

APPENDIX A – AIR QUALITY, ENERGY, AND GREENHOUSE GAS EMISSIONS IMPACT ANALYSIS



AIR QUALITY, ENERGY, AND GREENHOUSE GAS EMISSIONS IMPACT ANALYSIS

NEW FLEET SERVICES FACILITY PROJECT

CITY OF SANTA ANA

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
Air Basin	South Coast Air Basin
AQMP	Air Quality Management Plan
BACT	Best Available Control Technology
BSFC	Brake Specific Fuel Consumption
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFCs	chlorofluorocarbons
Cf ₄	tetrafluoromethane
C ₂ F ₆	hexafluoroethane
CH ₄	Methane
CO	Carbon monoxide
CO ₂	Carbon dioxide
CO ₂ e	Carbon dioxide equivalent
City	City of Santa Ana
County	County of Orange
DPM	Diesel particulate matter
EPA	Environmental Protection Agency
°F	Fahrenheit
FTIP	Federal Transportation Improvement Program
GHG	Greenhouse gas
GWP	Global warming potential
HAP	Hazardous Air Pollutants
HFCs	Hydrofluorocarbons
IPCC	International Panel on Climate Change
kWhr	kilowatt-hour

LADWP	Los Angeles Department of Water & Power
LCFS	Low Carbon Fuel Standard
LST	Localized Significant Thresholds
MATES	Multiple Air Toxics Exposure Study
MMTCO _{2e}	Million metric tons of carbon dioxide equivalent
MPO	Metropolitan Planning Organization
MWh	Megawatt-hour
NAAQS	National Ambient Air Quality Standards
NO _x	Nitrogen oxides
NO ₂	Nitrogen dioxide
OPR	Office of Planning and Research
Pfc	Perfluorocarbons
PM	Particle matter
PM ₁₀	Particles that are less than 10 micrometers in diameter
PM _{2.5}	Particles that are less than 2.5 micrometers in diameter
PPM	Parts per million
PPB	Parts per billion
PPT	Parts per trillion
RTIP	Regional Transportation Improvement Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCAG	Southern California Association of Governments
SF ₆	Sulfur Hexafluoride
SIP	State Implementation Plan
SO _x	Sulfur oxides
TAC	Toxic air contaminants
UNFCCC	United Nations' Framework Convention on Climate Change
VOC	Volatile organic compounds

1.0 INTRODUCTION

1.1 Purpose of Analysis and Study Objectives

This Air Quality, Energy, and Greenhouse Gas (GHG) Emissions Impact Analysis has been completed to determine the air quality, energy, and GHG emissions impacts associated with the proposed New Fleet Service Facility project (proposed project). The following is provided in this report:

- A description of the proposed project;
- A description of the atmospheric setting;
- A description of the criteria pollutants and GHGs;
- A description of the air quality regulatory framework;
- A description of the energy conservation regulatory framework;
- A description of the GHG emissions regulatory framework;
- A description of the air quality, energy, and GHG emissions thresholds including the California Environmental Quality Act (CEQA) significance thresholds;
- An analysis of the conformity of the proposed project with the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP);
- An analysis of the short-term construction related and long-term operational air quality, energy, and GHG emissions impacts; and
- An analysis of the conformity of the proposed project with all applicable energy and GHG emissions reduction plans and policies.

1.2 Site Locations and Study Area

The project site is located at 1400 S. Grand Avenue in the City of Santa Ana (City). The approximately 4.59-acre project site is mostly vacant other than the western and northern portions that are currently paved and is bounded by John F. Kennedy Elementary School and McFadden Avenue to the north, the Orange County Operations Center and a County Data Center located to the west, industrial uses to the south, and the Union Pacific Santa Ana Industrial Lead (Railroad) and multi-family residential uses to the west. The project local study area is shown in Figure 1.

Sensitive Receptors in Project Vicinity

The nearest sensitive receptor to the project site is the John F. Kennedy Elementary School that is adjacent to the north side of the project site. There are also the multi-family homes that are as near as 95 feet west of the project site.

1.3 Proposed Project Description

The project site would be developed with a new 45,706 square foot Fleet Services Building that will include vehicle maintenance bays, administrative staff offices, technician workspaces, and storage spaces. In addition, the project will include a future 20,000 square foot Facilities Operations Building, a 10,000 square foot solar panel canopy, surface parking spaces, extended access road, and a disposal lot. The Fleet Services Facility is proposed to be addressed as 1310 South Grand Avenue, and the Facility

Operations Building would be addressed as 1324 South Grand Avenue. The proposed project would extend the existing access roads to provide ingress and egress for the Project site via the existing driveways off McFadden Avenue and South Grand Avenue. The proposed site plan is shown in Figure 2.

Construction of the proposed project is expected to occur from July 2026 to December 2027, over an 18-month period. Construction activities will take place from 7:00 a.m. to 8:00 p.m. Monday through Saturday and no construction work will occur on Sundays or Federal holidays, per the County's Noise Control ordinance. Operations would primarily consist of providing maintenance and repair services to over 3,000 County-owned vehicles and equipment. These services ensure the safety and longevity of County-owned vehicles while maintaining compliance with vehicle rules and regulations. Approximately 50 employees would operate the proposed facility Monday through Friday.

1.4 Executive Summary

Standard Air Quality, Energy, and GHG Regulatory Conditions

The proposed project will be required to comply with the following regulatory conditions from the SCAQMD and State of California (State).

South Coast Air Quality Management District Rules

The following lists the SCAQMD rules that are applicable, but not limited to the proposed project.

- Rule 402 Nuisance – Controls the emissions of odors and other air contaminants;
- Rule 403 Fugitive Dust – Controls the emissions of fugitive dust;
- Rules 1108 and 1108.1 Cutback and Emulsified Asphalt – Controls the VOC content in asphalt;
- Rule 1113 Architectural Coatings – Controls the VOC content in paints and solvents; and
- Rule 1143 Paint Thinners – Controls the VOC content in paint thinners.

State of California Rules

The following lists the State of California Code of Regulations (CCR) air quality emission rules that are applicable, but not limited to the proposed project.

- CCR Title 13, Article 4.8, Chapter 9, Section 2449 – In use Off-Road Diesel Vehicles;
- CCR Title 13, Section 2025 – On-Road Diesel Truck Fleets;
- CCR Title 24 Part 6 – California Building Energy Standards; and
- CCR Title 24 Part 11 – California Green Building Standards.

Summary of Analysis Results

The following is a summary of the proposed project's impacts with regard to the State CEQA Guidelines air quality, energy, and GHG emissions checklist questions.

Conflict with or obstruct implementation of the applicable air quality plan?

Less than significant impact.

Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?

Less than significant impact.

Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact.

Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than significant impact.

Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation;

Less than significant impact.

Conflict with or obstruct a state or local plan for renewable energy;

Less than significant impact.

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

Less than significant impact.

Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?

Less than significant impact.

1.5 Mitigation Measures for the Proposed Project

This analysis found that implementation of the State and SCAQMD air quality, energy, and GHG emissions reductions regulations were adequate to limit criteria pollutants, toxic air contaminants, odors, and GHG emissions from the proposed project to less than significant levels. No mitigation measures are required for the proposed project with respect to air quality, energy, and GHG emissions.

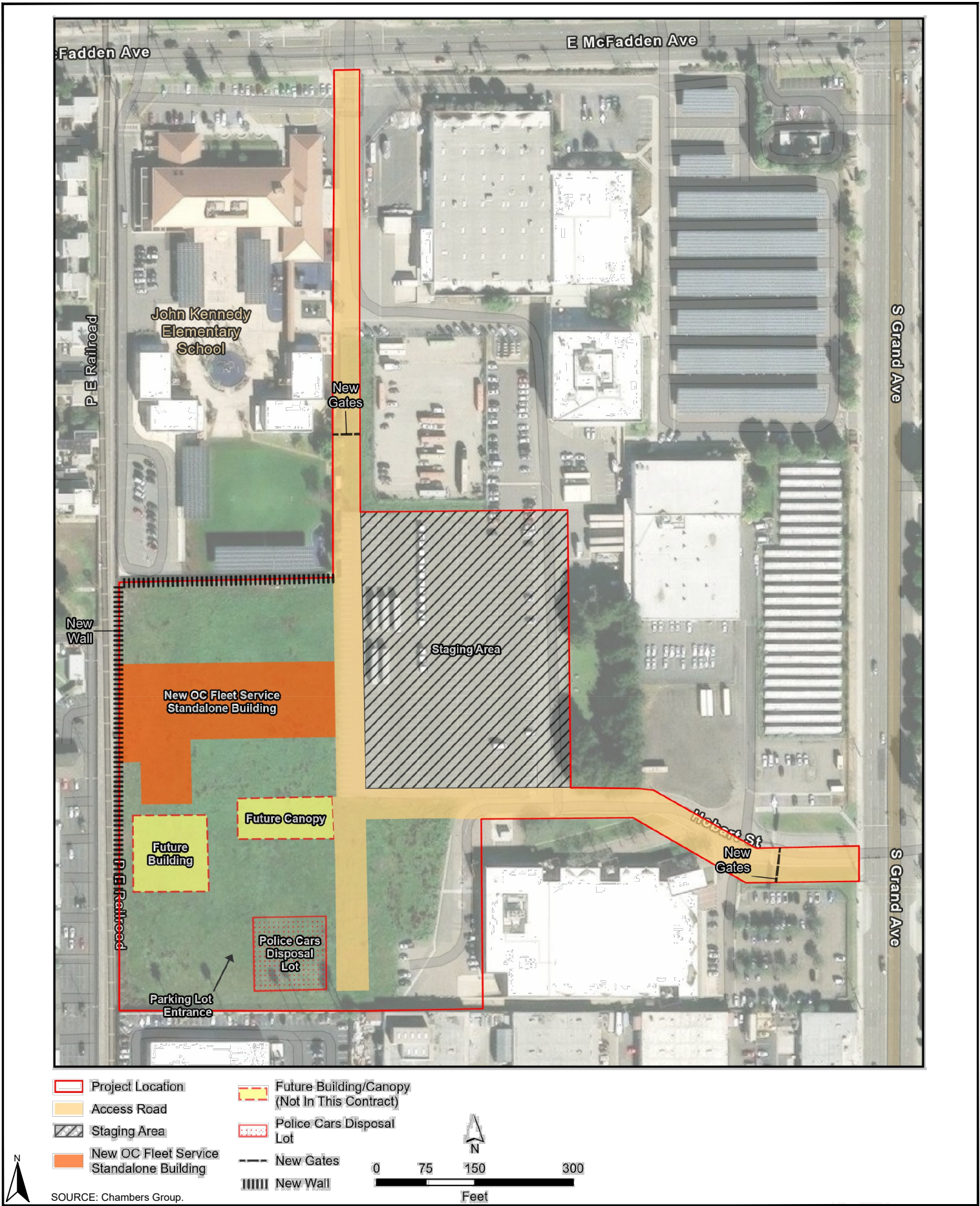


Figure 2
Proposed Site Plan

2.0 AIR POLLUTANTS

Air pollutants are generally classified as either criteria pollutants or non-criteria pollutants. Federal ambient air quality standards have been established for criteria pollutants, whereas no ambient standards have been established for non-criteria pollutants. For some criteria pollutants, separate standards have been set for different periods. Most standards have been set to protect public health. For some pollutants, standards have been based on other values (such as protection of crops, protection of materials, or avoidance of nuisance conditions). A summary of federal and state ambient air quality standards is provided in the Regulatory Framework section.

2.1 Criteria Pollutants and Ozone Precursors

The criteria pollutants consist of: ozone, nitrogen oxides (NO_x), CO, sulfur oxides (SO_x), lead, and particulate matter (PM). The ozone precursors consist of NO_x and VOC. These pollutants can harm your health and the environment, and cause property damage. The Environmental Protection Agency (EPA) calls these pollutants “criteria” air pollutants because it regulates them by developing human health-based and/or environmentally-based criteria for setting permissible levels. The following provides descriptions of each of the criteria pollutants and ozone precursors.

Nitrogen Oxides

NO_x is the generic term for a group of highly reactive gases which contain nitrogen and oxygen. While most NO_x are colorless and odorless, concentrations of nitrogen dioxide (NO₂) can often be seen as a reddish-brown layer over many urban areas. NO_x form when fuel is burned at high temperatures, as in a combustion process. The primary manmade sources of NO_x are motor vehicles, electric utilities, and other industrial, commercial, and residential sources that burn fuel. NO_x reacts with other pollutants to form, ground-level ozone, nitrate particles, acid aerosols, as well as NO₂, which cause respiratory problems. NO_x and the pollutants formed from NO_x can be transported over long distances, following the patterns of prevailing winds. Therefore, controlling NO_x is often most effective if done from a regional perspective, rather than focusing on the nearest sources.

Ozone

Ozone is not usually emitted directly into the air, instead it is created by a chemical reaction between NO_x and VOCs in the presence of sunlight. Motor vehicle exhaust, industrial emissions, gasoline vapors, chemical solvents as well as natural sources emit NO_x and VOC that help form ozone. Ground-level ozone is the primary constituent of smog. Sunlight and hot weather cause ground-level ozone to form with the greatest concentrations usually occurring downwind from urban areas. Ozone is subsequently considered a regional pollutant. Ground-level ozone is a respiratory irritant and an oxidant that increases susceptibility to respiratory infections and can cause substantial damage to vegetation and other materials. Because NO_x and VOC are ozone precursors, the health effects associated with ozone are also indirect health effects associated with significant levels of NO_x and VOC emissions.

Carbon Monoxide

Carbon monoxide (CO) is a colorless, odorless gas that is formed when carbon in fuel is not burned completely. It is a component of motor vehicle exhaust, which contributes approximately 56 percent of all CO emissions nationwide. In cities, 85 to 95 percent of all CO emissions may come from motor vehicle exhaust. Other sources of CO emissions include industrial processes (such as metals processing and chemical manufacturing), residential wood burning, and natural sources such as forest fires. Woodstoves,

gas stoves, cigarette smoke, and unvented gas and kerosene space heaters are indoor sources of CO. The highest levels of CO in the outside air typically occur during the colder months of the year when inversion conditions are more frequent. The air pollution becomes trapped near the ground beneath a layer of warm air. CO is described as having only a local influence because it dissipates quickly. Since CO concentrations are strongly associated with motor vehicle emissions, high CO concentrations generally occur in the immediate vicinity of roadways with high traffic volumes and traffic congestion, active parking lots, and in automobile tunnels. Areas adjacent to heavily traveled and congested intersections are particularly susceptible to high CO concentrations.

CO is a public health concern because it combines readily with hemoglobin and thus reduces the amount of oxygen transported in the bloodstream. The health threat from lower levels of CO is most serious for those who suffer from heart disease such as angina, clogged arteries, or congestive heart failure. For a person with heart disease, a single exposure to CO at low levels may cause chest pain and reduce that person's ability to exercise; repeated exposures may contribute to other cardiovascular effects. High levels of CO can affect even healthy people. People who breathe high levels of CO can develop vision problems, reduced ability to work or learn, reduced manual dexterity, and difficulty performing complex tasks. At extremely high levels, CO is poisonous and can cause death.

Sulfur Oxides

SO_x gases are formed when fuel containing sulfur, such as coal and oil is burned, as well as from the refining of gasoline. SO_x dissolves easily in water vapor to form acid and interacts with other gases and particles in the air to form sulfates and other products that can be harmful to people and the environment. Exposure to SO_x gases can cause respiratory symptoms (bronchoconstriction, possible wheezing or shortness of breath) during exercise or physical activity in persons with asthma and cause possible allergic sensitization, airway inflammation, and asthma development.

Lead

Lead is a metal found naturally in the environment as well as manufactured products. The major sources of lead emissions have historically been motor vehicles and industrial sources. Due to the phase out of leaded gasoline, metal processing is now the primary source of lead emissions to the air. High levels of lead in the air are typically only found near lead smelters, waste incinerators, utilities, and lead-acid battery manufacturers. Exposure of fetuses, infants and children to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure.

Particulate Matter

PM is the term for a mixture of solid particles and liquid droplets found in the air. PM is made up of a number of components including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles. The size of particles is directly linked to their potential for causing health problems. Particles that are less than 10 micrometers in diameter (PM₁₀) that are also known as *Respirable Particulate Matter* are the particles that generally pass through the throat and nose and enter the lungs. Once inhaled, these particles can affect the heart and lungs and cause serious health effects. Particles that are less than 2.5 micrometers in diameter (PM_{2.5}) that are also known as *Fine Particulate Matter* have been designated as a subset of PM₁₀ due to their increased negative health impacts and its ability to remain suspended in the air longer and travel further.

Volatile Organic Compounds

Hydrocarbons are organic gases that are formed from hydrogen and carbon and sometimes other elements. Hydrocarbons that contribute to formation of ozone are referred to and regulated as VOCs (also referred to as reactive organic gases). Combustion engine exhaust, oil refineries, and fossil-fueled power plants are the sources of hydrocarbons. Other sources of hydrocarbons include evaporation from petroleum fuels, solvents, dry cleaning solutions, and paint.

VOC is not classified as a criteria pollutant, since VOCs by themselves are not a known source of adverse health effects. The primary health effects of VOCs result from the formation of ozone and its related health effects. High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. Carcinogenic forms of hydrocarbons, such as benzene, are considered TACs. There are no separate health standards for VOCs as a group.

2.2 Other Pollutants of Concern

Toxic Air Contaminants

In addition to the above-listed criteria pollutants, TACs are another group of pollutants of concern. TACs is a term that is defined under the California Clean Air Act and consists of the same substances that are defined as Hazardous Air Pollutants (HAPs) in the Federal Clean Air Act. There are over 700 hundred different types of TACs with varying degrees of toxicity. Sources of TACs include industrial processes such as petroleum refining and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. Cars and trucks release at least 40 different toxic air contaminants. The most important of these TACs, in terms of health risk, are diesel particulates, benzene, formaldehyde, 1,3-butadiene, and acetaldehyde. Public exposure to TACs can result from emissions from normal operations as well as from accidental releases. Health effects of TACs include cancer, birth defects, neurological damage, and death.

TACs are less pervasive in the urban atmosphere than criteria air pollutants, however they are linked to short-term (acute) or long-term (chronic or carcinogenic) adverse human health effects. There are hundreds of different types of TACs with varying degrees of toxicity. Sources of TACs include industrial processes, commercial operations (e.g., gasoline stations and dry cleaners), and motor vehicle exhaust.

According to *The California Almanac of Emissions and Air Quality 2013 Edition*, the majority of the estimated health risk from TACs can be attributed to relatively few compounds, the most important of which is diesel particulate matter (DPM). DPM is a subset of PM_{2.5} because the size of diesel particles are typically 2.5 microns and smaller. The identification of DPM as a TAC in 1998 led the California Air Resources Board (CARB) to adopt the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-fueled Engines and Vehicles in October 2000. The plan's goals are a 75-percent reduction in DPM by 2010 and an 85-percent reduction by 2020 from the 2000 baseline. Diesel engines emit a complex mixture of air pollutants, composed of gaseous and solid material. The visible emissions in diesel exhaust are known as particulate matter or PM, which includes carbon particles or "soot." Diesel exhaust also contains a variety of harmful gases and over 40 other cancer-causing substances. California's identification of DPM as a TAC was based on its potential to cause cancer, premature deaths, and other health problems. Exposure to DPM is a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. Overall, diesel engine emissions are responsible for the majority of California's potential airborne cancer risk from combustion sources.

Asbestos

Asbestos is listed as a TAC by CARB and as a HAP by the EPA. Asbestos occurs naturally in mineral formations and crushing or breaking these rocks, through construction or other means, can release asbestiform fibers into the air. Asbestos emissions can result from the sale or use of asbestos-containing materials, road surfacing with such materials, grading activities, and surface mining. The risk of disease is dependent upon the intensity and duration of exposure. When inhaled, asbestos fibers may remain in the lungs and with time may be linked to such diseases as asbestosis, lung cancer, and mesothelioma. The nearest likely locations of naturally occurring asbestos, as identified in the *General Location Guide for Ultramafic Rocks in California*, prepared by the California Division of Mines and Geology, is located in Santa Barbara County. The nearest historic asbestos mine to the project site, as identified in the *Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California*, prepared by U.S. Geological Survey, is located at Asbestos Mountain, which is approximately 80 miles east of the project site in the San Jacinto Mountains. Due to the distance to the nearest natural occurrences of asbestos, the project site is not likely to contain asbestos.

Formaldehyde from Composite Wood Products

Many composite wood products used in building materials and furnishings commonly found in offices, warehouses, residences, and hotels contain formaldehyde-based glues which off-gas formaldehyde after installation. Formaldehyde is listed as a TAC by CARB and as a HAP by the EPA. The primary source of formaldehyde indoors is composite wood products manufactured with urea-formaldehyde resins, such as plywood, medium density fiberboard, and particleboard. These materials are commonly used in building construction for flooring, cabinetry, baseboards, window shades, interior doors, and window and door trims. All new building products sold in California are required to meet both California Phase 2 formaldehyde compliant standards and the U.S. EPA TSCA Title VI formaldehyde regulations. In addition, Title 24 regulation require all new structures built in California to install forced air HVAC systems that are equipped with high efficiency MERV 13 air filters that will reduce the formaldehyde concentrations by an additional 15 to 52 percent over traditional air filters. For these reasons, the employees are not anticipated to be negatively impacted by formaldehyde from composite wood products.

3.0 GREENHOUSE GASES

3.1 Greenhouse Gases

Constituent gases of the Earth's atmosphere, called atmospheric GHGs, play a critical role in the Earth's radiation amount by trapping infrared radiation from the Earth's surface, which otherwise would have escaped to space. Prominent GHGs contributing to this process include carbon dioxide (CO₂), methane, ozone, water vapor, nitrous oxide (N₂O), and chlorofluorocarbons (CFCs). This phenomenon, known as the Greenhouse Effect, is responsible for maintaining a habitable climate. Anthropogenic (caused or produced by humans) emissions of these GHGs in excess of natural ambient concentrations are responsible for the enhancement of the Greenhouse Effect and have led to a trend of unnatural warming of the Earth's natural climate, known as global warming or climate change. Emissions of gases that induce global warming are attributable to human activities associated with industrial/manufacturing, agriculture, utilities, transportation, and residential land uses. Emissions of CO₂ and N₂O are byproducts of fossil fuel combustion. Methane, a potent greenhouse gas, results from off-gassing associated with agricultural practices and landfills. Sinks of CO₂, where CO₂ is stored outside of the atmosphere, include uptake by vegetation and dissolution into the ocean. The following provides a description of each of the GHGs and their global warming potential.

Water Vapor

Water vapor 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 a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. The feedback loop in which water is involved is critically important to projecting future climate change. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to "hold" more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop will continue is unknown as there is also dynamics that put the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the Earth's surface and heat it up).

Carbon Dioxide

The natural production and absorption of CO₂ is achieved through the terrestrial biosphere and the ocean. However, humankind has altered the natural carbon cycle by burning coal, oil, natural gas, and wood. Since the industrial revolution began in the mid 1700s, each of these activities has increased in scale and distribution. CO₂ was the first GHG demonstrated to be increasing in atmospheric concentration with the first conclusive measurements being made in the last half of the 20th century. Prior to the industrial revolution, concentrations were fairly stable at 280 parts per million (ppm). The International Panel on Climate Change (IPCC) indicates that concentrations were 379 ppm in 2005, an increase of more than 30 percent. Left unchecked, the IPCC projects that concentration of CO₂ in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources. This could result in an average global temperature rise of at least two degrees Celsius or 3.6 degrees Fahrenheit.

Methane

Methane is an extremely effective absorber of radiation, although its atmospheric concentration is less than that of CO₂. Its lifetime in the atmosphere is brief (10 to 12 years), compared to some other GHGs (such as CO₂, N₂O, and CFCs). CH₄ 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.

Nitrous Oxide

Concentrations of N₂O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration of this GHG was documented at 314 parts per billion (ppb). N₂O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. N₂O is also commonly used as an aerosol spray propellant (i.e., in whipped cream bottles, in potato chip bags to keep chips fresh, and in rocket engines and race cars).

Chlorofluorocarbons

CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs have no natural source, but were first synthesized in 1928. They were used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and in 1989 the European Community agreed to ban CFCs by 2000 and subsequent treaties banned CFCs worldwide by 2010. This effort was extremely successful, and the levels of the major CFCs are now remaining level or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.

Hydrofluorocarbons

Hydrofluorocarbons (HFCs) are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF₃), HFC-134a (CF₃CH₂F), and HFC-152a (CH₃CHF₂). Prior to 1990, the only significant emissions were HFC-23. HFC-134a use is increasing due to its use as a refrigerant. Concentrations of HFC-23 and HFC-134a in the atmosphere are now about 10 parts per trillion (ppt) each. Concentrations of HFC-152a are about 1 ppt. HFCs are manmade for applications such as automobile air conditioners and refrigerants.

Perfluorocarbons

Perfluorocarbons (PFCs) have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF₄) and hexafluoroethane (C₂F₆). Concentrations of CF₄ in the atmosphere are over 70 ppt. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing.

Sulfur Hexafluoride

Sulfur Hexafluoride (SF₆) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF₆ has the highest global warming potential of any gas evaluated; 23,900 times that of CO₂. 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.

Aerosols

Aerosols are particles emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light. Cloud formation can also be affected by aerosols. Sulfate aerosols are emitted when fuel containing sulfur is burned. Black carbon (or soot) is emitted during biomass burning due to the incomplete combustion of fossil fuels. Particulate matter regulation has been lowering aerosol concentrations in the United States; however, global concentrations are likely increasing.

3.2 Global Warming Potential

GHGs have varying global warming potential (GWP). The GWP is the potential of a gas or aerosol to trap heat in the atmosphere; it is the cumulative radiative forcing effects of a gas over a specified time horizon resulting from the emission of a unit mass of gas relative to CO₂. The GHGs listed by the IPCC and the CEQA Guidelines are discussed in this section in order of abundance in the atmosphere. Water vapor, the most abundant GHG, is not included in this list because its natural concentrations and fluctuations far outweigh its anthropogenic (human-made) sources. To simplify reporting and analysis, GHGs are commonly defined in terms of their GWP. The IPCC defines the GWP of various GHG emissions on a normalized scale that recasts all GHG emissions in terms of CO₂ equivalent (CO₂e). As such, the GWP of CO₂ is equal to 1. The GWP values used in this analysis are based on the 2007 IPCC Fourth Assessment Report, which are used in the CalEEMod Model Version 2022.1 and are detailed in Table A. The IPCC has updated the GWP of some gases in their Sixth Assessment Report, however the new values have not yet been incorporated into the CalEEMod model that has been utilized in this analysis.

Table A – Global Warming Potentials, Atmospheric Lifetimes and Abundances of GHGs

Gas	Atmospheric Lifetime (years) ¹	Global Warming Potential (100 Year Horizon) ²	Atmospheric Abundance
Carbon Dioxide (CO ₂)	50-200	1	379 ppm
Methane (CH ₄)	9-15	25	1,774 ppb
Nitrous Oxide (N ₂ O)	114	298	319 ppb
HFC-23	270	14,800	18 ppt
HFC-134a	14	1,430	35 ppt
HFC-152a	1.4	124	3.9 ppt
PFC: Tetrafluoromethane (CF ₄)	50,000	7,390	74 ppt
PFC: Hexafluoroethane (C ₂ F ₆)	10,000	12,200	2.9 ppt
Sulfur Hexafluoride (SF ₆)	3,200	22,800	5.6 ppt

¹ Defined as the half-life of the gas.

² Compared to the same quantity of CO₂ emissions and is based on the Intergovernmental Panel On Climate Change (IPCC) 2007 standard, which is utilized in CalEEMod (Version 2022.1), that is used in this report (CalEEMod user guide: Appendix A).

Definitions: ppm = parts per million; ppb = parts per billion; ppt = parts per trillion

Source: IPCC 2007, EPA 2015

3.3 Greenhouse Gas Emissions Inventory

According to the Carbon Dioxide Information Analysis Center¹, 9,855 million metric tons of carbon dioxide equivalent (MMTCO₂e) emissions were created globally in the year 2014. According to the EPA, the breakdown of global GHG emissions by sector consists of: 25 percent from electricity and heat production; 21 percent from industry; 24 percent from agriculture, forestry and other land use activities; 14 percent from transportation; 6 percent from building energy use; and 10 percent from all other sources of energy use².

According to *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2022*, prepared by EPA, April 2024, total U.S. GHG emissions in 2022 were 6,343.2 million metric tons (MMT) of CO₂e emissions. Total U.S. emissions have decreased by 3.0 percent between 1990 and 2022, which is down from a high of 15.2 percent above 1990 levels in 2007. Emissions increased from 2021 to 2022 by 0.2 percent. The increase in total GHG emissions was driven largely in an increase in CO₂ emissions from fossil fuel combustion.

According to *California Greenhouse Gas Emissions for 2000 to 2022 Trends of Emissions and Other Indicators*, prepared by the CARB, September 20, 2024, the State of California created 371.1 MMTCO₂e in 2022. The 2022 emissions were 9.3 MMTCO₂e lower than in 2021. The 2022 emissions data shows the State is continuing its established long-term trend of GHG emissions declines, despite the anomalous emissions trends from 2019 through 2021, due in large part to the impacts of the COVID-19 pandemic. The transportation sector showed the largest decrease in emissions of 5.2 MMTCO₂e compared to 2021.

1 Obtained from: https://cdiac.ess-dive.lbl.gov/trends/emis/tre_glob_2014.html

2 Obtained from: <https://www.epa.gov/ghgemissions/global-greenhouse-gas-emissions-data>

4.0 AIR QUALITY MANAGEMENT

The air quality at the project site is addressed through the efforts of various federal, state, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for improving the air quality are discussed below.

4.1 Federal – United States Environmental Protection Agency

The Clean Air Act, first passed in 1963 with major amendments in 1970, 1977 and 1990, is the overarching legislation covering regulation of air pollution in the United States. The Clean Air Act has established the mandate for requiring regulation of both mobile and stationary sources of air pollution at the state and federal level. The EPA was created in 1970 in order to consolidate research, monitoring, standard-setting and enforcement authority into a single agency.

The EPA is responsible for setting and enforcing the National Ambient Air Quality Standards (NAAQS) for atmospheric pollutants. It regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. NAAQS pollutants were identified using medical evidence and are shown below in Table B.

Table B – State and Federal Criteria Pollutant Standards

Air Pollutant	Concentration / Averaging Time		Most Relevant Effects
	California Standards	Federal Primary Standards	
Ozone (O ₃)	0.09 ppm / 1-hour 0.07 ppm / 8-hour	0.070 ppm, / 8-hour	a) Pulmonary function decrements and localized lung injury in humans and animals; (b) asthma exacerbation; (c) chronic obstructive pulmonary disease (COPD) exacerbation; (d) respiratory infection; (e) increased school absences, and hospital admissions and emergency department (ED) visits for combined respiratory diseases; (e) increased mortality; (f) possible metabolic effects. Vegetation damage; property damage
Carbon Monoxide (CO)	20.0 ppm / 1-hour 9.0 ppm / 8-hour	35.0 ppm / 1-hour 9.0 ppm / 8-hour	Visibility reduction (a) Aggravation of angina pectoris and other aspects of coronary heart disease; (b) decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (c) possible impairment of central nervous system functions; (d) possible increased risk to fetuses; (f) possible increased risk of pulmonary disease; (g) possible emergency department visits for respiratory diseases overall and visits for asthma.
Nitrogen Dioxide (NO ₂)	0.18 ppm / 1-hour 0.030 ppm / annual	100 ppb / 1-hour 0.053 ppm / annual	Short-term (a) asthma exacerbations (“asthma attacks”) Long-term (a) asthma development; (b) higher risk of all-cause, cardiovascular, and respiratory mortality. Both short and long term NO ₂ exposure is also associated with chronic obstructive pulmonary disease (COPD) risk. Potential impacts on cardiovascular health, mortality and cancer, aggravate chronic respiratory disease. Contribution to atmospheric discoloration

Air Pollutant	Concentration / Averaging Time		Most Relevant Effects
	California Standards	Federal Primary Standards	
Sulfur Dioxide (SO ₂)	0.25 ppm / 1-hour 0.04 ppm / 24-hour	75 ppb / 1-hour	Respiratory symptoms (bronchoconstriction, possible wheezing or shortness of breath) during exercise or physical activity in persons with asthma. Possible allergic sensitization, airway inflammation, asthma development.
Respirable Particulate Matter (PM ₁₀)	50 µg/m ³ / 24-hour 20 µg/m ³ / annual	150 µg/m ³ / 24-hour	Short -term (a) increase in mortality rates; (b) increase in respiratory infections; (c) increase in number and severity of asthma attacks; (d) COPD exacerbation; (e) increase in combined respiratory-diseases and number of hospital admissions; (f) increased mortality due to cardiovascular or respiratory diseases; (g) increase in hospital admissions for acute respiratory conditions; (h) increase in school absences; (i) increase in lost work days; (j) decrease in respiratory function in children; (k) increase medication use in children and adults with asthma.
Suspended Particulate Matter (PM _{2.5})	12 µg/m ³ / annual	35 µg/m ³ / 24-hour 12 µg/m ³ / annual	Long-term (a) reduced lung function growth in children; (b) changes in lung development; (c) development of asthma in children; (d) increased risk of cardiovascular diseases; (e) increased total mortality from lung cancer; (f) increased risk of premature death. Possible link to metabolic, nervous system, and reproductive and developmental effects for short-term and long-term exposure to PM _{2.5} .
Sulfates	25 µg/m ³ / 24-hour	No Federal Standards	(a) Decrease in lung function; (b) aggravation of asthmatic symptoms; (c) vegetation damage; (d) Degradation of visibility; (e) property damage
Lead	1.5 µg/m ³ / 30-day	0.15 µg/m ³ / 3-month rolling	(a) Learning disabilities; (b) impairment of blood formation and nerve function; (c) cardiovascular effects, including coronary heart disease and hypertension Possible male reproductive system effects
Hydrogen Sulfide	0.03 ppm / 1-hour	No Federal Standards	Exposure to lower ambient concentrations above the standard may result in objectionable odor and may be accompanied by symptoms such as headaches, nausea, dizziness, nasal irritation, cough, and shortness of breath

Source: 2022 AQMP, SCAQMD, 2022.

As part of its enforcement responsibilities, the EPA requires each state with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the national standards. The SIP must integrate federal, state, and local components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the SIP. The CARB defines attainment as the category given to an area with no violations in the past three years. As indicated below in Table C, the Air Basin has been designated by EPA for the national standards as a non-attainment area for ozone and PM_{2.5} and partial non-attainment for lead. Currently, the Air Basin is in attainment with the national ambient air quality standards for CO, PM₁₀, SO₂, and NO₂.

Table C – National Air Quality Standards Attainment Status – South Coast Air Basin

Criteria Pollutant	Averaging Time	Designation ^a	Attainment Date ^b
Ozone	1979 1-Hour (0.12 ppm)	Nonattainment (Extreme)	2/6/2023 (revised deadline)
	2015 8-Hour (0.07 ppm) ^d	Nonattainment (Extreme)	8/3/2038
	2008 8-Hour (0.075 ppm) ^d	Nonattainment (Extreme)	7/20/2032
	1997 8-Hour (0.08 ppm) ^d	Nonattainment (Extreme)	6/15/2024
PM _{2.5} ^e	2006 24-Hour (35 µg/m ³)	Nonattainment (Serious)	12/31/2019
	2012 Annual (12 µg/m ³)	Nonattainment (Serious)	12/31/2021
	1997 Annual (15 µg/m ³)	Attainment (final determination pending)	4/5/2015 (attained 2013)
PM ₁₀ ^f	1987 24-Hour (150 µg/m ³)	Attainment (Maintenance)	7/26/2013 (attained)
Lead ^g	2008 3-Months Rolling (0.15 µg/m ³)	Nonattainment (Partial) (Attainment determination requested)	12/31/2015
CO	1971 1-Hour (35 ppm)	Attainment (Maintenance)	6/11/2007
	1971 8-Hour (9 ppm)	Attainment (Maintenance)	6/11/2007
NO ₂ ^h	2010 1-Hour (100 ppb)	Unclassifiable/Attainment	N/A (attained)
	1971 Annual (0.053 ppm)	Attainment (Maintenance)	9/22/1998 (attained)
SO ₂ ⁱ	2010 1-Hour (75 ppb)	Unclassifiable/Attainment	1/9/2018
	1971 24-Hour (0.14 ppm)	Unclassifiable/Attainment	3/19/1979

Source: SCAQMD, 2022

Notes:

a) U.S. EPA often only declares Nonattainment areas; everywhere else is listed as Unclassifiable/Attainment or Unclassifiable.

b) A design value below the NAAQS for data through the full year or smog season prior to the attainment date is typically required for attainment demonstration.

c) The 1979 1-hour ozone NAAQS (0.12 ppm) was revoked, effective June 15, 2005; however, the Basin has not attained this standard and therefore has some continuing obligations with respect to the revoked standard; original attainment date was 11/15/2010; the revised attainment date is 2/6/2023.

d) The 2008 8-hour ozone NAAQS (0.075 ppm) was revised to 0.070 ppm, effective 12/28/2015 with classifications and implementation goals to be finalized by 10/1/2017; the 1997 8-hour ozone NAAQS (0.08 ppm) was revoked in the 2008 ozone implementation rule, effective 4/6/2015; there are continuing obligations under the revoked 1997 and revised 2008 ozone NAAQS until they are attained.

e) The attainment deadline for the 2006 24-Hour PM_{2.5} NAAQS was 12/31/15 for the former “moderate” classification; the EPA approved reclassification to “serious”, effective 2/12/16 with an attainment deadline of 12/31/2019; the 2012 (proposal year) annual PM_{2.5} NAAQS was revised on 1/15/2013, effective 3/18/2013, from 15 to 12 µg/m³; new annual designations were final 1/15/2015, effective 4/15/2015; on 7/25/2016 the EPA finalized a determination that the Basin attained the 1997 annual (15.0 µg/m³) and 24-hour PM_{2.5} (65 µg/m³) NAAQS, effective 8/24/2016.f) The annual PM₁₀ standard was revoked, effective 12/18/2006; the 24-hour PM₁₀ NAAQS deadline was 12/31/2006; the Basin’s Attainment Re-designation Request and PM₁₀ Maintenance Plan was approved by the EPA on 6/26/2103, effective 7/26/2013.

g) Partial Nonattainment designation – Los Angeles County portion of the Basin only for near-source monitors; expect to remain in attainment based on current monitoring data; attainment re-designation request pending.

h) New 1-hour NO₂ NAAQS became effective 8/2/2010, with attainment designations 1/20/2012; annual NO₂ NAAQS retained.i) The 1971 annual and 24-hour SO₂ NAAQS were revoked, effective 8/23/2010.

Despite substantial improvements in air quality over the past few decades, some air monitoring stations in the Air Basin still exceed the NAAQS and frequently record the highest ozone levels in the United States. In 2020, monitoring stations in the Air Basin exceeded the most current federal standards on a total of 181 days (49 percent of the year), including: 8-hour ozone (157 days over the 2015 ozone NAAQS), 24-hour PM_{2.5} (39 days), PM₁₀ (3 days), and NO₂ (1 day). Nine of the top 10 stations in the nation most frequently exceeding the 2015 8-hour ozone NAAQS in 2020 were located within the Air Basin, including stations in San Bernardino, Riverside, and Los Angeles Counties (SCAQMD, 2022).

PM2.5 levels in the Air Basin have improved significantly in recent years. Since 2015, none of the monitoring stations in the Air Basin have recorded violations of the former 1997 annual PM2.5 NAAQS (15.0 µg/m³). On July 25, 2016 the U.S. EPA finalized a determination that the Air Basin attained the 1997 annual (15.0 µg/m³) and 24-hour PM2.5 (65 µg/m³) NAAQS, effective August 24, 2016. However, the Air Basin does not meet the 2012 annual PM2.5 NAAQS (12.0 µg/m³), with six monitoring stations having design values above the standard for the 2018-2020 period (SCAQMD, 2022).

4.2 State – California Air Resources Board

The CARB, which is a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, the CARB conducts research, sets the California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. The CAAQS for criteria pollutants in the Air Basin are shown in Table D. In addition, the CARB establishes emission standards for motor vehicles sold in California, consumer products (e.g. hairspray, aerosol paints, and barbeque lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

Table D – California Ambient Air Quality Standards Attainment Status – South Coast Air Basin

Criteria Pollutant	Averaging Time	Level ^a	Designation ^b
Ozone	1-Hour	0.09 ppm	Nonattainment
	8-Hour	0.070 ppm	Nonattainment
PM2.5	Annual	12 µg/m ³	Nonattainment
PM10	24-Hour	50 µg/m ³	Nonattainment
	Annual	20 µg/m ³	Nonattainment
Lead	30-Day Average	1.5 µg/m ³	Attainment
CO	1-Hour	20 ppm	Attainment
	8-Hour	9.0 ppm	Attainment
NO ₂	1-Hour	0.18 ppm	Attainment
	Annual	0.030	Attainment ^c
SO ₂	1-Hour	0.25 ppm	Attainment
	24-Hour	0.04 ppm	Attainment
Sulfates	24-Hour	25 µg/m ³	Attainment
Hydrogen Sulfide ^c	1-Hour	0.03 ppm	Unclassified

Source: SCAQMD, 2022

Notes:

a) CA State standards, or CAAQS, for ozone, SO₂, NO₂, PM10 and PM2.5 are values not to be exceeded; lead, sulfates and H₂S standards are values not to be equaled or exceeded; CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

b) CA State designations shown were updated by CARB in 2019, based on the 2016-2018 3-year period; stated designations are based on a 3-year data period after consideration of outliers and exceptional events.

c) The CA-60 near road portion of San Bernardino, Riverside and Los Angeles Counties has recently been redesignated as an attainment area based on data collected between 2018 and 2020.

As shown in Table D, the Air Basin has been designated by the CARB as a non-attainment area for ozone, PM10 and PM2.5. Currently, the Air Basin is in attainment with the ambient air quality standards for lead, CO, NO₂, SO₂ and sulfates, and is unclassified for Hydrogen Sulfide.

The following lists the State of California Code of Regulations (CCR) air quality emission rules that are applicable, but not limited to school projects in the State.

Assembly Bill 2588

The Air Toxics “Hot Spots” Information and Assessment Act (Assembly Bill [AB] 2588, 1987, Connelly) was enacted in 1987 as a means to establish a formal air toxics emission inventory risk quantification program. AB 2588, as amended, establishes a process that requires stationary sources to report the type and quantities of certain substances their facilities routinely release in California. The data is ranked by high, intermediate, and low categories, which are determined by: the potency, toxicity, quantity, volume, and proximity of the facility to nearby receptors.

CARB Regulation for In-Use Off-Road Diesel Vehicles

On July 26, 2007, the CARB adopted CCR Title 13, Article 4.8, Chapter 9, Section 2449 to reduce DPM and NOx emissions from in-use off-road heavy-duty diesel vehicles in California. Such vehicles are used in construction, mining, and industrial operations. The regulation limits idling to no more than five consecutive minutes, requires reporting and labeling, and requires disclosure of the regulation upon vehicle sale. Performance requirements of the rule are based on a fleet’s average NOx emissions, which can be met by replacing older vehicles with newer, cleaner vehicles or by applying exhaust retrofits. The regulation was amended in 2010 to delay the original timeline of the performance requirement making the first compliance deadline January 1, 2014 for large fleets (over 5,000 horsepower), 2017 for medium fleets (2,501-5,000 horsepower), and 2019 for small fleets (2,500 horsepower or less). Currently, no commercial operation in California may add any equipment to their fleet that has a Tier 0, Tier 1, or Tier 2 engine. It should be noted that commercial fleets may continue to use their existing Tier 0, 1 and 2 equipment, if they can demonstrate that the average emissions from their entire fleet emissions meet the NOx emissions targets.

CARB Resolution 08-43 for On-Road Diesel Truck Fleets

On December 12, 2008 the CARB adopted Resolution 08-43, which limits NOx, PM10 and PM2.5 emissions from on-road diesel truck fleets that operate in California. On October 12, 2009 Executive Order R-09-010 was adopted that codified Resolution 08-43 into CCR Title 13, Section 2025. This regulation requires that by the year 2023 all commercial diesel trucks that operate in California shall meet model year 2010 (Tier 4 Final) or latter emission standards. This regulation also provides a few exemptions including a onetime per year 3-day pass for trucks registered outside of California. All on-road diesel trucks utilized during construction of the proposed project will be required to comply with Resolution 08-43.

4.3 Regional – Southern California

The SCAQMD is the agency principally responsible for comprehensive air pollution control in the South Coast Air Basin. To that end, as a regional agency, the SCAQMD works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments and cooperates actively with all federal and state agencies.

South Coast Air Quality Management District

SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emission sources, and enforces such measures through educational programs or fines, when necessary. SCAQMD is directly responsible for reducing emissions from stationary, mobile, and indirect sources. It has responded to this requirement by preparing a sequence of AQMPs. The *Final 2022 Air Quality Management Plan* (2022 AQMP) was adopted by CARB on January 26, 2023 and has been submitted to the U.S. EPA for final approval, which is anticipated to occur sometime this year. After the 2022 AQMP has been adopted by the U.S. EPA, the 2022 AQMP will be incorporated into the SIP. The

2022 AQMP establishes actions and strategies to reduce ozone levels to the U.S. EPA 2015 ozone standard of 70 ppb by 2037. The 2022 AQMP promotes extensive use of zero-emission technologies across all stationary and mobile sources coupled with rules and regulations, investment strategies, and incentives.

Although SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate air quality issues associated with plans and new development projects throughout the Air Basin. Instead, this is controlled through local jurisdictions in accordance with CEQA. In order to assist local jurisdictions with air quality compliance issues the *CEQA Air Quality Handbook* (SCAQMD CEQA Handbook), prepared by SCAQMD, 1993, with the most current updates found at <http://www.aqmd.gov/ceqa/hdbk.html>, was developed in accordance with the projections and programs detailed in the AQMPs. The purpose of the SCAQMD CEQA Handbook is to assist Lead Agencies, as well as consultants, project proponents, and other interested parties in evaluating a proposed project's potential air quality impacts. Specifically, the SCAQMD CEQA Handbook explains the procedures that SCAQMD recommends be followed for the environmental review process required by CEQA. The SCAQMD CEQA Handbook provides direction on how to evaluate potential air quality impacts, how to determine whether these impacts are significant, and how to mitigate these impacts. The SCAQMD intends that by providing this guidance, the air quality impacts of plans and development proposals will be analyzed accurately and consistently throughout the Air Basin, and adverse impacts will be minimized.

The following lists the SCAQMD rules that are applicable but not limited to school development projects in the Air Basin.

Rule 402 - Nuisance

Rule 402 prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which causes injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. Compliance with Rule 402 will reduce local air quality and odor impacts to nearby sensitive receptors.

Rule 403- Fugitive Dust

Rule 403 governs emissions of fugitive dust during construction activities and requires that no person shall cause or allow the emissions of fugitive dust such that dust remains visible in the atmosphere beyond the property line or the dust emission exceeds 20 percent opacity, if the dust is from the operation of a motorized vehicle. Compliance with this rule is achieved through application of standard Best Available Control Measures, which include but are not limited to the measures below. Compliance with these rules would reduce local air quality impacts to nearby sensitive receptors.

- Utilize either a pad of washed gravel 50 feet long, 100 feet of paved surface, a wheel shaker, or a wheel washing device to remove material from vehicle tires and undercarriages before leaving project site.
- Do not allow any track out of material to extend more than 25 feet onto a public roadway and remove all track out at the end of each workday.
- Water all exposed areas on active sites at least three times per day and pre-water all areas prior to clearing and soil moving activities.

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- Apply nontoxic chemical stabilizers according to manufacturer specifications to all construction areas that will remain inactive for 10 days or longer.
 - Pre-water all material to be exported prior to loading, and either cover all loads or maintain at least 2 feet of freeboard in accordance with the requirements of California Vehicle Code Section 23114.
 - Replant all disturbed area as soon as practical.
 - Suspend all grading activities when wind speeds (including wind gusts) exceed 25 miles per hour.
 - Restrict traffic speeds on all unpaved roads to 15 miles per hour or less.

Rules 1108 and 1108.1 – Cutback and Emulsified Asphalt

Rules 1108 and 1108.1 govern the sale, use, and manufacturing of asphalt and limits the VOC content in asphalt. This rule regulates the VOC contents of asphalt used during construction as well as any on-going maintenance during operations. Therefore, all asphalt used during construction and operation of the proposed project must comply with SCAQMD Rules 1108 and 1108.1.

Rule 1113 – Architectural Coatings

Rule 1113 governs the sale, use, and manufacturing of architectural coatings and limits the VOC content in sealers, coatings, paints and solvents. This rule regulates the VOC contents of paints available during construction. Therefore, all paints and solvents used during construction and operation of the proposed project must comply with SCAQMD Rule 1113.

Rule 1143 – Paint Thinners

Rule 1143 governs the sale, use, and manufacturing of paint thinners and multi-purpose solvents that are used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations. This rule regulates the VOC content of solvents used during construction. Solvents used during construction and operation of the proposed project must comply with SCAQMD Rule 1143.

Rule 1403 – Asbestos Removal

Rule 1403 governs asbestos emissions from demolition and renovation activities. The existing structures on the project site shall be surveyed for asbestos prior to demolition activities. If asbestos is found within the existing structures, the asbestos shall be removed through utilization of the removal procedures detailed in Rule 1403.

Southern California Association of Governments

The SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG is the federally designated Metropolitan Planning Organization (MPO) for the majority of the southern California region and is the largest MPO in the nation. With respect to air quality planning, SCAG has prepared the *2024-2050 Regional Transportation Plan/Sustainable Communities Strategy* (Connect SoCal 2024), adopted by SCAG on April 4, 2024 which is based on the regional development and growth forecasts provided in the *2023 Federal Transportation Improvement Program* (2023 FTIP), adopted October 2022. In September 2024, SCAG adopted the *Final 2025 Federal Transportation Improvement Program* (2025 FTIP), that provides a comprehensive listing of projects that will receive federal funding and/or are regionally significant projects that are proposed over the Federal

Fiscal years of 2024/2025 through 2027/2028 as well as years 2028/2029 and 2029/2030 that have been included for informational purposes. The projects included in the 2025 FTIP are consistent with programs and projects and subsequent amendments contained in Connect SoCal 2024.

Although the Connect SoCal 2024 and 2025 FTIP are primarily planning documents for future transportation projects, a key component of these plans are to integrate land use planning with transportation planning that promotes higher density infill development in close proximity to existing transit service. These plans form the basis for the land use and transportation components of the 2022 AQMP, which are utilized in the preparation of air quality forecasts and in the consistency analysis included in the 2022 AQMP. The Connect SoCal 2024, 2025 FTIP, and 2022 AQMP are based on projections originating within the City and County General Plans.

4.4 Local Jurisdictions

Local jurisdictions, such as the City of Santa Ana and County of Orange, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the City and County are responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City and County are also responsible for the implementation of transportation control measures as outlined in the AQMPs. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals. In accordance with CEQA requirements and the CEQA review process, the City and County assess the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation.

In accordance with the CEQA requirements, the City and County do not, however, have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the City and region will meet federal and state standards. Instead, the City and County rely on the expertise of the SCAQMD and utilizes the SCAQMD CEQA Handbook as the guidance document for the environmental review of plans and development proposals within its jurisdiction.

5.0 ENERGY CONSERVATION MANAGEMENT

The regulatory setting related to energy conservation is primarily addressed through State and local regulations, which are discussed below.

5.1 State

Energy conservation management in the State was initiated by the 1974 Warren-Alquist State Energy Resources Conservation and Development Act that created the California Energy Resource Conservation and Development Commission (currently named California Energy Commission [CEC]), which was originally tasked with certifying new electric generating plants based on the need for the plant and the suitability of the site of the plant. In 1976 the Warren-Alquist Act was expanded to include new restrictions on nuclear generating plants, that effectively resulted in a moratorium of any new nuclear generating plants in the State. The following details specific regulations adopted by the State in order to reduce the consumption of energy.

California Code of Regulations Title 20

On November 3, 1976 the CEC adopted the *Regulations for Appliance Efficiency Standards Relating to Refrigerators, Refrigerator-Freezers and Freezers and Air Conditioners*, which were the first energy-efficiency standards for appliances. The appliance efficiency regulations have been updated several times by the CEC and the most current version is the *2016 Appliance Efficiency Regulations*, adopted January 2017 which includes almost all types of appliances and lamps that use electricity, natural gas as well as plumbing fixtures. The authority for the CEC to control the energy-efficiency of appliances is detailed in CCR Title 20, Division 2, Chapter 4, Article 4, Sections 1601-1609.

California Code of Regulations Title 24, Part 6

The CEC is also responsible for implementing the CCR Title 24, Part 6: *California's Energy Efficiency Standards for Residential and Nonresidential Buildings* (Title 24 Part 6) that were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. In 2008 the State set an energy-use reduction goal of zero-net-energy use of all new homes by 2020 and the CEC was mandated to meet this goal through revisions to the Title 24, Part 6 regulations.

The Title 24 standards are updated on a three-year schedule and since 2008 the standards have been incrementally moving to the 2020 goal of the zero-net-energy use. The 2022 Title 24 standards are the current standards that went into effect on January 1, 2023 and the 2025 Title 24 standards will go into effect on January 1, 2026.

According to the 2025 Title 24 Part 6 Fact Sheet, prepared by ACE Resources, some of the notable changes over the 2022 Title 24 standards for nonresidential buildings now include an energy budget requirement, HVAC programming requirements, new nonresidential pools will need to provide a solar thermal heating system that is a minimum 65% of the size of the pool, more efficient natural gas water heaters and HVAC systems and the HVAC systems now are required to provide variable air volume rates that is determined by occupancy and time of day, all buildings with public entrances that are greater than 10,000 sq ft are now required to include an enclosed vestibule with all doors equipped with self-closing devices (the vestibule can be created with either a second door or an air curtain), higher thermal requirements for relocatable school buildings, and laboratories are now subject to the energy code.

California Code of Regulations (CCR) Title 24, Part 11

CCR Title 24, Part 11: *California Green Building Standards* (CalGreen Code) was developed in response to continued efforts to reduce GHG emissions associated with energy consumption. The CalGreen Code is also updated every three years and the current version is the 2022 CalGreen Code that went into effect on January 1, 2023 and the 2025 CalGreen Code will go into effect on January 1, 2026.

The CalGreen Code contains requirements for construction site selection; storm water control during construction; construction waste reduction; indoor water use reduction; material selection; natural resource conservation; site irrigation conservation; and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for verifying that all building systems (e.g., heating and cooling equipment and lighting systems) are functioning at their maximum efficiency.

The CalGreen Code provides standards for bicycle parking, carpool/vanpool/electric vehicle spaces, light and glare reduction, grading and paving, energy efficient appliances, renewable energy, graywater systems, water efficient plumbing fixtures, recycling and recycled materials, pollutant controls (including moisture control and indoor air quality), acoustical controls, storm water management, building design, insulation, flooring, and framing, among others. Implementation of the CalGreen Code measures reduces energy consumption and vehicle trips and encourages the use of alternative-fuel vehicles, which reduces pollutant emissions.

Some of the notable changes in the 2022 CalGreen Code over the prior 2019 CalGreen Code for nonresidential development mandatory requirements include the repeal of designated parking spaces for clean air vehicles and an increase in the number of electric vehicle (EV) ready parking spaces. The 2022 CalGreen Code also added new requirements for installed Level 2 or direct-current fast charger EV charging stations for autos, EV charging readiness for loading docks, enhanced thermal insulation, and acoustical ceilings.

Senate Bill 1020

Senate Bill 1020 (SB 1020) was adopted September 16, 2022 and would speed up the timeline retail electricity is supplied by renewable energy sources over the prior adoption timelines provided in SB 100, SB 350, SB 1078, SB 107, and SB X1-2. SB 1020 requires that retail sales of electricity are from renewable energy resources and zero-carbon resources supply 90 percent by December 31, 2035, 95 percent by December 31, 2040, and 100 percent by December 31, 2045.

Executive Order N-79-20

The California Governor issued Executive Order N-79-20 on September 23, 2020 that requires all new passenger cars and trucks and commercial drayage trucks sold in California to be zero-emissions by the year 2035 and all medium- heavy-duty vehicles (commercial trucks) sold in the state to be zero-emission by 2045 for all operations where feasible. Executive Order N-79-20 also requires all off-road vehicles and equipment to transition to 100 percent zero-emission equipment, where feasible by 2035.

Executive Order B-48-18 and Assembly Bill 2127

The California Governor issued Executive Order B-48-18 on January 26, 2018 that orders all state entities to work with the private sector to put at least five million zero-emission vehicles on California roads by 2030 and to install 200 hydrogen fueling stations and 250,000 electric vehicle chargers by 2025. Currently there are approximately 350,000 electric vehicles operating in California, which represents approximately

1.5 percent of the 24 million vehicles total currently operating in California. Implementation of Executive Order B-48-18 would result in approximately 20 percent of all vehicles in California to be zero emission electric vehicles. Assembly Bill 2127 (AB 2127) was codified into statute on September 13, 2018 and requires that the CEC working with CARB prepare biannual assessments of the statewide electric vehicle charging infrastructure needed to support the levels of zero emission vehicle adoption required for the State to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030.

Assembly Bill 1109

California Assembly Bill 1109 (AB 1109) was adopted October 2007, also known as the Lighting Efficiency and Toxics Reduction Act, prohibits the manufacturing of lights after January 1, 2010 that contain levels of hazardous substances prohibited by the European Union pursuant to the Restriction of Hazardous Substances Directive. AB 1109 also requires reductions in energy usage for lighting and is structured to reduce lighting electrical consumption by: (1) At least 50 percent reduction from 2007 levels for indoor residential lighting; and (2) At least 25 percent reduction from 2007 levels for indoor commercial and all outdoor lighting by 2018. AB 1109 would reduce GHG emissions through reducing the amount of electricity required to be generated by fossil fuels in California.

Assembly Bill 1493

California Assembly Bill 1493 (also known as the Pavley Bill, in reference to its author Fran Pavley) was enacted on July 22, 2002 and required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. In 2004, CARB approved the “Pavley I” regulations limiting the amount of GHGs that may be released from new passenger automobiles that are being phased in between model years 2009 through 2016. These regulations will reduce GHG emissions by 30 percent from 2002 levels by 2016. In June 2009, the EPA granted California the authority to implement GHG emission reduction standards for light duty vehicles, in September 2009, amendments to the Pavley I regulations were adopted by CARB and implementation of the “Pavley I” regulations started in 2009.

The second set of regulations “Pavley II” was developed in 2010, and is being phased in between model years 2017 through 2025 with the goal of reducing GHG emissions by 45 percent by the year 2020 as compared to the 2002 fleet. The Pavley II standards were developed by linking the GHG emissions and formerly separate toxic tailpipe emissions standards previously known as the “LEV III” (third stage of the Low Emission Vehicle standards) into a single regulatory framework. The new rules reduce emissions from gasoline-powered cars as well as promote zero-emissions auto technologies such as electricity and hydrogen, and through increasing the infrastructure for fueling hydrogen vehicles. In 2009, the U.S. EPA granted California the authority to implement the GHG standards for passenger cars, pickup trucks and sport utility vehicles and these GHG emissions standards are currently being implemented nationwide.

The EPA has performed a midterm evaluation of the longer-term standards for model years 2022-2025, and based on the findings of this midterm evaluation, the EPA proposed The Safer Affordable Fuel Efficient (SAFE) Vehicles Proposed Rule for Model Years 2021-2026 that amends the corporate average fuel economy (CAFE) and GHG emissions standards for light vehicles for model years 2021 through 2026. The SAFE Vehicles Rule were made effective on June 29, 2020. However, the CAFE standards are now being reevaluated on a new more lenient criteria that restricts California from setting its own standards (see Section 6.2, below for more details). As such, the ability of the State to enforce AB 1493 regulations in the future is unlikely.

5.2 Local Jurisdictions

City of Santa Ana

The *Santa Ana General Plan Conservation Element*, adopted April 2022, provides the following applicable energy-related goals and policies.

Goal CN-3: Energy Resources

Reduce consumption of and reliance on nonrenewable energy, and support the development and use of renewable energy sources

Policy CN-3.1 Interagency Coordination

Consult with regional agencies and utility companies to pursue energy efficiency goals and expand renewable energy strategies

Policy CN-3.2 Education Programs

Support education programs to provide information on energy conservation and alternatives to nonrenewable energy sources.

Policy CN-3.3 Development Patterns

Promote energy-efficient development patterns by clustering mixed use developments and compatible uses adjacent to public transportation.

Policy CN-3.4 Site Design

Encourage site planning and subdivision design that incorporates the use of renewable energy systems.

Policy CN-3.5 Landscaping

Promote and encourage the planting of native and diverse tree species to improve air quality, reduce heat island effect, reduce energy consumption, and contribute to carbon mitigation with special focus in environmental justice areas.

Policy CN-3.6 Life Cycle Costs

Encourage construction and building development practices that use renewable resources and life cycle costing in construction and operating decisions.

Policy CN-3.7 Energy Conservation Design and Construction

Incorporate energy conservation features in the design of new construction and rehabilitation projects.

Policy CN-3.8 Energy-Efficient Public Facilities

Promote and encourage efficient use of energy and the conservation of available resources in the design, construction, maintenance, and operation of public facilities, infrastructure, and equipment.

Policy CN-3.9 Energy Generation in Public Facilities

Encourage and support the generation, transmission, use, and storage of locally distributed renewable energy in order to promote energy independence, efficiency, and sustainability.

Policy CN-3.10 Energy Conservation in Public Facilities

Work with businesses and contractors that use energy-efficient practices in the provision of services and equipment for City construction projects.

Policy CN-3.11 Energy-Efficient Transportation Infrastructure

Continue to support public and private infrastructure for public transportation such as bus routes, rail lines, and the OC Streetcar.

County of Orange

The County of Orange General Plan, Chapter 6 Resources Element, September 13, 2005, provides an Energy Resources Component that details the following applicable goals and policies.

Goal 1

Maximize the conservation and wise use of energy resources in all residences, businesses, public institutions, and industries in Orange County.

Goal 2

Encourage the utilization of existing energy resources to their highest potential and the development of alternative energy sources consistent with sound energy conservation practices and techniques to meet the County's future energy demand.

Policy 1 – Land Use

To plan urban land uses with a balance of residential, industrial, commercial, and public land uses as set forth in the Land Use Element.

Policy 2 – Energy Resource Development

To encourage and actively support the efficient use and optimum development of energy resources in the County consistent with sound resource management practices.

Policy 3 – Energy Conservation

To encourage and actively support the utilization of energy conservation measures in all new and existing structures in the County.

Policy 4 – Transportation

To provide incentives for transportation system management programs and support regional public transportation programs that reduce energy consumption.

Policy 5 – Energy Financing

To examine the benefits of local government financing programs that promote energy conservation and development through cooperative public/private efforts.

Policy 6 – Alternative Energy Systems

To encourage the use of alternative energy systems and to the extent feasible, remove the regulatory barriers to their implementation.

Policy 7 – Solar Access

To support and encourage voluntary efforts to provide solar access opportunities in new developments.

6.0 GLOBAL CLIMATE CHANGE MANAGEMENT

The regulatory setting related to global climate change is addressed through the efforts of various international, federal, state, regional, and local government agencies. These agencies work jointly, as well as individually, to reduce GHG emissions through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for global climate change regulations are discussed below.

6.1 International

In 1988, the United Nations established the IPCC to evaluate the impacts of global climate change and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling GHG emissions. The parties of the UNFCCC adopted the Kyoto Protocol, which set binding GHG reduction targets for 37 industrialized countries, the objective of reducing their collective GHG emissions by five percent below 1990 levels by 2012. The Kyoto Protocol has been ratified by 182 countries, but has not been ratified by the United States. It should be noted that Japan and Canada opted out of the Kyoto Protocol and the remaining developed countries that ratified the Kyoto Protocol have not met their Kyoto targets. The Kyoto Protocol expired in 2012 and the amendment for the second commitment period from 2013 to 2020 has not yet entered into legal force. The Parties to the Kyoto Protocol negotiated the Paris Agreement in December 2015, agreeing to set a goal of limiting global warming to less than 2 degrees Celsius compared with pre-industrial levels. The Paris Agreement has been adopted by 195 nations with 147 ratifying it, including the United States by President Obama, who ratified it by Executive Order on September 3, 2016. On June 1, 2017, President Trump announced that the United States is withdrawing from the Paris Agreement, on January 21, 2021 President Biden signed an executive order rejoining the Paris Agreement, and on January 20, 2025 President Trump signed an executive order withdrawing from the Paris Agreement.

Additionally, the Montreal Protocol was originally signed in 1987 and substantially amended in 1990 and 1992. The Montreal Protocol stipulates that the production and consumption of compounds that deplete ozone in the stratosphere—CFCs, halons, carbon tetrachloride, and methyl chloroform—were to be phased out, with the first three by the year 2000 and methyl chloroform by 2005.

6.2 Federal – United States Environmental Protection Agency

The EPA is responsible for implementing federal policy to address global climate change. The Federal government administers a wide array of public-private partnerships to reduce U.S. GHG intensity. These programs focus on energy efficiency, renewable energy, methane, and other non-CO₂ gases, agricultural practices and implementation of technologies to achieve GHG reductions. EPA implements several voluntary programs that substantially contribute to the reduction of GHG emissions.

In *Massachusetts v. Environmental Protection Agency* (Docket No. 05–1120), argued November 29, 2006 and decided April 2, 2007, the U.S. Supreme Court held that not only did the EPA have authority to regulate GHGs, but the EPA's reasons for not regulating this area did not fit the statutory requirements. As such, the U.S. Supreme Court ruled that the EPA should be required to regulate CO₂ and other GHGs as pollutants under the federal Clean Air Act (CAA).

In response to the Consolidations Appropriations Act, 2008 (H.R. 2764; Public Law 110-161), EPA proposed a rule on March 10, 2009 that requires mandatory reporting of GHG emissions from large sources in the United States. On September 22, 2009, the Final Mandatory Reporting of GHG Rule was signed and published in the Federal Register on October 30, 2009. The rule became effective on December 29, 2009. This rule requires 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 to submit annual reports to the EPA.

On December 7, 2009, the EPA Administrator signed two distinct findings under section 202(a) of the Clean Air Act. One is an endangerment finding that finds concentrations of the six GHGs in the atmosphere threaten the public health and welfare of current and future generations. The other is a cause or contribute finding, that finds emissions from new motor vehicles and new motor vehicle engines contribute to the GHG pollution which threatens public health and welfare. These actions did not impose any requirements on industry or other entities, however, since 2009 the EPA has been providing GHG emission standards for vehicles and other stationary sources of GHG emissions that are regulated by the EPA. On September 13, 2013 the EPA Administrator signed 40 CFR Part 60, that limits emissions from new sources to 1,100 pounds of CO₂ per mega-watt hour (MWh) for fossil fuel-fired utility boilers and 1,000 pounds of CO₂ per MWh for large natural gas-fired combustion units.

On August 3, 2015, the EPA announced the Clean Power Plan, emissions guidelines for U.S. states to follow in developing plans to reduce GHG emissions from existing fossil fuel-fired power plants (Federal Register Vol. 80, No. 205, October 23 2015). On October 11, 2017, the EPA issued a formal proposal to repeal the Clean Power Plan and on June 19, 2019 the EPA replaced the Clean Power Plan with the Affordable Clean Energy rule that is anticipated to lower power sector GHG emissions by 11 million tons by the year 2030.

On June 6, 2025, in accordance with President Trump's "Unleashing American Energy" Executive Order and the Secretary of Transportation's "Fixing the CAFÉ Program" Memorandum, the National Highway Traffic Safety Administration (NHTSA), published the "Resetting the Corporate Average Fuel Economy Program"³, that requires the NHTSA to reconsider the Corporate Average Fuel Economy (CAFE) standards for passenger vehicles and non-passenger medium and heavy duty vehicles that now require several additional factors to be considered when setting fuel economy standards that include technological feasibility and economic practicability as well as considering fuel standards set by other agencies. In addition, the Memorandum prohibits consideration of trading credits between manufacturers. The Memorandum directs the NHTSA to replace the *Corporate Average Fuel Economy Standards for Model Years 2024-2026 Passenger Cars and Light Trucks* and the Model Years 2027 and Beyond Fuel Standards at the earliest opportunity.

6.3 State

The CARB has the primary responsible for implementing state policy to address global climate change, however there are State regulations related to global climate change that affect a variety of State agencies. CARB, which is a part of the CalEPA, is responsible for the coordination and administration of both the federal and state air pollution control programs within California. In this capacity, the CARB conducts research, sets CAAQS, compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. In addition, the CARB establishes emission standards for motor vehicles sold in California, consumer products (e.g. hairspray, aerosol paints, and

3 Obtained from: <https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy>

barbeque lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

In 2008, CARB approved a Climate Change Scoping Plan that proposes a “comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health” (CARB 2008). The Climate Change Scoping Plan has a range of GHG reduction actions which include direct regulations; alternative compliance mechanisms; monetary and non-monetary incentives; voluntary actions; market-based mechanisms such as a cap-and-trade system. In 2014, CARB approved the First Update to the Climate Change Scoping Plan (CARB, 2014) that identifies additional strategies moving beyond the 2020 targets to the year 2050. On December 14, 2017 CARB adopted the California’s 2017 Climate Change Scoping Plan, November 2017 (CARB, 2017) that provides specific statewide policies and measures to achieve the 2030 GHG reduction target of 40 percent below 1990 levels by 2030 and the aspirational 2050 GHG reduction target of 80 percent below 1990 levels by 2050. On December 15, 2022, CARB adopted the *2022 Scoping Plan for Achieving Carbon Neutrality*, November 16, 2022 (CARB, 2022) that lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279.

In addition to the Scoping Plans, the State has passed the following laws directing CARB to develop actions to reduce GHG emissions, which are listed below in chronological order, with the most current first.

Executive Order B-55-18 and Assembly Bill 1279

The California Governor issued Executive Order B-55-18 in September 2018 that establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045. This executive order directs the CARB to work with relevant State agencies to develop a framework for implementation and accounting that tracks progress toward this goal as well as ensuring future scoping plans identify and recommend measures to achieve this carbon neutrality goal. Assembly Bill 1279 was passed by the legislature in September 2022 that codifies the carbon neutrality targets provided in Executive Order B-55-18. The *2022 Scoping Plan for Achieving Carbon Neutrality*, adopted by CARB on December 16, 2022, was prepared in order to meet the carbon neutrality goal targets developed in Executive Order B-55-18 and codified in Assembly Bill 1279.

California Code of Regulations Title 24, Part 6

The Title 24 Part 6 standards have been developed by the CEC primarily for energy conservation and is described in more detail above in Section 5.1 under Energy Conservation Management. It should be noted that implementation of the Title 24 Part 6 building standards would also reduce GHG emissions, since energy use for residential and commercial buildings creates 9.7 percent of the GHG emissions in the State.

California Code of Regulations Title 24, Part 11

The CalGreen Building standards have been developed by the CEC primarily for energy conservation and is described in more detail above in Section 5.1 under Energy Conservation Management. It should be noted that implementation of the CalGreen Building standards would also reduce GHG emissions, since as detailed above under Title 23, Part 6, energy usage from buildings creates 9.7 percent of GHG emissions in the State.

Senate Bill 1020

SB 1020 requires that by December 1, 2045 that 100 percent of retail sales of electricity to be generated from renewable or zero-carbon emission sources of electricity and is described in more detail above in Section 5.1 under Energy Conservation Management.

Executive Order B-55-18 and Assembly Bill 1279

The California Governor issued Executive Order B-55-18 in September 2018 that establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045. This executive order directs CARB to work with relevant State agencies to develop a framework for implementation and accounting that tracks progress toward this goal as well as ensuring future scoping plans identify and recommend measures to achieve this carbon neutrality goal. Assembly Bill 1279 was passed by the legislature in September 2022 that codifies the carbon neutrality targets provided in Executive Order B-55-18. The *2022 Scoping Plan for Achieving Carbon Neutrality*, adopted by CARB on December 16, 2022, was prepared in order to meet the carbon neutrality goal targets developed in Executive Order B-55-18 and codified in Assembly Bill 1279.

Executive Order N-79-20

EO N-79-20 establish targets for when all new vehicles and equipment are zero-emission and is described in more detail above in Section 5.1 under Energy Conservation Management.

Executive Order B-48-18 and Assembly Bill 2127

Executive Order B-48-18 and AB 2127 provides measures to put at least five million zero-emission vehicles on California roads by 2030 and to install 200 hydrogen fueling stations and 250,000 electric vehicle chargers by 2025 and is described in more detail above in Section 5.1 under Energy Conservation Management.

Executive Order B-30-15, Senate Bill 32 and Assembly Bill 197

The California Governor issued Executive Order B-30-15 on April 29, 2015 that aims to reduce California's GHG emissions 40 percent below 1990 levels by 2030. This executive order aligns California's GHG reduction targets with those of other international governments, such as the European Union that set the same target for 2030 in October, 2014. This target will make it possible to reach the ultimate goal of reducing GHG emissions 80 percent under 1990 levels by 2050 that is based on scientifically established levels needed in the U.S.A to limit global warming below 2 degrees Celsius – the warming threshold at which scientists say there will likely be major climate disruptions such as super droughts and rising sea levels. Assembly Bill 197 (AB 197) (September 8, 2016) and Senate Bill 32 (SB 32) (September 8, 2016) codified into statute the GHG emissions reduction targets of at least 40 percent below 1990 levels by 2030 as detailed in Executive Order B-30-15. AB 197 also requires additional GHG emissions reporting that is broken down to sub-county levels and requires CARB to consider the social costs of emissions impacting disadvantaged communities.

Executive Order B-29-15

The California Governor issued Executive Order B-29-15 on April 1, 2015 and directed the State Water Resources Control Board to impose restrictions to achieve a statewide 25 percent reduction in urban water usage and directed the Department of Water Resources to replace 50 million square feet of lawn with drought tolerant landscaping through an update to the State's Model Water Efficient Landscape Ordinance. The Ordinance also requires installation of more efficient irrigation systems, promotion of

greywater usage and onsite stormwater capture, and limits the turf planted in new residential landscapes to 25 percent of the total area and restricts turf from being planted in median strips or in parkways unless the parkway is next to a parking strip and a flat surface is required to enter and exit vehicles. Executive Order B-29-15 would reduce GHG emissions associated with the energy used to transport and filter water.

Assembly Bill 341 and Senate Bills 939 and 1374

Senate Bill 939 (SB 939) requires that each jurisdiction in California to divert at least 50 percent of its waste away from landfills, whether through waste reduction, recycling or other means. Senate Bill 1374 (SB 1374) requires the California Integrated Waste Management Board to adopt a model ordinance by March 1, 2004 suitable for adoption by any local agency to require 50 to 75 percent diversion of construction and demolition of waste materials from landfills. Assembly Bill 341 (AB 341) was adopted in 2011 and builds upon the waste reduction measures of SB 939 and 1374, and sets a new target of a 75 percent reduction in solid waste generated by the year 2020.

Senate Bill 375

Senate Bill 375 (SB 375) was adopted September 2008 in order to support the State's climate action goals to reduce GHG emissions through coordinated regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires CARB to set regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established targets for 2020 and 2035 for each MPO within the State. It was up to each MPO to adopt a sustainable communities strategy (SCS) that will prescribe land use allocation in that MPOs Regional Transportation Plan (RTP) to meet CARB's 2020 and 2035 GHG emission reduction targets. These reduction targets are required to be updated every eight years and the most current targets are detailed at: <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets>, which provides GHG emissions reduction targets for SCAG of 8 percent by 2020 and 19 percent by 2035.

The Connect SoCal 2024 provides a 2035 GHG emission reduction target of 19 percent reduction over the 2005 per capita emissions levels. The Connect SoCal 2024 include new initiatives of land use, transportation and technology to meet the 19 percent GHG emission reduction target for 2035. CARB is also charged with reviewing SCAG's RTP/SCS for consistency with its assigned targets.

City and County land use policies, including General Plans, are not required to be consistent with the RTP and associated SCS. However, new provisions of CEQA incentivize, through streamlining and other provisions, qualified projects that are consistent with an approved SCS and categorized as "transit priority projects."

Assembly Bill 1109

AB 1109 requires reductions in energy usage for lighting and is described in more detail above in Section 5.1 under Energy Conservation Management.

Senate Bill 97

Senate Bill 97 (SB 97) was adopted August 2007 and acknowledges that climate change is a prominent environmental issue that requires analysis under CEQA. SB 97 directed the Governor's Office of Planning and Research (OPR), which is part of the State Natural Resources Agency, to prepare, develop, and transmit to CARB guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, by July 1, 2009. The Natural Resources Agency was required to certify and adopt those guidelines by January 1, 2010.

Pursuant to the requirements of SB 97 as stated above, on December 30, 2009 the Natural Resources Agency adopted amendments to the State CEQA guidelines that addresses GHG emissions. The CEQA Guidelines Amendments changed 14 sections of the CEQA Guidelines and incorporated GHG language throughout the Guidelines. However, no GHG emissions thresholds of significance were provided and no specific mitigation measures were identified. The GHG emission reduction amendments went into effect on March 18, 2010 and are summarized below:

- Climate Action Plans and other greenhouse gas reduction plans can be used to determine whether a project has significant impacts, based upon its compliance with the plan.
- Local governments are encouraged to quantify the GHG emissions of proposed projects, noting that they have the freedom to select the models and methodologies that best meet their needs and circumstances. The section also recommends consideration of several qualitative factors that may be used in the determination of significance, such as the extent to which the given project complies with state, regional, or local GHG reduction plans and policies. OPR does not set or dictate specific thresholds of significance. Consistent with existing CEQA Guidelines, OPR encourages local governments to develop and publish their own thresholds of significance for GHG impacts assessment.
- When creating their own thresholds of significance, local governments may consider the thresholds of significance adopted or recommended by other public agencies, or recommended by experts.
- New amendments include guidelines for determining methods to mitigate the effects of GHG emissions in Appendix F of the CEQA Guidelines.
- OPR is clear to state that “to qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project; general compliance with a plan, by itself, is not mitigation.”
- OPR’s emphasizes the advantages of analyzing GHG impacts on an institutional, programmatic level. OPR therefore approves tiering of environmental analyses and highlights some benefits of such an approach.
- Environmental impact reports must specifically consider a project's energy use and energy efficiency potential.

Assembly Bill 32

In 2006, the California State Legislature adopted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires CARB, to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020 through an enforceable statewide emission cap which will be phased in starting in 2012. Emission reductions shall include carbon sequestration projects that would remove carbon from the atmosphere and utilize best management practices that are technologically feasible and cost effective.

In 2007 CARB released the calculated Year 1990 GHG emissions of 431 MMTCO₂e. The 2020 target of 431 MMTCO₂e requires the reduction of 78 MMTCO₂e, or approximately 16 percent from the State’s projected 2020 business as usual emissions of 509 MMTCO₂e (CARB, 2014). Under AB 32, CARB was required to adopt regulations by January 1, 2011 to achieve reductions in GHGs to meet the 1990 cap by 2020. Early measures CARB took to lower GHG emissions included requiring operators of the largest industrial facilities that emit 25,000 metric tons of CO₂ in a calendar year to submit verification of GHG emissions by

December 1, 2010. The CARB Board also approved nine discrete early action measures that include regulations affecting landfills, motor vehicle fuels, refrigerants in cars, port operations and other sources, all of which became enforceable on or before January 1, 2010.

Assembly Bill 1493

AB 1493 or the Pavley Bill sets tailpipe GHG emissions limits for passenger vehicles in California as well as fuel economy standards and is described in more detail above in Section 5.1 under Energy Conservation Management.

6.4 Regional – Southern California

The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Air Basin. To that end, as a regional agency, the SCAQMD works directly with SCAG, county transportation commissions, and local governments and cooperates actively with all federal and state agencies.

South Coast Air Quality Management District

SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emission sources, and enforces such measures through educational programs or fines, when necessary. SCAQMD is directly responsible for reducing emissions from stationary, mobile, and indirect sources. The SCAQMD is also responsible for GHG emissions for projects where it is the lead agency. However, for other projects in the Air Basin where it is not the lead agency, it is limited to providing resources to other lead agencies in order to assist them in determining GHG emission thresholds and GHG reduction measures. In order to assist local agencies with direction on GHG emissions, the SCAQMD organized a working group, which is described below.

SCAQMD Working Group

Since neither CARB nor the OPR has developed GHG emissions threshold, the SCAQMD formed a Working Group to develop significance thresholds related to GHG emissions. At the September 28, 2010 Working Group meeting, the SCAQMD released its most current version of the draft GHG emissions thresholds, which recommends a tiered approach that either provides a quantitative annual thresholds of 3,500 MTCO₂e for residential uses, 1,400 MTCO₂e for commercial uses, and 3,000 MTCO₂e for mixed uses. An alternative annual threshold of 3,000 MTCO₂e for all land use types is also proposed.

Southern California Association of Governments

As detailed above in Section 4.3, the current applicable RTP/SCS for the project area region is the Connect SoCal 2024 and 2025 FTIP, which have been prepared to meet the GHG emissions reduction targets set by SB 375 for the SCAG region of 19 percent reduction over the 2005 per capita emissions levels. The Connect SoCal 2024 includes new land use, transportation, and technology strategies to meet the new 19 percent GHG emission reduction target for 2035.

Although the Connect SoCal 2024 and 2025 FTIP are primarily planning documents for future transportation projects, a key component of these plans are to integrate land use planning with transportation planning that promotes higher density infill development in close proximity to existing transit service. These plans form the basis for the land use and transportation components of the 2022 AQMP, which are utilized in the preparation of air quality forecasts and in the consistency analysis included in the 2022 AQMP. The Connect SoCal 2024, 2025 FTIP, and 2022 AQMP are based on projections originating within the City and County General Plans.

6.5 Local Jurisdictions

Local jurisdictions, such as the City and County, have the authority and responsibility to reduce GHG emissions through their police power and decision-making authority. Specifically, the City and County are responsible for the assessment and mitigation of GHG emissions resulting from its land use decisions. In accordance with CEQA requirements and the CEQA review process, the City and County assess the global climate change potential of new development projects, requires mitigation of potentially significant global climate change impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation.

7.0 ATMOSPHERIC SETTING

7.1 South Coast Air Basin

The project site is located within Orange County, which is part of the South Coast Air Basin (Air Basin) that includes the non-desert portions of Riverside, San Bernardino, and Los Angeles Counties and all of Orange County. The Air Basin is located on a coastal plain with connecting broad valleys and low hills to the east. Regionally, the Air Basin is bounded by the Pacific Ocean to the southwest and high mountains to the east forming the inland perimeter.

7.2 Local Climate

Orange County is located on a coastal plain with connecting broad valleys and low hills to the east. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. Occasional periods of strong Santa Ana winds and winter storms interrupt the otherwise mild weather pattern.

Although the Air Basin has a semi-arid climate, the air near the surface is typically moist because of the presence of a shallow marine layer. Except for infrequent periods when dry air is brought into the Air Basin by offshore winds, the ocean effect is dominant. Periods of heavy fog are frequent and low stratus clouds, often referred to as “high fog” are a characteristic climate feature.

Winds are an important parameter in characterizing the air quality environment of a project site because they determine the regional pattern of air pollution transport and control the rate of dispersion near a source. Daytime winds in Orange County are usually light breezes from off the coast as air moves regionally onshore from the cool Pacific Ocean. These winds are usually the strongest in the dry summer months. Nighttime winds in Orange County are a result mainly from the drainage of cool air off of the mountains to the east and they occur more often during the winter months and are usually lighter than the daytime winds. Between the periods of dominant airflow, periods of air stagnation may occur, both in the morning and evening hours. Whether such a period of stagnation occurs is one of the critical determinants of air quality conditions on any given day.

During the winter and fall months, surface high-pressure systems north of the Air Basin combined with other meteorological conditions, can result in very strong winds, called “Santa Ana Winds”, from the northeast. These winds normally have durations of a few days before predominant meteorological conditions are reestablished. The highest wind speed typically occurs during the afternoon due to daytime thermal convection caused by surface heating. This convection brings about a downward transfer of momentum from stronger winds aloft. It is not uncommon to have sustained winds of 60 miles per hour with higher gusts during a Santa Ana Wind event.

The temperature and precipitation levels for the Santa Ana Fire Station, which is the nearest weather station to the project site with historical data is shown below in Table E. Table E shows that August is typically the warmest month and January is typically the coolest month. Rainfall in the project area varies considerably in both time and space. Almost all the annual rainfall comes from the fringes of mid-latitude storms from late November to early April, with summers being almost completely dry.

Table E – Monthly Climate Data

Month	Average Maximum Temperature (°F)	Average Minimum Temperature (°F)	Average Total Precipitation (inches)
January	68.1	43.1	2.73
February	68.9	44.9	3.05
March	70.7	46.7	2.21
April	73.1	50.0	1.05
May	75.2	54.0	0.25
June	78.6	57.4	0.06
July	83.5	60.9	0.02
August	84.7	61.6	0.06
September	83.9	59.3	0.22
October	79.4	54.5	0.49
November	74.2	47.5	1.28
December	68.8	43.6	2.28
Annual	75.8	52.0	13.69

Source: <https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca7888>

7.3 Monitored Local Air Quality

The air quality at any site is dependent on the regional air quality and local pollutant sources. Regional air quality is determined by the release of pollutants throughout the Air Basin. Improvements in cleaner technology and strict regulations have reduced ozone levels since its peak in the mid-twentieth century. However, ozone levels have remained unacceptably high over the past decade despite significant reductions. This trend is due to the changes in climate and other weather conditions such as the increase in hot, stagnant days that can lead to the formation of ozone that we have experienced in recent years. (SCAQMD, 2022).

SCAQMD has divided the Air Basin into 38 air-monitoring areas with a designated ambient air monitoring station representative of each area. The project site is located in air monitoring area 17, which covers the central portion of Orange County. The nearest air monitoring station to the project site is the Anaheim-Pampas Lane Monitoring Station (Anaheim Station), which is located approximately 8.4 miles northwest of the project site at 1630 Pampas Lane, Anaheim. However, it should be noted that due to the air monitoring station's distance from the project site, recorded air pollution levels at the Anaheim Station reflect with varying degrees of accuracy, local air quality conditions at the project site. The monitoring data presented in Table F shows that ozone and particulate matter (PM10 and PM2.5) are the air pollutants of primary concern in the project area, which are detailed below:

Ozone

During the last three years, the State 1-hour concentration standard for ozone has been exceeded between zero and three days each year at the Anaheim Station. Both the State and federal 8-hour ozone standards have been exceeded between one and three days each year over the last three years at the Anaheim Station. Ozone is a secondary pollutant as it is not directly emitted. Ozone is the result of chemical reactions between other pollutants, most importantly hydrocarbons and NO₂, which occur only in the presence of bright sunlight. Pollutants emitted from upwind cities react during transport downwind to produce the oxidant concentrations experienced in the area. Many areas of Southern California

contribute to the ozone levels experienced at this monitoring station, with the more significant areas being those directly upwind.

Table F – Local Area Air Quality Monitoring Summary

Pollutant (Standard)	Year ¹		
	2022	2023	2024
Ozone:			
Maximum 1-Hour Concentration (ppm)	0.102	0.089	0.104
Days > CAAQS (0.09 ppm)	1	0	3
Maximum 8-Hour Concentration (ppm)	0.076	0.076	0.079
Days > NAAQS (0.070 ppm)	1	2	3
Days > CAAQS (0.070 ppm)	1	2	3
Nitrogen Dioxide:			
Maximum 1-Hour Concentration (ppb)	53.0	50.9	53.1
Days > NAAQS (100 ppb)	0	0	0
Days > CAAQS (180 ppb)	0	0	0
Inhalable Particulates (PM10):			
Maximum 24-Hour National Measurement (ug/m ³)	67.0	97.8	118.9
Days > NAAQS (150 ug/m ³)	0	0	0
Days > CAAQS (50 ug/m ³)	1	1	4
Annual Arithmetic Mean (AAM) (ug/m ³)	20.9	20.6	27.7
Annual > NAAQS (50 ug/m ³)	No	No	No
Annual > CAAQS (20 ug/m ³)	Yes	Yes	Yes
Ultra-Fine Particulates (PM2.5):			
Maximum 24-Hour National Measurement (ug/m ³)	33.1	45.6	49.7
Days > NAAQS (35 ug/m ³)	0	1	5
Annual Arithmetic Mean (AAM) (ug/m ³)	9.8	9.1	10.5
Annual > NAAQS and CAAQS (12 ug/m ³)	No	No	No

Notes: Exceedances are listed in **bold**. CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard; ppm = parts per million; ppb = parts per billion; ND = no data available.

¹ Data obtained from the Anaheim Station.

Source: <http://www.arb.ca.gov/adam/>

Nitrogen Dioxide

The Anaheim Station did not record an exceedance of either the Federal or State 1-hour NO₂ standards for the last three years.

Particulate Matter

The State 24-hour concentration standard for PM10 has been exceeded between one and four days each year over the past three years at the Anaheim Station. Over the past three years the Federal 24-hour standard for PM10 has not been exceeded at the Anaheim Station. The annual PM10 concentration at

the Anaheim Station has exceeded the State standard for the past three years and has not exceeded the Federal standard for the past three years.

The 24-hour concentration standard for PM_{2.5} has been exceeded between zero and five days each year over the past three years at the Anaheim Station. The annual PM_{2.5} concentrations at the Anaheim Station has not exceeded either the State or Federal standard for the past three years. Particulate levels in the area are due to natural sources, grading operations, and motor vehicles.

According to the EPA, some people are much more sensitive than others to breathing fine particles (PM₁₀ and PM_{2.5}). People with influenza, chronic respiratory and cardiovascular diseases, and the elderly may suffer worsening illness and premature death due to breathing these fine particles. People with bronchitis can expect aggravated symptoms from breathing in fine particles. Children may experience decline in lung function due to breathing in PM₁₀ and PM_{2.5}. Other groups considered sensitive are smokers and people who cannot breathe well through their noses. Exercising athletes are also considered sensitive, because many breathe through their mouths during exercise.

7.4 Toxic Air Contaminant Levels

In order to determine the Air Basin-wide risks associated with major airborne carcinogens, the SCAQMD conducted the Multiple Air Toxics Exposure Study (MATES) studies. According to the MATES V study (SCAQMD, 2021), the project site has an estimated cancer risk of 465 per million persons chance of cancer. In comparison, the average cancer risk for the Air Basin is 455 per million persons. The MATES V study monitored air toxins between May 1, 2018 to April 30, 2019, found that cancer risk from air toxics has declined significantly in the Air Basin with a 40 percent decrease in cancer risk since the monitoring for the MATES IV study that occurred between July 1, 2012 and June 30, 2013 and an 84 percent decrease in cancer risk since the monitoring for the MATES II study that occurred between April 1, 1998 and March 31, 1999.

The MATES V study also analyzed impacts specific to the communities experiencing environmental injustices (EJ communities) that were evaluated using the Senate Bill 535 definition of disadvantaged communities, which found that between MATES IV and MATES V, the cancer risk from air toxics decreased by 57 percent in EJ communities overall, compared to a 53 percent reduction in non-EJ communities.

In order to provide a perspective of risk, it is often estimated that the incidence in cancer over a lifetime for the U.S. population ranges between 1 in 3 to 4 and 1 in 3, or a risk of about 300,000 per million persons. The MATES-III study referenced a Harvard Report on Cancer Prevention, which estimated that of cancers associated with known risk factors, about 30 percent were related to tobacco, about 30 percent were related to diet and obesity, and about 2 percent were associated with environmental pollution related exposures that includes hazardous air pollutants.

8.0 MODELING PARAMETERS AND ASSUMPTIONS

8.1 CalEEMod Model Input Parameters

The criteria air pollution and GHG emissions impacts created by the proposed project have been analyzed through use of the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.30 CalEEMod is a computer model published by the California Air Pollution Control Officers Association (CAPCOA) for estimating air pollutant and GHG emissions. The CalEEMod program uses the EMFAC2021 computer program to calculate the emission rates specific for Orange County for employee, vendor and haul truck vehicle trips and the OFFROAD2011 computer program to calculate emission rates for heavy equipment operations. EMFAC2021 and OFFROAD2011 are computer programs generated by CARB that calculates composite emission rates for vehicles. Emission rates are reported by the program in grams per trip and grams per mile or grams per running hour.

The project characteristics in the CalEEMod model were set to a project location of Orange County, utility companies of Southern California Edison and Southern California Gas (with 2027 forecast factors) and a project opening year of 2027.

Land Use Parameters

The proposed project would consist of development of a new 45,706 square foot Fleet Services Building that will include vehicle maintenance bays, administrative staff offices, technician workspaces, and storage spaces. In addition, the project will include a future 20,000 square foot Facilities Operations Building, a 10,000 square foot solar panel canopy, surface parking spaces, extended access road, and a disposal lot. The proposed project's land use parameters that were entered into the CalEEMod model are shown in Table G.

Table G – CalEEMod Land Use Parameters

Proposed Land Use	Land Use Subtype in CalEEMod	Land Use Size ¹	Lot Acreage ²	Building ³ (sq ft)	Landscaped Area ⁴ (sq ft)
Fleet Services Building	Automobile Care Center	45,706 TSF	1.05	45,706	4,596
Facilities Operations Building	Government Office Building	20.0 TSF	0.46	20,000	1,999
Solar Panel Canopy	Unenclosed Parking Structure	10.0 TSF	0.23	10,000	998
Onsite Roads, Disposal Lot and Parking Areas	Other Asphalt Surfaces	2.85 AC	2.85	--	12,428

Notes:

¹ TSF = Thousand Square Feet; AC = Acre.

² Lot acreage calculated based on a project site of 4.59 acres.

³ Building square feet represent area where architectural coatings will be applied

⁴ Landscaped area based on 10 percent of disturbed area landscaped.

Construction Parameters

Construction of the proposed project is anticipated to start July, 2026 and would be completed by December 2027. Since the CalEEMod default construction schedule for the project is approximately 13 months, the CalEEMod default construction schedule was extended by a factor of 1.4 times, to match the schedule provided by the applicant. The construction-related GHG emissions were based on a 30-year amortization rate as recommended in the SCAQMD GHG Working Group meeting on November 19, 2009.

The phases of construction activities that have been analyzed are detailed below and include: 1) Site Preparation, 2) Grading, 3) Building construction, 4) Paving, and 5) Application of architectural coatings.

CalEEMod provides the selection of reduction measures to account for project conditions that would result in less emissions than a project without these conditions. This includes the required to adherence to SCAQMD Rule 403, which requires that the Best Available Control Measures be utilized to reduce fugitive dust emissions and was modeled in CalEEMod by selection of water demolished area two times per day, water all exposed areas three times per day, water unpaved roads twice daily, reduce vehicle speeds on dirt roads and sweep paved roads once per month.

Site Preparation

The site preparation phase would consist of removing any vegetation, tree stumps, and stones onsite prior to grading. The site preparation phase is anticipated to start July 2026 and was modeled as occurring over seven workdays. The site preparation activities would generate an average of 17.5 worker trips per day. In order to account for water truck emissions, three onsite truck trips per day with a quarter-mile length was added to the site preparation phase. The onsite equipment would consist of three rubber-tired dozers, and four of either tractors, loaders, or backhoes.

Grading

The grading phase was modeled as starting after completion of the site preparation phase and was modeled as occurring over 11 workdays. During the grading phase it is anticipated that the site would be balanced with no import or export, however in order to provide a conservative analysis, the grading phase was modeled with 500 cubic yards of material imported to the project site and 500 cubic yards of material exported from the project site. The movement of material to and from the project site would generate an average of 11.4 haul truck trips per day over the duration of the grading phase. The onsite equipment would consist of one excavator, one grader, one rubber-tired dozer, and three of either tractors, loaders, or backhoes. The grading activities would generate an average of 15 automobile trips per day for the workers. In order to account for water truck emissions, three onsite truck trips per day with a quarter-mile length was added to the site preparation phase.

Building Construction

The building construction would occur after the completion of the grading phase and was modeled as occurring over 322 workdays (15 months). The building construction phase would generate an average of 25.2 worker trips and 12.4 vendor trips per day. The onsite equipment would consist of the simultaneous operation of one crane, three forklifts, one generator, one welder, and three of either tractors, loaders, or backhoes, which is based on the CalEEMod default equipment mix.

Paving

The paving phase would consist of paving the onsite roads, disposal lot, and parking areas. The paving phase was modeled as occurring after completion of the building construction phase and occurring over 25 workdays. The paving phase would generate an average of 20 worker trips per day. The onsite equipment would consist of the simultaneous operation of two cement and mortar mixers, one paver, two paving equipment, two rollers, and one of either a tractor, loader, or backhoe, which is based on the CalEEMod default equipment.

Architectural Coating

The application of architectural coatings was modeled as occurring after completion of the paving phase and occurring over 25 workdays. The architectural coating phase was modeled based on covering 99,009 square feet of nonresidential interior area, 32,903 square feet of nonresidential exterior area, and 8,049 square feet of parking and road area. The architectural coating phase would generate an average of 5.05 worker trips per day. The onsite equipment would consist of one air compressor, which is based on the CalEEMod default equipment mix.

Operational Emissions Modeling

The operations-related criteria air pollutant emissions and GHG emissions created by the proposed project have been analyzed through use of the CalEEMod model. The proposed project was analyzed in the CalEEMod model based on the land use parameters provided above and the parameters entered for each operational source is described below.

Mobile Sources

Mobile sources include emissions the additional vehicle miles generated from operation of the proposed project. According to OCPW staff, the new fleet services facility will generate approximately 150 daily vehicle trips (in and out) or a total of 300 one-way daily trips that include both vehicles to be serviced and loaner vehicles. In addition, approximately 50 employees would work at the proposed facility. Based on each employee driving from home to work and back (2 trips) and from work to lunch and back (2 trips), the 50 employees would generate up to 200 daily trips during each workday. Therefore, it is anticipated that operation of the proposed project would generate an average of 500 daily trips, Monday through Friday, which was entered into the CalEEMod model.

Area Sources

Area sources include emissions from consumer products, landscape equipment, and architectural coatings. The area source emissions were based on the on-going use of the proposed project in the CalEEMod model. No changes were made to the default area source parameters in the CalEEMod model.

Energy Usage

Energy usage includes emissions from electricity and natural gas used onsite. The energy usage was based on the ongoing use of the proposed project in the CalEEMod Model. It should be noted that the proposed project would include a 10,000 square foot solar canopy, however since the specifications of the solar canopy are not yet available, no solar PV system credit was accounted for in CalEEMod. No changes were made to the default energy usage parameters in the CalEEMod model.

Solid Waste

Waste includes the GHG emissions associated with the processing of waste from the proposed project as well as the GHG emissions from the waste once it is interred into a landfill. The analysis was based on the default CalEEMod waste generation rate of 194 tons of solid waste per year from the proposed project. No changes were made to the default solid waste parameters or mitigation measures in the CalEEMod model.

Water and Wastewater

Water includes the water used for the interior of the buildings as well as for landscaping and is based on the GHG emissions associated with the energy used to transport and filter the water. The analysis was based on the default CalEEMod water usage rate of 8,273,265 gallons per year of indoor water use and 259,130 gallons per year of outdoor water use. No changes were made to the default water and wastewater parameters in the CalEEMod model.

Refrigeration

Refrigeration is limited to the GHG analysis and is based on the leak rates of refrigerants utilized in air conditioner units and household refrigerators. Since, the proposed Fleet Services Building was analyzed as an Automobile Care Center, which is the closest available but not an exact match to the proposed land use, the Supermarket Refrigeration and Condensing Units was removed from the Automobile Care Center land use in CalEEMod. No other changes were made to the default refrigeration parameters in the CalEEMod model.

8.2 Energy Use Calculations

The proposed project is anticipated to consume energy during both construction and operation of the proposed project and the parameters utilized to calculate energy use from construction and operation of the proposed project are detailed separately below.

Construction-Related Energy Use

Construction of the proposed project is anticipated to use energy in the forms of petroleum fuel for both off-road equipment as well as from the transport of workers and materials to and from the project site and the calculations for each source are described below.

Off-Road Construction Equipment

The off-road construction equipment fuel usage was calculated through use of the CalEEMod model's default off-road equipment assumptions detailed above in Section 8.1. For each piece of off-road equipment, the fuel usage was calculated through use of the *2017 Off-road Diesel Emission Factors* spreadsheet, prepared by CARB (<https://ww3.arb.ca.gov/msei/ordiesel.htm>). The Spreadsheet provides the following formula to calculate fuel usage from off-road equipment:

$$\text{Fuel Used} = \text{Load Factor} \times \text{Horsepower} \times \text{Total Operational Hours} \times \text{BSFC} / \text{Unit Conversion}$$

Where:

Load Factor - Obtained from CalEEMod default values

Horsepower – Obtained from CalEEMod default values

Total Operational Hours – Calculated by multiplying CalEEMod default daily hours by CalEEMod default number of working days for each phase of construction

BSFC – Brake Specific Fuel Consumption (pounds per horsepower-hour) – If less than 100 Horsepower = 0.408, if greater than 100 Horsepower = 0.367

Unit Conversion – Converts pounds to gallons = 7.109

Table H shows the off-road construction equipment fuel calculations based on the above formula. Table H shows that the off-road equipment utilized during construction of the proposed project would consume 41,292 gallons of diesel fuel.

Table H – Off-Road Equipment and Fuel Consumption from Construction of the Proposed Project

Equipment Type	Equipment Quantity	Horse-power	Load Factor	Operating Hours per Day	Total Operational Hours ¹	Fuel Used (gallons)
Site Preparation						
Rubber Tired Dozers	3	367	0.40	8	168	1,273
Tractors/Loaders/Backhoes	4	84	0.37	8	224	400
Grading						
Excavator	1	36	0.38	8	90	70
Grader	1	148	0.41	8	90	281
Rubber Tired Dozer	1	367	0.40	8	90	679
Tractors/Loaders/Backhoes	3	84	0.37	8	269	479
Building Construction						
Crane	1	367	0.29	7	2,254	12,384
Forklifts	3	82	0.20	8	7,728	7,274
Generator Set	1	14	0.74	8	2,576	1,532
Tractors/Loaders/Backhoes	3	84	0.37	7	6,762	12,062
Welder	1	46	0.45	8	2,576	3,060
Paving						
Cement and Mortar Mixers	2	10	0.56	6	302	97
Paver	1	81	0.42	8	202	394
Paving Equipment	2	89	0.36	6	302	556
Rollers	2	36	0.38	6	302	237
Tractors/Loaders/Backhoe	1	84	0.37	8	202	360
Architectural Coating						
Air Compressor	1	37	0.48	6	151	154
Total Off-Road Equipment Diesel Fuel Used during Construction (gallons)						41,292

Notes:

¹ Based on: 7 days for Site Preparation; 11 days for Grading; 322 days for Building Construction; 25 days for Paving; and 25 days for Architectural Coating.

Source: CalEEMod Version 2022.1 (see Appendix A); CARB, 2017.

On-Road Construction-Related Vehicle Trips

The on-road construction-related vehicle trips fuel usage was calculated through use of the construction vehicle trip assumptions from the CalEEMod model run as detailed above in Section 8.1. The calculated total construction miles were then divided by the fleet average for South Coast Air Basin portion of Orange County miles per gallon rates for the year 2026 calculated through use of the EMFAC2025 model and the EMFAC2025 model printouts are shown in Appendix B. The worker trips were based on the combined fleet average miles per gallon rates for gasoline powered automobiles, SUVs and pickup trucks and the vendor and haul truck trips were based on the combined T6 and T7 diesel trucks fleet average miles per gallon rate. Table I shows the on-road construction vehicle trips modeled in CalEEMod and the fuel usage calculations.

Table I – On-Road Vehicle Trips and Fuel Consumption from Construction of Proposed Project

Vehicle Trip Types / Fuel Type	Daily Trips	Trip Length (miles)	Total Miles per Day	Total Miles per Phase¹	Fleet Average Miles per Gallon²	Fuel Used (gallons)
Site Preparation						
Worker (Gasoline)	17.5	18.5	324	2,266	22.8	99
Water Trucks (Diesel)	3	0.25	0.75	5	7.7	0.7
Grading						
Worker (Gasoline)	15	18.5	278	3,108	22.8	136
Haul (Diesel)	11.4	20	228	2,554	7.7	331
Water Trucks (Diesel)	3	0.25	0.75	8	7.7	1.1
Building Construction						
Worker (Gasoline)	25.2	18.5	466	150,116	22.8	6,586
Vendor (Diesel)	12.4	10.2	126	40,727	7.7	5,282
Paving						
Worker (Gasoline)	20	18.5	370	9,324	22.8	409
Architectural Coating						
Worker (Gasoline)	5.05	18.5	93	2,354	22.8	103
Total Gasoline Fuel Used from On-Road Construction Vehicles (gallons)						7,334
Total Diesel Fuel Used from On-Road Construction Vehicles (gallons)						5,615

Notes:

¹ Based on: 7 days for Site Preparation; 11 days for Grading; 322 days for Building Construction; 25 days for Paving; and 25 days for Architectural Coating.

² From EMFAC 2025 model (see Appendix B).

Source: CalEEMod Version 2022.1; CARB, 2018.

Table I shows that the on-road construction-related vehicle trips would consume 7,334 gallons of gasoline and 5,615 gallons of diesel fuel. As detailed above, Table H shows that the off-road construction equipment would consume 41,292 gallons of diesel fuel. This would result in the total consumption of 7,334 gallons of gasoline and 46,907 gallons of diesel fuel from construction of the proposed.

Operations-Related Energy Use

The operation of the proposed project is anticipated to use energy in the forms of petroleum fuel, electricity, and natural gas, and the calculations for each source are described below.

Operational Petroleum Fuel

The on-road operations-related vehicle trips fuel usage was calculated through use of the total annual vehicle miles traveled assumptions from the CalEEMod model run as detailed above in Section 8.1, which found that operation of the proposed project would generate 564,751 vehicle miles traveled per year. The calculated total operational miles were then divided by 22.8 miles per gallon, which was calculated through use of the EMFAC2025 model and based on the Orange County miles per gallon rates for the year 2026. The EMFAC2025 model printouts are shown in Appendix B. Based on the above calculation methodology, operational vehicle trips generated from the proposed project would consume 24,777 gallons of gasoline per year.

Operational Electricity Use

The operations-related electricity usage was calculated in the CalEEMod model run that is detailed above in Section 8.1 that found the operation of the proposed project would consume 821,132 kilowatt hours (kWh) per year with implementation of Title 24 part 6 requirements that require the implementation of building energy efficiency standards that include the use of LED lighting. It should be noted that the proposed project would include a 10,000 square foot solar canopy, however since the specifications of the solar canopy are not yet available, no solar PV system credit was accounted for in the electricity use calculations.

Operational Natural Gas Use

The operations-related natural gas usage was calculated in the CalEEMod model run that is detailed above in Section 8.1 that found the proposed project will use 2,463,235 kilo British Thermal Units (kBtu) per year, which is equivalent to 24,638 Therms per year of natural gas.

9.0 THRESHOLDS OF SIGNIFICANCE

9.1 Regional Air Quality

Many air quality impacts that derive from dispersed mobile sources, which are the dominant pollution generators in the Air Basin, often occurs hours later and miles away after photochemical processes have converted primary exhaust pollutants into secondary contaminants such as ozone. The incremental regional air quality impact of an individual project is generally very small and difficult to measure. Therefore, SCAQMD has developed significance thresholds based on the volume of pollution emitted rather than on actual ambient air quality because the direct air quality impact of a project is not quantifiable on a regional scale. The SCAQMD CEQA Handbook states that any project in the Air Basin with daily emissions that exceed any of the identified significance thresholds should be considered as having an individually and cumulatively significant air quality impact. For the purposes to this air quality impact analysis, a regional air quality impact would be considered significant if emissions exceed the SCAQMD significance thresholds identified in Table J.

Table J – SCAQMD Regional Criteria Pollutant Emission Thresholds of Significance

	Pollutant Emissions (pounds/day)						
	VOC	NOx	CO	SOx	PM10	PM2.5	Lead
Construction	75	100	550	150	150	55	3
Operation	55	55	550	150	150	55	3

Source: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>

9.2 Local Air Quality

Project-related construction air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. In order to assess local air quality impacts the SCAQMD has developed Localized Significant Thresholds (LSTs) to assess the project-related air emissions in the project vicinity. SCAQMD has also provided *Final Localized Significance Threshold Methodology* (LST Methodology), July 2008, which details the methodology to analyze local air emission impacts. The LST Methodology found that the primary emissions of concern are NO₂, CO, PM10, and PM2.5.

The LST Methodology provides Look-Up Tables with different thresholds based on the location and size of the project site and distance to the nearest sensitive receptors. As detailed above in Section 7.3, the project site is located in Monitoring Area 17, Central Orange County. The Look-Up Tables include site acreage sizes of 1-acre, 2-acres and 5-acres. Since the area disturbed as part of the project is approximately 4.59 acres, the 2-acre and 5-acre thresholds were interpolated to calculate the thresholds for a 4.59 acre project site.

The nearest sensitive receptor to the project site is the John F. Kennedy Elementary School that is adjacent to the north side of the project site. According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds. Table K below shows the LSTs for NO_x, CO, PM10 and PM2.5 for both construction and operational activities.

Table K – SCAQMD Local Air Quality Thresholds of Significance

Activity	Allowable Emissions (pounds/day) ¹			
	Nox	CO	PM10	PM2.5
Construction	174	1,179	12	7
Operation	174	1,179	3	2

Notes:

¹ The nearest sensitive receptor is the John F. Kennedy Elementary School that is adjacent to the north side of the project site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25-meter threshold.

Source: Calculated from SCAQMD's Mass Rate Look-up Tables for 2 and 5 acres interpolated to 4.59 acres in Air Monitoring Area 17, Central Orange County.

9.3 Toxic Air Contaminants

According to the SCAQMD CEQA Handbook, any project that has the potential to expose the public to toxic air contaminants in excess of the following thresholds would be considered to have a significant air quality impact:

- If the Maximum Incremental Cancer Risk is 10 in one million or greater; or
- Toxic air contaminants from the proposed project would result in a Hazard Index increase of 1 or greater.

In order to determine if the proposed project may have a significant impact related to TACs, the *Health Risk Assessment Guidance for analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, (Diesel Analysis) prepared by SCAQMD, August 2003, recommends that if the proposed project is anticipated to create TACs through stationary sources or regular operations of diesel trucks on the project site, then the proximity of the nearest receptors to the source of the TAC and the toxicity of the HAP should be analyzed through a comprehensive facility-wide health risk assessment (HRA).

9.4 Odor Impacts

The SCAQMD CEQA Handbook states that an odor impact would occur if the proposed project creates an odor nuisance pursuant to SCAQMD Rule 402, which states:

“A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.”

If the proposed project results in a violation of Rule 402 with regards to odor impacts, then the proposed project would create a significant odor impact.

9.5 Energy Conservation

The 2022 CEQA California Environmental Quality Act Statutes & Guidelines (2022 CEQA Guidelines) include an Energy Section that analyzes the proposed project's energy consumption in order to avoid or reduce

inefficient, wasteful or unnecessary consumption of energy. Appendix F of the 2022 CEQA Statute and Guidelines, states the following:

The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:

- (1) Decreasing overall per capita energy consumption,
- (2) Decreasing reliance on fossil fuels such as coal, natural gas and oil, and
- (3) Increasing reliance on renewable energy sources.

Since the Energy Section was recently added, no state or local agencies have adopted specific criteria or thresholds to be utilized in an energy impact analysis. However, Appendix F, Subsection II.C of the 2022 CEQA Guidelines provides the following criteria for determining significance.

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project life cycle including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
2. The effects of the project on local and regional energy supplies and on requirement for additional capacity.
3. The effects of the project on peak and base period demands for electricity and other forms of energy.
4. The degree to which the project complies with existing energy standards.
5. The effects of the project on energy resources.
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

If the proposed project creates inefficient, wasteful or unnecessary consumption of energy during construction or operation activities or conflicts with a state or local plan for renewable energy or energy efficiency, then the proposed project would create a significant energy impact.

9.6 Greenhouse Gas Emissions

The City of Santa Ana has adopted a Climate Action Plan (Santa Ana CAP) that has been prepared to assist the City in conforming to the GHG emissions reductions as mandated under AB 32. The Santa Ana CAP provides community-wide GHG emissions reduction goals of 15 percent below the baseline year 2008 by 2020 and 30 percent below the baseline year 2008 by 2035. A critical aspect of having a CAP that fits the criteria within State CEQA Guidelines Section 15183.5 is to have reduction targets that align with statewide goals. The Santa Ana CAP's 2020 reduction target parallels the state's commitment to reducing GHG emissions under AB 32. However, it proceeds even farther by identifying targets that are specific to the City's geographic location as well as activity types and their associated sources. Therefore, because the Santa Ana CAP's 2020 target aligns with the statewide goal for 2020, the Santa Ana CAP is consistent with AB 32. As such, for up to 2020, the Santa Ana CAP was a qualifying plan under State CEQA Guidelines Section 15183.5.

Although the Santa Ana CAP calculated emissions and quantified reductions to achieve the Santa Ana CAP's 2035 emissions target, the Santa Ana CAP does not achieve the Statewide reduction goals. Specifically, the statewide target in 2030 (as codified in SB 32) is 40 percent below 1990 levels and the 2050 target (not yet codified) is 80 percent below 1990 levels. The Santa Ana CAP's 2035 target of 1,371,602 MTCO₂e is only 18 percent below the 2020 target of 1,665,516 MTCO₂e (i.e., 1990 levels). This

level of reduction is not enough to achieve a fair share contribution toward the statewide targets of 40 percent and 80 percent below 1990 levels by 2030 and 2050, respectively. Therefore, because the Santa Ana CAP does not align with statewide goals beyond 2020, the CAP is not consistent with the criteria within State CEQA Guidelines Section 15183.5 for the post-2020 period. It should also be noted that the County has not yet adopted a Climate Action Plan or any other GHG-related thresholds or GHG reduction plans. As such, for determination of significance, this analysis has utilized on the SCAQMD's draft threshold of 3,000 MTCO₂e per year for a quantitative threshold of significance for GHG emissions and CARB's 2022 Scoping Plan for consistency with an applicable GHG emissions reduction plan.

The GHG emissions analysis for both construction and operation of the proposed project can be found below in Sections 10.8 and 10.9.

10.0 IMPACT ANALYSIS

10.1 CEQA Thresholds of Significance

Consistent with CEQA and the State CEQA Guidelines, a significant impact related to air quality, energy, and GHG emissions would occur if the proposed project is determined to:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard;
- Expose sensitive receptors to substantial pollutant concentrations;
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people;
- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation;
- Conflict with or obstruct a state or local plan for renewable energy;
- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

10.2 Air Quality Compliance

The proposed project would not conflict with or obstruct implementation of the SCAQMD Air Quality Management Plan (AQMP). The following section discusses the proposed project's consistency with the SCAQMD AQMP.

SCAQMD Air Quality Management Plan

The California Environmental Quality Act (CEQA) requires a discussion of any inconsistencies between a proposed project and applicable General Plans and regional plans (CEQA Guidelines Section 15125). The regional plan that applies to the proposed project includes the SCAQMD AQMP. Therefore, this section discusses any potential inconsistencies of the proposed project with the AQMP.

The purpose of this discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and discuss whether the proposed project would interfere with the region's ability to comply with Federal and State air quality standards. If the decision-makers determine that the proposed project is inconsistent, the lead agency may consider project modifications or inclusion of mitigation to eliminate the inconsistency.

The SCAQMD CEQA Handbook states that "New or amended GP Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." Strict consistency with all aspects of the plan is usually not required. A proposed project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

-
- (1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
 - (2) Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Both of these criteria are evaluated in the following sections.

Criterion 1 - Increase in the Frequency or Severity of Violations?

Based on the air quality modeling analysis contained in this report, short-term regional construction air emissions would not result in significant impacts based on SCAQMD regional thresholds of significance discussed above in Section 9.1 or local thresholds of significance discussed above in Section 9.2. The ongoing operation of the proposed project would generate air pollutant emissions that are inconsequential on a regional basis and would not result in significant impacts based on SCAQMD thresholds of significance discussed above in Section 9.1. The analysis for long-term local air quality impacts showed that local pollutant concentrations would not be projected to exceed the air quality standards. Therefore, a less than significant long-term impact would occur and no mitigation would be required.

Therefore, based on the information provided above, the proposed project would be consistent with the first criterion.

Criterion 2 - Exceed Assumptions in the AQMP?

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed project with the assumptions in the 2022 AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the proposed project are based on the same forecasts as the AQMP. The 2022 AQMP was developed through use of the planning forecasts provided in the Connect SoCal and 2019 FTIP. The Connect SoCal is a major planning document for the regional transportation and land use network within Southern California. The Connect SoCal is a long-range plan that is required by federal and state requirements placed on SCAG and is updated every four years. The 2019 FTIP provides long-range planning for future transportation improvement projects that are constructed with state and/or federal funds within Southern California. Local governments are required to use these plans as the basis of their plans for the purpose of consistency with applicable regional plans under CEQA. For this project, the City of Santa Ana General Plan Land Use Map⁵ defines the assumptions that are represented in AQMP.

The project site is currently designated as Industrial (IND) in the General Plan. The proposed project consists of development of a Fleet Services Building, Facilities Operations Building, solar panel canopy, surface parking spaces, extended access road, and a disposal lot. The proposed project is an allowed use within the current land use designation. As such, the proposed project is not anticipated to exceed the AQMP assumptions for the project site and is found to be consistent with the AQMP for the second criterion.

Based on the above, the proposed project will not result in an inconsistency with the SCAQMD AQMP. Therefore, a less than significant impact will occur in relation to implementation of the AQMP.

5 Obtained from: <https://storymaps.arcgis.com/stories/f200c8e3433b41948e2340024ff8cd1d>

Level of Significance

Less than significant impact.

10.3 Cumulative Net Increase in Non-Attainment Pollution

The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard. The SCAQMD has published a report on how to address cumulative impacts from air pollution: White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (<http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf>). In this report the AQMD clearly states (Page D-3):

“...the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or Environmental Impact Report (EIR). The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is $HI > 1.0$ while the cumulative (facility- wide) is $HI > 3.0$. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts. Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.”

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD’s recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable. The following section calculates the potential air emissions associated with the construction and operations of the proposed project and compares the emissions to the SCAQMD standards.

Construction Emissions

The construction activities for the proposed project are anticipated to include the site preparation and grading of the project site, building construction of the Fleet Services Building, Facilities Operations Building, and solar panel canopy, paving of the onsite roads, disposal lot, and parking areas, and application of architectural coatings. The CalEEMod model has been utilized to calculate the construction-related emissions from the proposed project and the input parameters utilized in this analysis have been detailed in Section 8.1. The maximum daily regional construction-related criteria pollutant emissions from the proposed project are shown below in Table L.

Table L – Construction-Related Criteria Pollutant Emissions

Season and Year of Construction	Maximum Daily Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO ₂	PM10	PM2.5
Daily Summer Maximum						
2026	3.20	29.3	29.8	0.05	6.86	3.85
2027	1.11	9.85	14.4	0.03	0.78	0.42
Daily Winter Maximum						
2026	1.16	10.4	14.3	0.03	0.82	0.46
2027	26.1	9.87	14.2	0.03	0.78	0.42
Maximum Daily Construction Emissions	26.1	29.3	29.8	0.05	6.86	3.85
SCQAMD Regional Thresholds	75	100	550	150	150	55
SCAQMD Local Thresholds¹	--	174	1,179	--	12	7
Exceeds Thresholds?	No	No	No	No	No	No

Notes:

¹ The nearest offsite sensitive receptor is the John F. Kennedy Elementary School that is adjacent to the north side of the project site. According to SCAQMD methodology, all receptors closer than 25 meters are based on the 25-meter threshold. Calculated from SCAQMD's Mass Rate Look-up Tables for 4.59 acres interpolated from two and five acres in Air Monitoring Area 17, Central Orange County.

Source: CalEEMod Version 2022.1.

Table L shows that none of the analyzed criteria pollutants would exceed the regional emissions thresholds during construction of the proposed project. Table L also shows that the proposed project's regional construction-related criteria pollutant emissions that consist of both onsite and offsite emissions sources would not exceed the local thresholds, which provides for a worst-case analysis, since the local thresholds are for analyzing only the emissions created onsite. Therefore, a less than significant regional or local air quality impact would occur from construction of the proposed project.

Operational Emissions

The on-going operation of the proposed project would result in a long-term increase in air quality emissions. This increase would be due to emissions from onsite area sources and energy usage emissions created from the on-going use of the proposed project. The operations-related regional criteria air quality impacts created by the proposed project have been analyzed through use of the CalEEMod model and the input parameters utilized in this analysis have been detailed in Section 8.1. The worst-case summer or winter VOC, NOx, CO, SO₂, PM10, and PM2.5 daily emissions created from the proposed project's long-term operations have been calculated and are summarized below in Table M and the CalEEMod emissions printouts are shown in Appendix A.

Table M – Operational Criteria Pollutant Emissions

Emissions Source	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO ₂	PM10	PM2.5
Mobile Sources ¹	1.30	0.73	7.30	0.02	1.50	0.40
Area Sources ²	2.10	0.03	3.30	<0.01	0.01	<0.01
Energy Usage ³	0.04	0.66	0.56	<0.01	0.05	0.05
Total Emissions	3.44	1.42	11.16	0.02	1.56	0.45
SCQAMD Regional Thresholds	55	55	550	150	150	55
SCAQMD Local Thresholds	--	174	1,179	--	3	2
Exceeds Thresholds?	No	No	No	No	No	No

Notes:

¹ Mobile sources consist of emissions from vehicles and road dust.

² Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.

³ Energy usage consist of emissions from natural gas usage.

Source: Calculated from CalEEMod Version 2022.1.

The data provided in Table M shows that none of the analyzed criteria pollutants would exceed either the regional or local emissions thresholds during operation of the proposed project. Therefore, less than significant regional and local air quality impacts would occur from operation of the proposed project.

Friant Ranch Case

In *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (also referred to as “*Friant Ranch*”), the California Supreme Court held that when an EIR concluded that when a project would have significant impacts to air quality impacts, an EIR should “make a reasonable effort to substantively connect a project’s air quality impacts to likely health consequences.” In order to determine compliance with this Case, the Court developed a multi-part test that includes the following:

- 1) The air quality discussion shall describe the specific health risks created from each criteria pollutant, including diesel particulate matter.

This Analysis details the specific health risks created from each criteria pollutant above in Section 4.1 and specifically in Table B. In addition, the specific health risks created from diesel particulate matter is detailed above in Section 2.2 of this analysis. As such, this analysis meets the part 1 requirements of the Friant Ranch Case.

- 2) The analysis shall identify the magnitude of the health risks created from the Project. The Ruling details how to identify the magnitude of the health risks. Specifically, on page 24 of the ruling it states “The Court of Appeal identified several ways in which the EIR could have framed the analysis so as to adequately inform the public and decision makers of possible adverse health effects. The County could have, for example, identified the Project’s impact on the days of nonattainment per year.”

The Friant Ranch Case found that an EIR’s air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. As noted in the Brief of Amicus Curiae by the SCAQMD in the Friant Ranch case (<https://www.courts.ca.gov/documents/9-s219783-ac-south-coast-air-quality-mgt-dist-041315.pdf>) (Brief), SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes. The SCAQMD discusses that it may be infeasible to quantify health risks caused by projects similar to the proposed Project, due to many factors. It is necessary to have data regarding the sources and types of air toxic contaminants, location of emission points, velocity of emissions, the meteorology and topography of the area, and the location of receptors (worker and residence). The Brief states that it may not be feasible to perform a health risk assessment for airborne toxics that will be emitted by a generic industrial building that was built on “speculation” (i.e., without knowing the future tenant(s)). Even where a health risk assessment can be prepared, however, the resulting maximum health risk value is only a calculation of risk, it does not necessarily mean anyone will contract cancer as a result of the Project. The Brief also cites the author of the CARB methodology, which reported that a PM2.5 methodology is not suited for small

projects and may yield unreliable results. Similarly, SCAQMD staff does not currently know of a way to accurately quantify ozone-related health impacts caused by NOx or VOC emissions from relatively small projects, due to photochemistry and regional model limitations. The Brief concludes, with respect to the Friant Ranch EIR, that although it may have been technically possible to plug the data into a methodology, the results would not have been reliable or meaningful.

On the other hand, for extremely large regional projects (unlike the proposed project), the SCAQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 pounds per day of NOx and 89,180 pounds per day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to ozone. As shown above in Table L, project-related construction activities would generate a maximum of 26.1 pounds per day of VOC and 29.3 pounds per day of NOx and as shown above in Table M, operation of the proposed project would generate 3.44 pounds per day of VOC and 1.42 pounds per day NOx. The proposed project would not generate anywhere near these levels of 6,620 pounds per day of NOx or 89,190 pounds per day of VOC emissions. Therefore, the proposed project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level.

Notwithstanding, this analysis does evaluate the proposed project's localized impact to air quality for emissions of CO, NOx, PM10, and PM2.5 by comparing the proposed project's onsite emissions to the SCAQMD's applicable LST thresholds. As evaluated in this analysis, the proposed project would not result in emissions that exceeded the SCAQMD's LSTs. Therefore, the proposed project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NOx, PM10, and PM2.5.

Local CO Hotspot Impacts from Project-Generated Vehicular Trips

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with project CO levels to the State and Federal CO standards of 20 ppm over one hour or 9 ppm over eight hours.

At the time of the 1993 Handbook, the Air Basin was designated nonattainment under the CAAQS and NAAQS for CO. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the Air Basin and in the state have steadily declined. In 2007, the Air Basin was designated in attainment for CO under both the CAAQS and NAAQS. SCAQMD conducted a CO hot spot analysis⁶ for attainment at the busiest intersections in Los Angeles during the peak morning and afternoon periods and did not predict a violation of CO standards. Since the nearby intersections to the proposed project are much smaller with less traffic than what was analyzed by the SCAQMD, no local CO Hotspot are anticipated to be created from the proposed project and no CO Hotspot modeling was performed. Therefore, a less than significant long-term air quality impact is anticipated to local air quality with the on-going use of the proposed project.

⁶ The four intersections analyzed by the SCAQMD were: Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard. The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day with LOS E in the morning and LOS F in the evening peak hour.

Therefore, the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant.

Level of Significance

Less than significant impact.

10.4 Sensitive Receptors

The proposed project would not expose sensitive receptors to substantial pollutant concentrations. The local concentrations of criteria pollutant emissions produced in the nearby vicinity of the proposed project, which may expose sensitive receptors to substantial concentrations have been calculated above in Section 10.3 for both construction and operations, which are discussed separately below. The discussion below also includes an analysis of the potential impacts from toxic air contaminant emissions. The nearest sensitive receptor to the project site is the John F. Kennedy Elementary School that is adjacent to the north side of the project site. There are also the multi-family homes that are as near as 95 feet west of the project site.

Construction-Related Sensitive Receptor Impacts

The construction activities for the proposed project are anticipated to include the site preparation and grading of the project site, building construction of the Fleet Services Building, Facilities Operations Building, and solar panel canopy, paving of the onsite roads, disposal lot, and parking areas, and application of architectural coatings. Construction activities may expose sensitive receptors to substantial pollutant concentrations of localized criteria pollutant concentrations and from toxic air contaminant emissions created from onsite construction equipment, which are described below.

Local Criteria Pollutant Impacts from Construction

The local air quality impacts from construction of the proposed project have been analyzed above in Section 10.3 and found that the construction of the proposed project would not exceed the local NO_x, CO, PM₁₀ and PM_{2.5} thresholds of significance discussed above in Section 9.2. Therefore, construction of the proposed project would create a less than significant construction-related impact to local air quality and no mitigation would be required.

Toxic Air Contaminants Impacts from Construction

The greatest potential for toxic air contaminant emissions would be related to diesel particulate matter (DPM) emissions associated with heavy equipment operations during construction of the proposed project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of “individual cancer risk”. “Individual Cancer Risk” is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. It should be noted that the most current cancer risk assessment methodology recommends analyzing a 30-year exposure period for the nearby sensitive receptors (OEHHA, 2015).

Given the relatively limited number of heavy-duty construction equipment, the varying distances that construction equipment would operate to the nearby sensitive receptors, and the short-term construction schedule, the proposed project would not result in a long-term (i.e., 30 or 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 regulates emissions from off-road diesel

equipment in California. This regulation limits idling of equipment to no more than five minutes, requires equipment operators to label each piece of equipment and provide annual reports to CARB of their fleet's usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet, and currently no commercial operator is allowed to purchase Tier 0, Tier 1 or Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets that become more stringent each year between years 2014 and 2023. By January, 2026, 75 percent or more of all contractors' equipment fleets must be Tier 2 or higher and by January, 2029 100 percent of all equipment fleets must be Tier 2 or higher. Therefore, no significant short-term DPM impacts would occur during construction of the proposed project.

Operations-Related Sensitive Receptor Impacts

The on-going operations of the proposed project may expose sensitive receptors to substantial pollutant concentrations of local CO emission impacts from the project-generated vehicular trips and from the potential local air quality impacts from onsite operations. The following analyzes the vehicular CO emissions. Local criteria pollutant impacts from onsite operations, and toxic air contaminant impacts.

Local CO Hotspot Impacts from Project-Generated Vehicle Trips

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential impacts to sensitive receptors. The analysis provided above in Section 10.3 shows that no local CO Hotspots are anticipated to be created at any nearby intersections from the vehicle traffic generated by the proposed project. Therefore, operation of the proposed project would result in a less than significant exposure of offsite sensitive receptors to substantial pollutant concentrations.

Local Criteria Pollutant Impacts from Onsite Operations

The local air quality impacts from the operation of the proposed project would occur from onsite sources such as architectural coatings and landscaping equipment. The analysis provided above in Section 10.3 found that the operation of the proposed project would not exceed the local NOx, CO, PM10 and PM2.5 thresholds of significance discussed above in Section 9.2. Therefore, the on-going operations of the proposed project would create a less than significant operations-related impact to local air quality due to on-site emissions and no mitigation would be required.

Operations-Related Toxic Air Contaminant Impacts

The proposed project consists of development of a new fleet services facility that would generate DPM emissions from the servicing of diesel vehicles and from diesel vehicle trips to and from the project site. Particulate matter (PM) from diesel exhaust is the predominant TAC in most areas and according to *The California Almanac of Emissions and Air Quality 2013 Edition*, prepared by CARB, about 80 percent of the outdoor TAC cancer risk is from diesel exhaust. Some chemicals in diesel exhaust, such as benzene and formaldehyde have been listed as carcinogens by State Proposition 65 and the Federal Hazardous Air Pollutants program.

According to the *2020 CEQA California Environmental Quality Act Statute & Guidelines* (State CEQA Guidelines), Appendix M provides the performance standards for infill projects eligible for streamlined review and states the following:

“Significant sources of air pollution” include airports, marine ports, rail yards and distribution centers that receive more than 100 heavy-duty truck visits per day, as well as stationary sources that are designated major by the Clean Air Act.

In addition, the *Health Risk Assessments for Proposed Land Use Project*, prepared by CAPCOA, July 2009, details that a potentially significant impact may occur if sensitive receptors are placed within 1,000 feet of distribution centers that generate more than 100 trucks deliveries per day. As detailed above in Section 8.1, the new fleet services facility will generate approximately 150 daily vehicle trips (in and out). According to OCPW staff, less than five percent of the fleet is diesel-powered or approximately 7.5 daily trips to the project site would be from diesel-powered vehicles, which is well below both the State CEQA Guidelines and CAPCOA guidelines provided above for when a potentially significant health risk impact would occur from diesel vehicle emissions. Based on the above reasons it can be reasonably concluded that the DPM emissions created from the on-going operation of the proposed project would result in a less than significant TAC impact to the nearby sensitive receptors and no mitigation would be required.

Level of Significance

Less than significant impact.

10.5 Odor Emissions

The proposed project would not create objectionable odors affecting a substantial number of people. Individual responses to odors are highly variable and can result in a variety of effects. Generally, the impact of an odor results from a variety of factors such as frequency, duration, offensiveness, location, and sensory perception. The frequency is a measure of how often an individual is exposed to an odor in the ambient environment. The intensity refers to an individual's or group's perception of the odor strength or concentration. The duration of an odor refers to the elapsed time over which an odor is experienced. The offensiveness of the odor is the subjective rating of the pleasantness or unpleasantness of an odor. The location accounts for the type of area in which a potentially affected person lives, works, or visits; the type of activity in which he or she is engaged; and the sensitivity of the impacted receptor.

Sensory perception has four major components: detectability, intensity, character, and hedonic tone. The detection (or threshold) of an odor is based on a panel of responses to the odor. There are two types of thresholds: the odor detection threshold and the recognition threshold. The detection threshold is the lowest concentration of an odor that will elicit a response in a percentage of the people that live and work in the immediate vicinity of the project site and is typically presented as the mean (or 50 percent of the population). The recognition threshold is the minimum concentration that is recognized as having a characteristic odor quality, this is typically represented by recognition by 50 percent of the population. The intensity refers to the perceived strength of the odor. The odor character is what the substance smells like. The hedonic tone is a judgment of the pleasantness or unpleasantness of the odor. The hedonic tone varies in subjective experience, frequency, odor character, odor intensity, and duration. Potential odor impacts have been analyzed separately for construction and operations below.

Construction-Related Odor Impacts

Potential sources that may emit odors during construction activities include the application of coatings such as asphalt pavement, paints and solvents and from emissions from diesel equipment. Standard construction requirements that limit the time of day when construction may occur as well as SCAQMD Rule 1108 that limits VOC content in asphalt and Rule 1113 that limits the VOC content in paints and solvents would minimize odor impacts from construction. As such, the objectionable odors that may be

produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the project site's boundaries. Through compliance with the applicable regulations that reduce odors and due to the transitory nature of construction odors, a less than significant odor impact would occur and no mitigation would be required.

Operations-Related Odor Impacts

The proposed project would consist of development of a Fleet Services Building, Facilities Operations Building, solar panel canopy, surface parking spaces, extended access road, and a disposal lot. Potential sources that may emit odors during the on-going operations of the proposed project would primarily occur from the trash storage areas. Pursuant to City regulations, permanent trash enclosures that protect trash bins from rain as well as limit air circulation would be required for the trash storage areas. Due to the distance of the nearest receptors from the project site and through compliance with SCAQMD's Rule 402, City trash storage regulations, a less than significant impact related to odors would occur during the on-going operations of the proposed project.

Level of Significance

Less than significant impact.

10.6 Energy Consumption

The proposed project would impact energy resources during construction and operation. Energy resources that would be potentially impacted include electricity, natural gas, and petroleum based fuel supplies and distribution systems. This analysis includes a discussion of the potential energy impacts of the proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. A general definition of each of these energy resources are provided below.

Electricity, a consumptive utility, is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, including substations and transformers that lower transmission line power (voltage) to a level appropriate for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands. In 2024, Orange County consumed 19,225 Gigawatt-hours per year of electricity⁷.

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs, mainly located outside the State, and delivered through high-pressure transmission pipelines. The natural gas transportation system is a nationwide network and, therefore, resource availability is typically not an issue. Natural gas satisfies almost one-third of the State's total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation

7 Obtained from: <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0>

fuel. Natural gas is measured in terms of cubic feet. In 2024, Orange County consumed 561.7 million Therms of natural gas⁸.

Petroleum-based fuels currently account for a majority of the California's transportation energy sources and primarily consist of diesel and gasoline types of fuels. However, the state has been working on developing strategies to reduce petroleum use. Over the last decade California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHG emissions from the transportation sector, and reduce vehicle miles traveled (VMT). Accordingly, petroleum-based fuel consumption in California has declined. In 2023, 1,150 million gallons of gasoline and 62 million gallons of diesel was sold in Orange County⁹.

The following section calculates the potential energy consumption associated with the construction and operations of the proposed project and provides a determination if any energy utilized by the proposed project is wasteful, inefficient, or unnecessary consumption of energy resources.

Construction Energy

The proposed project would consume energy resources during construction in three (3) general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, as well as delivery and haul truck trips (e.g. hauling of demolition material to off-site reuse and disposal facilities);
2. Electricity associated with the conveyance of water that would be used during Project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power; and,
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction-Related Electricity

During construction the proposed project would consume electricity to construct the proposed structures. Electricity would be supplied to the project site by SCE and would be obtained from the existing electrical lines in the vicinity of the project site. The use of electricity from existing power lines rather than temporary diesel or gasoline powered generators would minimize impacts on fuel consumption. Electricity consumed during project construction would vary throughout the construction period based on the construction activities being performed. Various construction activities include electricity associated with the conveyance of water that would be used during project construction for dust control (supply and conveyance) and electricity to power any necessary lighting during construction, electronic equipment, or other construction activities necessitating electrical power. Such electricity demand would be temporary, nominal, and would cease upon the completion of construction. Overall, construction activities associated with the proposed project would require limited electricity consumption that would not be expected to have an adverse impact on available electricity supplies and infrastructure. Therefore, the use of electricity during project construction would not be wasteful, inefficient, or unnecessary.

8 Obtained from: <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-1>

9 Obtained from: <https://www.energy.ca.gov/media/3874>

Since there are currently power lines in the vicinity of the project site, it is anticipated that only nominal improvements would be required to SCE distribution lines and equipment with development of the proposed project. Compliance with City's guidelines and requirements would ensure that the proposed project fulfills its responsibilities relative to infrastructure installation, coordinates any electrical infrastructure removals or relocations, and limits any impacts associated with construction of the project. Construction of the project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

Construction-Related Petroleum Fuel Use

Petroleum-based fuel usage represents the highest amount of transportation energy potentially consumed during construction, which would be utilized by both off-road equipment operating on the project site and on-road automobiles transporting workers to and from the project site and on-road trucks transporting equipment and supplies to the project site.

The off-road construction equipment fuel usage was calculated through use of the off-road equipment assumptions and fuel use assumptions shown above in Section 8.2, which found that construction of the proposed project would consume 7,334 gallons of gasoline and 46,907 gallons of diesel fuel. This equates to 0.0006 percent of the gasoline and 0.076 percent of the diesel used annually in Orange County. As such, the construction-related petroleum use would be nominal, when compared to current county-wide petroleum usage rates.

Construction activities associated with the proposed project would be required to adhere to all State and SCAQMD regulations for off-road equipment and on-road trucks, which provide minimum fuel efficiency standards. As such, construction activities for the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Impacts regarding transportation energy would be less than significant. Development of the project would not result in the need to manufacture construction materials or create new building material facilities specifically to supply the proposed project. It is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete, it is reasonable to assume that the production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business.

Operational Energy

The on-going operation of the proposed project would require the use of energy resources for multiple purposes including, but not limited to, heating/ventilating/air conditioning (HVAC), refrigeration, lighting, appliances, and electronics. Energy would also be consumed during operations related to water usage, solid waste disposal, landscape equipment, and vehicle trips.

Operations-Related Electricity

Operation of the proposed project would result in consumption of electricity at the project site. As detailed above in Section 8.2 the proposed project would consume 821,132 kilowatt-hours per year of electricity, which does not account for the electricity that will be produced by the proposed 10,000 square foot solar canopy. This equates to 0.0043 percent of the electricity consumed annually in Orange County. As such, the operations-related electricity use would be nominal, when compared to current electricity usage rates in the County.

It should be noted that, the proposed project would comply with all Federal, State, and City requirements related to the consumption of electricity, that includes CCR Title 24, Part 6 *Building Energy Efficiency Standards* and CCR Title 24, Part 11: *California Green Building Standards*. The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed structures, including enhanced insulation, use of energy efficient lighting and appliances, water and space heating systems, as well as requiring a variety of other energy-efficiency measures to be incorporated into the proposed project. Therefore, it is anticipated the proposed project will be designed and built to minimize electricity use and that existing and planned electricity capacity and electricity supplies would be sufficient to support the proposed project's electricity demand. Thus, the project would not result in the wasteful or inefficient use of electricity and no mitigation measures would be required.

Operations-Related Natural Gas

Operation of the proposed project would result in increased consumption of natural gas at the project site. As detailed above in Section 8.3 the proposed project would consume 2,463 MBTU per year of natural gas. This equates to 0.0044 percent of the natural gas consumed annually in Orange County. As such, the operations-related natural gas use would be nominal, when compared to current natural gas usage rates in the County.

It should be noted that, the proposed project would comply with all Federal, State, and City requirements related to the consumption of natural gas, that includes CCR Title 24, Part 6 *Building Energy Efficiency Standards* and CCR Title 24, Part 11: *California Green Building Standards*. The CCR Title 24, Part 6 and Part 11 standards require numerous energy efficiency measures to be incorporated into the proposed project, including enhanced insulation as well as use of efficient natural gas appliances and HVAC units. Therefore, it is anticipated the proposed project will be designed and built to minimize natural gas use and that existing and planned natural gas capacity and natural gas supplies would be sufficient to support the proposed project's natural gas demand. Thus, impacts with regard to natural gas supply and infrastructure capacity would be less than significant and no mitigation measures would be required.

Operations-Related Vehicular Petroleum Fuel Usage

Operation of the proposed project would result in increased consumption of petroleum-based fuels related to vehicular travel to and from the project site. As detailed above in Section 8.2 the proposed project would consume 24,777 gallons of gasoline per year from vehicle travel. This equates to 0.02 percent of the gasoline consumed annually in Orange County. As such, the operations-related petroleum use would be nominal, when compared to current petroleum usage rates

It should be noted that, the proposed project would comply with all Federal, State, County and City requirements related to the consumption of transportation energy that includes California Code of Regulations Title 24, Part 10 California Green Building Standards that require conduit to be installed to the proposed parking areas for future EV charging stations. Therefore, it is anticipated the proposed project will be designed and built to minimize transportation energy through the promotion of the use of electric-powered vehicles and it is anticipated that existing and planned capacity and supplies of transportation fuels would be sufficient to support the proposed project's demand. Thus, impacts with regard transportation energy supply and infrastructure capacity would be less than significant and no mitigation measures would be required.

In conclusion, the proposed project would comply with regulatory compliance measures outlined by the State and City related to air quality (see section 4.0 above), energy (see section 5.0 above), and GHGs (see section 6.0 above). Additionally, the proposed project would be constructed in accordance with all applicable City Building and Fire Codes. Therefore, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be less than significant.

Level of Significance

Less than significant impact.

10.7 Energy Plan Consistency

The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The applicable energy plans for the proposed project include the *Santa Ana General Plan Conservation Element*, adopted April 2022, and the County of Orange General Plan, Chapter 6 Resources Element, September 13, 2005, that provides an Energy Resources Component. The City and County plans are analyzed separately below.

City of Santa Ana General Plan Conservation Element

The proposed project's consistency with the energy conservation policies from the City's General Plan are shown in Table N.

Table N – Proposed Project Compliance with the City General Plan Energy Policies

General Plan Policy	Proposed Project Implementation Actions
Goal CN-3: Energy Resources Reduce consumption of and reliance on nonrenewable energy, and support the development and use of renewable energy sources.	
Policy CN-3.1: Interagency Coordination. Consult with regional agencies and utility companies to pursue energy efficiency goals and expand renewable energy strategies.	Not Applicable. This policy is for the City to implement.
Policy CN-3.2: Education Programs. Support education programs to provide information on energy conservation and alternatives to nonrenewable energy sources.	Not Applicable. This policy is for the City to implement.
Policy CN-3.3: Development Patterns. Promote energy-efficient development patterns by clustering mixed use developments and compatible uses adjacent to public transportation.	Consistent. The project will provide employment opportunities in close proximity to existing residential uses and there are existing OCTA bus stops adjacent to the project site on McFadden Avenue and Grand Avenue.
Policy CN-3.4: Site Design. Encourage site planning and subdivision design that incorporates the use of renewable energy systems.	Consistent. The proposed project will include a 10,000 square foot solar PV system.
Policy CN-3.5: Landscaping. Promote and encourage the planting of native and diverse tree species to improve air quality, reduce heat island effect, reduce energy consumption, and contribute to carbon mitigation with special focus in environmental justice areas.	Consistent. The proposed Landscape Plan will be designed to include native and diverse tree species that will be located adjacent to the onsite road system as well in the proposed parking lots, in order to reduce the heat island effect and associated reduction in energy consumption.
Policy CN-3.6: Life Cycle Costs. Encourage construction and building development practices that use renewable	Consistent. The proposed project will be constructed using renewable resources based on the Title 24 Part

General Plan Policy	Proposed Project Implementation Actions
resources and life cycle costing in construction and operating decisions.	6 and Part 11 building standards that require construction materials to be reused or recycled.
Policy CN-3.7: Energy Conservation Design and Construction. Incorporate energy conservation features in the design of new construction and rehabilitation projects.	Consistent. The proposed structures will be designed to meet or exceed the 2025 Title 24 Part 6 building standards that require the incorporation of energy conservation features into the structures.
Policy CN-3.8: Energy-Efficient Public Facilities. Promote and encourage efficient use of energy and the conservation of available resources in the design, construction, maintenance, and operation of public facilities, infrastructure, and equipment.	Consistent. The proposed public facilities will be designed to meet or exceed the 2025 Title 24 Part 6 building standards that require the incorporation of energy conservation features into the structures.
Policy CN-3.9: Energy Generation in Public Facilities. Encourage and support the generation, transmission, use, and storage of locally distributed renewable energy in order to promote energy independence, efficiency, and sustainability.	Consistent. The proposed public facility will include a 10,000 square foot solar PV canopy system.
Policy CN-3.10: Energy Conservation in Public Projects. Work with businesses and contractors that use energy-efficient practices in the provision of services and equipment for City construction projects.	Not Applicable. This policy is for City construction projects.
Policy CN-3.11: Energy-Efficient Transportation Infrastructure. Continue to support public and private infrastructure for public transportation such as bus routes, rail lines, and the OC Streetcar.	Consistent. There are existing OCTA bus stops adjacent to the project site on McFadden Avenue and Grand Avenue.

Source: City of Santa Ana, 2022.

As shown in Table N, the proposed project would be consistent with the energy conservation policies from the General Plan Conservation Element. Therefore, the proposed project would not conflict with the City's plan for renewable energy or energy efficiency. Impacts would be less than significant.

County of Orange General Plan Resource Element

The proposed project's consistency with the applicable energy-related policies in the County's General Plan are shown in Table O.

Table O – Proposed Project Compliance with County General Plan Energy Policies

General Plan Energy Policy	Proposed Project Consistency with General Plan Policies
Policy 1 – Land Use To plan urban land uses with a balance of residential, industrial, commercial, and public land uses as set forth in the Land Use Element.	Consistent. The proposed project is an allowed use under the current land use designation of Industrial. In addition, the proposed project is in close proximity to existing residential and retail uses, which will reduce energy usage by reducing vehicle trips.
Policy 2 – Energy Resource Development To encourage and actively support the efficient use and optimum development of energy resources in the County consistent with sound resource management practices.	Not Applicable. This policy is only applicable for the development of energy resources. No known energy resources (i.e. oil wells or mining) exist on the project site.
Policy 3 – Energy Conservation To encourage and actively support the utilization of energy conservation measures in all new and existing structures in the County.	Consistent. The proposed project has been designed to exceed the State’s Title 24 energy efficiency standards and will incorporate several energy-efficiency design features into the project.
Policy 4 – Transportation To provide incentives for transportation system management programs and support regional public transportation programs that reduce energy consumption.	Not Applicable. This policy is only applicable to the County to develop regional transportation programs.
Policy 5 – Energy Financing To examine the benefits of local government financing programs that promote energy conservation and development through cooperative public/private efforts.	Not Applicable. This policy is only applicable to the County to develop government financing programs that promote energy conservation.
Policy 6 – Alternative Energy Systems To encourage the use of alternative energy systems and to the extent feasible, remove the regulatory barriers to their implementation.	Consistent. The proposed project will include a 10,000 square foot solar PV canopy system and will provide electric vehicle charging stations.
Policy 7 – Solar Access To support and encourage voluntary efforts to provide solar access opportunities in new developments.	Consistent. The proposed project will include a 10,000 square foot solar PV canopy system.

Source: County of Orange, 2005.

As shown in Table O, the proposed project would be consistent with all applicable energy-related policies provided in the County’s General Plan. Therefore, the proposed project would not conflict with the County’s plan for renewable energy or energy efficiency. Impacts would be less than significant.

Level of Significance

Less than significant impact.

10.8 Generation of Greenhouse Gas Emissions

The proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The proposed project is anticipated to generate GHG emissions from mobile sources area sources, energy usage, waste disposal, water usage, and construction equipment. The project’s GHG emissions have been calculated with the CalEEMod model based on the construction and operational parameters detailed above in Section 8.1. A summary of the results is shown below in Table P and the CalEEMod model run is provided in Appendix A.

Table P – Project Related Greenhouse Gas Annual Emissions

Category	Greenhouse Gas Emissions (Metric Tons per Year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Mobile Sources ¹	192	0.01	0.01	195
Area Sources ²	1.5	<0.01	<0.01	1.5
Energy Usage ³	260	0.02	<0.01	261
Water and Wastewater ⁴	12.0	0.27	0.01	20.0
Solid Waste ⁵	17.0	1.70	0.00	60.0
Refrigeration ⁶	--	--	--	0.02
Construction ⁷	17.0	<0.01	<0.01	17.1
Total GHG Emissions	499	2.00	0.03	555
SCAQMD Screening Threshold				3,000
Exceed Thresholds?				No

Notes:

¹ Mobile sources consist of GHG emissions from vehicles.

² Area sources consist of GHG emissions from consumer products, architectural coatings, and landscaping equipment.

³ Energy usage consists of GHG emissions from electricity and natural gas usage.

⁴ Water includes GHG emissions from electricity used for transport of water and processing of wastewater.

⁵ Waste includes the CO₂ and CH₄ emissions created from the solid waste placed in landfills.

⁶ Refrigeration includes GHG emissions from refrigerants in air conditioning units.

⁷ Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009.

Source: CalEEMod Version 2022.1 (see Appendix A)

The data provided in Table P shows that the proposed project would create 555 MTCO₂e per year, which would be well below the SCAQMD's screening threshold of 3,000 MTCO₂e per year. Therefore, a less than significant generation of greenhouse gas emissions would occur from development of the proposed project. Impacts would be less than significant.

Level of Significance

Less than significant impact.

10.9 Greenhouse Gas Plan Consistency

The proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. As detailed above, the applicable plan for the proposed project is CARB's 2022 Scoping Plan.

The 2022 Scoping Plan identifies additional GHG reduction actions and strategies necessary to achieve the AB 1279 target of 85 percent below 1990 levels by 2045. These actions and strategies build upon those identified in the first update to the Scoping Plan (2013) and in the second update to the Scoping Plan (2017). Although a number of these measures are currently established as statewide regulations, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. Provided in Table Q, Consistency with the 2022 Scoping Plan, is an evaluation of applicable reduction actions/strategies by emissions source category to determine how the proposed project would be consistent with or exceed reduction actions/strategies outlined in the 2022 Scoping Plan.

Table Q – Consistency with the 2022 Scoping Plan

AB 32 GHG Inventory Sector (shown in Bold) and Scoping Plan Action	Proposed Project Consistency with Scoping Plan Actions
GHG Emissions Reductions Relative to the SB 32 Target 40% below 1990 levels by 2030.	No Conflict. As shown above in Table P, the primary GHG emissions generated by the proposed project would be from generation of electricity. SB 1020 requires that by end of 2035, 90 percent of electricity and by end of 2045 that 100 percent of electricity is generated from renewable and zero-carbon resources. In addition, the proposed project will include a 10,000 square foot solar PV canopy system that will assist in meeting this requirement. As such, the proposed project would not conflict with this strategy.
Smart Growth / Vehicle Miles Traveled (VMT) VMT per capita reduced 25% below 2019 levels by 2030, and 22% below 2019 levels by 2045.	No Conflict. As detailed in the VMT Screening Memo, the proposed project meets both the City and County VMT screening criteria. As such, the proposed project would not conflict with this strategy.
Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs) 100% of LDV sales are ZEV by 2035.	Not Applicable. Executive Order N-79-20 requires all new LDVs sold in California to be zero-emission by the year 2035. The proposed project would not include any vehicle sales activities.
Truck ZEVs 100% of medium-duty (MDV)/HDC sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report).	No Conflict. Executive Order N-79-20 requires all new LDVs sold in California to be zero-emission by the year 2045. Any truck deliveries to the project site during either construction or operations would be operated and maintained by outside companies that would be required to meet the State truck regulations. As such, the proposed project would not conflict with this Strategy.
Aviation 10% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	Not Applicable. The proposed project would not utilize any aviation fuel.
Ocean-going Vessels (OGV) 2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	Not Applicable. The proposed project would not utilize any OGVs.
Port Operations	

AB 32 GHG Inventory Sector (shown in Bold) and Scoping Plan Action	Proposed Project Consistency with Scoping Plan Actions
100% of cargo handling equipment is zero-emission by 2037. 100% of drayage trucks are zero emission by 2035.	Not Applicable. The proposed project would not impact any operations at any ports.
Freight and Passenger Rail	
100% of passenger and other locomotive sales are ZEV by 2030. 100% of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	Not Applicable. The proposed project would not impact any freight or passenger rail operations.
Oil and Gas Extraction	
Phase out oil and gas extraction operations by 2045.	Not Applicable. The proposed project would not impact any oil and gas extraction activities.
Petroleum Refining	
CCS on majority of petroleum refining operations by 2030. Production reduced in line with petroleum demand.	Not Applicable. The proposed project would not impact any petroleum refining activities.
Electricity Generation	
Electric sector GHG target of 38 MMTCO ₂ e in 2030 and 31 MMTCO ₂ e in 2045. Retail sales load coverage	No Conflict. Senate Bill 1020 requires that 100 percent of retail sales of electricity be generated by renewable or zero-carbon source of electricity by December 1, 2045. In addition, the proposed project will include a 10,000 square foot solar PV canopy system that will assist in meeting this requirement. As such, the proposed project would not conflict with this strategy.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial).	Not Applicable. The proposed non-residential project would be constructed prior to 2029.
Existing Residential Buildings	
80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. Appliances are replaced at end of life.	Not Applicable. The proposed project would not include any existing residential buildings.
Existing Commercial Buildings	
80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. Appliances are replaced at end of life.	Not Applicable. The proposed project would not include any existing commercial buildings.
Food Products	
7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045.	Not Applicable. The proposed project would not include any commercial food production activities.
Construction Equipment	
25% of energy demand electrified by 2030 and 75% electrified by 2045.	No Conflict. Executive Order N-79-20 requires all off-road vehicles and equipment to transition to 100 percent zero-emission equipment, where feasible, by 2035. All construction equipment fleets utilized during construction of the proposed project are required to be registered with CARB and meet CARB's current emission reductions regulations, which are

AB 32 GHG Inventory Sector (shown in Bold) and Scoping Plan Action	Proposed Project Consistency with Scoping Plan Actions
	anticipated to be updated to meet Executive Order N-79-20 requirements. As such, the proposed project would not conflict with this strategy.
Chemicals and Allied Products; Pulp and Paper	
Electrify 0% of boilers by 2030 and 100% of boilers by 2045.	Not Applicable. The proposed project would not include any pulp and paper production activities.
Hydrogen for 25% of process heat by 2035 and 100% by 2045.	
Electrify 100% of other energy demand by 2045.	
Stone, Clay, Glass, and Cement	
CCS on 40% of operations by 2035 and on all facilities by 2045.	Not Applicable. The proposed project would not include any stone, clay, glass and cement production activities.
Process emissions reduced through alternative materials and CCS.	
Other Industrial Manufacturing	
0% energy demand electrified by 2030 and 50% by 2045.	Not Applicable. The proposed project would be constructed prior to 2030.
Combined Heat and Power	
Facilities retire by 2040.	Not Applicable. The proposed project would not include any existing combined heat and power facilities.
Agriculture Energy Use	
25% energy demand electrified by 2030 and 75% by 2045.	Not Applicable. The proposed project would not include any commercial agriculture activities.
Low Carbon Fuels for Transportation	
Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	Not Applicable. The proposed project would not include any production of fuels for transportation.
Low Carbon Fuels for Buildings and Industry	
In 2030s, renewable natural gas (RNG) blended in pipeline.	Not Applicable. The proposed project would not include any production of fuels for buildings and industry.
Renewable hydrogen blended in natural gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040.	
In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters.	
Non-combustion Methane Emissions	
Increase landfill and dairy digester methane capture.	Not Applicable. The proposed project would not include the operation of any landfill or dairy.
Some alternative manure management deployed for smaller dairies.	
Moderate adoption of enteric strategies by 2030.	
Divert 75% of organic waste from landfills by 2025.	
Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand.	
High GWP Potential Emissions	

AB 32 GHG Inventory Sector (shown in Bold) and Scoping Plan Action	Proposed Project Consistency with Scoping Plan Actions
Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions.	Not Applicable. The proposed project would not include the manufacturing of appliances that use low GWP refrigerants.
Compensate for Remaining Emissions	
Carbon Dioxide Removal (CDR) demonstration projects deployed by 2030.	Not Applicable. The proposed project would not include any CDR demonstration projects
CDR scaled to compensate for remaining GHG emissions in 2045	
Source: CARB, 2022.	

As shown above in Table Q, the proposed project would not conflict with any applicable proposed action or strategy in the 2022 CARB Scoping Plan. Therefore, the proposed project would be consistent with the 2022 CARB Scoping Plan and potential impacts would be less than significant.

Level of Significance

Less than significant impact.

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U.S. Geological Survey, *Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California*, 2011.

APPENDIX A

CalEEMod Model Printouts

New OC Fleet Services Facility Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	New OC Fleet Services Facility
Construction Start Date	7/1/2026
Operational Year	2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.5
Precipitation (days)	19
Location	1400 S Grand Ave, Santa Ana, CA 92705, USA
County	Orange
City	Santa Ana
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	6825
EDFZ	7
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.30

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Government Office Building	20	1000sqft	0.46	20,000	1,999	—	—	—

Automobile Care Center	46	1000sqft	1.0	45,706	4,569	—	—	—
Unenclosed Parking Structure	10.0	1000sqft	0.23	10,000	998	—	—	—
Other Asphalt Surfaces	2.9	Acre	2.9	0.00	12,428	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.2	29	30	0.05	6.6	3.8	5,526	0.22	0.15	2.3	5,547
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	26	10	14	0.03	0.82	0.46	3,099	0.12	0.09	0.06	3,128
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.5	6.1	8.9	0.02	0.48	0.26	1,889	0.07	0.05	0.51	1,906
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.45	1.1	1.6	< 0.005	0.09	0.05	313	0.01	0.01	0.08	316
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—
Threshold	75	100	550	150	150	55	—	—	—	—	—
Unmit.	No	No	No	No	No	No	—	—	—	—	—

Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	75	100	550	150	150	55													
Unmit.	No	No	No	No	No	No													

2.2. Construction Emissions by Year, Unmitigated

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

Year	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
2026	3.2	29	30	0.05	6.6	3.8	5,526	0.22	0.15	2.3	5,547
2027	1.1	9.8	14	0.03	0.78	0.42	3,102	0.12	0.08	1.9	3,132
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
2026	1.2	10	14	0.03	0.82	0.46	3,099	0.12	0.09	0.06	3,128
2027	26	9.9	14	0.03	0.78	0.42	3,087	0.12	0.08	0.05	3,115
Average Daily	—	—	—	—	—	—	—	—	—	—	—
2026	0.47	4.2	5.6	0.01	0.46	0.26	1,184	0.05	0.03	0.32	1,195
2027	2.5	6.1	8.9	0.02	0.48	0.26	1,889	0.07	0.05	0.51	1,906
Annual	—	—	—	—	—	—	—	—	—	—	—
2026	0.09	0.77	1.0	< 0.005	0.08	0.05	196	0.01	0.01	0.05	198
2027	0.45	1.1	1.6	< 0.005	0.09	0.05	313	0.01	0.01	0.08	316

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—

Unmit.	3.5	1.4	11	0.02	1.6	0.45	3,421	12	0.13	5.2	3,772
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.0	1.4	7.7	0.02	1.6	0.45	3,346	12	0.13	0.25	3,693
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.9	1.2	8.0	0.02	1.1	0.33	2,909	12	0.11	1.7	3,250
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.54	0.22	1.5	< 0.005	0.21	0.06	482	2.0	0.02	0.28	538
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—
Threshold	55	55	550	150	150	55	—	—	—	—	—
Unmit.	No	No	No	No	No	No	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—
Threshold	55	55	550	150	150	55	—	—	—	—	—
Unmit.	No	No	No	No	No	No	—	—	—	—	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	—	—	—	—	—	—	—	—	—	3,000
Unmit.	—	—	—	—	—	—	—	—	—	—	No

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.3	0.67	7.3	0.02	1.5	0.40	1,665	0.10	0.08	5.1	1,696
Area	2.1	0.03	3.3	< 0.005	0.01	< 0.005	14	< 0.005	< 0.005	—	14
Energy	0.04	0.66	0.56	< 0.005	0.05	0.05	1,568	0.14	0.01	—	1,575

Water	—	—	—	—	—	—	71	1.6	0.04	—	123
Waste	—	—	—	—	—	—	104	10	0.00	—	364
Refrig.	—	—	—	—	—	—	—	—	—	0.12	0.12
Total	3.5	1.4	11	0.02	1.6	0.45	3,421	12	0.13	5.2	3,772
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.3	0.73	7.2	0.02	1.5	0.40	1,603	0.11	0.08	0.13	1,630
Area	1.6	—	—	—	—	—	—	—	—	—	—
Energy	0.04	0.66	0.56	< 0.005	0.05	0.05	1,568	0.14	0.01	—	1,575
Water	—	—	—	—	—	—	71	1.6	0.04	—	123
Waste	—	—	—	—	—	—	104	10	0.00	—	364
Refrig.	—	—	—	—	—	—	—	—	—	0.12	0.12
Total	3.0	1.4	7.7	0.02	1.6	0.45	3,346	12	0.13	0.25	3,693
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.95	0.52	5.2	0.01	1.1	0.28	1,157	0.08	0.06	1.6	1,178
Area	2.0	0.02	2.3	< 0.005	< 0.005	< 0.005	9.3	< 0.005	< 0.005	—	9.3
Energy	0.04	0.66	0.56	< 0.005	0.05	0.05	1,568	0.14	0.01	—	1,575
Water	—	—	—	—	—	—	71	1.6	0.04	—	123
Waste	—	—	—	—	—	—	104	10	0.00	—	364
Refrig.	—	—	—	—	—	—	—	—	—	0.12	0.12
Total	2.9	1.2	8.0	0.02	1.1	0.33	2,909	12	0.11	1.7	3,250
Annual	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.17	0.10	0.94	< 0.005	0.20	0.05	192	0.01	0.01	0.26	195
Area	0.36	< 0.005	0.41	< 0.005	< 0.005	< 0.005	1.5	< 0.005	< 0.005	—	1.5
Energy	0.01	0.12	0.10	< 0.005	0.01	0.01	260	0.02	< 0.005	—	261
Water	—	—	—	—	—	—	12	0.27	0.01	—	20
Waste	—	—	—	—	—	—	17	1.7	0.00	—	60
Refrig.	—	—	—	—	—	—	—	—	—	0.02	0.02
Total	0.54	0.22	1.5	< 0.005	0.21	0.06	482	2.0	0.02	0.28	538

3. Construction Emissions Details

3.1. Site Preparation (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.1	29	29	0.05	1.2	1.1	5,298	0.21	0.04	—	5,316
Dust From Material Movement	—	—	—	—	5.1	2.6	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.56	0.55	< 0.005	0.02	0.02	102	< 0.005	< 0.005	—	102
Dust From Material Movement	—	—	—	—	0.10	0.05	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.10	0.10	< 0.005	< 0.005	< 0.005	17	< 0.005	< 0.005	—	17
Dust From Material Movement	—	—	—	—	0.02	0.01	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.92	0.00	0.23	0.05	228	< 0.005	0.01	0.79	231						
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00						
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00						
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—						
Average Daily	—	—	—	—	—	—	—	—	—	—	—						
Worker	< 0.005	< 0.005	0.02	0.00	< 0.005	< 0.005	4.2	< 0.005	< 0.005	0.01	4.3						
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00						
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00						
Annual	—	—	—	—	—	—	—	—	—	—	—						
Worker	< 0.005	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.70	< 0.005	< 0.005	< 0.005	0.71						
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00						
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00						

3.3. Grading (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.6	15	17	0.03	0.65	0.59	2,960	0.12	0.02	—	2,970
Dust From Material Movement	—	—	—	—	1.8	0.89	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.05	0.45	0.53	< 0.005	0.02	0.02	0.02	89	< 0.005	< 0.005	—	90
Dust From Material Movement	—	—	—	—	0.06	0.03	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.08	0.10	< 0.005	< 0.005	< 0.005	< 0.005	15	< 0.005	< 0.005	—	15
Dust From Material Movement	—	—	—	—	0.01	< 0.005	< 0.005	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.79	0.00	0.20	0.05	0.05	195	< 0.005	0.01	0.68	198
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.93	0.41	0.01	0.22	0.07	0.07	779	0.06	0.12	1.6	819
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.01	< 0.005	< 0.005	5.7	< 0.005	< 0.005	0.01	5.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.03	0.01	< 0.005	0.01	< 0.005	< 0.005	23	< 0.005	< 0.005	0.02	25
Annual	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	< 0.005	< 0.005	< 0.005	0.94	< 0.005	< 0.005	< 0.005	0.95
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	3.9	< 0.005	< 0.005	< 0.005	4.1

3.5. Building Construction (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.1	9.9	13	0.02	0.38	0.35	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.1	9.9	13	0.02	0.38	0.35	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.33	3.0	4.0	0.01	0.12	0.11	741	0.03	0.01	—	744
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.56	0.73	< 0.005	0.02	0.02	123	< 0.005	< 0.005	—	123
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	1.3	0.00	0.33	0.08	328	< 0.005	0.01	1.1	333
Vendor	0.01	0.40	0.20	< 0.005	0.11	0.03	389	0.02	0.05	1.0	407
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.09	1.1	0.00	0.33	0.08	313	< 0.005	0.01	0.03	316
Vendor	0.01	0.41	0.20	< 0.005	0.11	0.03	389	0.02	0.05	0.03	406

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.37	0.00	0.10	0.02	98	< 0.005	< 0.005	0.15	99			
Vendor	< 0.005	0.13	0.06	< 0.005	0.03	0.01	120	0.02	0.13	126				
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.07	0.00	0.02	< 0.005	16	< 0.005	< 0.005	0.03	16			
Vendor	< 0.005	0.02	0.01	< 0.005	0.01	< 0.005	20	< 0.005	< 0.005	0.02	21			
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2027) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.0	9.4	13	0.02	0.34	0.31	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.0	9.4	13	0.02	0.34	0.31	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.59	5.4	7.4	0.01	0.19	0.18	1,370	0.06	0.01	—	1,374
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.11	0.98	1.3	< 0.005	0.04	0.03	227	0.01	< 0.005	—	228
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.08	1.2	0.00	0.33	0.08	323	< 0.005	0.01	1.0	328
Vendor	0.01	0.38	0.19	< 0.005	0.11	0.03	382	0.02	0.05	0.91	399
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.08	1.1	0.00	0.33	0.08	307	< 0.005	0.01	0.03	311
Vendor	0.01	0.40	0.19	< 0.005	0.11	0.03	382	0.02	0.05	0.02	398
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.05	0.64	0.00	0.19	0.04	178	< 0.005	0.01	0.25	180
Vendor	< 0.005	0.23	0.11	< 0.005	0.06	0.02	218	0.01	0.03	0.23	228
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.12	0.00	0.03	0.01	29	< 0.005	< 0.005	0.04	30
Vendor	< 0.005	0.04	0.02	< 0.005	0.01	< 0.005	36	< 0.005	< 0.005	0.04	38
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2027) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.66	6.1	8.8	0.01	0.24	0.22	1,350	0.05	0.01	—	1,355								
Paving	0.32	—	—	—	—	—	—	—	—	—	—								
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Average Daily	—	—	—	—	—	—	—	—	—	—	—								
Off-Road Equipment	0.05	0.42	0.60	< 0.005	0.02	0.02	92	< 0.005	< 0.005	—	93								
Paving	0.02	—	—	—	—	—	—	—	—	—	—								
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Annual	—	—	—	—	—	—	—	—	—	—	—								
Off-Road Equipment	0.01	0.08	0.11	< 0.005	< 0.005	< 0.005	15	< 0.005	< 0.005	—	15								
Paving	< 0.005	—	—	—	—	—	—	—	—	—	—								
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Offsite	—	—	—	—	—	—	—	—	—	—	—								
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—								
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—								
Worker	0.06	0.06	0.85	0.00	0.26	0.06	244	< 0.005	0.01	0.02	247								
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Average Daily	—	—	—	—	—	—	—	—	—	—	—								
Worker	< 0.005	< 0.005	0.06	0.00	0.02	< 0.005	17	< 0.005	< 0.005	0.02	17								
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Annual	—	—	—	—	—	—	—	—	—	—	—								
Worker	< 0.005	< 0.005	0.01	0.00	< 0.005	< 0.005	2.8	< 0.005	< 0.005	< 0.005	2.8								
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								

3.1.1. Architectural Coating (2027) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.83	1.1	< 0.005	0.02	0.02	134	0.01	< 0.005	—	134
Architectural Coatings	26	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.06	0.08	< 0.005	< 0.005	< 0.005	9.1	< 0.005	< 0.005	—	9.2
Architectural Coatings	1.8	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	1.5	< 0.005	< 0.005	—	1.5
Architectural Coatings	0.32	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—

Worker	0.01	0.02	0.21	0.00	0.07	0.02	61	< 0.005	< 0.005	0.01	62
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	< 0.005	< 0.005	4.3	< 0.005	< 0.005	0.01	4.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.71	< 0.005	< 0.005	< 0.005	0.72
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)											
Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Automobile Care Center	1.3	0.67	7.3	0.02	1.5	0.40	1,665	0.10	0.08	5.1	1,696
Unenclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.3	0.67	7.3	0.02	1.5	0.40	1,665	0.10	0.08	5.1	1,696

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Automobile Care Center	1.3	0.73	7.2	0.02	1.5	0.40	1,603	0.11	0.08	0.13	1,630								
Unenclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Total	1.3	0.73	7.2	0.02	1.5	0.40	1,603	0.11	0.08	0.13	1,630								
Annual	—	—	—	—	—	—	—	—	—	—	—								
Government Office Building	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Automobile Care Center	0.17	0.10	0.94	< 0.005	0.20	0.05	192	0.01	0.01	0.26	195								
Unenclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Total	0.17	0.10	0.94	< 0.005	0.20	0.05	192	0.01	0.01	0.26	195								

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	338	0.03	< 0.005	—	340

Automobile Care Center	—	—	—	—	—	—	—	—	416	0.04	< 0.005	—	418
Unenclosed Parking Structure	—	—	—	—	—	—	—	—	25	< 0.005	< 0.005	—	25
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	779	0.07	0.01	—	783
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	338	0.03	< 0.005	—	340
Automobile Care Center	—	—	—	—	—	—	—	—	416	0.04	< 0.005	—	418
Unenclosed Parking Structure	—	—	—	—	—	—	—	—	25	< 0.005	< 0.005	—	25
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	779	0.07	0.01	—	783
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	56	0.01	< 0.005	—	56
Automobile Care Center	—	—	—	—	—	—	—	—	69	0.01	< 0.005	—	69
Unenclosed Parking Structure	—	—	—	—	—	—	—	—	4.1	< 0.005	< 0.005	—	4.2
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	129	0.01	< 0.005	—	130

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	0.01	0.14	0.11	< 0.005	0.01	0.01	162	0.01	< 0.005	—	163
Automobile Care Center	0.03	0.53	0.44	< 0.005	0.04	0.04	627	0.06	< 0.005	—	629
Unenclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	0.04	0.66	0.56	< 0.005	0.05	0.05	789	0.07	< 0.005	—	792
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	0.01	0.14	0.11	< 0.005	0.01	0.01	162	0.01	< 0.005	—	163
Automobile Care Center	0.03	0.53	0.44	< 0.005	0.04	0.04	627	0.06	< 0.005	—	629
Unenclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	0.04	0.66	0.56	< 0.005	0.05	0.05	789	0.07	< 0.005	—	792
Annual	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	27	< 0.005	< 0.005	—	27
Automobile Care Center	0.01	0.10	0.08	< 0.005	0.01	0.01	104	0.01	< 0.005	—	104
Unenclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	1.4	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.18	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.54	0.03	3.3	< 0.005	0.01	< 0.005	14	< 0.005	< 0.005	—	14
Total	2.1	0.03	3.3	< 0.005	0.01	< 0.005	14	< 0.005	< 0.005	—	14
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	1.4	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.18	—	—	—	—	—	—	—	—	—	—
Total	1.6	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.26	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.03	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.07	< 0.005	0.41	< 0.005	< 0.005	< 0.005	1.5	< 0.005	< 0.005	—	1.5
Total	0.36	< 0.005	0.41	< 0.005	< 0.005	< 0.005	1.5	< 0.005	< 0.005	—	1.5

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	33	0.78	0.02	—	59
Automobile Care Center	—	—	—	—	—	—	36	0.85	0.02	—	64
Unenclosed Parking Structure	—	—	—	—	—	—	0.07	< 0.005	< 0.005	—	0.07
Other Asphalt Surfaces	—	—	—	—	—	—	0.81	< 0.005	< 0.005	—	0.82
Total	—	—	—	—	—	—	71	1.6	0.04	—	123
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	33	0.78	0.02	—	59
Automobile Care Center	—	—	—	—	—	—	36	0.85	0.02	—	64
Unenclosed Parking Structure	—	—	—	—	—	—	0.07	< 0.005	< 0.005	—	0.07
Other Asphalt Surfaces	—	—	—	—	—	—	0.81	< 0.005	< 0.005	—	0.82
Total	—	—	—	—	—	—	71	1.6	0.04	—	123
Annual	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	5.5	0.13	< 0.005	—	9.7

Automobile Care Center	—	—	—	—	—	—	6.0	0.14	< 0.005	—	11
Unenclosed Parking Structure	—	—	—	—	—	—	0.01	< 0.005	< 0.005	—	0.01
Other Asphalt Surfaces	—	—	—	—	—	—	0.13	< 0.005	< 0.005	—	0.14
Total	—	—	—	—	—	—	12	0.27	0.01	—	20

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	10	1.0	0.00	—	35
Automobile Care Center	—	—	—	—	—	—	94	9.4	0.00	—	329
Unenclosed Parking Structure	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	104	10	0.00	—	364
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	10	1.0	0.00	—	35
Automobile Care Center	—	—	—	—	—	—	94	9.4	0.00	—	329

Unenclosed Parking Structure	—	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00	—	0.00
Total	—	—	—	—	—	—	—	104	10	0.00	—	364	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	1.7	0.17	0.00	—	5.8	—	—
Automobile Care Center	—	—	—	—	—	—	—	16	1.6	0.00	—	55	—	—
Unenclosed Parking Structure	—	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00	—	—
Other Asphalt Surfaces	—	—	—	—	—	—	—	0.00	0.00	0.00	—	0.00	—	0.00
Total	—	—	—	—	—	—	—	17	1.7	0.00	—	60	—	—

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Government Office Building	—	—	—	—	—	—	—	—	—	0.05	0.05
Automobile Care Center	—	—	—	—	—	—	—	—	—	0.07	0.07
Total	—	—	—	—	—	—	—	—	—	0.12	0.12
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—

[illegible]

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

[illegible]

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

Equipment Type	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

Equipment Type	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

Vegetation	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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

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

Land Use	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

Species	ROG	NOx	CO	SO2	PM10T	PM2.5T	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—

Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	7/1/2026	7/9/2026	5.0	7.0	—
Grading	Grading	7/10/2026	7/24/2026	5.0	11	—
Building Construction	Building Construction	7/27/2026	10/19/2027	5.0	322	—

Paving	Paving	10/20/2027	11/23/2027	5.0	25	—
Architectural Coating	Architectural Coating	11/24/2027	12/28/2027	5.0	25	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.0	8.0	367	0.40
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	4.0	8.0	84	0.37
Grading	Graders	Diesel	Average	1.00	8.0	148	0.41
Grading	Excavators	Diesel	Average	1.00	8.0	36	0.38
Grading	Tractors/Loaders/Back hoes	Diesel	Average	3.0	8.0	84	0.37
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.0	367	0.40
Building Construction	Cranes	Diesel	Average	1.00	7.0	367	0.29
Building Construction	Forklifts	Diesel	Average	3.0	8.0	82	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.0	14	0.74
Building Construction	Welders	Diesel	Average	1.00	8.0	46	0.45
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	3.0	7.0	84	0.37
Paving	Tractors/Loaders/Back hoes	Diesel	Average	1.00	8.0	84	0.37
Paving	Cement and Mortar Mixers	Diesel	Average	2.0	6.0	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	8.0	81	0.42
Paving	Paving Equipment	Diesel	Average	2.0	6.0	89	0.36
Paving	Rollers	Diesel	Average	2.0	6.0	36	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.0	37	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	Worker	18	19	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10	HHDT,MHDT
Site Preparation	Hauling	0.00	20	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	15	19	LDA,LDT1,LDT2
Grading	Vendor	—	10	HHDT,MHDT
Grading	Hauling	11	20	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	25	19	LDA,LDT1,LDT2
Building Construction	Vendor	12	10	HHDT,MHDT
Building Construction	Hauling	0.00	20	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	20	19	LDA,LDT1,LDT2
Paving	Vendor	—	10	HHDT,MHDT
Paving	Hauling	0.00	20	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	5.0	19	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10	HHDT,MHDT
Architectural Coating	Hauling	0.00	20	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%
Sweep paved roads once per month	9%	9%

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	99,009	32,903	8,049

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	—	11	0.00	0.00
Grading	500	500	11	0.00	0.00
Paving	0.00	0.00	0.00	0.00	3.1

5.6.2. Construction Earthmoving Control Strategies

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

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Government Office Building	0.00	0%
Paving	Automobile Care Center	0.00	0%
Paving	Unenclosed Parking Structure	0.23	100%

Paving	Other Asphalt Surfaces		2.9	100%
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5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	532	0.03	< 0.005
2027	0.00	532	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Government Office Building	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Automobile Care Center	500	0.00	0.00	130,363	2,166	0.00	0.00	564,751
Unenclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Government Office Building	Wood Fireplaces	0	0
Government Office Building	Gas Fireplaces	0	0
Government Office Building	Propane Fireplaces	0	0
Government Office Building	Electric Fireplaces	0	0

Government Office Building	No Fireplaces	0	0
Government Office Building	Conventional Wood Stoves	0	0
Government Office Building	Catalytic Wood Stoves	0	0
Government Office Building	Non-Catalytic Wood Stoves	0	0
Government Office Building	Pellet Wood Stoves	0	0
Automobile Care Center	Wood Fireplaces	0	0
Automobile Care Center	Gas Fireplaces	0	0
Automobile Care Center	Propane Fireplaces	0	0
Automobile Care Center	Electric Fireplaces	0	0
Automobile Care Center	No Fireplaces	0	0
Automobile Care Center	Conventional Wood Stoves	0	0
Automobile Care Center	Catalytic Wood Stoves	0	0
Automobile Care Center	Non-Catalytic Wood Stoves	0	0
Automobile Care Center	Pellet Wood Stoves	0	0
Unenclosed Parking Structure	Wood Fireplaces	0	0
Unenclosed Parking Structure	Gas Fireplaces	0	0
Unenclosed Parking Structure	Propane Fireplaces	0	0
Unenclosed Parking Structure	Electric Fireplaces	0	0
Unenclosed Parking Structure	No Fireplaces	0	0
Unenclosed Parking Structure	Conventional Wood Stoves	0	0
Unenclosed Parking Structure	Catalytic Wood Stoves	0	0
Unenclosed Parking Structure	Non-Catalytic Wood Stoves	0	0
Unenclosed Parking Structure	Pellet Wood Stoves	0	0
Other Asphalt Surfaces	Wood Fireplaces	0	0
Other Asphalt Surfaces	Gas Fireplaces	0	0
Other Asphalt Surfaces	Propane Fireplaces	0	0
Other Asphalt Surfaces	Electric Fireplaces	0	0
Other Asphalt Surfaces	No Fireplaces	0	0

Other Asphalt Surfaces	Conventional Wood Stoves	0	0	
Other Asphalt Surfaces	Catalytic Wood Stoves	0	0	
Other Asphalt Surfaces	Non-Catalytic Wood Stoves	0	0	
Other Asphalt Surfaces	Pellet Wood Stoves	0	0	

5.10.2. Architectural Coatings

—	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
undefined	0.00	0.00	99,009	32,903	8,049

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBtu/yr)
Government Office Building	356,406	346	0.0330	0.0040	506,929
Automobile Care Center	438,446	346	0.0330	0.0040	1,956,306
Unenclosed Parking Structure	26,280	346	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	346	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Government Office Building	3,973,194	25,908
Automobile Care Center	4,300,071	59,216
Unenclosed Parking Structure	0.00	12,934
Other Asphalt Surfaces	0.00	161,072

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Government Office Building	19	0.00
Automobile Care Center	175	0.00
Unenclosed Parking Structure	0.00	0.00
Other Asphalt Surfaces	0.00	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Government Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
Government Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.0	4.0	18
Automobile Care Center	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.0	4.0	18

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

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

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

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

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	9.0	annual days of extreme heat
Extreme Precipitation	3.5	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	1.3	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi. Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about $\frac{3}{4}$ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi. Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure. The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

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

6.3. Adjusted Climate Risk Scores

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

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	60
AQ-PM	73
AQ-DPM	72
Drinking Water	46

Lead Risk Housing	70
Pesticides	0.00
Toxic Releases	98
Traffic	94
Effect Indicators	—
CleanUp Sites	95
Groundwater	69
Haz Waste Facilities/Generators	97
Impaired Water Bodies	0.00
Solid Waste	44
Sensitive Population	—
Asthma	32
Cardio-vascular	16
Low Birth Weights	52
Socioeconomic Factor Indicators	—
Education	96
Housing	92
Linguistic	93
Poverty	92
Unemployment	7.1

7.2. Healthy Places Index Scores

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

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	1.360195047
Employed	30.82253304
Median HI	8.058514051

Education	—
Bachelor's or higher	1.193378673
High school enrollment	21.68612858
Preschool enrollment	61.70922623
Transportation	—
Auto Access	23.89323752
Active commuting	64.42961632
Social	—
2-parent households	46.6957526
Voting	5.338123957
Neighborhood	—
Alcohol availability	43.89837033
Park access	62.36365969
Retail density	95.88091877
Supermarket access	50.72500962
Tree canopy	16.63030925
Housing	—
Homeownership	7.327088413
Housing habitability	5.594764532
Low-inc homeowner severe housing cost burden	99.12742205
Low-inc renter severe housing cost burden	14.48736045
Uncrowded housing	0.179648402
Health Outcomes	—
Insured adults	2.399589375
Arthritis	91.0
Asthma ER Admissions	71.2
High Blood Pressure	93.7
Cancer (excluding skin)	98.5

Asthma	9.8
Coronary Heart Disease	79.3
Chronic Obstructive Pulmonary Disease	40.0
Diagnosed Diabetes	34.4
Life Expectancy at Birth	28.8
Cognitively Disabled	82.5
Physically Disabled	93.4
Heart Attack ER Admissions	86.3
Mental Health Not Good	4.1
Chronic Kidney Disease	55.3
Obesity	14.4
Pedestrian Injuries	86.7
Physical Health Not Good	9.4
Stroke	64.5
Health Risk Behaviors	—
Binge Drinking	40.3
Current Smoker	6.3
No Leisure Time for Physical Activity	4.5
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	9.5
Elderly	98.8
English Speaking	1.7
Foreign-born	92.1
Outdoor Workers	9.9
Climate Change Adaptive Capacity	—
Impervious Surface Cover	4.8

Traffic Density	97.6
Traffic Access	74.7
Other Indices	—
Hardship	99.2
Other Decision Support	—
2016 Voting	19.5

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	81
Healthy Places Index Score for Project Location (b)	9.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
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Construction: Construction Phases	No Demolition. Construction schedule extended by 1.4x to match schedule provided by applicant
Operations: Vehicle Data	500 Daily Trips, Monday thru Friday
Operations: Refrigerants	The Supermarket Refrigeration and Condensing Units were removed, since the project will not contain these units.

APPENDIX B

EMFAC2025 Model Printouts

Source: EMFAC2025 (v2.0.0) Emissions Inventory

Region Type: Sub-Area
Region: Orange (SC)
Calendar Year: 2026
Season: Annual

Vehicle Classification: EMFAC202Y Categories

Units: miles/day for Combustion VMT and Electric VMT, trips/day for Trips, tons/day for Emissions, 1000 gallons/day for Fuel Consumption, kWh/day for Energy Consumption, kg/k

Region	Calendar	Vehicle Category	Model Year	Speed	Fuel	Population	Total VMT	Trips	Fuel Consumption
Orange (SC)	2026	LDA	Aggregate	Aggregate	Gasoline	848604	23182433	3665204	885.9
Orange (SC)	2026	LDT1	Aggregate	Aggregate	Gasoline	90795	2639735	377114	117.1
Orange (SC)	2026	LDT2	Aggregate	Aggregate	Gasoline	537160	17946064	2592728	803.9
Orange (SC)	2026	MCY	Aggregate	Aggregate	Gasoline	50540	288816	96904	7.2
Orange (SC)	2026	MDV	Aggregate	Aggregate	Gasoline	328966	10921005	1513764	597.9
Orange (SC)	2026	T6 Instate Delivery Class	Aggregate	Aggregate	Diesel	1587	46338	22643	5.3
Orange (SC)	2026	T6 Instate Delivery Class	Aggregate	Aggregate	Diesel	1438	42518	20527	4.8
Orange (SC)	2026	T6 Instate Delivery Class	Aggregate	Aggregate	Diesel	4459	131819	63632	15.0
Orange (SC)	2026	T6 Instate Delivery Class	Aggregate	Aggregate	Diesel	642	30564	9157	3.4
Orange (SC)	2026	T6 Instate Other Class 4	Aggregate	Aggregate	Diesel	1663	59115	19222	6.9
Orange (SC)	2026	T6 Instate Other Class 5	Aggregate	Aggregate	Diesel	5735	212001	66298	24.2
Orange (SC)	2026	T6 Instate Other Class 6	Aggregate	Aggregate	Diesel	3843	139977	44424	15.9
Orange (SC)	2026	T6 Instate Other Class 7	Aggregate	Aggregate	Diesel	1460	60677	16877	6.8
Orange (SC)	2026	T6 Instate Tractor Class	Aggregate	Aggregate	Diesel	21	938	240	0.1
Orange (SC)	2026	T6 Instate Tractor Class	Aggregate	Aggregate	Diesel	667	40101	7716	4.0
Orange (SC)	2026	T6 Utility Class 5	Aggregate	Aggregate	Diesel	198	7358	2537	0.8
Orange (SC)	2026	T6 Utility Class 6	Aggregate	Aggregate	Diesel	36	1268	461	0.1
Orange (SC)	2026	T6 Utility Class 7	Aggregate	Aggregate	Diesel	33	1436	421	0.2
Orange (SC)	2026	T7 Single Concrete/Tran	Aggregate	Aggregate	Diesel	371	21312	3492	3.5
Orange (SC)	2026	T7 Single Dump Class 8	Aggregate	Aggregate	Diesel	1176	61099	11075	10.3
Orange (SC)	2026	T7 Single Other Class 8	Aggregate	Aggregate	Diesel	1762	103780	16599	17.0
Orange (SC)	2026	T7 Tractor Class 8	Aggregate	Aggregate	Diesel	3008	252101	43703	38.9
Orange (SC)	2026	T7 Utility Class 8	Aggregate	Aggregate	Diesel	54	2313	695	0.4

Worker (Autos) vehicle miles per day 54,978,053 2,412 1,000 gall per day
Workers (Autos) Avg Miles per gallon 22.8 2,412,051 gallons per day

Diesel Truck vehicle miles per day 1,214,717 158 1,000 gall per day
Diesel Truck Fleet Avg Miles per gallon 7.7 157,532 gallons per day