboratory (LBNL) and supported by CARB, California, under its existing and proposed GHG reduction policies, is on track to meet the 2020 reduction targets under AB 32 and could achieve the 2030 goals under SB 32. The research utilized a new, validated model known as the California LBNL GHG Analysis of Policies Spreadsheet (CALGAPS), which simulates GHG and criteria pollutant emissions in California from 2010 to 2050 in accordance to existing and future GHG-reducing policies. The CALGAPS model showed that GHG emissions through 2020 could range from 317 to 415 $MTCO_2e$/yr, "indicating that existing state policies will likely allow California to meet its target [of 2020 levels under AB 32]." CALGAPS also showed that by 2030, emissions could range from 211 to 428 $MTCO_2e$/yr, indicating that "even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40 percent below the 1990 level [of SB 32]." CALGAPS analyzed emissions through 2050 even though it did not generally account for policies that might be put in place after 2030. Although the research indicated that the emissions would not meet the State's 80 percent reduction goal by 2050, various combinations of policies could allow California's cumulative emissions to remain very low through 2050 (31) (32).

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 GHG emissions to 40 percent 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 GHG reduction target of 80 percent below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature (33).

Cap-and-Trade Program. The Scoping Plan identifies a Cap-and-Trade Program as one of the key strategies for California to reduce GHG emissions. According to CARB, a cap-and-trade program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020 and ultimately achieving an 80 percent reduction from 1990 levels by 2050. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is

established, and facilities subject to the cap will be able to trade permits to emit GHGs within the overall limit.

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. See Title 17 of the California Code of Regulations (CCR) §§ 95800 to 96023). The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program's duration.

Covered entities that emit more than 25.000 $MTCO_2e$/yr must comply with the Cap-and-Trade Program. Triggering of the 25.000 $MTCO_2e$/yr "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of GHG Emissions (Mandatory Reporting Rule or "MRR").

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender "compliance instruments" (30) for each $MTCO_2e$ of GHG they emit. There also are requirements to surrender compliance instruments covering 30 percent of the prior year's compliance obligation by November of each year. For example, in November 2014, a covered entity was required to submit compliance instruments to cover 30 percent of its 2013 GHG emissions.

The Cap-and-Trade Program provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. As summarized by CARB in the First Update:

> *"The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced. In other words, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program if there is a reduction in GHG emissions from other covered entities. Such a focus on aggregate GHG emissions is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative (CARB 2014)."*

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2020 GHG emissions reduction mandate:

> *"The Cap-and-Trade Program establishes an overall limit on GHG emissions from most of the California economy—the "capped sectors." Within the capped sectors, some of the reductions are being accomplished through direct regulations, such as improved building and appliance efficiency standards, the LCFS, and the 33 percent [Renewables Portfolio Standard] RPS. Whatever additional reductions are needed to bring emissions within the cap is accomplished through price incentives posed by emissions allowance prices. Together, direct regulation and price incentives assure that emissions are brought down cost-effectively to the level of the overall cap. The Cap-and-Trade Regulation provides assurance that California's 2020 limit will be met because the regulation sets a firm limit on 85 percent of California's GHG emissions. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site specific or project-level, GHG emissions reductions. Also, due to the regulatory architecture adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures (CARB 2014)."*

As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program.

The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. While the Cap-and-Trade Program technically covered fuel suppliers as early as 2012, they did not have a compliance obligation (i.e., they were not fully regulated) until 2015. The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with vehicle miles traveled (VMT) are covered by the Cap-and-Trade Program (34). In addition, the Scoping Plan differentiates between "capped" and "uncapped" strategies. "Capped" strategies are subject to the proposed cap-and-trade program. The Scoping Plan states that the inclusion of these emissions within the Program will help ensure that the year 2020 emission targets are

met despite some degree of uncertainty in the emission reduction estimates for any individual measure. Implementation of the capped strategies is calculated to achieve a sufficient amount of reductions by 2020 to achieve the emission target contained in AB 32. "Uncapped" strategies that will not be subject to the cap-and-trade emissions caps and requirements are provided as a margin of safety by accounting for additional GHG emission reductions.[3]

The Sustainable Communities and Climate Protection Act of 2008 (SB 375). Passing the Senate on August 30, 2008, Senate Bill (SB) 375 was signed by the Governor on September 30, 2008. According to SB 375, the transportation sector is the largest contributor of GHG emissions, which emits over 40 percent of the total GHG emissions in California. SB 375 states, "Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32." SB 375 does the following: it (1) requires metropolitan planning organizations (MPO) to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, (2) aligns planning for transportation and housing, and (3) creates specified incentives for the implementation of the strategies.

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

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

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

The standards phase in during the 2009 through 2016 model years. When fully phased in, the near-term (2009–2012) standards will result in about a 22 percent reduction compared with the 2002 fleet, and the mid-term (2013–2016) standards will result in about a 30 percent reduction. Several technologies stand out as providing significant reductions in emissions at favorable costs. These include discrete variable valve lift or camless valve actuation to optimize valve

[3] On March 17, 2011, the San Francisco Superior Court issued a final decision in *Association of Irritated Residents v. California Air Resources Board* (Case No. CPF-09-509562). While the Court upheld the validity of the CARB Scoping Plan for the implementation of AB 32, the Court enjoined CARB from further rulemaking under AB 32 until CARB amends its CEQA environmental review of the Scoping Plan to address the flaws identified by the Court. On May 23, 2011, CARB filed an appeal. On June 24, 2011, the Court of Appeal granted CARB's petition staying the trail court's order pending consideration of the appeal. In the interest of informed decision-making, on June 13, 2011, CARB released the expanded alternatives analysis in a draft Supplement to the AB 32 Scoping Plan FED. The CARB Board approved the Scoping Plan and the CEQA document on August 24, 2011.

operation rather than relying on fixed valve timing and lift as has historically been done; turbocharging to boost power and allow for engine downsizing; improved multi-speed transmissions; and improved air conditioning systems that operate optimally, leak less, and/or use an alternative refrigerant.

The second phase of the implementation for the Pavley bill was incorporated into Amendments to the Low-Emission Vehicle Program (LEV III) or the Advanced Clean Cars program. The Advanced Clean Car program combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for model years 2017 through 2025. The regulation will reduce GHGs from new cars by 34 percent from 2016 levels by 2025. The new rules will clean up gasoline and diesel-powered cars, and deliver increasing numbers of zero-emission technologies, such as full battery electric cars, newly emerging plug-in hybrid electric vehicles and hydrogen fuel cell cars. The package will also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California.

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

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utilities Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States (35).

EXECUTIVE ORDERS RELATED TO GHG EMISSIONS

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

Executive Order B-55-18 and SB 100. Executive Order B-55-18 and SB 100. SB 100 and Executive Order B-55-18 were signed by Governor Brown on September 10, 2018. Under the existing RPS, 25 percent of retail sales are required to be from renewable sources by December 31, 2016, 33 percent by December 31, 2020, 40 percent by December 31, 2024, 45 percent by December 31, 2027, and 50 percent by December 31, 2030. SB 100 raises California's RPS requirement to 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also requires that retail sellers and local

publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the California Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

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

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

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

Executive Order S-01-07 – LCFS. The Governor signed Executive Order S-01-07 on January 18, 2007. The order mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. In particular, the Executive Order established a LCFS and directed the Secretary for Environmental Protection to coordinate the actions of the CEC, the CARB, the University of California, and other agencies to develop and propose protocols for measuring the "life-cycle carbon intensity" of transportation fuels. This analysis supporting development of the protocols was included in the State Implementation Plan for alternative fuels (State Alternative Fuels Plan adopted by CEC on December 24, 2007) and was submitted to CARB for consideration as an "early action" item under AB 32. The CARB adopted the LCFS on April 23, 2009.

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

tailored its remedy to protect the public interest by allowing the LCFS regulations to remain operative while CARB complies with the procedural requirements it failed to satisfy.

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

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

Executive Order B-30-15. On April 29, 2015, Governor Edmund G. Brown Jr. issued an executive order to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. The Governor's executive order aligns California's GHG reduction targets with those of leading international governments ahead of the United Nations Climate Change Conference in Paris late 2015. The Order sets a new interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030 in order to ensure California meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of $MMTCO_2e$. The Order also requires the state's climate adaptation plan to be updated every three years, and for the State to continue its climate change research program, among other provisions. As with Executive Order S-3-05, this Order is not legally enforceable for local governments and the private sector. Legislation that would update AB 32 to make post 2020 targets and requirements a mandate is in process in the State Legislature.

CALIFORNIA REGULATIONS AND BUILDING CODES

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

Title 20. CCR, Title 20: Division 2, Chapter 4, Article 4, Sections 1601-1608: Appliance Efficiency Regulations regulates the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. Twenty-three (23) categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered

for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles or other mobile equipment (36).

Title 24 Energy Efficiency Standards and California Green Building Standards. CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2011, and is administered by the California Building Standards Commission (CBSC). CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that will be effective January 1, 2020. Local jurisdictions are permitted to adopt more stringent requirements, as state law provides methods for local enhancements. CALGreen recognizes that many jurisdictions have developed existing construction and demolition ordinances and defers to them as the ruling guidance provided, they establish a minimum 65 percent diversion requirement. The code also provides exemptions for areas not served by construction and demolition recycling infrastructure. The State Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy, which is generally enforced by the local building official.

Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2019 version of Title 24 was adopted by the CEC and will become effective on January 1, 2020. It should be noted that the analysis herein assumes compliance with the 2019 Title 24 Standards because the Project will be constructed after January 1, 2020.

The 2019 Title 24 standards will result in less energy use, thereby reducing air pollutant emissions associated with energy consumption in the SCAB and across the State of California. For example, the 2019 Title 24 standards will require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting requirements for nonresidential buildings. The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7 percent less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar photovoltaic systems, homes built under the 2019 standards will use about 53 percent less energy than homes built under the 2016 standards. Nonresidential buildings (such as the Project) will use approximately 30 percent less energy due to lighting upgrade requirements (37).

Because the Project will be constructed after January 1,2019, the 2019 CALGreen standards are applicable to the Project and require, among other items (38):

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the

visitors' entrance, readily visible to passers-by, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).

- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- Designated parking. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
    - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
    - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
    - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
    - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of note more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- Outdoor portable water use in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient (MWELO), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new

building or within an addition that is project to consume more than 1,000 gal/day (5.303.1.1 and 5.303.1.2).

- Outdoor water use in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

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

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

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

CARB staff has worked jointly with the EPA and the NHTSA on the next phase of federal GHG emission standards for MD and HD vehicles, called federal Phase 2. The federal Phase 2 standards were built on the improvements in engine and vehicle efficiency required by the

Phase 1 emission standards and represent a significant opportunity to achieve further GHG reductions for 2018 and later model year HD vehicles, including trailers. But as discussed above, the EPA and NHTSA have proposed to roll back GHG and fuel economy standards for cars and LDTs, which suggests a similar rollback of Phase 2 standards for MD and HD vehicles may be pursued.

SB 97 and the CEQA Guidelines Update. Passed in August 2007, SB 97 added Section 21083.05 to the Public Resources Code. The code states "(a) On or before July 1, 2009, the Office of Planning and Research (OPR) shall prepare, develop, and transmit to the Resources Agency guidelines for the mitigation of GHG emissions or the effects of GHG emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption. (b) On or before January 1, 2010, the Resources Agency shall certify and adopt guidelines prepared and developed by the OPR pursuant to subdivision (a)." Section 21097 was also added to the Public Resources Code. It provided CEQA protection until January 1, 2010 for transportation projects funded by the Highway Safety, Traffic Reduction, Air Quality, and Port Security Bond Act of 2006 or projects funded by the Disaster Preparedness and Flood Prevention Bond Act of 2006, in stating that the failure to analyze adequately the effects of GHGs would not violate CEQA.

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

Section 1506.4 was amended to state that in determining the significance of a project's GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. Additionally, a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use (39).

REGIONAL

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

SCAQMD

SCAQMD is the agency responsible for air quality planning and regulation in the SCAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions.

In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold, that could be applied by lead agencies. The working group has not provided additional guidance since release of the interim guidance in 2008. The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current interim thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
    - Residential and Commercial land use: 3,000 $MTCO_2e$/yr
    - Industrial land use: 10,000 $MTCO_2e$/yr
    - Based on land use type: residential: 3,500 $MTCO_2e$ per year; commercial: 1,400 $MTCO_2e$/yr; or mixed use: 3,000 $MTCO_2e$/yr
- Tier 4 has the following options:
    - Option 1: Reduce BAU emissions by a certain percentage; this percentage is currently undefined.
    - Option 2: Early implementation of applicable AB 32 Scoping Plan measures
    - Option 3, 2020 target for service populations (SP), which includes residents and employees: 4.8 $MTCO_2e$/SP/year for projects and 6.6 $MTCO_2e$/SP/year for plans;
    - Option 3, 2035 target: 3.0 $MTCO_2e$/SP/year for projects and 4.1 $MTCO_2e$/SP/year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO_2 concentrations at 450 ppm, thus stabilizing global climate.

SCAQMD only has authority over GHG emissions from development projects that include air quality permits. At this time, it is unknown if the Project would include stationary sources of emissions subject to SCAQMD permits. Notwithstanding, if the Project requires a stationary permit, it would be subject to the applicable SCAQMD regulations.

SCAQMD Regulation XXVII, adopted in 2009 includes the following rules:

- Rule 2700 defines terms and post GWPs.
- Rule 2701, SoCal Climate Solutions Exchange, establishes a voluntary program to encourage, quantify, and certify voluntary, high quality certified GHG emission reductions in the SCAQMD.
- Rule 2702, GHG Reduction Program created a program to produce GHG emission reductions within the SCAQMD. The SCAQMD will fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

2.8 CLIMATE ACTION PLAN

The County of Riverside provided the Updated CAP on November 2019 and was adopted on December 17, 2019. The CAP was designed under the premise that the County of Riverside, and the community it represents, is uniquely capable of addressing emissions associated with sources under Riverside County's jurisdiction, and that Riverside County's emission reduction efforts should coordinate with the state strategies of reducing emissions in order to accomplish these reductions in an efficient and cost-effective manner. The County of Riverside plans to reduce community-wide emissions to 3,576,598 $MTCO_2e$ per year by 2030.

In order to evaluate consistency with the CAP, the County of Riverside provided Screening Tables to aid in measuring the reduction of GHG emissions attributable to certain design and construction measures incorporated into development projects. The CAP contains a menu of measures potentially applicable to discretionary development that include energy conservation, water use reduction, increased residential density or mixed uses, transportation management and solid waste recycling. Individual sub-measures are assigned a point value within the overall screening table of GHG implementation measures. The point values are adjusted according to the intensity of action items with modest adoption/installation (those that reduce GHG emissions by modest amounts) worth the least number of points and greatly enhanced adoption/installation worth the most. Projects that garner at least 100 points (equivalent to an approximate 49% reduction in GHG emissions) are determined to be consistent with the reduction quantities anticipated in the County's GHG Technical Report, and consequently would be consistent with the CAP. As such, projects that achieve a total of 100 points or more are considered to have a less than significant individual and cumulative impact on GHG emissions.

2.9 DISCUSSION ON ESTABLISHMENT OF SIGNIFICANCE THRESHOLDS

Consistent with CEQA Guidelines Appendix G, the following thresholds are considered in determining the significance of impacts from GHG.

- **Would the project generate direct or indirect GHG emissions that would result in a significant impact on the environment (see Impact GHG-1)?**

  The SCAQMD's 10,000 $MTCO_2e$ per year interim screening threshold is intended to apply to industrial projects where SCAQMD is the lead agency. Although the Project does not meet the definition of an "industrial" project pursuant to the County's CAP (because no structures are proposed as part of the Project), the SCAQMD's industrial threshold is likely the most applicable to the Project since mining activities have similar emission characteristics as industrial projects with stationary sources and because the SCAQMD threshold applies to industrial projects whether or not buildings are proposed. Accordingly, a screening threshold of 10,000 $MTCO_2e$ per year is appropriate to evaluate. Notwithstanding, in the abundance of caution, the more stringent SCAQMD numeric threshold of 3,000 $MTCO_2e$ per year is utilized herein. The SCAQMD determined that if a project's emissions are less than the numeric threshold of 3,000 $MTCO_2e$ per year a less than significant impact would occur.

- **Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs (see Impact GHG-2)?**

  Analysis under Impact GHG-2 involves analysis of the Project's compliance with the CAP. The CAP is a geographically specific plan that was adopted by the County of Riverside for the purpose of reducing GHG emissions under the control or influence of the County consistent with AB 32 and subsequent state legislation and state agency action to address climate change. This threshold is also consistent with the SCAQMD's draft interim threshold Tier 2, which consists of determining whether a project is consistent with a qualified greenhouse gas reduction plan. Consistent with the County of Riverside CAP, projects that garner at least 100 points are determined to be consistent with the reduction quantities anticipated in the County's GHG Technical Report, and consequently would be consistent with the CAP. As such, projects that achieve a total of 100 points or more are considered to have a less than significant individual and cumulative impact on GHG emissions.

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3 PROJECT GREENHOUSE GAS IMPACT

3.1 INTRODUCTION

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

3.2 STANDARDS OF SIGNIFICANCE

The criteria used to determine the significance of potential Project-related GHG impacts are taken from the Initial Study Checklist in Appendix G of the State CEQA Guidelines (14 CCR §§15000, et seq.). Based on these thresholds, a project would result in a significant impact related to GHG if it would (1):

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

3.3 CALIFORNIA EMISSIONS ESTIMATOR MODEL™ EMPLOYED TO ANALYZE GHG EMISSIONS

On October 17, 2017, 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) v2016.3.2. The purpose of this model is to calculate construction-source and operational-source criteria air pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures (40). Accordingly, the latest version of CalEEMod has been used for this Project to determine GHG emissions. Output from the model runs for operational activity are provided in Appendix 3.1.

3.3.1 EMFAC2017 EMISSION RATES

On August 19, 2019, the EPA approved the 2017 version of the Emission Factor model (EMFAC) web database for use in State Implementation Plan and transportation conformity analyses. EMFAC2017 is a mathematical model that was developed to calculate emission rates, fuel consumption, VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources (41). This GHGA utilizes summer, winter, and annual EMFAC2017 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season.

3.4 OPERATIONAL LIFE-CYCLE ANALYSIS NOT REQUIRED

A full life-cycle analysis (LCA) for operational activity is not included in this analysis due to the lack of consensus guidance on LCA methodology at this time (42). 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, an LCA would be extremely speculative and thus has not been prepared.

Additionally, the SCAQMD 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 (43). 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.

3.5 OPERATIONAL EMISSIONS

Operational activities associated with the proposed Project will result in emissions of CO_2, CH_4, and N_2O from the following primary sources:

- On-Site Equipment
- Mobile Source (Passenger Cars and Truck Traffic)
- Electricity Usage

3.5.1 OPERATIONAL EQUIPMENT

Table 3-1 summarizes the equipment utilized at the Mine on a daily basis for the baseline operating period, proposed project operating characteristics, and net new equipment activity. As shown, mining activities during the baseline period results in approximately 30,388 horsepower (HP) hours per day. Based on information provided by the client, the proposed project would result in the generation of approximately 19,292 net new HP hours in addition to the baseline for a net total of 47,400 HP hours.

TABLE 3-1: OPERATIONAL EQUIPMENT

Baseline Operational Equipment Summary				
Hours/Day	**Equipment**	**Quantity**	**HP**	**Total HP Hours Per Day**
4	Skid Steer	1	51	204
10	735 Haul Truck	2	394	7,880
8	980K Wheel Loader	1	318	2,544
8	988H Wheel Loader	1	501	4,008
11	JD 844 Wheel Loader	2	380	8,360
4	D10R Dozer	1	570	4,560
			Total Baseline HP Hours	**30,388**
Proposed Project Equipment Summary				
Hours/Day	**Equipment**	**Quantity**	**HP**	**Total HP Hours Per Day**
6	Skid Steer	1	51	306
16	735C Haul Truck	2	394	12,608
16	980K Wheel Loader	1	318	5,088
14	988H Wheel Loader	1	501	7,014
16	JD 844 Wheel Loader	2	380	12,160
8	D10R Dozer	1	570	4,560
16	Water Truck 2000 Gal	1	354	5,664
			Subtotal Project HP Hours	**47,400**
Net New Project Equipment Summary				
Hours/Day	**Equipment**	**Quantity**	**HP**	**Total HP Hours Per Day**
2	Skid Steer	1	51	102
6	735C Haul Truck	2	394	4,728
8	980K Wheel Loader	1	318	2,544
6	988H Wheel Loader	1	501	3,006
5	JD 844 Wheel Loader	2	380	3,800
4	D10R Dozer	1	570	2,280
8	Water Truck 2000 Gal	1	354	2,832
			Total Net New Project HP Hours	**19,292**

3.5.2 MOBILE SOURCE EMISSIONS

According to the TIA prepared by Urban Crossroads, Inc., the Project is expected to generate a net total of approximately 218 two-way trips per day (109 inbound and 109 outbound). The

Project trip generation includes 199 two-way truck trips per day and 19 two-way passenger vehicles per day (2).

The CalEEMod default of a 20 mile one-way trip length for trucks was increased to 25 miles based on discussion with the Project applicant and based on regional aggregate studies that have found that 25 miles is generally the maximum distance for aggregate to travel before the cost of delivery renders the aggregate material non-economical (44) (45).

The Project is anticipated to serve a regional need and will likely reduce VMT in the long term by diverting trips that would otherwise travel to other aggregate facilities in the region. Notwithstanding, for purposes of this analysis, no "credit" has been taken and emissions associated with the Project are considered "new" as a conservative measure.

The fact is that aggregate will be consumed with or without the proposed Project. The Project will not have an effect on demand for aggregate but will have an effect on the distance that aggregates travel within the region in the long term. Project aggregate made available by the proposed expansion area will replace materials hauled from farther distances in the long term and supply new demand for aggregate that will occur in the Riverside County region. This rationale is supported by Dr. Peter Berck's *Working Paper No. 994 – A Note on the Environmental Costs of Aggregate (Department of Agricultural and Resource Economics and Policy, Division of Agricultural and Natural Resources, University of California Berkley, January 2005)* (44). Dr. Berck states that:

> *"The opening of a new quarry for aggregates will change the pattern of transportation of aggregates in the area served by the quarry. In this note, we will show that, so long as aggregate producers are cost minimizing, the new pattern of transportation requires less truck transport than the pattern of transportation that existed before the opening of the new quarry. Since the costs of providing aggregates falls, it is reasonable to assume that the price of delivered aggregates also will fall. This note also shows that the demand expansion effect is of very small magnitude. Since the demand increase from a new quarry is quite small, the dominant effect is that the quarries are on average closer to the users of aggregates and, as a result, the truck mileage for aggregate hauling decreases. To summarize the effects of a new quarry project:*
>
> > *a) The project in itself will not significantly increase the demand for construction materials in the region through market forces, which include the downward pressure on pricing.*
> >
> > *b) Truck traffic (i.e. VMT) in the region will not increase and may decrease as a result of the project."*

In its guidance document CEQA and Climate Change the CAPCOA lists various MMs that can be implemented to reduce AQ and GHG emissions for various projects. One particular mitigation measure for reducing AQ and GHG emissions during construction activity is Mitigation Measure C-5 "Use of Local Building Materials." The Project will provide local building materials to serve the demand for aggregate resources in the local area, thus resulting in a reduction in emissions

associated with transport of materials from sources of aggregate products located further away. However, no "credit" is taken for this measure in this analysis in an effort to be conservative.

3.5.3 NATURAL GAS AND ELECTRICITY USAGE

The Project will not result in an increase in the amount of natural gas associated with aggregate usage (since aggregate usage does not currently use any natural gas), as such, no emissions associated natural gas has been calculated or is required.

The Project will result in a 264.8% increase in electricity associated with the aggregate production over baseline conditions. Implementation of the proposed Project (i.e. mining activities) would result in additional electricity demands associated with the existing operations trailer, on-site equipment usage, and water usage. The annual operation electricity during the baseline period was approximately 1,242.7 megawatt hours (Mwh). Therefore, the Project would require a 264.8% increase in electricity usage consistent with the assumption utilized for Project-related tonnage. Thus, the proposed Project would require a net increase in electricity usage of 2,048.0 Mwh annually compared to baseline conditions, ultimately requiring 3,290.7 Mwh annually overall. Based on CalEEMod defaults, the CO_2 intensity factor for electricity is 702 pounds per Mwh (0.32 MT/Mwh), as such, the Project's net increase in electricity usage would be 2,048.0 Mwh annually and would equate to approximately 652.13 MT per year as summarized in Table 3-2 below.

3.6 NET EMISSIONS SUMMARY

The total amount of net new Project-related GHG emissions would total 4,975.49 $MTCO_2e$ as shown on Table 3-2.

TABLE 3-2: NET NEW PROJECT GHG EMISSIONS

Emission Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2E
Operational Equipment	1,074.16	0.34	0.00	1,082.66
Electricity from Aggregate Processing	652.13	0.00	0.00	652.13
Mobile Sources	3,236.03	0.19	0.00	3,240.70
Total CO_2E (All Sources)	**4,975.49**			

Source: See Appendix 3.1 for detailed CalEEMod 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

3.7 GREENHOUSE GAS EMISSIONS FINDINGS AND RECOMMENDATIONS

GHG Impact 1: Would the Project generate direct or indirect GHG emission that would result in a significant impact on the environment?

As shown on Table 3-2 the project will result in approximately 4,975.49 $MTCO_2e$ per year; the proposed project would exceed the SCAQMD's screening threshold of 3,000 $MTCO_2e$ per year. It is important to note that more than 50 percent of the Project's GHG emissions are derived from vehicular activity. Neither the Project Applicant nor the Lead Agency (County of Riverside) can substantively or materially affect reductions in Project mobile-source emissions beyond the regulatory requirements. Therefore, a significant and unavoidable impact is expected to occur with respect to this threshold.

GHG Impact #2: Would the Project would conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?

As previously stated, analysis under Impact GHG-2 involves analysis of the Project's compliance with the CAP. The CAP is a geographically specific plan that was adopted by the County of Riverside for the purpose of reducing GHG emissions under the control or influence of the County consistent with AB 32 and subsequent state legislation and state agency action to address climate change.

The County's adopted CAP Screening Tables have been established primarily for traditional residential and non-residential development. Since the Project (a proposed expansion of a mining operation) does not fit within the type of development contemplated when developing the CAP Screening Tables (CAP Appendix D), the measures available in the CAP screening tables are not applicable to the proposed Project. For example, CAP Reduction Measure R2-EE10 primarily addresses energy efficiency in new buildings, and no new buildings are proposed as part of the Project. CAP Reduction Measure R2-CE1 (Clean Energy) relates to solar panels on new buildings and wind energy generation, and is not applicable to the proposed Project because no new buildings are proposed and the Project site is not located in a portion of Riverside County with adequate wind speeds for wind energy generation. CAP Reduction Measure R2-W2 addresses water efficiency standards related to irrigation/landscaping, potable water, and reclaimed water; however, none of the available measures are applicable to mining projects, despite the fact that the Project would result in a 16.1% reduction in water usage associated with dust control as compared to baseline conditions. CAP Reduction Measure R2-T3 relates to ride-sharing and bike-to-work programs; however, with implementation of the Project there would be an increase of approximately 8 employees at the Mine, and any ride-sharing or bike-to-work programs would have only a nominal effect on the Project's GHG emissions. Similarly, CAP Reduction Measure R2-T1, which addresses alternative transportation options, would only have a nominal effect on the Project's GHG emissions due to the limited number of projected employees, and because the vast majority of Project-related emissions would be associated with haul truck trips. The Project site is not targeted for bike trails as part of the County's Bicycle Master Plan or General Plan, and the Project has very limited frontage on Gilman Springs Road; thus, CAP Reduction Measure R2-T2 is not applicable to the proposed

Project. CAP Reduction Measure R2-T4 addresses electric vehicles, and similarly would not be effective in reducing the Project's GHG emissions due to the limited number of projected employees. The increase of 8 employees under the proposed Project also would result in only a nominal increase in the amount of solid waste generated by the Mine; thus, CAP Reduction Measure R2-S1 (Reduce Waste to Landfills) is not applicable to the proposed Project. As such, it is not possible for the Project to achieve a minimum of 100 points pursuant to the County's CAP Screening Tables. Therefore, because the Project would emit more than 3,000 $MTCO_2e$ (the screening threshold identified in the CAP), and because the Project would be unable to achieve the required 100 points as required by the CAP Screening Tables, the Project would not comply with the Riverside County CAP. This is evaluated as a significant impact of the proposed Project.

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5 CERTIFICATIONS

The contents of this GHG study report represent an accurate depiction of the GHG impacts associated with the proposed Gilman Springs Mine Project. The information contained in this GHG report is based on the best available data at the time of preparation. If you have any questions, please contact me directly at (949) 660-1994 ext. 217.

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California State University, Fullerton • May 2010

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AEP – Association of Environmental Planners
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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
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APPENDIX 3.1:

CALEEMOD EMISSIONS MODEL OUTPUTS

Gilman Springs Mine

Riverside-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	1.00	User Defined Unit	0.00	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.4	**Precipitation Freq (Days)**	28
Climate Zone	10			**Operational Year**	2019
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 -

Construction Phase - 7 day per week 365 per year

Off-road Equipment - Equipment list based on data provided by project applicant

Trips and VMT - Data on TIA

Construction Off-road Equipment Mitigation - Tiers based on data provided by project applicant

Vehicle Emission Factors - EMFAC2017

Vehicle Emission Factors - EMFAC2017

Vehicle Emission Factors - EMFAC2017

Fleet Mix -

Table Name	Column Name	Default Value	New Value
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	1.00
tblConstEquipMitigation	Tier	No Change	Tier 2
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 2
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstructionPhase	NumDays	0.00	365.00

tblConstructionPhase	NumDaysWeek	5.00	7.00
tblOffRoadEquipment	HorsePower	97.00	318.00
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tblOffRoadEquipment	LoadFactor	0.37	0.36
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tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
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tblTripsAndVMT	VendorTripNumber	0.00	199.00
tblTripsAndVMT	VendorVehicleClass	HDT_Mix	HHDT
tblTripsAndVMT	WorkerTripNumber	0.00	19.00
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tblVehicleEF	HHD	0.03	0.02
tblVehicleEF	HHD	0.13	0.00
tblVehicleEF	HHD	3.79	6.83
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tblVehicleEF	HHD	1,494.29	1,400.02

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tblVehicleEF	HHD	1.1100e-004	8.0000e-006
tblVehicleEF	HHD	3.4350e-003	2.2200e-004
tblVehicleEF	HHD	0.98	0.59
tblVehicleEF	HHD	6.0000e-005	4.0000e-006
tblVehicleEF	HHD	0.08	0.11
tblVehicleEF	HHD	2.3400e-004	1.0630e-003
tblVehicleEF	HHD	0.06	1.0000e-006
tblVehicleEF	HHD	0.06	0.01
tblVehicleEF	HHD	0.01	0.01
tblVehicleEF	HHD	7.6000e-005	0.00
tblVehicleEF	HHD	1.1100e-004	8.0000e-006
tblVehicleEF	HHD	3.4350e-003	2.2200e-004
tblVehicleEF	HHD	1.13	0.68
tblVehicleEF	HHD	6.0000e-005	4.0000e-006

tblVehicleEF	HHD	0.12	0.14
tblVehicleEF	HHD	2.3400e-004	1.0630e-003
tblVehicleEF	HHD	0.06	1.0000e-006
tblVehicleEF	HHD	1.52	0.03
tblVehicleEF	HHD	0.03	0.02
tblVehicleEF	HHD	0.13	0.00
tblVehicleEF	HHD	2.77	6.64
tblVehicleEF	HHD	0.48	0.50
tblVehicleEF	HHD	1.54	3.7440e-003
tblVehicleEF	HHD	6,972.69	1,372.01
tblVehicleEF	HHD	1,494.29	1,400.02
tblVehicleEF	HHD	4.90	0.04
tblVehicleEF	HHD	30.66	7.27
tblVehicleEF	HHD	3.23	3.72
tblVehicleEF	HHD	0.02	0.02
tblVehicleEF	HHD	0.06	0.06
tblVehicleEF	HHD	0.04	0.04
tblVehicleEF	HHD	0.02	0.08
tblVehicleEF	HHD	5.6000e-005	1.0000e-006
tblVehicleEF	HHD	0.02	0.02
tblVehicleEF	HHD	0.03	0.03
tblVehicleEF	HHD	8.8740e-003	8.9020e-003
tblVehicleEF	HHD	0.02	0.07
tblVehicleEF	HHD	5.2000e-005	1.0000e-006
tblVehicleEF	HHD	2.1900e-004	1.6000e-005
tblVehicleEF	HHD	4.0040e-003	2.5800e-004
tblVehicleEF	HHD	0.93	0.61

tblVehicleEF	HHD	1.1900e-004	8.0000e-006
tblVehicleEF	HHD	0.08	0.11
tblVehicleEF	HHD	2.4100e-004	1.1060e-003
tblVehicleEF	HHD	0.06	1.0000e-006
tblVehicleEF	HHD	0.07	0.01
tblVehicleEF	HHD	0.01	0.01
tblVehicleEF	HHD	7.5000e-005	0.00
tblVehicleEF	HHD	2.1900e-004	1.6000e-005
tblVehicleEF	HHD	4.0040e-003	2.5800e-004
tblVehicleEF	HHD	1.06	0.70
tblVehicleEF	HHD	1.1900e-004	8.0000e-006
tblVehicleEF	HHD	0.12	0.14
tblVehicleEF	HHD	2.4100e-004	1.1060e-003
tblVehicleEF	HHD	0.06	1.0000e-006
tblVehicleEF	HHD	1.73	0.03
tblVehicleEF	HHD	0.03	5.2660e-003
tblVehicleEF	HHD	0.13	0.00
tblVehicleEF	HHD	5.20	7.08
tblVehicleEF	HHD	0.48	0.47
tblVehicleEF	HHD	1.61	3.9310e-003
tblVehicleEF	HHD	6,054.82	1,370.69
tblVehicleEF	HHD	1,494.29	1,392.51
tblVehicleEF	HHD	4.90	0.04
tblVehicleEF	HHD	28.43	7.67
tblVehicleEF	HHD	3.40	3.91
tblVehicleEF	HHD	0.03	0.02
tblVehicleEF	HHD	0.06	0.06

tblVehicleEF	HHD	0.04	0.04
tblVehicleEF	HHD	0.02	0.08
tblVehicleEF	HHD	5.6000e-005	1.0000e-006
tblVehicleEF	HHD	0.03	0.02
tblVehicleEF	HHD	0.03	0.03
tblVehicleEF	HHD	8.8740e-003	8.8820e-003
tblVehicleEF	HHD	0.02	0.07
tblVehicleEF	HHD	5.2000e-005	1.0000e-006
tblVehicleEF	HHD	9.4000e-005	7.0000e-006
tblVehicleEF	HHD	3.9000e-003	2.7600e-004
tblVehicleEF	HHD	1.06	0.57
tblVehicleEF	HHD	5.4000e-005	4.0000e-006
tblVehicleEF	HHD	0.08	0.11
tblVehicleEF	HHD	2.4800e-004	1.1130e-003
tblVehicleEF	HHD	0.06	1.0000e-006
tblVehicleEF	HHD	0.06	0.01
tblVehicleEF	HHD	0.01	0.01
tblVehicleEF	HHD	7.6000e-005	0.00
tblVehicleEF	HHD	9.4000e-005	7.0000e-006
tblVehicleEF	HHD	3.9000e-003	2.7600e-004
tblVehicleEF	HHD	1.21	0.65
tblVehicleEF	HHD	5.4000e-005	4.0000e-006
tblVehicleEF	HHD	0.12	0.13
tblVehicleEF	HHD	2.4800e-004	1.1130e-003
tblVehicleEF	HHD	0.06	1.0000e-006
tblVehicleEF	LDA	5.0030e-003	3.2950e-003
tblVehicleEF	LDA	7.3280e-003	0.06

tblVehicleEF	LDA	0.67	0.80
tblVehicleEF	LDA	1.45	2.25
tblVehicleEF	LDA	276.36	280.63
tblVehicleEF	LDA	62.93	57.89
tblVehicleEF	LDA	0.06	0.05
tblVehicleEF	LDA	1.6480e-003	1.5390e-003
tblVehicleEF	LDA	2.2760e-003	2.0320e-003
tblVehicleEF	LDA	1.5190e-003	1.4180e-003
tblVehicleEF	LDA	2.0930e-003	1.8690e-003
tblVehicleEF	LDA	0.06	0.09
tblVehicleEF	LDA	0.12	0.12
tblVehicleEF	LDA	0.05	0.06
tblVehicleEF	LDA	0.01	0.01
tblVehicleEF	LDA	0.04	0.23
tblVehicleEF	LDA	0.10	0.28
tblVehicleEF	LDA	2.7690e-003	2.7760e-003
tblVehicleEF	LDA	6.5400e-004	5.7300e-004
tblVehicleEF	LDA	0.06	0.09
tblVehicleEF	LDA	0.12	0.12
tblVehicleEF	LDA	0.05	0.06
tblVehicleEF	LDA	0.02	0.02
tblVehicleEF	LDA	0.04	0.23
tblVehicleEF	LDA	0.11	0.30
tblVehicleEF	LDA	5.6890e-003	3.7490e-003
tblVehicleEF	LDA	6.3700e-003	0.05
tblVehicleEF	LDA	0.82	0.98
tblVehicleEF	LDA	1.28	1.99

tblVehicleEF	LDA	301.08	305.29
tblVehicleEF	LDA	62.93	57.35
tblVehicleEF	LDA	0.06	0.05
tblVehicleEF	LDA	1.6480e-003	1.5390e-003
tblVehicleEF	LDA	2.2760e-003	2.0320e-003
tblVehicleEF	LDA	1.5190e-003	1.4180e-003
tblVehicleEF	LDA	2.0930e-003	1.8690e-003
tblVehicleEF	LDA	0.12	0.17
tblVehicleEF	LDA	0.15	0.14
tblVehicleEF	LDA	0.09	0.12
tblVehicleEF	LDA	0.01	0.02
tblVehicleEF	LDA	0.04	0.23
tblVehicleEF	LDA	0.09	0.24
tblVehicleEF	LDA	3.0180e-003	3.0200e-003
tblVehicleEF	LDA	6.5100e-004	5.6800e-004
tblVehicleEF	LDA	0.12	0.17
tblVehicleEF	LDA	0.15	0.14
tblVehicleEF	LDA	0.09	0.12
tblVehicleEF	LDA	0.02	0.02
tblVehicleEF	LDA	0.04	0.23
tblVehicleEF	LDA	0.09	0.26
tblVehicleEF	LDA	4.8190e-003	3.1800e-003
tblVehicleEF	LDA	7.5260e-003	0.06
tblVehicleEF	LDA	0.63	0.75
tblVehicleEF	LDA	1.48	2.30
tblVehicleEF	LDA	269.46	273.80
tblVehicleEF	LDA	62.93	57.99

tblVehicleEF	LDA	0.06	0.05
tblVehicleEF	LDA	1.6480e-003	1.5390e-003
tblVehicleEF	LDA	2.2760e-003	2.0320e-003
tblVehicleEF	LDA	1.5190e-003	1.4180e-003
tblVehicleEF	LDA	2.0930e-003	1.8690e-003
tblVehicleEF	LDA	0.05	0.07
tblVehicleEF	LDA	0.13	0.13
tblVehicleEF	LDA	0.04	0.05
tblVehicleEF	LDA	0.01	0.01
tblVehicleEF	LDA	0.05	0.26
tblVehicleEF	LDA	0.10	0.28
tblVehicleEF	LDA	2.6990e-003	2.7090e-003
tblVehicleEF	LDA	6.5500e-004	5.7400e-004
tblVehicleEF	LDA	0.05	0.07
tblVehicleEF	LDA	0.13	0.13
tblVehicleEF	LDA	0.04	0.05
tblVehicleEF	LDA	0.02	0.02
tblVehicleEF	LDA	0.05	0.26
tblVehicleEF	LDA	0.11	0.31
tblVehicleEF	LDT1	0.02	0.01
tblVehicleEF	LDT1	0.02	0.10
tblVehicleEF	LDT1	1.81	2.09
tblVehicleEF	LDT1	4.20	2.63
tblVehicleEF	LDT1	333.57	334.08
tblVehicleEF	LDT1	75.52	70.49
tblVehicleEF	LDT1	0.18	0.19
tblVehicleEF	LDT1	2.8360e-003	2.7180e-003

tblVehicleEF	LDT1	4.1040e-003	3.4020e-003
tblVehicleEF	LDT1	2.6120e-003	2.5020e-003
tblVehicleEF	LDT1	3.7750e-003	3.1290e-003
tblVehicleEF	LDT1	0.24	0.27
tblVehicleEF	LDT1	0.39	0.33
tblVehicleEF	LDT1	0.16	0.18
tblVehicleEF	LDT1	0.04	0.05
tblVehicleEF	LDT1	0.23	1.04
tblVehicleEF	LDT1	0.30	0.55
tblVehicleEF	LDT1	3.3590e-003	3.3060e-003
tblVehicleEF	LDT1	8.3000e-004	6.9800e-004
tblVehicleEF	LDT1	0.24	0.27
tblVehicleEF	LDT1	0.39	0.33
tblVehicleEF	LDT1	0.16	0.18
tblVehicleEF	LDT1	0.06	0.07
tblVehicleEF	LDT1	0.23	1.04
tblVehicleEF	LDT1	0.33	0.60
tblVehicleEF	LDT1	0.02	0.01
tblVehicleEF	LDT1	0.02	0.09
tblVehicleEF	LDT1	2.17	2.52
tblVehicleEF	LDT1	3.70	2.32
tblVehicleEF	LDT1	362.11	360.42
tblVehicleEF	LDT1	75.52	69.77
tblVehicleEF	LDT1	0.17	0.18
tblVehicleEF	LDT1	2.8360e-003	2.7180e-003
tblVehicleEF	LDT1	4.1040e-003	3.4020e-003
tblVehicleEF	LDT1	2.6120e-003	2.5020e-003

tblVehicleEF	LDT1	3.7750e-003	3.1290e-003
tblVehicleEF	LDT1	0.47	0.53
tblVehicleEF	LDT1	0.49	0.41
tblVehicleEF	LDT1	0.30	0.35
tblVehicleEF	LDT1	0.04	0.05
tblVehicleEF	LDT1	0.23	1.05
tblVehicleEF	LDT1	0.26	0.48
tblVehicleEF	LDT1	3.6500e-003	3.5670e-003
tblVehicleEF	LDT1	8.2100e-004	6.9000e-004
tblVehicleEF	LDT1	0.47	0.53
tblVehicleEF	LDT1	0.49	0.41
tblVehicleEF	LDT1	0.30	0.35
tblVehicleEF	LDT1	0.06	0.08
tblVehicleEF	LDT1	0.23	1.05
tblVehicleEF	LDT1	0.29	0.52
tblVehicleEF	LDT1	0.01	0.01
tblVehicleEF	LDT1	0.02	0.11
tblVehicleEF	LDT1	1.70	1.96
tblVehicleEF	LDT1	4.27	2.69
tblVehicleEF	LDT1	325.12	326.11
tblVehicleEF	LDT1	75.52	70.64
tblVehicleEF	LDT1	0.17	0.19
tblVehicleEF	LDT1	2.8360e-003	2.7180e-003
tblVehicleEF	LDT1	4.1040e-003	3.4020e-003
tblVehicleEF	LDT1	2.6120e-003	2.5020e-003
tblVehicleEF	LDT1	3.7750e-003	3.1290e-003
tblVehicleEF	LDT1	0.21	0.23

tblVehicleEF	LDT1	0.44	0.36
tblVehicleEF	LDT1	0.13	0.15
tblVehicleEF	LDT1	0.04	0.05
tblVehicleEF	LDT1	0.27	1.21
tblVehicleEF	LDT1	0.31	0.56
tblVehicleEF	LDT1	3.2730e-003	3.2270e-003
tblVehicleEF	LDT1	8.3100e-004	6.9900e-004
tblVehicleEF	LDT1	0.21	0.23
tblVehicleEF	LDT1	0.44	0.36
tblVehicleEF	LDT1	0.13	0.15
tblVehicleEF	LDT1	0.05	0.07
tblVehicleEF	LDT1	0.27	1.21
tblVehicleEF	LDT1	0.34	0.62
tblVehicleEF	LDT2	6.8180e-003	5.5100e-003
tblVehicleEF	LDT2	9.5660e-003	0.08
tblVehicleEF	LDT2	0.89	1.20
tblVehicleEF	LDT2	1.93	2.95
tblVehicleEF	LDT2	377.54	363.01
tblVehicleEF	LDT2	86.05	76.74
tblVehicleEF	LDT2	0.10	0.12
tblVehicleEF	LDT2	1.5870e-003	1.6130e-003
tblVehicleEF	LDT2	2.2990e-003	2.0910e-003
tblVehicleEF	LDT2	1.4600e-003	1.4850e-003
tblVehicleEF	LDT2	2.1150e-003	1.9230e-003
tblVehicleEF	LDT2	0.08	0.12
tblVehicleEF	LDT2	0.14	0.16
tblVehicleEF	LDT2	0.06	0.10

tblVehicleEF	LDT2	0.02	0.02
tblVehicleEF	LDT2	0.07	0.48
tblVehicleEF	LDT2	0.13	0.40
tblVehicleEF	LDT2	3.7830e-003	3.5920e-003
tblVehicleEF	LDT2	8.9300e-004	7.5900e-004
tblVehicleEF	LDT2	0.08	0.12
tblVehicleEF	LDT2	0.14	0.16
tblVehicleEF	LDT2	0.06	0.10
tblVehicleEF	LDT2	0.02	0.03
tblVehicleEF	LDT2	0.07	0.48
tblVehicleEF	LDT2	0.14	0.44
tblVehicleEF	LDT2	7.7320e-003	6.2520e-003
tblVehicleEF	LDT2	8.3130e-003	0.07
tblVehicleEF	LDT2	1.09	1.47
tblVehicleEF	LDT2	1.71	2.61
tblVehicleEF	LDT2	410.83	389.16
tblVehicleEF	LDT2	86.05	76.02
tblVehicleEF	LDT2	0.09	0.11
tblVehicleEF	LDT2	1.5870e-003	1.6130e-003
tblVehicleEF	LDT2	2.2990e-003	2.0910e-003
tblVehicleEF	LDT2	1.4600e-003	1.4850e-003
tblVehicleEF	LDT2	2.1150e-003	1.9230e-003
tblVehicleEF	LDT2	0.15	0.24
tblVehicleEF	LDT2	0.17	0.19
tblVehicleEF	LDT2	0.12	0.18
tblVehicleEF	LDT2	0.02	0.03
tblVehicleEF	LDT2	0.07	0.48

tblVehicleEF	LDT2	0.11	0.35
tblVehicleEF	LDT2	4.1180e-003	3.8500e-003
tblVehicleEF	LDT2	8.8900e-004	7.5200e-004
tblVehicleEF	LDT2	0.15	0.24
tblVehicleEF	LDT2	0.17	0.19
tblVehicleEF	LDT2	0.12	0.18
tblVehicleEF	LDT2	0.03	0.04
tblVehicleEF	LDT2	0.07	0.48
tblVehicleEF	LDT2	0.12	0.38
tblVehicleEF	LDT2	6.5550e-003	5.2920e-003
tblVehicleEF	LDT2	9.8290e-003	0.09
tblVehicleEF	LDT2	0.84	1.12
tblVehicleEF	LDT2	1.97	3.03
tblVehicleEF	LDT2	367.62	355.10
tblVehicleEF	LDT2	86.05	76.89
tblVehicleEF	LDT2	0.09	0.12
tblVehicleEF	LDT2	1.5870e-003	1.6130e-003
tblVehicleEF	LDT2	2.2990e-003	2.0910e-003
tblVehicleEF	LDT2	1.4600e-003	1.4850e-003
tblVehicleEF	LDT2	2.1150e-003	1.9230e-003
tblVehicleEF	LDT2	0.06	0.10
tblVehicleEF	LDT2	0.15	0.17
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.02	0.02
tblVehicleEF	LDT2	0.08	0.55
tblVehicleEF	LDT2	0.13	0.41
tblVehicleEF	LDT2	3.6830e-003	3.5130e-003

tblVehicleEF	LDT2	8.9400e-004	7.6100e-004
tblVehicleEF	LDT2	0.06	0.10
tblVehicleEF	LDT2	0.15	0.17
tblVehicleEF	LDT2	0.05	0.08
tblVehicleEF	LDT2	0.02	0.03
tblVehicleEF	LDT2	0.08	0.55
tblVehicleEF	LDT2	0.15	0.45
tblVehicleEF	LHD1	5.7930e-003	5.0720e-003
tblVehicleEF	LHD1	0.01	6.5060e-003
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	0.15	0.17
tblVehicleEF	LHD1	1.11	0.91
tblVehicleEF	LHD1	2.68	1.04
tblVehicleEF	LHD1	9.27	9.53
tblVehicleEF	LHD1	618.47	652.47
tblVehicleEF	LHD1	31.44	10.97
tblVehicleEF	LHD1	0.09	0.09
tblVehicleEF	LHD1	2.49	1.92
tblVehicleEF	LHD1	9.6100e-004	9.5000e-004
tblVehicleEF	LHD1	0.01	9.9790e-003
tblVehicleEF	LHD1	0.02	0.01
tblVehicleEF	LHD1	9.8800e-004	2.7800e-004
tblVehicleEF	LHD1	9.2000e-004	9.0900e-004
tblVehicleEF	LHD1	2.5180e-003	2.4950e-003
tblVehicleEF	LHD1	0.01	0.01
tblVehicleEF	LHD1	9.1000e-004	2.5600e-004
tblVehicleEF	LHD1	4.0170e-003	3.5250e-003

tblVehicleEF	LHD1	0.10	0.09
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	1.9210e-003	1.6800e-003
tblVehicleEF	LHD1	0.09	0.07
tblVehicleEF	LHD1	0.31	0.55
tblVehicleEF	LHD1	0.29	0.09
tblVehicleEF	LHD1	9.3000e-005	9.2000e-005
tblVehicleEF	LHD1	6.0720e-003	6.3480e-003
tblVehicleEF	LHD1	3.6500e-004	1.0900e-004
tblVehicleEF	LHD1	4.0170e-003	3.5250e-003
tblVehicleEF	LHD1	0.10	0.09
tblVehicleEF	LHD1	0.02	0.03
tblVehicleEF	LHD1	1.9210e-003	1.6800e-003
tblVehicleEF	LHD1	0.11	0.09
tblVehicleEF	LHD1	0.31	0.55
tblVehicleEF	LHD1	0.32	0.10
tblVehicleEF	LHD1	5.7930e-003	5.0850e-003
tblVehicleEF	LHD1	0.01	6.6010e-003
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	0.15	0.17
tblVehicleEF	LHD1	1.13	0.93
tblVehicleEF	LHD1	2.55	0.99
tblVehicleEF	LHD1	9.27	9.53
tblVehicleEF	LHD1	618.47	652.49
tblVehicleEF	LHD1	31.44	10.88
tblVehicleEF	LHD1	0.09	0.09
tblVehicleEF	LHD1	2.34	1.80

tblVehicleEF	LHD1	9.6100e-004	9.5000e-004
tblVehicleEF	LHD1	0.01	9.9790e-003
tblVehicleEF	LHD1	0.02	0.01
tblVehicleEF	LHD1	9.8800e-004	2.7800e-004
tblVehicleEF	LHD1	9.2000e-004	9.0900e-004
tblVehicleEF	LHD1	2.5180e-003	2.4950e-003
tblVehicleEF	LHD1	0.01	0.01
tblVehicleEF	LHD1	9.1000e-004	2.5600e-004
tblVehicleEF	LHD1	7.5430e-003	6.6270e-003
tblVehicleEF	LHD1	0.12	0.11
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	3.7360e-003	3.2860e-003
tblVehicleEF	LHD1	0.09	0.07
tblVehicleEF	LHD1	0.31	0.55
tblVehicleEF	LHD1	0.28	0.09
tblVehicleEF	LHD1	9.3000e-005	9.2000e-005
tblVehicleEF	LHD1	6.0720e-003	6.3480e-003
tblVehicleEF	LHD1	3.6300e-004	1.0800e-004
tblVehicleEF	LHD1	7.5430e-003	6.6270e-003
tblVehicleEF	LHD1	0.12	0.11
tblVehicleEF	LHD1	0.02	0.03
tblVehicleEF	LHD1	3.7360e-003	3.2860e-003
tblVehicleEF	LHD1	0.11	0.09
tblVehicleEF	LHD1	0.31	0.55
tblVehicleEF	LHD1	0.30	0.10
tblVehicleEF	LHD1	5.7930e-003	5.0710e-003
tblVehicleEF	LHD1	0.01	6.4920e-003

tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	0.15	0.17
tblVehicleEF	LHD1	1.11	0.91
tblVehicleEF	LHD1	2.67	1.04
tblVehicleEF	LHD1	9.27	9.53
tblVehicleEF	LHD1	618.47	652.46
tblVehicleEF	LHD1	31.44	10.98
tblVehicleEF	LHD1	0.09	0.09
tblVehicleEF	LHD1	2.46	1.89
tblVehicleEF	LHD1	9.6100e-004	9.5000e-004
tblVehicleEF	LHD1	0.01	9.9790e-003
tblVehicleEF	LHD1	0.02	0.01
tblVehicleEF	LHD1	9.8800e-004	2.7800e-004
tblVehicleEF	LHD1	9.2000e-004	9.0900e-004
tblVehicleEF	LHD1	2.5180e-003	2.4950e-003
tblVehicleEF	LHD1	0.01	0.01
tblVehicleEF	LHD1	9.1000e-004	2.5600e-004
tblVehicleEF	LHD1	3.6490e-003	3.1890e-003
tblVehicleEF	LHD1	0.12	0.10
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	1.7560e-003	1.5290e-003
tblVehicleEF	LHD1	0.09	0.07
tblVehicleEF	LHD1	0.33	0.59
tblVehicleEF	LHD1	0.29	0.09
tblVehicleEF	LHD1	9.3000e-005	9.2000e-005
tblVehicleEF	LHD1	6.0720e-003	6.3480e-003
tblVehicleEF	LHD1	3.6500e-004	1.0900e-004

tblVehicleEF	LHD1	3.6490e-003	3.1890e-003
tblVehicleEF	LHD1	0.12	0.10
tblVehicleEF	LHD1	0.02	0.03
tblVehicleEF	LHD1	1.7560e-003	1.5290e-003
tblVehicleEF	LHD1	0.11	0.09
tblVehicleEF	LHD1	0.33	0.59
tblVehicleEF	LHD1	0.32	0.10
tblVehicleEF	LHD2	3.9590e-003	3.3170e-003
tblVehicleEF	LHD2	5.7450e-003	4.5320e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.12	0.13
tblVehicleEF	LHD2	0.63	0.63
tblVehicleEF	LHD2	1.32	0.60
tblVehicleEF	LHD2	14.58	14.99
tblVehicleEF	LHD2	616.22	651.54
tblVehicleEF	LHD2	24.28	7.56
tblVehicleEF	LHD2	0.13	0.13
tblVehicleEF	LHD2	2.18	2.13
tblVehicleEF	LHD2	1.3590e-003	1.4210e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	4.4300e-004	1.2600e-004
tblVehicleEF	LHD2	1.3000e-003	1.3590e-003
tblVehicleEF	LHD2	2.6890e-003	2.7070e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	4.0800e-004	1.1600e-004
tblVehicleEF	LHD2	1.7180e-003	1.8390e-003

tblVehicleEF	LHD2	0.04	0.05
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	8.5600e-004	8.8800e-004
tblVehicleEF	LHD2	0.07	0.07
tblVehicleEF	LHD2	0.10	0.27
tblVehicleEF	LHD2	0.14	0.05
tblVehicleEF	LHD2	1.4200e-004	1.4300e-004
tblVehicleEF	LHD2	5.9930e-003	6.2790e-003
tblVehicleEF	LHD2	2.6800e-004	7.5000e-005
tblVehicleEF	LHD2	1.7180e-003	1.8390e-003
tblVehicleEF	LHD2	0.04	0.05
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	8.5600e-004	8.8800e-004
tblVehicleEF	LHD2	0.08	0.08
tblVehicleEF	LHD2	0.10	0.27
tblVehicleEF	LHD2	0.15	0.05
tblVehicleEF	LHD2	3.9590e-003	3.3250e-003
tblVehicleEF	LHD2	5.8160e-003	4.5690e-003
tblVehicleEF	LHD2	9.7250e-003	9.8280e-003
tblVehicleEF	LHD2	0.12	0.13
tblVehicleEF	LHD2	0.63	0.63
tblVehicleEF	LHD2	1.26	0.58
tblVehicleEF	LHD2	14.58	14.99
tblVehicleEF	LHD2	616.22	651.54
tblVehicleEF	LHD2	24.28	7.51
tblVehicleEF	LHD2	0.13	0.13
tblVehicleEF	LHD2	2.05	2.01

tblVehicleEF	LHD2	1.3590e-003	1.4210e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	4.4300e-004	1.2600e-004
tblVehicleEF	LHD2	1.3000e-003	1.3590e-003
tblVehicleEF	LHD2	2.6890e-003	2.7070e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	4.0800e-004	1.1600e-004
tblVehicleEF	LHD2	3.2580e-003	3.4780e-003
tblVehicleEF	LHD2	0.05	0.06
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	1.6480e-003	1.7290e-003
tblVehicleEF	LHD2	0.07	0.07
tblVehicleEF	LHD2	0.10	0.28
tblVehicleEF	LHD2	0.13	0.05
tblVehicleEF	LHD2	1.4200e-004	1.4300e-004
tblVehicleEF	LHD2	5.9940e-003	6.2790e-003
tblVehicleEF	LHD2	2.6700e-004	7.4000e-005
tblVehicleEF	LHD2	3.2580e-003	3.4780e-003
tblVehicleEF	LHD2	0.05	0.06
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	1.6480e-003	1.7290e-003
tblVehicleEF	LHD2	0.08	0.08
tblVehicleEF	LHD2	0.10	0.28
tblVehicleEF	LHD2	0.14	0.05
tblVehicleEF	LHD2	3.9590e-003	3.3160e-003
tblVehicleEF	LHD2	5.7300e-003	4.5210e-003

tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.12	0.13
tblVehicleEF	LHD2	0.63	0.63
tblVehicleEF	LHD2	1.33	0.61
tblVehicleEF	LHD2	14.58	14.99
tblVehicleEF	LHD2	616.22	651.53
tblVehicleEF	LHD2	24.28	7.57
tblVehicleEF	LHD2	0.13	0.13
tblVehicleEF	LHD2	2.15	2.11
tblVehicleEF	LHD2	1.3590e-003	1.4210e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	4.4300e-004	1.2600e-004
tblVehicleEF	LHD2	1.3000e-003	1.3590e-003
tblVehicleEF	LHD2	2.6890e-003	2.7070e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	4.0800e-004	1.1600e-004
tblVehicleEF	LHD2	1.3960e-003	1.4790e-003
tblVehicleEF	LHD2	0.05	0.05
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	7.2400e-004	7.3700e-004
tblVehicleEF	LHD2	0.07	0.07
tblVehicleEF	LHD2	0.11	0.29
tblVehicleEF	LHD2	0.14	0.05
tblVehicleEF	LHD2	1.4200e-004	1.4300e-004
tblVehicleEF	LHD2	5.9930e-003	6.2790e-003
tblVehicleEF	LHD2	2.6800e-004	7.5000e-005

tblVehicleEF	LHD2	1.3960e-003	1.4790e-003
tblVehicleEF	LHD2	0.05	0.05
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	7.2400e-004	7.3700e-004
tblVehicleEF	LHD2	0.08	0.08
tblVehicleEF	LHD2	0.11	0.29
tblVehicleEF	LHD2	0.15	0.06
tblVehicleEF	MCY	0.41	0.32
tblVehicleEF	MCY	0.15	0.24
tblVehicleEF	MCY	20.43	20.42
tblVehicleEF	MCY	9.65	8.52
tblVehicleEF	MCY	164.18	208.16
tblVehicleEF	MCY	47.21	61.43
tblVehicleEF	MCY	1.14	1.14
tblVehicleEF	MCY	1.6550e-003	1.6430e-003
tblVehicleEF	MCY	3.5170e-003	2.9350e-003
tblVehicleEF	MCY	1.5510e-003	1.5400e-003
tblVehicleEF	MCY	3.3230e-003	2.7700e-003
tblVehicleEF	MCY	1.68	1.63
tblVehicleEF	MCY	0.86	0.84
tblVehicleEF	MCY	0.92	0.89
tblVehicleEF	MCY	2.20	2.20
tblVehicleEF	MCY	0.60	1.98
tblVehicleEF	MCY	2.11	1.85
tblVehicleEF	MCY	2.0380e-003	2.0600e-003
tblVehicleEF	MCY	6.9200e-004	6.0800e-004
tblVehicleEF	MCY	1.68	1.63

tblVehicleEF	MCY	0.86	0.84
tblVehicleEF	MCY	0.92	0.89
tblVehicleEF	MCY	2.69	2.69
tblVehicleEF	MCY	0.60	1.98
tblVehicleEF	MCY	2.29	2.01
tblVehicleEF	MCY	0.40	0.32
tblVehicleEF	MCY	0.14	0.22
tblVehicleEF	MCY	21.17	21.08
tblVehicleEF	MCY	9.12	8.00
tblVehicleEF	MCY	164.18	209.10
tblVehicleEF	MCY	47.21	59.93
tblVehicleEF	MCY	0.99	0.99
tblVehicleEF	MCY	1.6550e-003	1.6430e-003
tblVehicleEF	MCY	3.5170e-003	2.9350e-003
tblVehicleEF	MCY	1.5510e-003	1.5400e-003
tblVehicleEF	MCY	3.3230e-003	2.7700e-003
tblVehicleEF	MCY	3.34	3.23
tblVehicleEF	MCY	1.25	1.22
tblVehicleEF	MCY	2.10	2.03
tblVehicleEF	MCY	2.17	2.17
tblVehicleEF	MCY	0.59	1.97
tblVehicleEF	MCY	1.88	1.64
tblVehicleEF	MCY	2.0490e-003	2.0690e-003
tblVehicleEF	MCY	6.7600e-004	5.9300e-004
tblVehicleEF	MCY	3.34	3.23
tblVehicleEF	MCY	1.25	1.22
tblVehicleEF	MCY	2.10	2.03

tblVehicleEF	MCY	2.66	2.65
tblVehicleEF	MCY	0.59	1.97
tblVehicleEF	MCY	2.05	1.79
tblVehicleEF	MCY	0.41	0.32
tblVehicleEF	MCY	0.15	0.24
tblVehicleEF	MCY	19.91	19.90
tblVehicleEF	MCY	9.57	8.43
tblVehicleEF	MCY	164.18	207.32
tblVehicleEF	MCY	47.21	61.30
tblVehicleEF	MCY	1.13	1.13
tblVehicleEF	MCY	1.6550e-003	1.6430e-003
tblVehicleEF	MCY	3.5170e-003	2.9350e-003
tblVehicleEF	MCY	1.5510e-003	1.5400e-003
tblVehicleEF	MCY	3.3230e-003	2.7700e-003
tblVehicleEF	MCY	1.60	1.58
tblVehicleEF	MCY	1.07	1.04
tblVehicleEF	MCY	0.75	0.73
tblVehicleEF	MCY	2.20	2.19
tblVehicleEF	MCY	0.67	2.24
tblVehicleEF	MCY	2.11	1.85
tblVehicleEF	MCY	2.0300e-003	2.0520e-003
tblVehicleEF	MCY	6.9100e-004	6.0700e-004
tblVehicleEF	MCY	1.60	1.58
tblVehicleEF	MCY	1.07	1.04
tblVehicleEF	MCY	0.75	0.73
tblVehicleEF	MCY	2.68	2.68
tblVehicleEF	MCY	0.67	2.24

tblVehicleEF	MCY	2.29	2.01
tblVehicleEF	MDV	0.01	7.3840e-003
tblVehicleEF	MDV	0.02	0.10
tblVehicleEF	MDV	1.71	1.46
tblVehicleEF	MDV	3.77	3.58
tblVehicleEF	MDV	513.72	445.75
tblVehicleEF	MDV	115.03	94.10
tblVehicleEF	MDV	0.21	0.16
tblVehicleEF	MDV	1.7440e-003	1.6710e-003
tblVehicleEF	MDV	2.5510e-003	2.2050e-003
tblVehicleEF	MDV	1.6090e-003	1.5420e-003
tblVehicleEF	MDV	2.3490e-003	2.0300e-003
tblVehicleEF	MDV	0.12	0.14
tblVehicleEF	MDV	0.21	0.18
tblVehicleEF	MDV	0.09	0.11
tblVehicleEF	MDV	0.04	0.03
tblVehicleEF	MDV	0.12	0.52
tblVehicleEF	MDV	0.30	0.53
tblVehicleEF	MDV	5.1540e-003	4.4080e-003
tblVehicleEF	MDV	1.2170e-003	9.3100e-004
tblVehicleEF	MDV	0.12	0.14
tblVehicleEF	MDV	0.21	0.18
tblVehicleEF	MDV	0.09	0.11
tblVehicleEF	MDV	0.06	0.05
tblVehicleEF	MDV	0.12	0.52
tblVehicleEF	MDV	0.33	0.58
tblVehicleEF	MDV	0.02	8.2990e-003

tblVehicleEF	MDV	0.02	0.09
tblVehicleEF	MDV	2.07	1.77
tblVehicleEF	MDV	3.34	3.16
tblVehicleEF	MDV	557.63	473.46
tblVehicleEF	MDV	115.03	93.21
tblVehicleEF	MDV	0.20	0.15
tblVehicleEF	MDV	1.7440e-003	1.6710e-003
tblVehicleEF	MDV	2.5510e-003	2.2050e-003
tblVehicleEF	MDV	1.6090e-003	1.5420e-003
tblVehicleEF	MDV	2.3490e-003	2.0300e-003
tblVehicleEF	MDV	0.23	0.27
tblVehicleEF	MDV	0.25	0.21
tblVehicleEF	MDV	0.18	0.21
tblVehicleEF	MDV	0.05	0.04
tblVehicleEF	MDV	0.12	0.53
tblVehicleEF	MDV	0.26	0.46
tblVehicleEF	MDV	5.5980e-003	4.6820e-003
tblVehicleEF	MDV	1.2090e-003	9.2200e-004
tblVehicleEF	MDV	0.23	0.27
tblVehicleEF	MDV	0.25	0.21
tblVehicleEF	MDV	0.18	0.21
tblVehicleEF	MDV	0.07	0.05
tblVehicleEF	MDV	0.12	0.53
tblVehicleEF	MDV	0.29	0.50
tblVehicleEF	MDV	0.01	7.1140e-003
tblVehicleEF	MDV	0.02	0.11
tblVehicleEF	MDV	1.60	1.37

tblVehicleEF	MDV	3.84	3.65
tblVehicleEF	MDV	500.72	437.52
tblVehicleEF	MDV	115.03	94.26
tblVehicleEF	MDV	0.20	0.15
tblVehicleEF	MDV	1.7440e-003	1.6710e-003
tblVehicleEF	MDV	2.5510e-003	2.2050e-003
tblVehicleEF	MDV	1.6090e-003	1.5420e-003
tblVehicleEF	MDV	2.3490e-003	2.0300e-003
tblVehicleEF	MDV	0.09	0.11
tblVehicleEF	MDV	0.23	0.19
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.04	0.03
tblVehicleEF	MDV	0.13	0.60
tblVehicleEF	MDV	0.31	0.54
tblVehicleEF	MDV	5.0220e-003	4.3260e-003
tblVehicleEF	MDV	1.2190e-003	9.3300e-004
tblVehicleEF	MDV	0.09	0.11
tblVehicleEF	MDV	0.23	0.19
tblVehicleEF	MDV	0.08	0.10
tblVehicleEF	MDV	0.06	0.05
tblVehicleEF	MDV	0.13	0.60
tblVehicleEF	MDV	0.34	0.59
tblVehicleEF	MH	0.04	3.4240e-003
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	3.65	0.35
tblVehicleEF	MH	6.81	0.00
tblVehicleEF	MH	1,008.83	950.70

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tblVehicleEF	MH	1.85	4.69
tblVehicleEF	MH	0.01	0.02
tblVehicleEF	MH	0.05	0.15
tblVehicleEF	MH	1.4510e-003	0.00
tblVehicleEF	MH	3.2440e-003	4.0000e-003
tblVehicleEF	MH	0.04	0.15
tblVehicleEF	MH	1.3450e-003	0.00
tblVehicleEF	MH	1.73	0.00
tblVehicleEF	MH	0.09	0.00
tblVehicleEF	MH	0.58	0.00
tblVehicleEF	MH	0.12	0.07
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.42	0.00
tblVehicleEF	MH	0.01	8.9880e-003
tblVehicleEF	MH	7.2200e-004	0.00
tblVehicleEF	MH	1.73	0.00
tblVehicleEF	MH	0.09	0.00
tblVehicleEF	MH	0.58	0.00
tblVehicleEF	MH	0.17	0.08
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.46	0.00
tblVehicleEF	MH	0.04	3.4240e-003
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	3.78	0.35
tblVehicleEF	MH	6.40	0.00
tblVehicleEF	MH	1,008.83	950.70

tblVehicleEF	MH	60.25	0.00
tblVehicleEF	MH	1.71	4.42
tblVehicleEF	MH	0.01	0.02
tblVehicleEF	MH	0.05	0.15
tblVehicleEF	MH	1.4510e-003	0.00
tblVehicleEF	MH	3.2440e-003	4.0000e-003
tblVehicleEF	MH	0.04	0.15
tblVehicleEF	MH	1.3450e-003	0.00
tblVehicleEF	MH	3.18	0.00
tblVehicleEF	MH	0.11	0.00
tblVehicleEF	MH	1.16	0.00
tblVehicleEF	MH	0.12	0.07
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.41	0.00
tblVehicleEF	MH	0.01	8.9880e-003
tblVehicleEF	MH	7.1500e-004	0.00
tblVehicleEF	MH	3.18	0.00
tblVehicleEF	MH	0.11	0.00
tblVehicleEF	MH	1.16	0.00
tblVehicleEF	MH	0.17	0.08
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.44	0.00
tblVehicleEF	MH	0.04	3.4240e-003
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	3.62	0.35
tblVehicleEF	MH	6.83	0.00
tblVehicleEF	MH	1,008.83	950.70

tblVehicleEF	MH	60.25	0.00
tblVehicleEF	MH	1.83	4.64
tblVehicleEF	MH	0.01	0.02
tblVehicleEF	MH	0.05	0.15
tblVehicleEF	MH	1.4510e-003	0.00
tblVehicleEF	MH	3.2440e-003	4.0000e-003
tblVehicleEF	MH	0.04	0.15
tblVehicleEF	MH	1.3450e-003	0.00
tblVehicleEF	MH	1.77	0.00
tblVehicleEF	MH	0.11	0.00
tblVehicleEF	MH	0.58	0.00
tblVehicleEF	MH	0.12	0.07
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.42	0.00
tblVehicleEF	MH	0.01	8.9880e-003
tblVehicleEF	MH	7.2300e-004	0.00
tblVehicleEF	MH	1.77	0.00
tblVehicleEF	MH	0.11	0.00
tblVehicleEF	MH	0.58	0.00
tblVehicleEF	MH	0.16	0.08
tblVehicleEF	MH	0.03	0.00
tblVehicleEF	MH	0.46	0.00
tblVehicleEF	MHD	0.02	3.1400e-003
tblVehicleEF	MHD	8.6800e-003	9.0500e-003
tblVehicleEF	MHD	0.07	9.0140e-003
tblVehicleEF	MHD	0.49	0.34
tblVehicleEF	MHD	0.64	0.83

tblVehicleEF	MHD	7.10	1.09
tblVehicleEF	MHD	158.32	78.04
tblVehicleEF	MHD	1,070.79	1,032.91
tblVehicleEF	MHD	55.67	8.27
tblVehicleEF	MHD	1.32	0.83
tblVehicleEF	MHD	2.52	3.41
tblVehicleEF	MHD	6.0510e-003	3.7990e-003
tblVehicleEF	MHD	0.09	0.12
tblVehicleEF	MHD	8.9600e-004	1.1000e-004
tblVehicleEF	MHD	5.7900e-003	3.6350e-003
tblVehicleEF	MHD	0.08	0.11
tblVehicleEF	MHD	8.2500e-004	1.0100e-004
tblVehicleEF	MHD	2.0360e-003	8.5200e-004
tblVehicleEF	MHD	0.05	0.02
tblVehicleEF	MHD	0.04	0.02
tblVehicleEF	MHD	9.6700e-004	4.0800e-004
tblVehicleEF	MHD	0.11	0.16
tblVehicleEF	MHD	0.02	0.12
tblVehicleEF	MHD	0.43	0.05
tblVehicleEF	MHD	1.5220e-003	7.4000e-004
tblVehicleEF	MHD	0.01	9.8290e-003
tblVehicleEF	MHD	6.8100e-004	8.2000e-005
tblVehicleEF	MHD	2.0360e-003	8.5200e-004
tblVehicleEF	MHD	0.05	0.02
tblVehicleEF	MHD	0.05	0.03
tblVehicleEF	MHD	9.6700e-004	4.0800e-004
tblVehicleEF	MHD	0.13	0.19

tblVehicleEF	MHD	0.02	0.12
tblVehicleEF	MHD	0.47	0.06
tblVehicleEF	MHD	0.02	2.9730e-003
tblVehicleEF	MHD	8.7590e-003	9.0910e-003
tblVehicleEF	MHD	0.06	8.7130e-003
tblVehicleEF	MHD	0.36	0.28
tblVehicleEF	MHD	0.65	0.83
tblVehicleEF	MHD	6.79	1.04
tblVehicleEF	MHD	167.70	80.31
tblVehicleEF	MHD	1,070.79	1,032.92
tblVehicleEF	MHD	55.67	8.18
tblVehicleEF	MHD	1.37	0.85
tblVehicleEF	MHD	2.38	3.21
tblVehicleEF	MHD	5.1010e-003	3.2050e-003
tblVehicleEF	MHD	0.09	0.12
tblVehicleEF	MHD	8.9600e-004	1.1000e-004
tblVehicleEF	MHD	4.8810e-003	3.0670e-003
tblVehicleEF	MHD	0.08	0.11
tblVehicleEF	MHD	8.2500e-004	1.0100e-004
tblVehicleEF	MHD	3.9550e-003	1.6370e-003
tblVehicleEF	MHD	0.07	0.03
tblVehicleEF	MHD	0.04	0.02
tblVehicleEF	MHD	1.9390e-003	8.2000e-004
tblVehicleEF	MHD	0.11	0.16
tblVehicleEF	MHD	0.02	0.12
tblVehicleEF	MHD	0.42	0.05
tblVehicleEF	MHD	1.6100e-003	7.6100e-004

tblVehicleEF	MHD	0.01	9.8290e-003
tblVehicleEF	MHD	6.7600e-004	8.1000e-005
tblVehicleEF	MHD	3.9550e-003	1.6370e-003
tblVehicleEF	MHD	0.07	0.03
tblVehicleEF	MHD	0.05	0.03
tblVehicleEF	MHD	1.9390e-003	8.2000e-004
tblVehicleEF	MHD	0.13	0.19
tblVehicleEF	MHD	0.02	0.12
tblVehicleEF	MHD	0.46	0.05
tblVehicleEF	MHD	0.02	3.3780e-003
tblVehicleEF	MHD	8.6340e-003	9.0250e-003
tblVehicleEF	MHD	0.07	9.0860e-003
tblVehicleEF	MHD	0.68	0.44
tblVehicleEF	MHD	0.64	0.82
tblVehicleEF	MHD	7.19	1.10
tblVehicleEF	MHD	145.36	74.90
tblVehicleEF	MHD	1,070.79	1,032.91
tblVehicleEF	MHD	55.67	8.29
tblVehicleEF	MHD	1.26	0.81
tblVehicleEF	MHD	2.50	3.38
tblVehicleEF	MHD	7.3630e-003	4.6200e-003
tblVehicleEF	MHD	0.09	0.12
tblVehicleEF	MHD	8.9600e-004	1.1000e-004
tblVehicleEF	MHD	7.0450e-003	4.4200e-003
tblVehicleEF	MHD	0.08	0.11
tblVehicleEF	MHD	8.2500e-004	1.0100e-004
tblVehicleEF	MHD	1.6250e-003	6.9200e-004

tblVehicleEF	MHD	0.06	0.03
tblVehicleEF	MHD	0.04	0.02
tblVehicleEF	MHD	7.8100e-004	3.3600e-004
tblVehicleEF	MHD	0.11	0.16
tblVehicleEF	MHD	0.02	0.12
tblVehicleEF	MHD	0.44	0.05
tblVehicleEF	MHD	1.3990e-003	7.1000e-004
tblVehicleEF	MHD	0.01	9.8290e-003
tblVehicleEF	MHD	6.8300e-004	8.2000e-005
tblVehicleEF	MHD	1.6250e-003	6.9200e-004
tblVehicleEF	MHD	0.06	0.03
tblVehicleEF	MHD	0.06	0.03
tblVehicleEF	MHD	7.8100e-004	3.3600e-004
tblVehicleEF	MHD	0.13	0.19
tblVehicleEF	MHD	0.02	0.12
tblVehicleEF	MHD	0.48	0.06
tblVehicleEF	OBUS	0.01	9.2340e-003
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	0.04	0.03
tblVehicleEF	OBUS	0.28	0.50
tblVehicleEF	OBUS	0.76	1.30
tblVehicleEF	OBUS	7.10	2.73
tblVehicleEF	OBUS	73.80	74.06
tblVehicleEF	OBUS	1,109.07	1,462.79
tblVehicleEF	OBUS	71.94	21.69
tblVehicleEF	OBUS	0.42	0.55
tblVehicleEF	OBUS	1.56	2.45

tblVehicleEF	OBUS	2.2500e-004	3.2370e-003
tblVehicleEF	OBUS	7.9560e-003	0.06
tblVehicleEF	OBUS	9.0400e-004	2.0900e-004
tblVehicleEF	OBUS	2.1500e-004	3.0970e-003
tblVehicleEF	OBUS	7.5980e-003	0.06
tblVehicleEF	OBUS	8.3600e-004	1.9300e-004
tblVehicleEF	OBUS	2.3520e-003	2.6130e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.04	0.06
tblVehicleEF	OBUS	9.8600e-004	1.1030e-003
tblVehicleEF	OBUS	0.05	0.13
tblVehicleEF	OBUS	0.05	0.25
tblVehicleEF	OBUS	0.45	0.14
tblVehicleEF	OBUS	7.1700e-004	7.0700e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	8.4400e-004	2.1500e-004
tblVehicleEF	OBUS	2.3520e-003	2.6130e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.05	0.08
tblVehicleEF	OBUS	9.8600e-004	1.1030e-003
tblVehicleEF	OBUS	0.06	0.16
tblVehicleEF	OBUS	0.05	0.25
tblVehicleEF	OBUS	0.49	0.15
tblVehicleEF	OBUS	0.01	9.2250e-003
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	0.03	0.02
tblVehicleEF	OBUS	0.27	0.47

tblVehicleEF	OBUS	0.78	1.32
tblVehicleEF	OBUS	6.65	2.55
tblVehicleEF	OBUS	77.15	75.22
tblVehicleEF	OBUS	1,109.07	1,462.82
tblVehicleEF	OBUS	71.94	21.39
tblVehicleEF	OBUS	0.43	0.56
tblVehicleEF	OBUS	1.45	2.29
tblVehicleEF	OBUS	1.8900e-004	2.7320e-003
tblVehicleEF	OBUS	7.9560e-003	0.06
tblVehicleEF	OBUS	9.0400e-004	2.0900e-004
tblVehicleEF	OBUS	1.8100e-004	2.6140e-003
tblVehicleEF	OBUS	7.5980e-003	0.06
tblVehicleEF	OBUS	8.3600e-004	1.9300e-004
tblVehicleEF	OBUS	4.3980e-003	4.7610e-003
tblVehicleEF	OBUS	0.02	0.03
tblVehicleEF	OBUS	0.04	0.06
tblVehicleEF	OBUS	1.9240e-003	2.1450e-003
tblVehicleEF	OBUS	0.05	0.13
tblVehicleEF	OBUS	0.05	0.25
tblVehicleEF	OBUS	0.43	0.13
tblVehicleEF	OBUS	7.4900e-004	7.1700e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	8.3700e-004	2.1200e-004
tblVehicleEF	OBUS	4.3980e-003	4.7610e-003
tblVehicleEF	OBUS	0.02	0.03
tblVehicleEF	OBUS	0.05	0.08
tblVehicleEF	OBUS	1.9240e-003	2.1450e-003

tblVehicleEF	OBUS	0.06	0.17
tblVehicleEF	OBUS	0.05	0.25
tblVehicleEF	OBUS	0.47	0.14
tblVehicleEF	OBUS	0.01	9.2730e-003
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	0.04	0.03
tblVehicleEF	OBUS	0.29	0.54
tblVehicleEF	OBUS	0.76	1.29
tblVehicleEF	OBUS	7.14	2.75
tblVehicleEF	OBUS	69.18	72.45
tblVehicleEF	OBUS	1,109.07	1,462.78
tblVehicleEF	OBUS	71.94	21.73
tblVehicleEF	OBUS	0.40	0.54
tblVehicleEF	OBUS	1.55	2.43
tblVehicleEF	OBUS	2.7300e-004	3.9350e-003
tblVehicleEF	OBUS	7.9560e-003	0.06
tblVehicleEF	OBUS	9.0400e-004	2.0900e-004
tblVehicleEF	OBUS	2.6200e-004	3.7650e-003
tblVehicleEF	OBUS	7.5980e-003	0.06
tblVehicleEF	OBUS	8.3600e-004	1.9300e-004
tblVehicleEF	OBUS	2.1010e-003	2.4660e-003
tblVehicleEF	OBUS	0.02	0.03
tblVehicleEF	OBUS	0.04	0.06
tblVehicleEF	OBUS	9.2100e-004	1.0680e-003
tblVehicleEF	OBUS	0.05	0.13
tblVehicleEF	OBUS	0.05	0.26
tblVehicleEF	OBUS	0.45	0.14

tblVehicleEF	OBUS	6.7300e-004	6.9100e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	8.4500e-004	2.1500e-004
tblVehicleEF	OBUS	2.1010e-003	2.4660e-003
tblVehicleEF	OBUS	0.02	0.03
tblVehicleEF	OBUS	0.05	0.08
tblVehicleEF	OBUS	9.2100e-004	1.0680e-003
tblVehicleEF	OBUS	0.06	0.16
tblVehicleEF	OBUS	0.05	0.26
tblVehicleEF	OBUS	0.50	0.15
tblVehicleEF	SBUS	0.86	0.08
tblVehicleEF	SBUS	0.01	7.4880e-003
tblVehicleEF	SBUS	0.07	6.8950e-003
tblVehicleEF	SBUS	7.75	2.95
tblVehicleEF	SBUS	0.70	0.62
tblVehicleEF	SBUS	6.83	0.95
tblVehicleEF	SBUS	1,163.20	369.36
tblVehicleEF	SBUS	1,114.68	1,133.14
tblVehicleEF	SBUS	52.56	6.04
tblVehicleEF	SBUS	11.16	3.76
tblVehicleEF	SBUS	5.34	5.18
tblVehicleEF	SBUS	0.01	4.7200e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	4.3400e-004	3.7000e-005
tblVehicleEF	SBUS	0.01	4.5160e-003
tblVehicleEF	SBUS	2.7040e-003	2.6520e-003

tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	3.9900e-004	3.4000e-005
tblVehicleEF	SBUS	4.4650e-003	1.1980e-003
tblVehicleEF	SBUS	0.03	7.7610e-003
tblVehicleEF	SBUS	0.93	0.35
tblVehicleEF	SBUS	1.9610e-003	5.5200e-004
tblVehicleEF	SBUS	0.12	0.10
tblVehicleEF	SBUS	0.02	0.05
tblVehicleEF	SBUS	0.37	0.04
tblVehicleEF	SBUS	0.01	3.5270e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	6.4400e-004	6.0000e-005
tblVehicleEF	SBUS	4.4650e-003	1.1980e-003
tblVehicleEF	SBUS	0.03	7.7610e-003
tblVehicleEF	SBUS	1.34	0.51
tblVehicleEF	SBUS	1.9610e-003	5.5200e-004
tblVehicleEF	SBUS	0.14	0.12
tblVehicleEF	SBUS	0.02	0.05
tblVehicleEF	SBUS	0.41	0.04
tblVehicleEF	SBUS	0.86	0.08
tblVehicleEF	SBUS	0.01	7.5790e-003
tblVehicleEF	SBUS	0.06	5.7750e-003
tblVehicleEF	SBUS	7.61	2.90
tblVehicleEF	SBUS	0.71	0.64
tblVehicleEF	SBUS	4.94	0.69
tblVehicleEF	SBUS	1,216.91	380.74
tblVehicleEF	SBUS	1,114.68	1,133.16

tblVehicleEF	SBUS	52.56	5.60
tblVehicleEF	SBUS	11.51	3.86
tblVehicleEF	SBUS	5.02	4.87
tblVehicleEF	SBUS	0.01	3.9850e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	4.3400e-004	3.7000e-005
tblVehicleEF	SBUS	0.01	3.8130e-003
tblVehicleEF	SBUS	2.7040e-003	2.6520e-003
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	3.9900e-004	3.4000e-005
tblVehicleEF	SBUS	8.1040e-003	2.1670e-003
tblVehicleEF	SBUS	0.03	8.3370e-003
tblVehicleEF	SBUS	0.93	0.35
tblVehicleEF	SBUS	3.7500e-003	1.0440e-003
tblVehicleEF	SBUS	0.12	0.10
tblVehicleEF	SBUS	0.01	0.05
tblVehicleEF	SBUS	0.31	0.03
tblVehicleEF	SBUS	0.01	3.6340e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	6.1200e-004	5.5000e-005
tblVehicleEF	SBUS	8.1040e-003	2.1670e-003
tblVehicleEF	SBUS	0.03	8.3370e-003
tblVehicleEF	SBUS	1.34	0.51
tblVehicleEF	SBUS	3.7500e-003	1.0440e-003
tblVehicleEF	SBUS	0.14	0.12
tblVehicleEF	SBUS	0.01	0.05

tblVehicleEF	SBUS	0.34	0.04
tblVehicleEF	SBUS	0.86	0.08
tblVehicleEF	SBUS	0.01	7.4810e-003
tblVehicleEF	SBUS	0.07	7.1280e-003
tblVehicleEF	SBUS	7.94	3.01
tblVehicleEF	SBUS	0.70	0.62
tblVehicleEF	SBUS	7.18	1.00
tblVehicleEF	SBUS	1,089.04	353.65
tblVehicleEF	SBUS	1,114.68	1,133.14
tblVehicleEF	SBUS	52.56	6.11
tblVehicleEF	SBUS	10.66	3.61
tblVehicleEF	SBUS	5.29	5.14
tblVehicleEF	SBUS	0.02	5.7350e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	4.3400e-004	3.7000e-005
tblVehicleEF	SBUS	0.02	5.4870e-003
tblVehicleEF	SBUS	2.7040e-003	2.6520e-003
tblVehicleEF	SBUS	0.03	0.03
tblVehicleEF	SBUS	3.9900e-004	3.4000e-005
tblVehicleEF	SBUS	4.2030e-003	1.1030e-003
tblVehicleEF	SBUS	0.03	8.1650e-003
tblVehicleEF	SBUS	0.94	0.35
tblVehicleEF	SBUS	1.9180e-003	5.4000e-004
tblVehicleEF	SBUS	0.12	0.10
tblVehicleEF	SBUS	0.02	0.06
tblVehicleEF	SBUS	0.38	0.04

tblVehicleEF	SBUS	0.01	3.3790e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	6.5000e-004	6.0000e-005
tblVehicleEF	SBUS	4.2030e-003	1.1030e-003
tblVehicleEF	SBUS	0.03	8.1650e-003
tblVehicleEF	SBUS	1.35	0.51
tblVehicleEF	SBUS	1.9180e-003	5.4000e-004
tblVehicleEF	SBUS	0.14	0.12
tblVehicleEF	SBUS	0.02	0.06
tblVehicleEF	SBUS	0.42	0.04
tblVehicleEF	UBUS	1.69	3.55
tblVehicleEF	UBUS	0.10	0.02
tblVehicleEF	UBUS	11.10	24.52
tblVehicleEF	UBUS	17.17	1.45
tblVehicleEF	UBUS	1,862.15	1,636.13
tblVehicleEF	UBUS	155.25	18.72
tblVehicleEF	UBUS	6.40	0.74
tblVehicleEF	UBUS	0.50	0.09
tblVehicleEF	UBUS	0.01	0.02
tblVehicleEF	UBUS	0.08	2.9450e-003
tblVehicleEF	UBUS	1.6610e-003	7.1000e-005
tblVehicleEF	UBUS	0.21	0.04
tblVehicleEF	UBUS	3.0000e-003	5.4780e-003
tblVehicleEF	UBUS	0.07	2.8110e-003
tblVehicleEF	UBUS	1.5380e-003	6.5000e-005
tblVehicleEF	UBUS	0.01	2.4860e-003
tblVehicleEF	UBUS	0.14	0.02

tblVehicleEF	UBUS	5.6860e-003	1.1520e-003
tblVehicleEF	UBUS	0.72	0.12
tblVehicleEF	UBUS	0.03	0.08
tblVehicleEF	UBUS	1.32	0.09
tblVehicleEF	UBUS	0.01	5.0960e-003
tblVehicleEF	UBUS	1.8630e-003	1.8500e-004
tblVehicleEF	UBUS	0.01	2.4860e-003
tblVehicleEF	UBUS	0.14	0.02
tblVehicleEF	UBUS	5.6860e-003	1.1520e-003
tblVehicleEF	UBUS	2.48	3.70
tblVehicleEF	UBUS	0.03	0.08
tblVehicleEF	UBUS	1.44	0.09
tblVehicleEF	UBUS	1.70	3.55
tblVehicleEF	UBUS	0.09	0.02
tblVehicleEF	UBUS	11.41	24.52
tblVehicleEF	UBUS	14.82	1.23
tblVehicleEF	UBUS	1,862.15	1,636.14
tblVehicleEF	UBUS	155.25	18.35
tblVehicleEF	UBUS	5.97	0.74
tblVehicleEF	UBUS	0.50	0.09
tblVehicleEF	UBUS	0.01	0.02
tblVehicleEF	UBUS	0.08	2.9450e-003
tblVehicleEF	UBUS	1.6610e-003	7.1000e-005
tblVehicleEF	UBUS	0.21	0.04
tblVehicleEF	UBUS	3.0000e-003	5.4780e-003
tblVehicleEF	UBUS	0.07	2.8110e-003
tblVehicleEF	UBUS	1.5380e-003	6.5000e-005

tblVehicleEF	UBUS	0.02	4.3840e-003
tblVehicleEF	UBUS	0.18	0.02
tblVehicleEF	UBUS	0.01	2.2070e-003
tblVehicleEF	UBUS	0.73	0.12
tblVehicleEF	UBUS	0.03	0.08
tblVehicleEF	UBUS	1.20	0.08
tblVehicleEF	UBUS	0.01	5.0960e-003
tblVehicleEF	UBUS	1.8220e-003	1.8200e-004
tblVehicleEF	UBUS	0.02	4.3840e-003
tblVehicleEF	UBUS	0.18	0.02
tblVehicleEF	UBUS	0.01	2.2070e-003
tblVehicleEF	UBUS	2.49	3.70
tblVehicleEF	UBUS	0.03	0.08
tblVehicleEF	UBUS	1.32	0.08
tblVehicleEF	UBUS	1.69	3.55
tblVehicleEF	UBUS	0.10	0.02
tblVehicleEF	UBUS	11.11	24.52
tblVehicleEF	UBUS	17.35	1.44
tblVehicleEF	UBUS	1,862.15	1,636.13
tblVehicleEF	UBUS	155.25	18.70
tblVehicleEF	UBUS	6.36	0.74
tblVehicleEF	UBUS	0.50	0.09
tblVehicleEF	UBUS	0.01	0.02
tblVehicleEF	UBUS	0.08	2.9450e-003
tblVehicleEF	UBUS	1.6610e-003	7.1000e-005
tblVehicleEF	UBUS	0.21	0.04
tblVehicleEF	UBUS	3.0000e-003	5.4780e-003

tblVehicleEF	UBUS	0.07	2.8110e-003
tblVehicleEF	UBUS	1.5380e-003	6.5000e-005
tblVehicleEF	UBUS	0.01	2.4290e-003
tblVehicleEF	UBUS	0.16	0.02
tblVehicleEF	UBUS	4.9150e-003	1.1960e-003
tblVehicleEF	UBUS	0.73	0.12
tblVehicleEF	UBUS	0.03	0.09
tblVehicleEF	UBUS	1.33	0.08
tblVehicleEF	UBUS	0.01	5.0960e-003
tblVehicleEF	UBUS	1.8660e-003	1.8500e-004
tblVehicleEF	UBUS	0.01	2.4290e-003
tblVehicleEF	UBUS	0.16	0.02
tblVehicleEF	UBUS	4.9150e-003	1.1960e-003
tblVehicleEF	UBUS	2.48	3.70
tblVehicleEF	UBUS	0.03	0.09
tblVehicleEF	UBUS	1.46	0.09

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					
2019	0.9645	18.8974	5.7350	0.0456	0.8206	0.3315	1.1521	0.2250	0.3065	0.5315	0.0000	4,310.1950	4,310.1950	0.5265	0.0000	4,323.3576
Maximum	**0.9645**	**18.8974**	**5.7350**	**0.0456**	**0.8206**	**0.3315**	**1.1521**	**0.2250**	**0.3065**	**0.5315**	**0.0000**	**4,310.1950**	**4,310.1950**	**0.5265**	**0.0000**	**4,323.3576**

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					
2019	0.5148	17.2549	7.9269	0.0456	0.8206	0.1849	1.0056	0.2250	0.1831	0.4081	0.0000	4,310.1938	4,310.1938	0.5265	0.0000	4,323.3563
Maximum	**0.5148**	**17.2549**	**7.9269**	**0.0456**	**0.8206**	**0.1849**	**1.0056**	**0.2250**	**0.1831**	**0.4081**	**0.0000**	**4,310.1938**	**4,310.1938**	**0.5265**	**0.0000**	**4,323.3563**

	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	**46.63**	**8.69**	**-38.22**	**0.00**	**0.00**	**44.21**	**12.72**	**0.00**	**40.26**	**23.22**	**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	1-1-2019	3-31-2019	4.8624	4.3465
2	4-1-2019	6-30-2019	4.8736	4.3520
3	7-1-2019	9-30-2019	4.9272	4.3998
		Highest	4.9272	4.3998

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	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Energy	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
Mobile	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
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	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**1.0000e-005**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**2.0000e-005**	**2.0000e-005**	**0.0000**	**0.0000**	**3.0000e-005**

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	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Energy	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
Mobile	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
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	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0000**	**0.0000**	**1.0000e-005**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**2.0000e-005**	**2.0000e-005**	**0.0000**	**0.0000**	**3.0000e-005**

	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	Project Operations	Building Construction	1/1/2019	12/31/2019	7	365	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

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

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Project Operations	Cranes	0	4.00	231	0.29
Project Operations	Forklifts	0	6.00	89	0.20
Project Operations	Off-Highway Trucks	2	6.00	394	0.38
Project Operations	Other General Industrial Equipment	1	8.00	354	0.38
Project Operations	Other Material Handling Equipment	1	6.00	501	0.36
Project Operations	Rubber Tired Dozers	1	4.00	570	0.40
Project Operations	Rubber Tired Loaders	2	5.00	380	0.36
Project Operations	Skid Steer Loaders	1	2.00	51	0.37
Project Operations	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Project Operations	Tractors/Loaders/Backhoes	1	8.00	318	0.36

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
Project Operations	9	19.00	199.00	0.00	14.70	25.00	20.00	LD_Mix	HHDT	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

3.2 Project Operations - 2019

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	0.7078	8.0044	4.2127	0.0120		0.2896	0.2896		0.2665	0.2665	0.0000	1,074.1587	1,074.1587	0.3399	0.0000	1,082.6551
Total	**0.7078**	**8.0044**	**4.2127**	**0.0120**		**0.2896**	**0.2896**		**0.2665**	**0.2665**	**0.0000**	**1,074.1587**	**1,074.1587**	**0.3399**	**0.0000**	**1,082.6551**

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	0.2395	10.8805	1.3908	0.0333	0.7825	0.0416	0.8242	0.2148	0.0398	0.2547	0.0000	3,203.1086	3,203.1086	0.1858	0.0000	3,207.7524
Worker	0.0172	0.0125	0.1316	3.6000e-004	0.0381	2.4000e-004	0.0384	0.0101	2.2000e-004	0.0103	0.0000	32.9277	32.9277	9.0000e-004	0.0000	32.9502
Total	**0.2567**	**10.8931**	**1.5223**	**0.0337**	**0.8206**	**0.0419**	**0.8625**	**0.2250**	**0.0401**	**0.2650**	**0.0000**	**3,236.0363**	**3,236.0363**	**0.1867**	**0.0000**	**3,240.7025**

3.2 Project Operations - 2019

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	0.2581	6.3619	6.4045	0.0120		0.1431	0.1431		0.1431	0.1431	0.0000	1,074.1575	1,074.1575	0.3399	0.0000	1,082.6538
Total	**0.2581**	**6.3619**	**6.4045**	**0.0120**		**0.1431**	**0.1431**		**0.1431**	**0.1431**	**0.0000**	**1,074.1575**	**1,074.1575**	**0.3399**	**0.0000**	**1,082.6538**

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	0.2395	10.8805	1.3908	0.0333	0.7825	0.0416	0.8242	0.2148	0.0398	0.2547	0.0000	3,203.1086	3,203.1086	0.1858	0.0000	3,207.7524
Worker	0.0172	0.0125	0.1316	3.6000e-004	0.0381	2.4000e-004	0.0384	0.0101	2.2000e-004	0.0103	0.0000	32.9277	32.9277	9.0000e-004	0.0000	32.9502
Total	**0.2567**	**10.8931**	**1.5223**	**0.0337**	**0.8206**	**0.0419**	**0.8625**	**0.2250**	**0.0401**	**0.2650**	**0.0000**	**3,236.0363**	**3,236.0363**	**0.1867**	**0.0000**	**3,240.7025**

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	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
Unmitigated	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

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

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
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.533383	0.039495	0.183627	0.126156	0.018688	0.005561	0.017029	0.066607	0.001345	0.001247	0.004677	0.000974	0.001211

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	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	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
NaturalGas Unmitigated	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

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					
User Defined Industrial	0	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**

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					
User Defined Industrial	0	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**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Unmitigated	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

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	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Total	**0.0000**	**0.0000**	**1.0000e-005**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**2.0000e-005**	**2.0000e-005**	**0.0000**	**0.0000**	**3.0000e-005**

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	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Total	**0.0000**	**0.0000**	**1.0000e-005**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**2.0000e-005**	**2.0000e-005**	**0.0000**	**0.0000**	**3.0000e-005**

7.0 Water Detail

7.1 Mitigation Measures Water

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

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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			
User Defined Industrial	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			
User Defined Industrial	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