

# Appendix 4.5

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Greenhouse Gas



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# **The Homestead**

## **GREENHOUSE GAS ANALYSIS**

### **CITY OF EASTVALE**

PREPARED BY:

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

Alyssa Tamase  
atamase@urbanxroads.com  
(949) 336-5988

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## **LIST OF ABBREVIATED TERMS**

(1)	Reference
AB	Assembly Bill
APA	Administrative Procedure Act
APS	Alternative Planning Organizations
AQIA	Air Quality Impact Analysis
AR5	IPCC's 5 <sup>th</sup> Assessment Report
ARB	California Air Resources Board
BAU	Business As Usual
C <sub>2</sub> F <sub>6</sub>	Hexafluoroethane
C <sub>2</sub> H <sub>6</sub>	Ethane
C <sub>2</sub> H <sub>2</sub> F <sub>4</sub>	Tetrafluoroethane
C <sub>2</sub> H <sub>4</sub> F <sub>2</sub>	Ethylidene Fluoride
CAA	Federal Clean Air Act
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGAPS	California LBNL GHG Analysis of Policies Spreadsheet
CALGreen	California Green Building Standards Code
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resource Board
CAP	Climate Action Plan
CAT	Climate Action Team
CBSC	California Building Standards Commission
CEC	California Energy Commission
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CF <sub>4</sub>	Tetrafluoromethane
CFC	Chlorofluorocarbons
CFR	Code of Federal Regulations
CH <sub>4</sub>	Methane
CHF <sub>3</sub>	Carbon Trifluoride
CO	Carbon Monoxide
CO <sub>2</sub>	Carbon Dioxide
CO <sub>2</sub> e	Carbon Dioxide Equivalent
COP	Conference of the Parties
CPUC	California Public Utilities Commission
EMFAC	Emission Factor Model

EPA	Environmental Protection Agency
EPS	Emission Performance Standard
EVSE	Electric Vehicle Supply Equipment
FED	Functional Equivalent Document
GCC	Global Climate Change
GHGA	Greenhouse Gas Analysis
GPD	Gallons Per Day
GPY	Gallons Per Year
GWP	Global Warming Potential
H <sub>2</sub> O	Water
HFC	Hydrofluorocarbons
HP	Horsepower
I-15	Interstate 15
IPCC	Intergovernmental Panel on Climate Change
ISO	Independent System Operator
ITE	Institute of Transportation Engineers
LBNL	Lawrence Berkeley National Laboratory
LCA	Life-Cycle Analysis
LCFS	Low Carbon Fuel Standard
LEV	Low-Emission Vehicle
MMR	Mandatory Reporting Rule
MMTCO <sub>2e</sub>	Million Metric Ton of Carbon Dioxide Equivalent
MPG	Miles Per Gallon
MPOs	Metropolitan Planning Organizations
MTCO <sub>2e</sub>	Metric Ton of Carbon Dioxide Equivalent
MY	Model Year
NHTSA	National Highway Traffic Safety Administration
N <sub>2</sub> O	Nitrogen Dioxide/Nitrous Oxide
NCHRP	National Cooperative Highway Research Program
NDC	Nationally Determined Contributions
NF <sub>3</sub>	Nitrogen Trifluoride
NIOSH	National Institute for Occupational Safety and Health
NO <sub>x</sub>	Oxides of Nitrogen
PFC	Perfluorocarbons
PM <sub>10</sub>	Particulate Matter 10 microns in diameter or less
PM <sub>2.5</sub>	Particulate Matter 2.5 microns in diameter or less
PPM	Parts Per Million
PPT	Parts Per Trillion

Project	The Homestead
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plan
SAR	Second Assessment Report
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategies
SF <sub>6</sub>	Sulfur Hexafluoride
SLPS	Short-Lived Climate Pollutant Strategy
SP	Service Population
TIA	Traffic Impact Analysis
UNFCCC	United Nations' Framework Convention on Climate Change
URBEMIS	Urban Emissions
UTR	Utility Tractors
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
WRI	World Resources Institute
WSA	Water Supply Assessment
ZE/NZE	Zero and Near-Zero Emissions



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## EXECUTIVE SUMMARY

### ES.1 SUMMARY OF FINDINGS

The results of this *The Homestead Greenhouse Gas Analysis* 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 impacts under CEQA.

**TABLE ES-1: SUMMARY OF CEQA SIGNIFICANCE FINDINGS**

Analysis	Report Section	Significance Findings	
		Unmitigated	Mitigated
GHG Impact #1: The Project would not generate direct or indirect greenhouse gas emission that would result in a significant impact on the environment.	3.8	<i>Potentially Significant</i>	<i>Significant and Unavoidable</i>
GHG Impact #2: The Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.	3.8	<i>Less Than Significant</i>	<i>n/a</i>

### ES.2 PROJECT REQUIREMENTS

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

- Global Warming Solutions Act of 2006 (AB32) (2).
- Regional GHG Emissions Reduction Targets (2)/Sustainable Communities Strategies (SB 375) (3).
- Pavley Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles (4).
- Title 24 California Code of Regulations (California Building Code). Establishes energy efficiency requirements for new construction (5).
- Title 20 California Code of Regulations (Appliance Energy Efficiency Standards). Establishes energy efficiency requirements for appliances (6).
- Title 17 California Code of Regulations (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020 (7).
- California Water Conservation in Landscaping Act of 2006 (AB1881). Requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or equivalent by January 1, 2010 to ensure efficient landscapes in new development and reduced water waste in existing landscapes (8).

- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions (9).
- Renewable Portfolio Standards (SB 1078). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2010 and 33 percent by 2020 (10).
- Senate Bill 32 (SB 32). Requires the state to reduce statewide greenhouse gas emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15 (11).

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

### ES.3 PROJECT DESIGN FEATURES

The Project incorporates and expresses the following design features and attributes promoting energy efficiency and sustainability. Because these features/attributes are integral to the Project, and/or are regulatory requirements, they are not considered to be mitigation measures.

- The Project buildings would be designed to support the installation of photo-voltaic solar panels (PV system) on the rooftops of the warehouse buildings if they are desired in the future. The installation of a PV system will be determined by each individual building tenant/operator.
- All on-site *outdoor* cargo handling equipment (CHE) (including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment) will be powered by compressed natural gas.
- To reduce water demands and associated energy use, subsequent development proposals within the Project site would be required to implement a Water Conservation Strategy and demonstrate a minimum 20% reduction in indoor water usage when compared to baseline water demand (total expected water demand without implementation of the Water Conservation Strategy)<sup>1</sup>. The Project would also be required to implement the following:
  - Landscaping palette emphasizing drought tolerant plants consistent with provisions of the City of Eastvale requirements;
  - Use of water-efficient irrigation techniques consistent with provisions of the City of Eastvale requirements;
  - U.S. Environmental Protection Agency (EPA) Certified WaterSense labeled or equivalent faucets, high-efficiency toilets (HETs), and water-conserving shower heads.
- The Project would meet incumbent (at the time of building permits) standards established under the Building Energy Efficiency Standards contained in the California Code of Regulations (CCR), Title 24, Part 6 (Title 24, Title 24 Energy Efficiency Standards).

<sup>1</sup> Reduction of 20% indoor water usage is consistent with the current CALGreen Code performance standards for residential and non-residential land uses. Per CALGreen, the reduction shall be based on the maximum allowable water use per plumbing fixture and fittings as required by the California Building Standards Code.

## **ES.4 MITIGATION MEASURES**

The Project's Air Quality Impact Analysis (AQIA) establishes operational activity mitigation measures that would globally reduce air pollutant emissions generated by subsequent development proposals within the Project site. Although these measures could act to reduce GHG emissions, there is insufficient data to support any reductions associated with the operational activity mitigation measures identified in the AQIA. Thus, as a conservative measure no reduction in GHG emissions are taken for operational activity mitigation measures identified in the AQIA.

### **MM AQ-1**

The truck access gates and loading docks within the truck court on the Project site shall be posted with signs which state:

- Truck drivers shall turn off engines when not in use;
- Diesel delivery trucks servicing the Project shall not idle for more than five (5) minutes; and
- Telephone numbers of the building facilities manager and the CARB to report violations.

### **MM AQ-2**

The City will require operators of the proposed facilities to encourage the trucks to incorporate energy efficiency improvement features through the Carl Moyer Program—including truck modernization, retrofits, and/or aerodynamic kits and low rolling resistance tires—to reduce fuel consumption.

### **MM AQ-3**

Incorporate Electric Vehicle Charging Stations and Carpool Parking. The project will be designed to incorporate electric vehicle charging stations and a minimum of five carpool parking spaces at each building for employees and the public to use.

### **MM AQ-4**

Provide Electric Interior Vehicles. All buildings will be designed to provide infrastructure to support use of electric-powered forklifts and/or other interior vehicles.

### **MM AQ-5**

The project shall be designed to incorporate electric vehicle charging stations and carpool parking spaces for employees.

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# 1 INTRODUCTION

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

## 1.1 SITE LOCATION

The proposed The Homestead is located west of Archibald Avenue and on either side of Limonite Avenue, in the City of Eastvale, as shown on Exhibit 1-A. Chino Airport is located approximately one mile west of the Project site. Existing land uses in the Project study area include residential uses north, east, and southeast of the Project site, and existing agricultural use to the west and south (designated as future commercial use) of the Project site.

## 1.2 PROJECT DESCRIPTION

Exhibit 1-B illustrates the preliminary site plan. As indicated on Exhibit 1-B, the Project is proposed to consist of the following uses:

- 560,291 square feet (sf) of warehousing use
- 520,317 sf of high-cube fulfillment center use

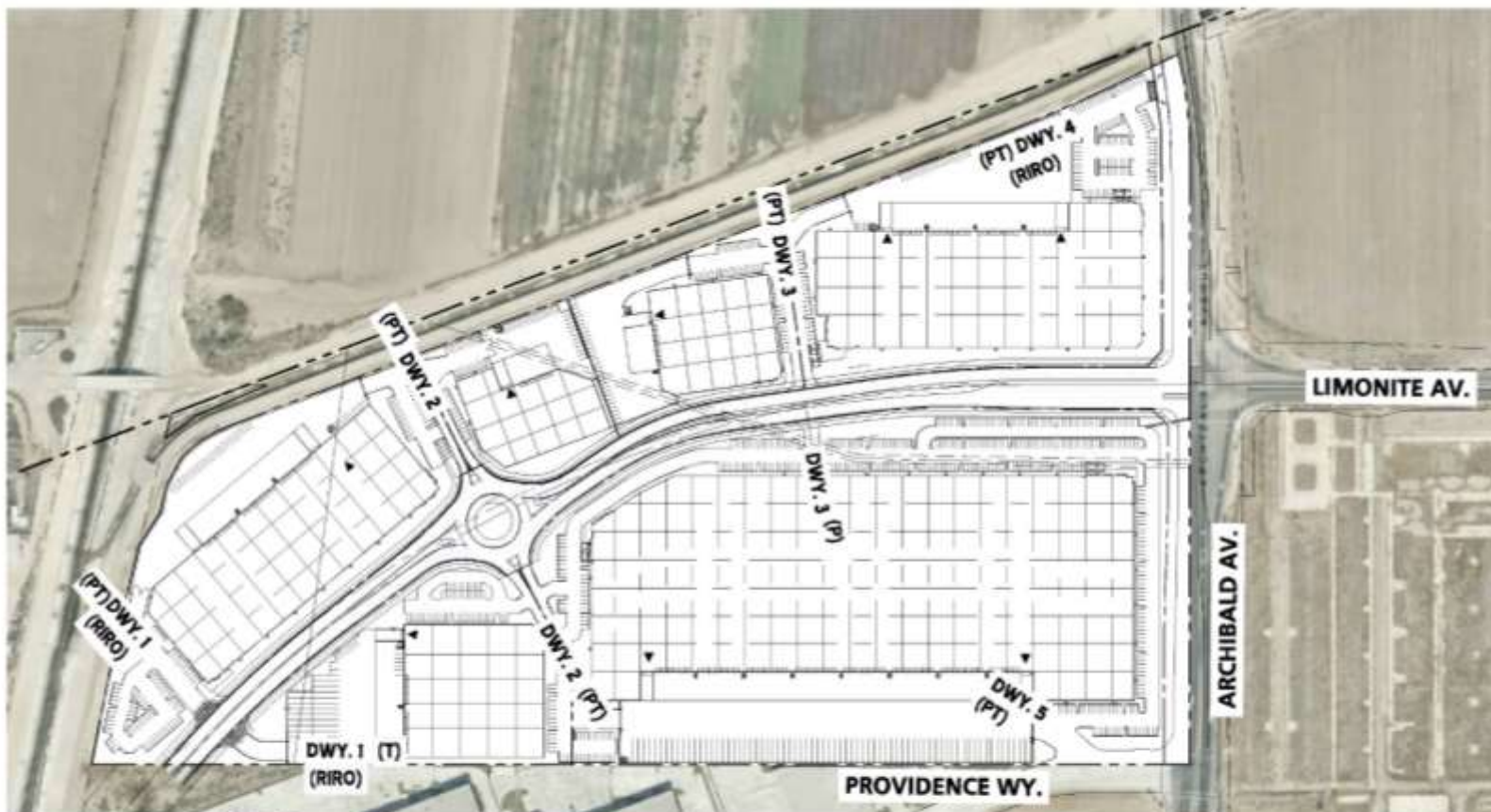
Since the time this GHGA was prepared, the site plan has been updated. The current site plan shows 541,756 square feet of warehousing use and 507,631 square feet of high-cube fulfillment center warehouse use. These updated site plan building square footages are less intensive, and as such the number of trips and consequently emissions would decrease. However, for the purposes of this GHGA, the higher square footage (and therefore higher trip generation and consequently emissions) has been evaluated in an effort to conduct a conservative analysis and overstate as opposed to understate potential GHG impacts.

The Project is anticipated to be constructed in a single phase by the year 2021. At the time this GHG analysis was prepared, the future tenants of the proposed Project were unknown. This GHG study is intended to describe emission impacts associated with the expected typical 24-hour, seven days per week operational activities at the Project site.

EXHIBIT 1-A: LOCATION MAP



EXHIBIT 1-B: SITE PLAN



**LEGEND:**

- RIRO = RIGHT-IN/RIGHT-OUT ONLY ACCESS
- P = PASSENGER CARS ONLY
- T = TRUCKS ONLY
- PT = PASSENGER CARS AND TRUCKS



NOTE: UNLESS NOTED, ALL DRIVEWAYS ARE ASSUMED TO BE FULL ACCESS.



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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, methane, nitrous oxide, and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years.

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

### 2.2 GLOBAL CLIMATE CHANGE DEFINED

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO<sub>2</sub> (carbon dioxide), N<sub>2</sub>O (nitrous oxide), CH<sub>4</sub> (methane), hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radioactive heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages.

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° Fahrenheit 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<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O 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
Water Vapor (H <sub>2</sub> O)	<p>H<sub>2</sub>O is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. A climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change.</p> <p>As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to ‘hold’ more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a “positive feedback loop.” The extent to which this positive</p>	<p>The main source of water vapor is evaporation from the oceans (approximately 85 percent). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves.</p>	<p>There are no known direct health effects related to water vapor at this time. It should be noted however that when some pollutants react with water vapor, the reaction forms a transport mechanism for some of these pollutants to enter the human body through water vapor.</p>

Greenhouse Gases	Description	Sources	Health Effects
	<p>feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the earth's surface and heat it up) (12).</p>		
<p>Carbon Dioxide (CO<sub>2</sub>)</p>	<p>CO<sub>2</sub> 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<sub>2</sub> concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30 percent. Left unchecked, the concentration of carbon dioxide in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources (13).</p>	<p>Carbon dioxide is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil, natural gas, and wood. Carbon dioxide is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks (14).</p>	<p>Outdoor levels of carbon dioxide are not high enough to result in negative health effects.</p> <p>According to the National Institute for Occupational Safety and Health (NIOSH) high concentrations of carbon dioxide can result in health effects such as: headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. It should be noted that current concentrations of carbon dioxide in the earth's atmosphere are estimated to be approximately 370 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</p>

Greenhouse Gases	Description	Sources	Health Effects
			ppm averaged over a 15 minute period (15).
Methane (CH <sub>4</sub> )	CH <sub>4</sub> is an extremely effective absorber of radiation, although its atmospheric concentration is less than carbon dioxide and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs.	Methane has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other anthropogenic sources include fossil-fuel combustion and biomass burning (16).	Methane is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to high levels of methane can cause asphyxiation, loss of consciousness, headache and dizziness, nausea and vomiting, weakness, loss of coordination, and an increased breathing rate.
Nitrous Oxide (N <sub>2</sub> O)	N <sub>2</sub> O, also known as laughing gas, is a colorless GHG. Concentrations of nitrous oxide also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb).	Nitrous oxide is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions)	Nitrous oxide can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage) (17).

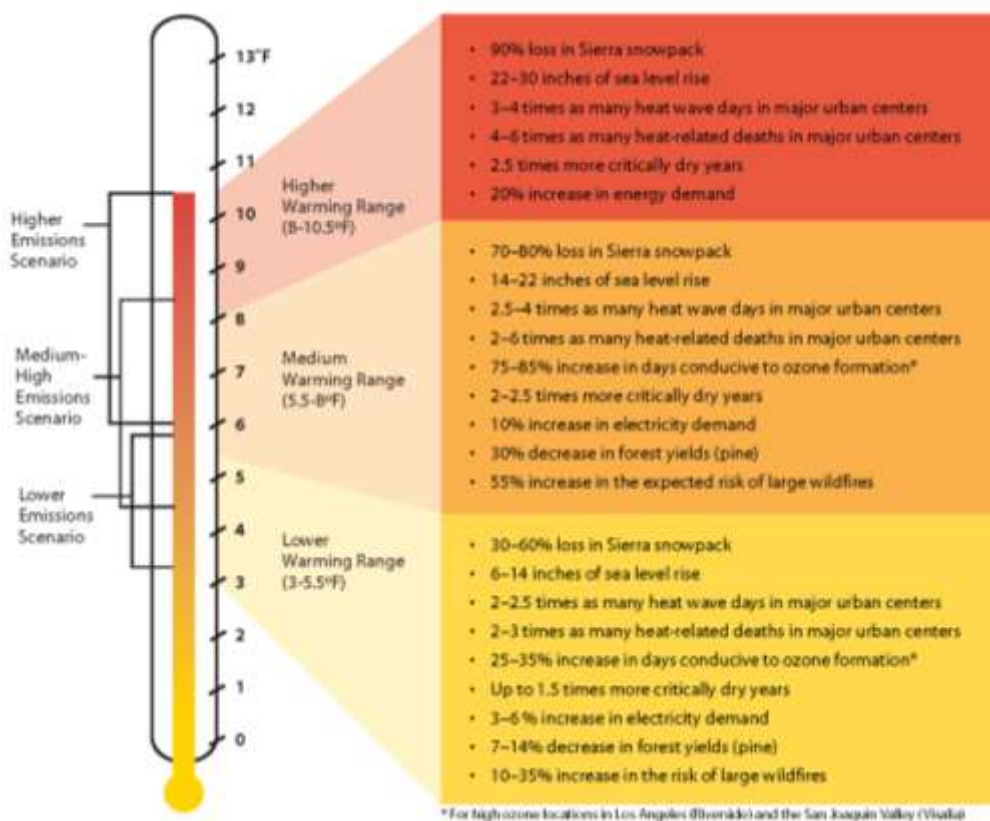
Greenhouse Gases	Description	Sources	Health Effects
		<p>also contribute to its atmospheric load. It is used as an aerosol spray propellant, i.e., in whipped cream bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. Nitrous oxide can be transported into the stratosphere, be deposited on the earth's surface, and be converted to other compounds by chemical reaction (17).</p>	
<p>Chlorofluorocarbons (CFCs)</p>	<p>CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C<sub>2</sub>H<sub>6</sub>) 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).</p>	<p>CFCs have no natural source but were first synthesized in 1928. They were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years (18).</p>	<p>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.</p>

Greenhouse Gases	Description	Sources	Health Effects
Hydrofluorocarbons (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 <sub>3</sub> ), HFC-134a (CH <sub>2</sub> FCF), and HFC-152a (CH <sub>3</sub> CF <sub>2</sub> ). 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.
Perfluorocarbons (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 <sub>4</sub> ) and hexafluoroethane (C <sub>2</sub> F <sub>6</sub> ). The EPA estimates that concentrations of CF <sub>4</sub> 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.
Sulfur Hexafluoride (SF <sub>6</sub> )	Sulfur hexafluoride (SF <sub>6</sub> ) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900) (19). The EPA indicates that concentrations in the 1990s were about 4 ppt.	Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.	In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.

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

The potential health effects related directly to the emissions of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O as they relate to development projects such as the proposed Project are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth’s ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport that higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change will likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas (22). Exhibit 2-A presents the potential impacts of global warming (23).

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



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



## 2.4 GLOBAL WARMING POTENTIAL

GHGs have varying GWP values. GWP of a GHG indicates the amount of warming a gas causes over a given period of time and represents the potential of a gas to trap heat in the atmosphere. Carbon dioxide is utilized as the reference gas for GWP, and thus has a GWP of 1. Carbon dioxide equivalent (CO<sub>2</sub>e) is a term used for describing the difference GHGs in a common unit. CO<sub>2</sub>e signifies the amount of CO<sub>2</sub> 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, the Intergovernmental Panel on Climate Change (IPCC)'s scientific and socio-economic assessment on climate change, range from 1 for carbon dioxide to 23,900 for sulfur hexafluoride and GWP for the IPCC's 5<sup>th</sup> Assessment Report range from 1 for CO<sub>2</sub> to 23,500 for SF<sub>6</sub> (24).

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

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)	
		Second Assessment Report	5 <sup>th</sup> Assessment Report
CO <sub>2</sub>	See*	1	1
CH <sub>4</sub>	12 .4	21	28
N <sub>2</sub> O	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 <sub>6</sub>	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 2016. For the Year 2016, the sum of these emissions totaled approximately 28,747,554 Gg CO<sub>2</sub>e<sup>2</sup> (25) (26). The GHG emissions in more recent years may differ from the inventories presented in Table 2-3; however, the data is representative of currently available inventory data.

<sup>2</sup> 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 2016 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 were taken in 2012, while the most recent GHG emissions for India were taken in 2010.

### United States

As noted in Table 2-3, the United States, as a single country, was the number two producer of GHG emissions in 2016. The primary GHG emitted by human activities in the United States was CO<sub>2</sub>, representing approximately 81.6 percent of total GHG emissions in the US. Carbon dioxide from fossil fuel combustion, the largest source of GHG emissions, accounted for approximately 93.5 percent of the CO<sub>2</sub> emissions (27).

**TABLE 2-3: TOP GHG PRODUCING COUNTRIES AND THE EUROPEAN UNION**<sup>3</sup>

Emitting Countries	GHG Emissions (Gg CO <sub>2</sub> e)
China	11,895,765
United States	6,511,302
European Union (28-member countries)	4,291,252
India	2,643,817
Russian Federation	2,100,850
Japan	1,304,568
<b>Total</b>	<b>28,747,554</b>

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 (28). California Air Resources Board (CARB) compiles GHG inventories for the State of California. Based upon the 2018 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2016 GHG emissions inventory, California emitted 429.4 million metric tons of CO<sub>2</sub>e (MMT CO<sub>2</sub>e) including emissions resulting from imported electrical power in 2015 (29).

## 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

<sup>3</sup> Used <http://unfccc.int> data for Annex I countries. Consulted the CAIT Climate Data Explorer in <http://www.wri.org> site to reference Non-Annex I countries such as China and India.

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 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<sub>2</sub> 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.

**Intergovernmental Panel on Climate Change.** 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 (“Convention”).** 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 U.N. Framework Convention on Climate Change (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 21<sup>st</sup> 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) (30).

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 States 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* 549 U.S. 497 (2007), decided on April 2, 2007, the Supreme Court found that four GHGs, including carbon dioxide, are air pollutants subject to regulation under Section 202(a)(1) of the 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—carbon dioxide, methane, nitrous oxide, 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 (31).

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

The first phase of the national program applies to passenger cars, light-duty trucks, and medium-duty (MD) passenger vehicles, covering model years 2012 through 2016. They require these vehicles to meet an estimated combined average emissions level of 250 grams of carbon dioxide per mile, equivalent to 35.5 miles per gallon (mpg) if the automobile industry were to meet this carbon dioxide level solely through fuel economy improvements. Together, these standards would cut carbon dioxide 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 (EPA 2012c). The new standards for model years 2017 through 2025 apply to passenger cars, light-duty trucks, and MD passenger vehicles. The final standards are projected to result in an average industry fleetwide level of 163 grams/mile of carbon dioxide (CO<sub>2</sub>) 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 carbon dioxide 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 carbon dioxide 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 (32). 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 (33).

**Mandatory Reporting of GHGs.** The Consolidated Appropriations Act of 2008, passed in December 2007, requires the establishment of mandatory GHG reporting requirements. On September 22, 2009, the EPA issued the Final Mandatory Reporting of GHGs Rule, which became effective January 1, 2010. The rule requires reporting of GHG emissions from large sources and suppliers in the U.S. and is intended to collect accurate and timely emissions data to inform future policy decisions. Under the rule, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year 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 carbon dioxide 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 carbon dioxide 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<sub>2</sub> 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 Nitrous Oxide (NO<sub>x</sub>) 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 carbon dioxide emissions from power plants, auctions carbon dioxide 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 (C2ES 2015).

**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 (EPA 2014):

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 AB 32 was specifically enacted to address GHG emissions. Other legislation such as Title 24 and Title 20 energy standards were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions. This section describes the major provisions of the legislation.

**AB 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 carbon dioxide, methane, N<sub>2</sub>O, 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.*

CARB approved the 1990 GHG emissions level of 427 MMTCO<sub>2e</sub> on December 6, 2007 (CARB 2007). Therefore, emissions generated in California in 2020 are required to be equal to or less than 427 MMTCO<sub>2e</sub>. Emissions in 2020 in a “business as usual” (BAU) scenario were estimated

to be 596 MMTCO<sub>2</sub>e, which do not account for reductions from AB 32 regulations (CARB 2008). At that level, a 28.4 percent reduction was required to achieve the 427 MMTCO<sub>2</sub>e 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<sub>2</sub>e. Therefore, under the updated forecast, a 21.7 percent reduction from BAU is required to achieve 1990 levels (CARB 2010).

### 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<sub>2</sub>e (AB 32 2020 target)
- 2000: 463 MMTCO<sub>2</sub>e (an average 8 percent reduction needed to achieve 1990 base)
- 2010: 450 MMTCO<sub>2</sub>e (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<sub>2</sub>e 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 (CARB 2014).

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 (Pavley I) 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<sub>2e</sub> by 2020 requires a reduction of 80 MMTCO<sub>2e</sub>, or a 16 percent reduction below the estimated BAU levels to return to 1990 levels (i.e., 427 MMTCO<sub>2e</sub>) 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 climate action plans, 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<sub>2e</sub>. The updated CARB 2020 BAU projection in the Supplemental FED is 545 MMTCO<sub>2e</sub>. Considering the updated BAU estimate of 545 MMTCO<sub>2e</sub> 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<sub>2e</sub>) by 2020, instead of the approximate 28.4 percent BAU reduction previously reported under the original Climate Change Scoping Plan (2008).

## 2017 Climate Change Scoping Plan Update

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 methane emissions from agricultural and other wastes.

The 2017 Scoping Plan establishes a new emissions limit of 260 MMTCO<sub>2e</sub> 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 (methane, 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 methane and hydrofluorocarbon 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 metric tons of CO<sub>2</sub>e (MTCO<sub>2</sub>e) or less per capita by 2030 and 2 MTCO<sub>2</sub>e 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 climate action plan 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<sub>2</sub>e per year, “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<sub>2</sub>e per year, 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 (34) (35).

**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 (11).

**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<sub>2</sub>e per year must comply with the Cap-and-Trade Program. Triggering of the 25,000 MTCO<sub>2</sub>e per year “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<sub>2</sub>e 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 [Low Carbon Fuel Standard] 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 VMT are covered by the Cap-and-Trade Program (CARB 2015) (36).

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.<sup>4</sup>

**SB 375 – the Sustainable Communities and Climate Protection Act of 2008.** 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 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.

**AB 1493 Pavley Regulations and Fuel Efficiency Standards.** 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 operation rather than relying on fixed valve timing and lift as has historically been done; turbocharging to

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<sup>4</sup> On March 17, 2011, the San Francisco Superior Court issued a final decision in *Association of Irrigated 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 trial 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 Functional Equivalent Document. The CARB Board approved the Scoping Plan and the CEQA document on August 24, 2011.

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 referred to as 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.

**SB 350— Clean Energy and Pollution Reduction Act of 2015.** 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 Utility Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.
- Reorganize the Independent System Operator 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 (California Leginfo 2015).

#### **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 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 – Low Carbon Fuel Standard.** 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<sub>2e</sub>. 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 Appliance Efficiency Standards.** 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. 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 (CEC 2012).

**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. 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. As such, the analysis herein assumes compliance with the 2019 Title 24 Standards.

The CEC indicates that the 2019 Title 24 standards may require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, update indoor and outdoor lighting 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 about 53 percent less energy than homes built under the 2016 standards. Nonresidential buildings will use approximately 30 percent less energy due to lighting upgrades (37).

CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2011, and is administered by the California Building Standards Commission (BSC). 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. 2019 CALGreen standards are applicable to the Project and require (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 phase project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
  - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
  - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
  - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
  - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute at 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 square feet 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 square feet. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 square feet requiring a building or landscape permit (5.304.3).

Commissioning. For new buildings 10,000 square feet 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).

**Model Water Efficient Landscape Ordinance.** The Model Water Efficient Landscape Ordinance (“Ordinance”) was required by AB 1881, the Water Conservation Act. The bill required local agencies to adopt a local landscape ordinance at least as effective in conserving water as the Model Ordinance by January 1, 2010. Reductions in water use of 20 percent consistent with (SBX-7-7) 2020 mandate are expected upon compliance with the ordinance. Governor Brown’s Drought Executive Order of April 1, 2015 (EO B-29-15) directed Department of Water Resources (DWR) to update the Ordinance through expedited regulation. The California Water Commission approved the revised Ordinance on July 15, 2015 effective December 15, 2015. New development projects that include landscape areas of 500 sf or more are subject to the Ordinance. The update requires:

- More efficient irrigation systems;
- Incentives for graywater usage;
- Improvements in on-site stormwater capture;
- Limiting the portion of landscapes that can be planted with high water use plants; and
- Reporting requirements for local agencies.

**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 U.S. 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 (MY) 2014 with stringency levels increasing through MY 2018. The rule organizes truck compliance into three groupings, which include a) HD pickups and vans; b) vocational vehicles; and c) combination tractors. The EPA rule does not regulate trailers.

CARB staff has worked jointly with the EPA and the NHTSA on the next phase of federal GHG emission standards for 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 light-duty trucks, 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 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 Office of Planning and Research 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).



## 2.8 DISCUSSION ON ESTABLISHMENT OF SIGNIFICANCE THRESHOLDS

The City of Eastvale does not have an adopted threshold of significance for GHG emissions. For CEQA purposes, the City has discretion to select an appropriate significance criterion, based on substantial evidence. The SCAQMD's adopted numerical threshold of 10,000 MTCO<sub>2e</sub> per year for industrial stationary source emissions is selected as the significance criterion. The SCAQMD-adopted industrial threshold was selected by the City because the proposed Project is analogous to an industrial use much more closely than any other land use such as commercial or residential in terms of its expected operating characteristics. The Project proposes the development of warehousing use within two buildings that will serve mid-stream functions in the goods movement chain between manufacturers and consumers, characteristic of an industrial operation. Further, analysis of the Project's traffic generation in this EIR is based on the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10<sup>th</sup> Edition, 2017 for industrial and warehouse uses. Also, 10,000 MTCO<sub>2e</sub> has been used as the significance threshold by many local government lead agencies for logistics projects throughout the SCAG region since the SCAQMD adopted this threshold for its own use. Further, to ensure that the threshold is conservative in its application, although the SCAQMD uses their adopted 10,000 MTCO<sub>2e</sub> threshold to determine the significance of stationary source emissions for industrial projects, the 10,000 MTCO<sub>2e</sub> threshold used in this EIR is applied to all sources of Project-related GHG emissions whether stationary source, mobile source, area source, or other.

Use of this threshold is also consistent with guidance provided in the CAPCOA *CEQA and Climate Change* handbook, as such the City has opted to use a non-zero threshold approach based on Approach 2 of the handbook. Threshold 2.5 (Unit-Based Thresholds Based on Market Capture) establishes a numerical threshold based on capture of approximately 90 percent of emissions from future development. The latest threshold developed by SCAQMD using this method is 10,000 MTCO<sub>2e</sub> per year for industrial projects. This threshold is based on the review of 711 CEQA projects.

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### 3 PROJECT GREENHOUSE GAS IMPACT

#### 3.1 INTRODUCTION

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

#### 3.2 STANDARDS OF SIGNIFICANCE

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

- Generate greenhouse gas 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 greenhouse gases?

#### 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 pollutant (VOCs, NO<sub>x</sub>, SO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>) and greenhouse gas 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 greenhouse gas emissions. Output from the model runs for construction and operational activity are provided in Appendices 3.1 through 3.3. The CalEEMod model includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water.

##### 3.3.1 LAND USES MODELED IN CAL EEMOD

The Project is located on 1,980,673 sf/45.47 acres. As previously stated, the Project proposes to construct the following uses:

- 560,291 sf of warehousing use (Buildings 1 through 6)
- 520,317 sf of high-cube fulfillment center use (Building 7)

CalEEMod does not provide an extensive selection of land use subtype categories, land uses that most closely fit the Project will be utilized. For purposes of analysis, the following land uses were modeled (41):

- 560.291 thousand square feet (TSF)/12.86 acres of Unrefrigerated Warehouse – No Rail<sup>5</sup>
- 520.317 TSF/11.94 acres of Unrefrigerated Warehouse – Rail<sup>6</sup>
- 67.64 TSF/1.55 acres Other Non-Asphalt Surfaces<sup>7</sup>
- 156.03 TSF/3.58 acres Other Asphalt Surfaces<sup>8</sup>
- 1,691 Space Parking Lot<sup>9</sup> on 15.54 acres

### 3.3.2 EMISSION FACTORS MODEL

Vehicle emissions were estimated using information generated within the 2017 version of the Emission Factor model (EMFAC) developed by the CARB. EMFAC2017 is a mathematical model that was developed to calculate emission rates, fuel consumption, and 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 (42). This GHG utilizes annual EMFAC2017 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season.

### 3.4 CONSTRUCTION AND OPERATIONAL LIFE-CYCLE ANALYSIS NOT REQUIRED

A full life-cycle analysis (LCA) for construction and operational activity is not included in this analysis due to the lack of consensus guidance on LCA methodology at this time (43). 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 (44). 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 CONSTRUCTION EMISSIONS

Project construction activities would generate CO<sub>2</sub> and CH<sub>4</sub> emissions. The report *The Homestead Air Quality Impact Analysis Report* (Urban Crossroads, Inc., 2019) contains detailed information

<sup>5</sup> CalEEMod defines Unrefrigerated Warehouse – No Rail uses as warehouse uses that do not have refrigeration and a rail spur.

<sup>6</sup> Unrefrigerated Warehouse – Rail uses are defined as warehouse uses that do not have refrigeration by a rail spur.

<sup>7</sup> The User's Guide defines Other Non-Asphalt Surfaces as non-asphalt areas. As indicated on the site plan, the landscaped area is approximately 10% of the interior parking area. For purposes of analysis, this category is used to model the 67,640 sf/1.55 acre of Landscaped areas.

<sup>8</sup> For purposes of analysis, the remaining 156,030 sf/3.58 acre of Paved/Yard Area will be modeled as Other Asphalt Surfaces. These surfaces are defined as an asphalt area not used as a parking lot.

<sup>9</sup> CalEEMod default of 676,400 sf/15.54 acres will be used to model the 1,691 parking spaces.

regarding Project construction activities (45). As discussed in the AQIA, Construction related emissions are expected from the following construction activities:

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

**3.5.1 CONSTRUCTION DURATION**

Construction is expected to commence in January 2020 and will last through December 2021. The construction schedule utilized in the analysis, shown in Table 3-1, represents a “worst-case” analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.<sup>10</sup> The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per *CEQA Guidelines*. The duration of construction activity was based on the 2021 opening year and CalEEMod defaults.

**TABLE 3-1: CONSTRUCTION DURATION**

Phase Name	Start Date	End Date	Days
Demolition	01/06/2020	03/13/2020	50
Site Preparation	03/14/2020	04/24/2020	30
Grading	04/25/2020	08/07/2020	75
Building Construction	08/08/2020	12/10/2021	350
Paving	10/02/2021	12/17/2021	55
Architectural Coating	08/01/2021	12/17/2021	100

Source: Construction activity based the 2021 opening year and CalEEMod defaults.

**3.5.2 CONSTRUCTION EQUIPMENT**

Site specific construction fleet may vary due to specific project needs at the time of construction. The associated construction equipment was generally based on CalEEMod 2016.3.2 defaults. A detailed summary of construction equipment assumptions by phase is provided at Table 3-2. Please refer to specific detailed modeling inputs/outputs contained in Appendix 3.1 of this GHGA.

<sup>10</sup> As shown in the California Emissions Estimator Model (CalEEMod) User’s Guide Version 2016.3.2, Section 4.3 “OFFROAD Equipment” as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

**TABLE 3-2: CONSTRUCTION EQUIPMENT ASSUMPTIONS**

Activity	Equipment	Number	Hours Per Day
Demolition	Concrete/Industrial Saws	1	8
	Excavators	3	8
	Rubber Tired Dozers	2	8
Site Preparation	Rubber Tired Dozers	3	8
	Tractors/Loaders/Backhoes	4	8
Grading	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
	Tractors/Loaders/Backhoes	2	8
Building Construction	Cranes	1	8
	Forklifts	3	8
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	8
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

Source: Construction equipment based on CalEEMod defaults.

### 3.5.3 CONSTRUCTION EMISSIONS SUMMARY

For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life then adding that number to the annual operational phase GHG emissions (46). As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 3-3.

**TABLE 3-3: AMORTIZED ANNUAL CONSTRUCTION EMISSIONS**

Year	Emissions (MT/yr)
	Total CO <sub>2</sub> e
Annual Construction Emissions (2020)	1,457.32
Annual Construction Emissions (2021)	2,344.51
<b>Amortized Construction Emissions (MTCO<sub>2</sub>e)</b>	<b>126.73</b>

### 3.6 OPERATIONAL EMISSIONS

Operational activities associated with the proposed Project will result in emissions of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O from the following primary sources:

- Area Source Emissions
- Energy Source Emissions (combustion emissions associated with natural gas and electricity)
- Mobile Source Emissions
- On-site Equipment Emissions
- Water Supply, Treatment, and Distribution
- Solid Waste

#### 3.6.1 AREA SOURCE EMISSIONS

##### Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. The emissions associated with landscape maintenance equipment were calculated based on assumptions provided in the CalEEMod model.

#### 3.6.2 ENERGY SOURCE EMISSIONS

##### Combustion Emissions Associated with Natural Gas and Electricity

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO<sub>2</sub> and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building; the building energy use emissions do not include street lighting<sup>11</sup>. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Unless otherwise noted, CalEEMod default parameters were used.

<sup>11</sup> The CalEEMod emissions inventory model does not include indirect emission related to street lighting. Indirect emissions related to street lighting are expected to be negligible and cannot be accurately quantified at this time as there is insufficient information as to the number and type of street lighting that would occur.

## Title 24 Energy Efficiency Standards

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. Energy efficient buildings require less electricity. The 2019 version of Title 24 was adopted by the CEC and will become effective on January 1, 2020. As such, the analysis herein assumes compliance with the 2019 Title 24 Standards.

### **3.6.3 MOBILE SOURCE EMISSIONS**

#### Vehicles

Project-related GHG emissions derive predominantly from mobile sources. In this regard, approximately 77 percent (by weight) of all Project GHG emissions would be generated by mobile sources (vehicles). Neither the Project Applicant nor the City have any regulatory control over these tail pipe emissions. Rather, vehicle tail pipe source emissions are regulated by CARB and EPA. As summarized previously herein, as the result of CARB and EPA actions, basin-wide vehicular-source emissions have been reduced dramatically over the past years and are expected to further decline as clean vehicle and fuel technologies improve.

The Project related GHG emissions derive primarily from vehicle trips generated by the Project. Trip characteristics available from *The Homestead Traffic Impact Analysis* (Urban Crossroads, Inc.) report were utilized in this analysis. Per TIA prepared by Urban Crossroads, Inc. the Project is expected to generate a total of approximately 2,102 trip-ends per day (actual vehicles) (47). The Project trip generation includes 408 truck trip-ends per day. The passenger car and truck fleet for the proposed industrial uses are broken down by passenger car and truck type (or axle type).

#### **3.6.3.1 Trip Length**

Trip lengths for passenger cars and trucks were determined based on the regional traffic model. The Riverside County Traffic Analysis Model (RivTAM) was used to estimate trip lengths for the Project's passenger cars and trucks.

More specifically, RivTAM was utilized to conduct select zone model runs for the proposed Project. RivTAM was prepared for the Riverside County Transportation Department as a sub-regional model based on SCAG model, which includes the entire SCAG region.

Based on RivTAM, the average trip length for trucks was calculated to be 36.2 miles. The trip length for automobiles (passenger cars, small trucks, motorcycles, etc.) was calculated to be 14.4 miles (48).

The use of a travel demand model is supported by substantial evidence since the information contained in the model is specific to the region and for the land use type being proposed. Furthermore, the use of travel demand models is also a recommended practice that is being promoted by the Governor's Office of Planning and Research (OPR) in their updated CEQA



guidelines with respect to Senate Bill (SB) 743. Specifically, the latest technical advisory documentation published by OPR (December 2018 see Page 30-31) (49) explicitly states that:

*...agencies can use travel demand models or survey data to estimate existing trip lengths and input those into sketch models such as CalEEMod to achieve more accurate results. Whenever possible, agencies should input localized trip lengths into a sketch model to tailor the analysis to the project location.*

The procedure described by OPR in their SB 743 technical advisory is precisely the method that has been used to calculate trip lengths and consequently VMT for the Project.

**3.6.3.2 Approach for Analysis of the Project**

Two Separate model runs were utilized for each phase in order to more accurately model emissions resulting from passenger car and truck operations.

Passenger Cars

The first run analyzed passenger car emissions, incorporated the RivTAM calculated trip length of 14.4 miles for passenger cars and an assumption of 100% primary trips. It is important to note that although the TIA does not breakdown passenger cars by type, this analysis assumes that passenger cars include Light-Duty-Auto vehicles (LDA), Light-Duty-Trucks (LDT1<sup>12</sup> & LDT2<sup>13</sup>), and Medium-Duty-Vehicles (MDV) vehicle types. In order to account for emissions generated by passenger cars, the following fleet mix was utilized in this analysis:

**TABLE 3-4: PASSENGER CAR FLEET MIX**

Phase Name	Vehicle Type	%
Warehouse	LDA	61.40
	LDT1	4.30
	LDT2	21.00
	MDV	13.30
High-Cube Fulfillment Center Warehouse	LDA	61.40
	LDT1	4.30
	LDT2	21.00
	MDV	13.30

Note: The Project-specific passenger car fleet mix used in this analysis is based on a proportional split utilizing the default CalEEMod percentages assigned to LDA, LDT1, LDT2, and MDV vehicles types.

Trucks

The second run analyzed truck emissions, incorporated the RivTAM calculated trip length of 36.2 miles for trucks and an assumption of 100% primary trips. The truck fleet mix is estimated by

<sup>12</sup> Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.

<sup>13</sup> Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

rationing the trip rates for each truck type based on information provided in the TIA. Heavy trucks are broken down by truck type (or axle type) and are categorized as either Light-Heavy-Duty Trucks (LHDT)/2-axle, Medium-Heavy-Duty Trucks (MHDT)/3-axle, and Heavy-Heavy-Duty Trucks (HHDT)/4+-axle. In order to account for emissions generated by trucks, the following fleet mix was utilized in this analysis:

**TABLE 3-5: TRUCK FLEET MIX**

Phase Name	Vehicle Type	%
Warehouse	LHDT	10.70
	MHDT	10.70
	HHDT	78.60
High-Cube Fulfillment Center Warehouse	LHDT	16.70
	MHDT	20.70
	HHDT	62.60

Note: Project-specific truck fleet mix is based on the number of trips generated by each truck type (LHDT, MHDT, and HHDT) relative to the total number of truck trips.

It should be noted that the TIA identifies two different truck categories for the high-cube fulfillment center warehouse use, 2-4-axle and 5+-axle trucks. CalEEMod categorizes trucks by truck type, not by axle-type. In order to account for emissions from LHDT, MHDT, and HHDT trucks, the analysis herein assumed that 25 percent of the 2-4 axle trucks are LHDT, 25 percent are MHDT, and the remaining 50 percent are HHDT.

**3.6.4 ON-SITE EQUIPMENT EMISSIONS**

It is common for industrial buildings to require cargo handling equipment to move empty containers and empty chassis to and from the various pieces of cargo handling equipment that receive and distribute containers. The most common type of cargo handling equipment is the yard truck which is designed for moving cargo containers. Yard trucks are also known as yard goats, utility tractors (UTRs), hustlers, yard hostlers, and yard tractors. The cargo handling equipment is assumed to have a horsepower (hp) range of approximately 175 hp to 200 hp. Based on the latest available information from SCAQMD (50); for example, high-cube warehouse projects typically have 3.6 yard trucks per million square feet of building space. For this particular Project, based on the maximum square footage of manufacturing use permitted by the proposed Project, on-site modeled operational equipment includes four (4) 200 hp, compressed natural gas-powered yard tractors operating at 4 hours a day for 365 days of the year.

**3.6.5 WATER SUPPLY, TREATMENT AND DISTRIBUTION**

Indirect GHG emissions result from the production of electricity used to convey, treat and distribute water and wastewater. The amount of electricity required to convey, treat and distribute water depends on the volume of water as well as the sources of the water. CalEEMod default parameters were used to estimate GHG emissions associated with water supply, treatment and distribution for the Project scenario.

### 3.6.6 SOLID WASTE

Industrial land uses will result in the generation and disposal of solid waste. A large percentage of this waste will be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted will be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. GHG emissions associated with the disposal of solid waste associated with the proposed Project were calculated by the CalEEMod™ model using default parameters.

### 3.7 EMISSIONS SUMMARY

The annual GHG emissions associated with the operation of the proposed Project are estimated to be 11,848.90 MTCO<sub>2</sub>e per year as summarized in Table 3-6.

**TABLE 3-6: PROJECT GHG EMISSIONS**

Emission Source	Emissions (metric tons per year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total CO <sub>2</sub> E
Annual construction-related emissions amortized over 30 years	126.41	0.01	0.00	126.73
Area Source	0.07	2.00e-04	0.00	0.08
Energy Source	812.07	0.03	0.01	815.17
Mobile Source (Passenger Car)	2,728.30	0.07	0.00	2,730.03
Mobile Source (Truck)	6,354.67	0.08	0.00	6,356.57
On-Site Equipment	203.36	0.07	0.00	205.01
Waste	206.19	12.19	0.00	510.83
Water Usage	892.82	6.55	0.16	1,104.47
<b>Total CO<sub>2</sub>E (All Sources)</b>	<b>11,848.90</b>			

Source: CalEEMod™ model output, See Appendices 3.1 through 3.3 for detailed model outputs.

### 3.8 GREENHOUSE GAS EMISSIONS FINDINGS AND RECOMMENDATIONS

***GHG Impact #1: The Project would generate direct or indirect greenhouse gas emission that would result in a significant impact on the environment***

The City of Eastvale does not have an adopted threshold of significance for GHG emissions. For CEQA purposes, the City has discretion to select an appropriate significance criterion, based on substantial evidence. The SCAQMD’s adopted numerical threshold of 10,000 MTCO<sub>2</sub>e per year for industrial stationary source emissions is selected as the significance criterion. The SCAQMD-adopted industrial threshold was selected by the City because the proposed Project is more analogous to an industrial use than any other land use such as commercial or residential in terms of its expected operating characteristics. The Project proposes a warehouse use that will serve mid- stream functions in the goods movement chain between manufacturers and consumers, characteristic of an industrial operation. Further, analysis of the Project’s traffic

generation in this report is based on the ITE Trip Generation Manual, 10th Edition, 2017 for warehouse and industrial land use categories. Also, 10,000 MTCO<sub>2e</sub> has been used as the significance threshold by many local government lead agencies for logistics projects throughout the SCAG region since the SCAQMD adopted this threshold for its own use. Further, to ensure that the threshold is conservative in its application, although the SCAQMD uses their adopted 10,000 MTCO<sub>2e</sub> threshold to determine the significance of stationary source emissions for industrial projects, the 10,000 MTCO<sub>2e</sub> threshold used in this CEQA document is applied to all sources of Project-related GHG emissions whether stationary source, mobile source, area source, or other.

Use of this threshold is also consistent with guidance provided in the CAPCOA *CEQA and Climate Change* handbook, as such, the City has opted to use a non-zero threshold approach based on Approach 2 of the handbook. Threshold 2.5 (Unit-Based Thresholds Based on Market Capture) establishes a numerical threshold based on capture of approximately 90 percent of emissions from future development. The latest threshold developed by SCAQMD using this method is 10,000 MTCO<sub>2e</sub> based on the review of 711 CEQA projects.

As previously stated, the Project will result in approximately 11,848.90 MTCO<sub>2e</sub> per year. As such, the Project would exceed the SCAQMD's numeric threshold of 10,000 MTCO<sub>2e</sub> if it were applied. Thus, the Project would have potential to result in a cumulatively considerable impact with respect to GHG emissions.

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

The Project would comply with a number of regulations that would reduce GHG emissions as identified in Section 2.7 of this GHGA. It should be noted that a majority of the regulations are subsets of AB 32 and SB 32. As such, the Project's consistency with AB 32 and SB 32 are discussed below.

### **2008 Scoping Plan Consistency**

ARB's *Scoping Plan* identifies strategies to reduce California's greenhouse gas emissions in support of AB32 which requires the State to reduce its GHG emissions to 1990 levels by 2020. Many of the strategies identified in the Scoping Plan are not applicable at the project level, such as long-term technological improvements to reduce emissions from vehicles. Some measures are applicable and supported by the project, such as energy efficiency. Finally, while some measures are not directly applicable, the project would not conflict with their implementation. Reduction measures are grouped into 18 action categories, as follows:

1. **California Cap-and-Trade Program Linked to Western Climate Initiative Partner Jurisdictions.** Implement a broad-based California cap-and-trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic

benefits for California.<sup>14</sup> Ensure California’s program meets all applicable AB 32 requirements for market-based mechanisms.

2. **California Light-Duty Vehicle Greenhouse Gas Standards.** Implement adopted Pavley standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.
3. **Energy Efficiency.** Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).
4. **Renewables Portfolio Standards.** Achieve 33 percent renewable energy mix statewide.
5. **Low Carbon Fuel Standard.** Develop and adopt the Low Carbon Fuel Standard.
6. **Regional Transportation-Related Greenhouse Gas Targets.** Develop regional greenhouse gas emissions reduction targets for passenger vehicles.
7. **Vehicle Efficiency Measures.** Implement light-duty vehicle efficiency measures.
8. **Goods Movement.** Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.
9. **Million Solar Roofs Program.** Install 3,000 megawatts of solar-electric capacity under California’s existing solar programs.
10. **Medium- and Heavy-Duty Vehicles.** Adopt medium- (MD) and heavy-duty (HD) vehicle efficiencies. Aerodynamic efficiency measures for HD trucks pulling trailers 53-feet or longer that include improvements in trailer aerodynamics and use of rolling resistance tires were adopted in 2008 and went into effect in 2010.<sup>15</sup> Future, yet to be determined improvements, includes hybridization of MD and HD trucks.
11. **Industrial Emissions.** Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions and provide other pollution reduction co-benefits. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.
12. **High Speed Rail.** Support implementation of a high-speed rail system.
13. **Green Building Strategy.** Expand the use of green building practices to reduce the carbon footprint of California’s new and existing inventory of buildings.
14. **High Global Warming Potential Gases.** Adopt measures to reduce high warming global potential gases.
15. **Recycling and Waste.** Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials, and mandate commercial recycling. Move toward zero-waste.
16. **Sustainable Forests.** Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation. The 2020 target for carbon sequestration is 5 million MTCO<sub>2</sub>E/YR.
17. **Water.** Continue efficiency programs and use cleaner energy sources to move and treat water.

<sup>14</sup> California Air Resources Board. California GHG Emissions – Forecast (2002-2020). October 2010

<sup>15</sup> California Air Resources Board. Scoping Plan Measures Implementation Timeline. October 2010

18. **Agriculture.** In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.

Table 3-7 summarizes the project’s consistency with the State Scoping Plan. As summarized, the project will not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories through energy efficiency, water conservation, recycling, and landscaping.

**TABLE 3-7: 2008 SCOPING PLAN CONSISTENCY SUMMARY**

Action	Supporting Measures <sup>16</sup>	Consistency
Cap-and-Trade Program	--	Not applicable. These programs involve capping emissions from electricity generation, industrial facilities, and broad scoped fuels. Caps do not directly affect commercial projects.
Light-Duty Vehicle Standards	T-1	Not applicable. While these are CARB-enforced measures that are not directly applicable to the proposed Project, vehicles that access the Project are required to comply with the standards and will comply with this strategy.
Energy Efficiency	E-1	Consistent. The Project will include a variety of building, water, and solid waste efficiencies consistent with the most current CALGreen requirements.
	E-2	
	CR-1	
	CR-2	
Renewables Portfolio Standard	E-3	Not applicable. Establishes the minimum statewide renewable energy mix.
Low Carbon Fuel Standard	T-2	Not applicable. Establishes reduced carbon intensity of transportation fuels.
Regional Transportation-Related GHG Targets	T-3	Not applicable. This is a statewide measure and is not within the purview of this Project.
Vehicle Efficiency Measures	T-4	Not applicable. Identifies measures such as minimum tire-fuel efficiency, lower friction oil, and reduction in air conditioning use.
Goods Movement	T-5	Not applicable. Identifies measures to improve goods movement efficiencies such as advanced combustion strategies, friction reduction, waste heat recovery, and electrification of accessories. While

<sup>16</sup> Supporting measures can be found at the following link: [http://www.arb.ca.gov/cc/scopingplan/2013\\_update/appendix\\_b.pdf](http://www.arb.ca.gov/cc/scopingplan/2013_update/appendix_b.pdf)

Action	Supporting Measures <sup>16</sup>	Consistency
	T-6	these measures are not directly applicable to the Project, any commercial activity associated with Goods Movement would be required to comply with these measures as adopted. As such, the proposed Project would not interfere with their implementation.
Million Solar Roofs (MSR) Program	E-4	Consistent. The MSR program sets a goal for use of solar systems throughout the state as a whole. While the Project currently does not include solar energy generation, the building roof structure will be designed to support solar panels in the future, consistent with Title 24 requirements.
Medium- & Heavy-Duty Vehicles	T-7	Not applicable. MD and HD trucks and trailers for industrial uses are be subject to aerodynamic and hybridization requirements as established by CARB; the proposed Project would interfere with implementation of these requirements and programs.
	T-8	
Industrial Emissions	I-1	Not applicable. These measures are applicable to large industrial facilities (> 500,000 MTCO <sub>2</sub> e/yr) and other intensive uses such as refineries.
	I-2	
	I-3	
	I-4	
	I-5	
High Speed Rail	T-9	Not applicable. Supports increased mobility choice.
Green Building Strategy	GB-1	Consistent. The Project will include a variety of building, water, and solid waste efficiencies consistent with the current CALGreen requirements.
High Global Warming Potential Gases	H-1	Not applicable. The proposed Project are not substantial sources of high GWP emissions and will comply with any future changes in air conditioning, fire protection suppressant, and other requirements.
	H-2	
	H-3	
	H-4	
	H-5	
	H-6	
	H-7	
Recycling and Waste	RW-1	Consistent. The Project will be required to recycle a minimum of 65 percent from construction activities and Project operations per State and City requirements.
	RW-2	
	RW-3	
Sustainable Forests	F-1	Consistent. The Project will increase carbon sequestration by increasing on-site trees per the project landscaping plan.

Action	Supporting Measures <sup>16</sup>	Consistency
Water	W-1	Consistent. The Project will include use of low-flow fixtures and efficient landscaping per State requirements.
	W-2	
	W-3	
	W-4	
	W-5	
	W-6	
Agriculture	A-1	Not applicable. The Project is not an agricultural use.

**SB 32/2017 Scoping Plan Consistency**

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 SB 32. Table 3-8 summarizes the project’s consistency with the 2017 Scoping Plan. As summarized, the project will not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories.

**TABLE 3-8: 2017 SCOPING PLAN CONSISTENCY SUMMARY<sup>17</sup>**

Action	Responsible Parties	Consistency
<b>Implement SB 350 by 2030</b>		
Increase the Renewables Portfolio Standard to 50 percent of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	Consistent. This measure is not directly applicable to development projects, but the proposed Project would use energy from Southern California Edison, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		Consistent. Although this measure is directed towards policymakers, the proposed Project would be designed and constructed to implement the energy efficiency measures for new commercial developments and would include several measures designed to reduce energy consumption.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly- owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		Consistent. The proposed Project would be designed and constructed to implement the energy efficiency measures, where applicable by including several measures designed to reduce energy consumption. The proposed Project includes energy efficient field lighting and fixtures that meet the current Title 24 Standards throughout the Project Site and would be a modern development with energy efficient boilers, heaters, and air conditioning systems.

<sup>17</sup> Measures can be found at the following link: [https://www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf)



Action	Responsible Parties	Consistency
<b>Implement Mobile Source Strategy (Cleaner Technology and Fuels)</b>		
At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025.	<p style="text-align: center;">CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies</p>	Not applicable. While these are CARB-enforced measures that are not directly applicable to the proposed Project, vehicles that access the Project that are required to comply with the standards will comply with the strategy.
At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030.		Not applicable. While these are CARB-enforced measures that are not directly applicable to the proposed Project, vehicles that access the Project are required to comply with the standards and will comply with this strategy.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		Not applicable. This measure is not within the purview of this Project.
Medium- and Heavy-Duty GHG Phase 2.		Not applicable. This measure is not within the purview of this Project.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO <sub>x</sub> standard.		Not applicable. This measure is not within the purview of this Project.
Last Mile Delivery: New regulation that would result in the use of low NO <sub>x</sub> or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3-7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030.		Not applicable. This Project is not responsible for implementation of SB 375 and would therefore not conflict with this measure.
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT		Not applicable. This Project is not responsible for implementation of SB 375 and would therefore not conflict with this measure.

Action	Responsible Parties	Consistency
reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	Not applicable. The Project is not within the purview of SB 375 and would therefore not conflict with this measure.
<b>By 2019, adjust performance measures used to select and design transportation facilities</b>		
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GO-Biz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	Not applicable. Although this is directed towards CARB and Caltrans, the proposed Project would be designed to promote and support pedestrian activity on-site and in the Project Site area. The Project Site is within proximity to residential neighborhoods.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	Not applicable. Although this measure is directed towards policymakers, the proposed Project would comply with AB 939, which sets a statewide policy that not less than 65 percent of solid waste generated be source reduced, recycled, or composted. Additionally, the proposed Project would be required to have a recycling program and recycling collection. During construction, the proposed Project shall recycle and reuse construction and demolition waste per City Solid Waste procedures.
<b>Implement California Sustainable Freight Action Plan</b>		

Action	Responsible Parties	Consistency
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	When adopted, this measure would apply to all trucks accessing the Project site, this may include existing trucks or new trucks that are part of the statewide goods movement sector.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.		Not applicable. This measure is not within the purview of this Project.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18 percent.	CARB	LCFS, with an increased stringency (18 percent by 2030). When adopted, this measure would apply to all fuel purchased and used by the Project in the state.
<b>Implement the Short-Lived Climate Pollutant Strategy by 2030</b>		
40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	When adopted, the Project would be required to comply with this measure and reduce SLPS accordingly.
50 percent reduction in black carbon emissions below 2013 levels.		Not applicable. This measure is not within the purview of this Project.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA SWRCB, Local Air Districts	Not applicable. This measure is not within the purview of this Project.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	Not applicable. These programs involve capping emissions from electricity generation, industrial facilities, and broad scoped fuels. Caps do not directly affect commercial projects.
<b>By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California’s land base as a net carbon sink</b>		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	Not applicable. This measure is not within the purview of this Project.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity		Not applicable. This measure is not within the purview of this Project.

Action	Responsible Parties	Consistency
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments		Not applicable. This measure is not within the purview of this Project.
Establish scenario projections to serve as the foundation for the Implementation Plan		Not applicable. This measure is not within the purview of this Project.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	Not applicable. This measure is not within the purview of this Project.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	Not applicable. This measure is not within the purview of this Project.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	Not applicable. This measure is not within the purview of this Project.

As shown above, the Project would not conflict with any of the 2017 Scoping Plan elements as any regulations adopted would apply directly or indirectly to the Project. Further, recent studies show that the State’s existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 (34).

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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 The Homestead. 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) 336-5987.

Haseeb Qureshi  
Associate Principal  
URBAN CROSSROADS, INC.  
260 E. Baker St., Suite 200  
Costa Mesa, CA 92626  
(949) 336-5987  
[hqureshi@urbanxroads.com](mailto:hqureshi@urbanxroads.com)

### EDUCATION

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

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

### PROFESSIONAL AFFILIATIONS

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

### PROFESSIONAL CERTIFICATIONS

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

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**APPENDIX 3.1:**

**CALEEMOD ANNUAL CONSTRUCTION EMISSIONS MODEL OUTPUTS**

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**APPENDIX 3.2:**

**CALEEMOD OPERATIONAL (PASSENGER CAR) EMISSIONS MODEL OUTPUTS**

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**APPENDIX 3.3:**

**CALEEMOD OPERATIONAL (TRUCK) EMISSIONS MODEL OUTPUTS**



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