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**San Bernardino County FLOD Project  
GREENHOUSE GAS ANALYSIS  
COUNTY OF SAN BERNARDINO**

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# TABLE OF CONTENTS

**TABLE OF CONTENTS** .....I

**APPENDICES** .....II

**LIST OF EXHIBITS** .....III

**LIST OF TABLES** .....III

**LIST OF ABBREVIATED TERMS**..... IV

**EXECUTIVE SUMMARY** ..... 1

**1 INTRODUCTION**..... 3

    1.1 Site Location..... 3

    1.2 Project Description..... 3

**2 CLIMATE CHANGE SETTING**..... 5

    2.1 Introduction to Global Climate Change ..... 5

    2.2 Greenhouse Gas Emissions Inventories ..... 5

    2.3 Global Climate Change Defined ..... 6

    2.4 Greenhouse Gases ..... 7

    2.5 Effects of Climate Change in California ..... 10

    2.6 Human Health Effects ..... 12

    2.7 Regulatory Setting..... 14

    2.8 Discussion on Establishment of Significance Thresholds..... 25

**3 PROJECT GREENHOUSE GAS IMPACT**..... 27

    3.1 Introduction ..... 27

    3.2 Project Related Greenhouse Gas Emissions ..... 27

    3.3 Life-Cycle Analysis ..... 27

    3.3 Construction Emissions ..... 27

    3.4 Emissions Summary ..... 27

**4 FINDINGS & CONCLUSIONS**..... 29

    4.1 Standard Regulatory Requirements/Best Available Control Measures (BACMs) ..... 29

    4.2 Mitigation Measures ..... 29

**5 REFERENCES**..... 31

**6 CERTIFICATION**..... 33

## **APPENDICES**

### **APPENDIX 3.1: CALEEMOD EMISSIONS MODEL OUTPUTS**

**LIST OF EXHIBITS**

EXHIBIT 1-A: LOCATION MAP .....4  
EXHIBIT 2-A: SUMMARY OF PROJECTED GLOBAL WARMING IMPACT ..... 14

**LIST OF TABLES**

TABLE 2-1: TOP GHG PRODUCER COUNTRIES AND THE EUROPEAN UNION .....6  
TABLE 2-2: GLOBAL WARMING POTENTIAL AND ATMOSPHERIC LIFETIME OF SELECT GHGS .....7  
TABLE 2-3: SCOPING PLAN GHG REDUCTION MEASURES TOWARDS 2020 TARGET ..... 21  
TABLE 3-1: TOTAL PROJECT GREENHOUSE GAS EMISSIONS (ANNUAL) ..... 28

## LIST OF ABBREVIATED TERMS

(1)	Reference
APS	Alternative Planning Organizations
ARB	California Air Resources Board
CAA	Federal Clean Air Act
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resource Board
CAT	Climate Action Team
CBSC	California Building Standards Commission
CEC	California Energy Commission
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CFC	Chlorofluorocarbons
CFR	Code of Federal Regulations
CH <sub>4</sub>	Methane
CO	Carbon Monoxide
CO <sub>2</sub>	Carbon Dioxide
CO <sub>2</sub> e	Carbon Dioxide Equivalent
CPUC	California Public Utilities Commission
EPA	Environmental Protection Agency
EPS	Emission Performance Standard
GCC	Global Climate Change
GHGA	Greenhouse Gas Analysis
GWP	Global Warming Potential
HFC	Hydrofluorocarbons
LCA	Life-Cycle Analysis
MMs	Mitigation Measures
MMTCO <sub>2</sub> e	Million Metric Ton of Carbon Dioxide Equivalent
MPOs	Metropolitan Planning Organizations
MTCO <sub>2</sub> e	Metric Ton of Carbon Dioxide Equivalent
N <sub>2</sub> O	Nitrogen Dioxide
NIOSH	National Institute for Occupational Safety and Health
NO <sub>x</sub>	Oxides of Nitrogen
PFC	Perfluorocarbons
PM <sub>10</sub>	Particulate Matter 10 microns in diameter or less

PM2.5	Particulate Matter 2.5 microns in diameter or less
PPM	Parts Per Million
Project	San Bernardino County FLOD Project
RTP	Regional Transportation Plan
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategies
UNFCCC	United Nations' Framework Convention on Climate Change
VOC	Volatile Organic Compounds

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## EXECUTIVE SUMMARY

The County of San Bernardino has adopted a threshold of significance of 3,000 MTCO<sub>2</sub>e per year for GHG emissions (1). As such, a screening threshold of 3,000 MTCO<sub>2</sub>e per year is applied herein, which is also a widely accepted screening threshold used by the County of Riverside and numerous cities in the South Coast Air Basin and is based on the South Coast Air Quality Management District (SCAQMD) staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* ("SCAQMD Interim GHG Threshold"). The County of San Bernardino GHG threshold identifies a screening threshold to determine the level of significance and whether additional analysis is required.

The Project will result in approximately 131.06 MTCO<sub>2</sub>e per year; the proposed project would not exceed the County of San Bernardino's threshold of 3,000 MTCO<sub>2</sub>e per year. Thus, project-related emissions would not have a significant direct or indirect impact on GHG and climate change.

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# 1 INTRODUCTION

This report presents the results of the greenhouse gas analysis (GHGA) prepared by Urban Crossroads, Inc., for the proposed San Bernardino County FLOD Project (referred to as “Project”).

The purpose of this GHGA is to evaluate the proposed maintenance activities on the Project site and determine the level of greenhouse gas (GHG) impacts as a result of constructing the proposed Project.

## 1.1 SITE LOCATION

The District is divided into six zones. The Proposed Project is located in three of these six zones as shown in Exhibit 1-A. Zone 1 is a 275-square-mile area in the western portion of the San Bernardino valley extending from Beech Avenue in Fontana west to the Los Angeles/San Bernardino County boundary, south of the San Gabriel Mountains. Included in the zone are the incorporated cities of Chino, Chino Hills, Fontana, Montclair, Ontario, Rancho Cucamonga, and Upland and the unincorporated community of Etiwanda. Thirteen Project facilities are located in Zone 1.

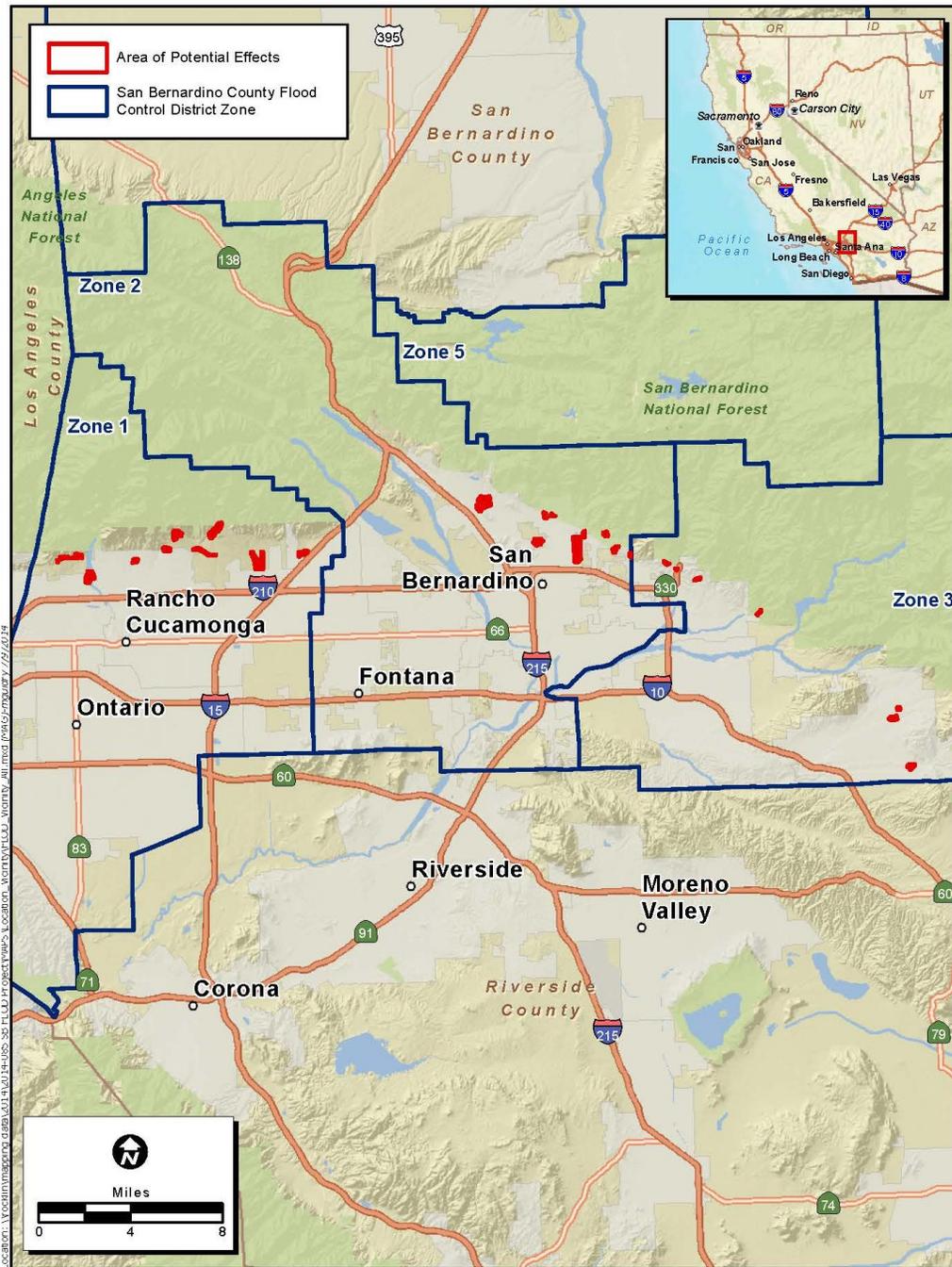
Zone 2 is located in the central area of the San Bernardino Valley, east of Zone 1. It is a 318-square-mile area mostly affected by the Santa Ana River and City Creek. Zone 2 includes portions of the cities of Colton, Fontana, Grand Terrace, Highland, Loma Linda, Redlands, Rialto, and San Bernardino and the unincorporated communities of Bloomington, Del Rosa, Devore, and Muscoy. Eleven Project facilities are located in Zone 2.

Zone 3 is a 366-square-mile area located on the east end of the San Bernardino Valley, east of Zone 2. Zone 3 includes portions of the cities of Highland, Loma Linda, Redlands, San Bernardino, and Yucaipa and the unincorporated community of Mentone. Eight Project facilities are located in Zone 3.

## 1.2 PROJECT DESCRIPTION

The Environmental Management Division (EMD) requires regulatory permits from California Department of Fish & Wildlife (CDFW), the Santa Ana Regional Water Quality Control Board (SARWQCB), and the US Army Corp of Engineers (USACE) to support routine maintenance efforts of its priority detention/debris basins. The purpose of this project is to provide routine maintenance of various flood control facilities (dam, basins, and spreading grounds) in order to ensure that the basins continue to provide flood protection and water conservation, as well as to prevent any type of damage to both public and private property, and to protect the District’s other facilities located within the County.

EXHIBIT 1-A: LOCATION MAP



Map Date: 7/9/2014  
Service Layer Credits: Sources: USGS, ESRI, TANA, AND

## 2 CLIMATE CHANGE SETTING

### 2.1 INTRODUCTION TO GLOBAL CLIMATE CHANGE

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

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

### 2.2 GREENHOUSE GAS EMISSIONS INVENTORIES

#### *Global*

Worldwide anthropogenic (man-made) GHG emissions are tracked by the Intergovernmental Panel on Climate Change for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Man-made GHG emissions data for Annex I nations are available through 2011. For the Year 2011 the sum of these emissions totaled approximately 25,285,543 Gg CO<sub>2</sub>e<sup>1(2)</sup> (3). The GHG emissions in more recent years may differ from the inventories presented in Table 2-1; however, the data is representative of currently available inventory data.

#### United States

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<sup>1</sup> The global emissions are the sum of Annex I and non-Annex I countries, without counting Land-Use, Land-Use Change and Forestry (LULUCF). For countries without 2005 data, the UNFCCC data for the most recent year were used. United Nations Framework Convention on Climate Change, "Annex I Parties – GHG total without LULUCF,"

As noted in Table 2-1, the United States, as a single country, was the number two producer of GHG emissions in 2011. The primary greenhouse gas emitted by human activities in the United States was CO<sub>2</sub>, representing approximately 83 percent of total greenhouse gas emissions (4). Carbon dioxide from fossil fuel combustion, the largest source of US greenhouse gas emissions, accounted for approximately 78 percent of the GHG emissions.

**TABLE 2-1: TOP GHG PRODUCER COUNTRIES AND THE EUROPEAN UNION<sup>2</sup>**

<b>Emitting Countries</b>	<b>GHG Emissions (Gg CO<sub>2</sub>e)</b>
China	8,715,307
United States	6,665,700
European Union (27 member countries)	4,550,212
Russian Federation	2,320,834
India	1,725,762
Japan	1,307,728
<b>Total</b>	<b>25,285,543</b>

### *State of California*

CARB compiles GHG inventories for the State of California. Based upon the 2008 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2008 greenhouse gas emissions inventory, California emitted 474 MMTCO<sub>2</sub>e including emissions resulting from imported electrical power in 2008 (5). Based on the CARB inventory data and GHG inventories compiled by the World Resources Institute (6), California's total statewide GHG emissions rank second in the United States (Texas is number one) with emissions of 417 MMTCO<sub>2</sub>e excluding emissions related to imported power.

## **2.3 GLOBAL CLIMATE CHANGE DEFINED**

Global Climate Change (GCC) refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO<sub>2</sub> (Carbon Dioxide), N<sub>2</sub>O (Nitrous Oxide), CH<sub>4</sub> (Methane), hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the Earth's atmosphere, but prevent radioactive heat from escaping, thus warming the Earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages. According to the California Air Resources Board (CARB), the climate change since the industrial revolution differs from previous climate changes in both rate and magnitude (7).

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

<sup>2</sup> Used <http://unfccc.int> data for Annex I countries. Consulted the <http://www.eia.gov> site to reference Non-Annex I countries such as China and India.

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

Although California’s rate of growth of greenhouse gas emissions is slowing, the state is still a substantial contributor to the U.S. emissions inventory total. In 2004, California is estimated to have produced 492 million gross metric tons of carbon dioxide equivalent (CO2e) greenhouse gas emissions. Despite a population increase of 16 percent between 1990 and 2004, California has significantly slowed the rate of growth of greenhouse gas emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls (6).

**2.4 GREENHOUSE GASES**

For the purposes of this analysis, emissions of carbon dioxide, methane, and nitrous oxide were evaluated (see Table 3-4 later in this report) because these gasses are the primary contributors to GCC from development projects. Although other substances such as fluorinated gases also contribute to GCC, sources of fluorinated gases are not well-defined and no accepted emissions factors or methodology exist to accurately calculate these gases.

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

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

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

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100 year time horizon)
Carbon Dioxide	50-200	1
Methane	12 ± 3	25
Nitrous Oxide	120	298
HFC-23	264	14,800
HFC-134a	14.6	1,430
HFC-152a	1.5	124
Sulfur Hexafluoride (SF6)	3,200	22,800
Source: Environmental Protection Agency (EPA) 2013 (URL: <a href="http://www.epa.gov/ghgreporting/documents/pdf/2013/documents/2013-data-elements.pdf">http://www.epa.gov/ghgreporting/documents/pdf/2013/documents/2013-data-elements.pdf</a> )		

Water Vapor: Water vapor (H<sub>2</sub>O) is the most abundant, important, and variable greenhouse gas in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. A climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change.

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

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

Carbon Dioxide: Carbon dioxide (CO<sub>2</sub>) is an odorless and colorless GHG. Outdoor levels of carbon dioxide are not high enough to result in negative health effects. Carbon dioxide is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil, natural gas, and wood. Carbon dioxide is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks (8).

Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO<sub>2</sub> concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30 percent. Left unchecked, the concentration of carbon dioxide in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources (9).

Methane: Methane (CH<sub>4</sub>) is an extremely effective absorber of radiation, though its atmospheric concentration is less than carbon dioxide and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs. No health effects are known to occur from exposure to methane.

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

Nitrous Oxide: Nitrous oxide (N<sub>2</sub>O), also known as laughing gas, is a colorless greenhouse gas. Nitrous oxide can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage) (10).

Concentrations of nitrous oxide also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb). Nitrous oxide is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant, i.e., in whipped cream bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. Nitrous oxide can be transported into the stratosphere, be deposited on the Earth's surface, and be converted to other compounds by chemical reaction

Chlorofluorocarbons: Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C<sub>2</sub>H<sub>6</sub>) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs are no longer being used; therefore, it is not likely that health effects would be experienced. Nonetheless, in confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.

CFCs have no natural source, but were first synthesized in 1928. They were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.

Hydrofluorocarbons: Hydrofluorocarbons (HFCs) are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the greenhouse gases, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF<sub>3</sub>), HFC-134a (CF<sub>3</sub>CH<sub>2</sub>F), and HFC-152a (CH<sub>3</sub>CHF<sub>2</sub>). Prior to 1990, the only significant emissions were of HFC-23. HFC-134a emissions are increasing

due to its use as a refrigerant. The U.S. EPA estimates that concentrations of HFC-23 and HFC-134a are now about 10 parts per trillion (ppt) each; and that concentrations of HFC-152a are about 1 ppt (11). No health effects are known to result from exposure to HFCs, which are manmade for applications such as automobile air conditioners and refrigerants.

Perfluorocarbons: Perfluorocarbons (PFCs) have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above Earth's surface, are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF<sub>4</sub>) and hexafluoroethane (C<sub>2</sub>F<sub>6</sub>). The U.S. EPA estimates that concentrations of CF<sub>4</sub> in the atmosphere are over 70 ppt.

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

Sulfur Hexafluoride: Sulfur hexafluoride (SF<sub>6</sub>) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900). The U.S. EPA indicates that concentrations in the 1990s were about 4 ppt. In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.

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

## 2.5 EFFECTS OF CLIMATE CHANGE IN CALIFORNIA

### *Public Health*

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

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

### *Water Resources*

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

If temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90 percent. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding.

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

### *Agriculture*

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. First, California farmers could possibly lose as much as 25 percent of the water supply they need. Although higher CO<sub>2</sub> levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate O<sub>3</sub> pollution, which makes plants more susceptible to disease and pests and interferes with plant growth.

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

In addition, continued global climate change could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion could occur in many species while range contractions may be less likely in rapidly evolving species with significant populations already established. Should range contractions occur, new or different weed species could fill the emerging gaps. Continued global climate change could alter the

abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates.

### *Forests and Landscapes*

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

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

### *Rising Sea Levels*

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

## **2.6 HUMAN HEALTH EFFECTS**

The potential health effects related directly to the emissions of carbon dioxide, methane, and nitrous oxide as they relate to development projects such as the proposed Project are still being debated in the scientific community. Their cumulative effects to global climate change have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport that higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change will likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas (12). Exhibit 2-A presents the potential impacts of global warming.

Water Vapor: There are no known direct health effects related to water vapor at this time. It should be noted however that when some pollutants react with water vapor, the reaction forms a transport mechanism for some of these pollutants to enter the human body through water vapor.

Carbon Dioxide: According to the National Institute for Occupational Safety and Health (NIOSH) high concentrations of carbon dioxide can result in health effects such as: headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. It should be noted that current concentrations of carbon dioxide in the earth's atmosphere are estimated to be approximately 370 parts per million (ppm), the actual reference exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour workweek and short-term reference exposure levels of 30,000 ppm averaged over a 15 minute period (13).

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

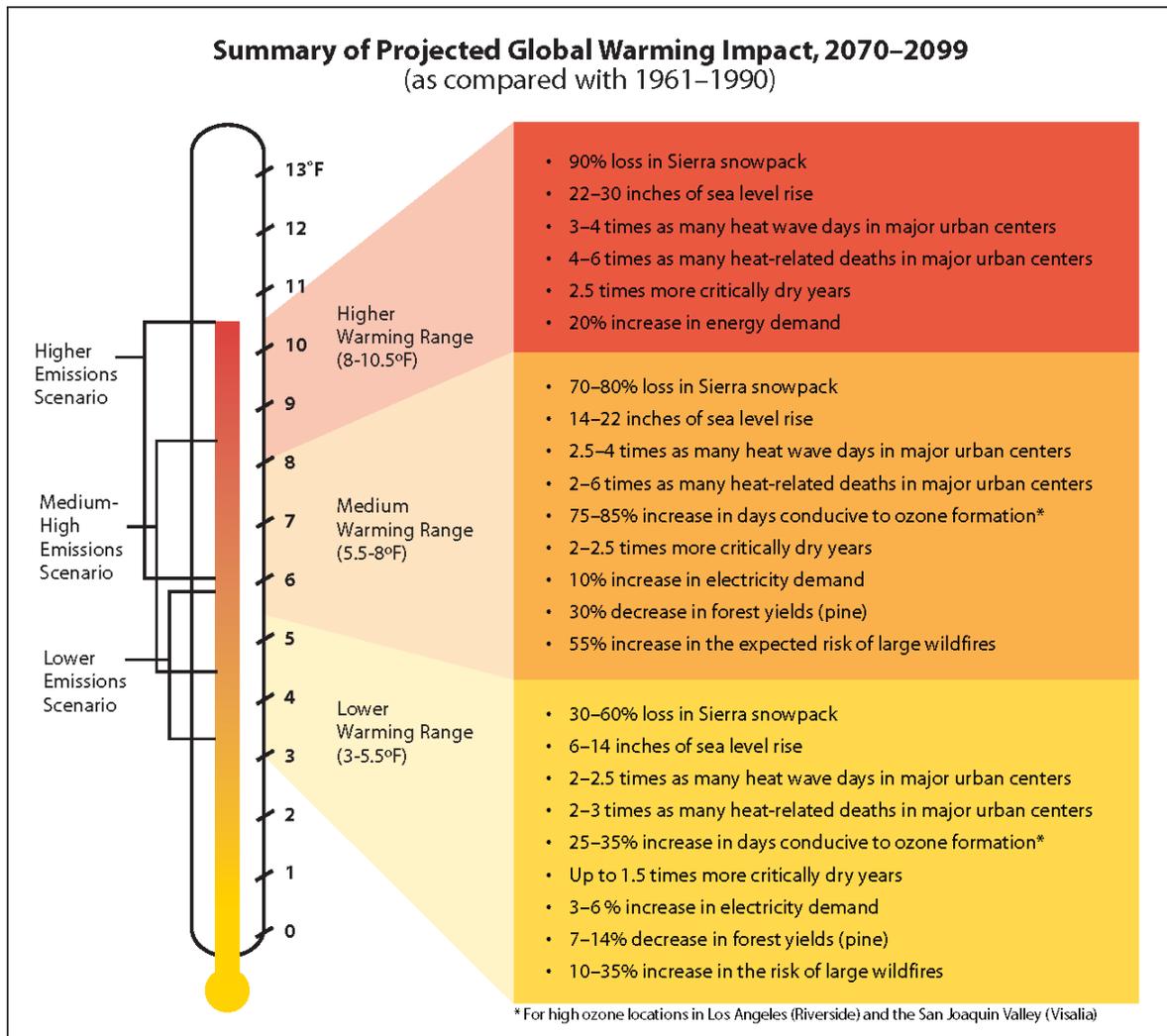
Methane: Methane is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Methane is also an asphyxiant and may displace oxygen in an enclosed space (14).

Nitrous Oxide: Nitrous Oxide is often referred to as laughing gas; it is a colorless greenhouse gas. The health effects associated with exposure to elevated concentrations of nitrous oxide include dizziness, euphoria, slight hallucinations, and in extreme cases of elevated concentrations nitrous oxide can also cause brain damage(14).

Fluorinated Gases: High concentrations of fluorinated gases can also result in adverse health effects such as asphyxiation, dizziness, headache, cardiovascular disease, cardiac disorders, and in extreme cases, increased mortality (13).

Aerosols: The health effects of aerosols are similar to that of other fine particulate matter. Thus aerosols can cause elevated respiratory and cardiovascular diseases as well as increased mortality (15).

**EXHIBIT 2-A: SUMMARY OF PROJECTED GLOBAL WARMING IMPACT**



**2.7 REGULATORY SETTING**

International Regulation and the Kyoto Protocol:

In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the United Nations’ Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHGs in the United States. The Plan currently consists of more than 50 voluntary programs for member nations to adopt.

The Kyoto protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Kyoto protocol are met, global GHG emissions could be reduced an estimated five

percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the United States is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the United States is not bound by the Protocol's commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Kyoto.

#### Federal Regulation and the Clean Air Act:

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

Previously the EPA had not regulated GHGs under the Clean Air Act (16) because it asserted that the Act did not authorize it to issue mandatory regulations to address global climate change and that such regulation would be unwise without an unequivocally established causal link between GHGs and the increase in global surface air temperatures. In *Massachusetts v. Environmental Protection Agency et al.* (127 S. Ct. 1438 (2007)), however, the U.S. Supreme Court held that GHGs are pollutants under the Clean Air Act and directed the EPA to decide whether the gases endangered public health or welfare. The EPA had also not moved aggressively to regulate GHGs because it expected Congress to make progress on GHG legislation, primarily from the standpoint of a cap-and-trade system. However, proposals circulated in both the House of Representative and Senate have been controversial and it may be some time before the U.S. Congress adopts major climate change legislation. The EPA's Endangerment Finding paves the way for federal regulation of GHGs with or without Congress.

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

#### Title 24 Energy Standards:

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (17) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The Energy Commission's most recent standard, 2013 Building Energy Efficiency Standard, is 25 percent more efficient than previous standards for residential construction and 30 percent better for nonresidential construction. The Standards,

which took effect on January 1, 2014, offer builders better windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses. Some improved measures in the Standards include:

Residential:

- Solar-ready roofs to allow homeowners to add solar photovoltaic panels at a future date
- More efficient windows to allow increased sunlight, while decreasing heat gain
- Insulated hot water pipes, to save water and energy and reduce the time it takes to deliver hot water
- Whole house fans to cool homes and attics with evening air reducing the need for air conditioning load
- Air conditioner installation verification to insure efficient operation

Nonresidential:

- High performance windows, sensors and controls that allow buildings to use "daylighting"
- Efficient process equipment in supermarkets, computer data centers, commercial kitchens, laboratories, and parking garages
- Advanced lighting controls to synchronize light levels with daylight and building occupancy, and provide demand response capability
- Solar-ready roofs to allow businesses to add solar photovoltaic panels at a future date
- Cool roof technologies

CALGreen

Part 11 of the Title 24 Building Standards Code is referred to as the California Green Building Standards Code (CALGreen Code) (18). The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). The CBSC has released the 2010 California Green Building Standards Code on its Web site. Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code.

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

The 2013 CALGreen include additions and amendments to the water efficiency standards for non residential buildings in order to comply with the reduced flow rate table. The 2013 CALGreen has also been rewritten to clarify and definitively identify the requirements and applicability for residential and nonresidential buildings.

California Assembly Bill No. 1493 (AB 1493):

AB 1493 requires CARB to develop and adopt the nation's first greenhouse gas emission standards for automobiles. The Legislature declared in AB 1493 that global warming was a matter of increasing concern for public health and environment in California (19). Further, the legislature stated that technological solutions to reduce greenhouse gas emissions would stimulate the California economy and provide jobs.

To meet the requirements of AB 1493, ARB approved amendments to the California Code of Regulations (CCR) adding GHG emission standards to California's existing motor vehicle emission standards in 2004. Amendments to CCR Title 13 Sections 1900 (CCR 13 1900) and 1961 (CCR 13 1961) and adoption of Section 1961.1 (CCR 13 1961.1) require automobile manufacturers to meet fleet average GHG emission limits for all passenger cars, light-duty trucks within various weight criteria, and medium-duty passenger vehicle weight classes beginning with the 2009 model year. Emission limits are further reduced each model year through 2016.

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

The Obama administration subsequently directed the USEPA to re-examine their decision. On May 19, 2009, challenging parties, automakers, the State of California, and the federal government reached an agreement on a series of actions that would resolve these current and potential future disputes over the standards through model year 2016. In summary, the USEPA and the U.S. Department of Transportation agreed to adopt a federal program to reduce GHGs and improve fuel economy, respectively, from passenger vehicles in order to achieve equivalent or greater greenhouse gas benefits as the AB 1493 regulations for the 2012–2016 model years.

Manufacturers agreed to ultimately drop current and forego similar future legal challenges, including challenging a waiver grant, which occurred on June 30, 2009. The State of California committed to (1) revise its standards to allow manufacturers to demonstrate compliance with the fleet-average GHG emission standard by “pooling” California and specified State vehicle sales; (2) revise its standards for 2012–2016 model year vehicles so that compliance with USEPA-adopted GHG standards would also comply with California’s standards; and (3) revise its standards, as necessary, to allow manufacturers to use emissions data from the federal CAFE program to demonstrate compliance with the AB 1493 regulations (CARB 2009, <http://www.arb.ca.gov/regact/2009/ghgpv09/ghgpvisor.pdf>) both of these programs are aimed at light-duty auto and light-duty trucks.

#### Executive Order S-3-05:

Executive Order S-3-05, which was signed by Governor Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change (20). It declares that increased temperatures could reduce the Sierra’s snowpack, further exacerbate California’s air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established total greenhouse gas emission targets. Specifically, emissions are to be reduced to the 1990 level by 2020, and to 80% below the 1990 level by 2050. The Executive Order directed the Secretary of the California Environmental Protection Agency (CalEPA) to coordinate a multi-agency effort to reduce greenhouse gas emissions to the target levels. The Secretary also is required to submit biannual reports to the Governor and state Legislature describing: (1) progress made toward reaching the emission targets; (2) impacts of global warming on California’s resources; and (3) mitigation and adaptation plans to combat these impacts. To comply with the Executive Order, the Secretary of the CalEPA created a Climate Action Team (CAT) made up of members from various state agencies and commission. CAT released its first report in March 2006. The report proposed to achieve the targets by building on voluntary actions of California businesses, local government and community actions, as well as through state incentive and regulatory programs.

#### California Assembly Bill 32 (AB 32):

In September 2006, Governor Arnold Schwarzenegger signed AB 32, the California Climate Solutions Act of 2006. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by the year 2020 (21). This reduction will be accomplished through an enforceable statewide cap on GHG emissions that will be phased in starting in 2012. To effectively implement the cap, AB 32 directs CARB to develop and implement regulations to reduce statewide GHG emissions from stationary sources. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

AB 32 requires that CARB adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrives at the cap; institute a schedule to meet the emissions cap; and develop tracking, reporting, and enforcement mechanisms to ensure that the state achieves reductions in GHG emissions necessary to meet the cap. AB 32 also includes

guidance to institute emissions reductions in an economically efficient manner and conditions to ensure that businesses and consumers are not unfairly affected by the reductions.

In November 2007, CARB completed its estimates of 1990 GHG levels. Net emission 1990 levels were estimated at 427 MMTs (emission sources by sector were: transportation – 35 percent; electricity generation – 26 percent; industrial – 24 percent; residential – 7 percent; agriculture – 5 percent; and commercial – 3 percent). Accordingly, 427 MMTs of CO<sub>2</sub> equivalent was established as the emissions limit for 2020. For comparison, CARB's estimate for baseline GHG emissions was 473 MMT for 2000 and 532 MMT for 2010. "Business as usual" conditions (without the 28.4 percent reduction to be implemented by CARB regulations) for 2020 were projected to be 596 MMTs.

In December 2007, CARB approved a regulation for mandatory reporting and verification of GHG emissions for major sources. This regulation covered major stationary sources such as cement plants, oil refineries, electric generating facilities/providers, and co-generation facilities, which comprise 94 percent of the point source CO<sub>2</sub> emissions in the State.

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

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

#### California Senate Bill No. 1368 (SB 1368):

In 2006, the State Legislature adopted Senate Bill 1368 ("SB 1368"), which was subsequently signed into law by the Governor (22). SB 1368 directs the California Public Utilities Commission ("CPUC") to adopt a greenhouse gas emission performance standard ("EPS") for the future power purchases of California utilities. SB 1368 seeks to limit carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. Due to the carbon content of its fuel source, a coal-fired plant

cannot meet this standard because such plants emit roughly twice as much carbon as natural gas, combined cycle plants.

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

#### Senate Bill 97 (SB 97):

Pursuant to the direction of SB 97, OPR released preliminary draft CEQA Guideline amendments for greenhouse gas emissions on January 8, 2009, and submitted its final proposed guidelines to the Secretary for Natural Resources on April 13, 2009 (23). The Natural Resources Agency adopted the Guideline amendments and they became effective on March 18, 2010.

Of note, the new guidelines state that a lead agency shall have discretion to determine whether to use a quantitative model or methodology, or in the alternative, rely on a qualitative analysis or performance based standards. CEQA Guideline § 15064.4(a)“A lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use . . .; or (2) Rely on a qualitative analysis or performance based standards.”

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

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

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

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

Source: CARB. 2008, MMTons CO<sub>2</sub>e: million metric tons of CO<sub>2</sub>e

<sup>1</sup>Reductions represent an estimate of what may be achieved from local land use changes. It is not the SB 375 regional target.

<sup>2</sup>According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles by approximately 2 percent through land use planning, resulting in a potential GHG reduction of 2 million metric tons of CO<sub>2</sub>e (or approximately 1.2 percent of the GHG reduction target). However, these reductions were not included in the Scoping Plan reductions to achieve the 2020 Target

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

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

1. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; or
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must include specific requirements that reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The CEQA Guideline amendments do not identify a threshold of significance for greenhouse gas emissions, nor do they prescribe assessment methodologies or specific mitigation measures. Instead, they call for a "good-faith effort, based on available information, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." The amendments encourage lead agencies to consider many factors in performing a CEQA analysis and preserve lead agencies' discretion to make their own determinations based upon substantial evidence. The amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. Specific GHG language incorporated in the Guidelines' suggested Environmental Checklist (Guidelines Appendix G) is as follows:

#### VII. GREENHOUSE GAS EMISSIONS

Would the project:

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

#### Executive Order S-01-07:

On January 18, 2007 California Governor Arnold Schwarzenegger, through Executive Order S-01-07, mandated a statewide goal to reduce the carbon intensity of California's transportation fuel by at least ten percent by 2020 (24). The order also requires that a California specific Low Carbon Fuel Standard be established for transportation fuels.

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

SB 1078 (Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20% of their supply from renewable sources by 2017 (25). SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010 (24). In November 2008 Governor Schwarzenegger signed Executive Order S-14-08, which expands the state's Renewable Energy Standard to 33% renewable power by 2020 (26).

### Senate Bill 375:

SB 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation(27). SB 375 requires metropolitan planning organizations (MPOs) to adopt a sustainable communities strategy (SCS) or alternative planning strategy (APS) that will prescribe land use allocation in that MPO's regional transportation plan. ARB, in consultation with MPOs, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035.

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

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

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

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

Separate from its Scoping Plan approved in December of 2008 (28), CARB issued a Staff Proposal in October 2008, as its first step toward developing recommended statewide interim thresholds of significance for GHGs that may be adopted by local agencies for their own use.

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

As currently proposed by CARB, a quantitative threshold of 7,000 metric tons (MT) of CO<sub>2</sub>e per year for operational emissions (excluding transportation), and performance standards yet to be defined for construction and transportation emissions are under consideration. However, CARB's proposal is not yet final, and thus cannot be applied to the Project.

#### South Coast Air Quality Management District Recommendations for Significance Thresholds:

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

Initially, SCAQMD staff presented the working group with a significance threshold that could be applied to various types of projects—residential; non-residential; industrial; etc (29). However, the threshold is still under development. In December 2008, staff presented the SCAQMD Governing Board with a significance threshold for stationary source projects where it is the lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e) as a screening numerical threshold for stationary sources. More importantly it should be noted that when setting the 10,000 MTCO<sub>2</sub>e threshold, the SCAQMD did not consider mobile sources (vehicular travel), rather the threshold is based mainly on stationary source generators such as boilers, refineries, power plants, etc. Therefore it would be misleading to apply a threshold that was developed without consideration for mobile sources to a Project where the majority of emissions are related to mobile sources. Thus there is no SCAQMD threshold that can be applied to this Project.

In September 2010(30), the Working Group released additional revisions that consist of the following recommended tiered approach:

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

- Tier 3 consists of screening values at the discretion of the lead agency; however they should be consistent for all projects within its jurisdiction. Project-related construction emissions should be amortized over 30 years and should be added back the Project’s operational emissions. The following thresholds are proposed for consideration:
  - 3,000 MTCO<sub>2</sub>e per year for all land use types
  - or
  - 3,500 MTCO<sub>2</sub>e per year for residential; 1,400 MTCO<sub>2</sub>e per year for commercial; or 3,000 MTCO<sub>2</sub>e per year for mixed-use projects
- Tier 4 has the following options:
  - Option 1: Reduce emissions from business as usual by a certain percentage (currently undefined)
  - Option 2: Early implementation of applicable AB 32 Scoping Plan measures
  - Option 3: A project-level efficiency target of 4.8 MTCO<sub>2</sub>e per service population as a 2020 target and 3.0 MTCO<sub>2</sub>e per service population as a 2035 target. The recommended plan-level target for 2020 is 6.6 MTCO<sub>2</sub>e and the plan level target for 2035 is 4.1 MTCO<sub>2</sub>e
- Tier 5 involves mitigation offsets to achieve target significance thresholds

The SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG reductions. However, these rules address boilers and process heater, forestry, and manure management projects, none of which are required by the Project

## 2.8 DISCUSSION ON ESTABLISHMENT OF SIGNIFICANCE THRESHOLDS

The County of San Bernardino has adopted a threshold of significance of 3,000 MTCO<sub>2</sub>e per year for GHG emissions. As such, a screening threshold of 3,000 MTCO<sub>2</sub>e per year is applied herein, which is a widely accepted screening threshold used by the County of Riverside(31) and numerous cities in the South Coast Air Basin and is based on the South Coast Air Quality Management District (SCAQMD) staff’s proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD’s *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* (“SCAQMD Interim GHG Threshold”).

Based on guidance from the County of San Bernardino Performance Standards, “projects that do not exceed 3,000 MTCO<sub>2</sub>e per year will be considered to be consistent with the Plan and determined to have a less than significant individual and cumulative impact for GHG emissions.” (1)

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### 3 PROJECT GREENHOUSE GAS IMPACT

#### 3.1 INTRODUCTION

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

#### 3.2 PROJECT RELATED GREENHOUSE GAS EMISSIONS

CEQA Guidelines 15064.4 (b) (1) states that a lead agency may use a model or methodology to quantify greenhouse gas emissions associated with a project (32).

On October 2, 2013, the SCAQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) released the latest version of the California Emissions Estimator Model™ (CalEEMod™) v2013.2.2. The purpose of this model is to more accurately calculate construction-source and operational-source criteria pollutant (NO<sub>x</sub>, VOC, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>x</sub>, and CO) and greenhouse gas (GHG) emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures (33). Accordingly, the latest version of CalEEMod™ has been used for this Project to determine construction and operational air quality impacts. Output from the model runs for both construction and operational activity are provided in Appendix 3.1

#### 3.3 LIFE-CYCLE ANALYSIS

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

#### 3.3 CONSTRUCTION EMISSIONS

Construction activities associated with the proposed Project will result in emissions of CO<sub>2</sub> and CH<sub>4</sub> from construction activities. The report [San Bernardino County FLOD Project Air Quality Impact Analysis Report](#), Urban Crossroads, Inc. (2015) contains detailed information regarding construction activity (34). For construction Project emissions, GHGs are quantified over the life of the Project.

#### 3.4 EMISSIONS SUMMARY

The annual GHG emissions associated with the construction of the proposed Project are estimated to be 131.06 MTCO<sub>2</sub>e per year as summarized in Table 3-1. Direct and indirect construction emissions associated with the Project are compared with the County of San Bernardino's threshold of 3,000 MTCO<sub>2</sub>e per year (1). As shown, the proposed Project would result in a less than significant impact with respect to GHG emissions.

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

Annual construction-related emissions	Emissions (metric tons per year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total CO <sub>2</sub> E
2015	130.31	0.04	--	131.06
<b>Total CO<sub>2</sub>E (Total Project)</b>	<b>131.06</b>			
<b>Threshold</b>	<b>3,000 MTCO<sub>2</sub>e</b>			
<b>Significant?</b>	<b>NO</b>			

Source: CalEEMod™ model output, See Appendix 3.1 for detailed model outputs.

Note: Totals obtained from CalEEMod™ and may not total 100% due to rounding.

Table results include scientific notation. *e* is used to represent *times ten raised to the power of* (which would be written as x 10<sup>*b*</sup>) and is followed by the value of the exponent

## 4 FINDINGS & CONCLUSIONS

The County of San Bernardino has adopted a threshold of significance of 3,000 MTCO<sub>2</sub>e per year for GHG emissions (1). As such, a screening threshold of 3,000 MTCO<sub>2</sub>e per year is applied herein, which is also a widely accepted screening threshold used by the County of Riverside and numerous cities in the South Coast Air Basin and is based on the South Coast Air Quality Management District (SCAQMD) staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* ("SCAQMD Interim GHG Threshold"). The County of San Bernardino GHG threshold identifies a screening threshold to determine the level of significance and whether additional analysis is required.

The Project will result in approximately 131.06 MTCO<sub>2</sub>e per year; the proposed project would not exceed the County of San Bernardino's threshold of 3,000 MTCO<sub>2</sub>e per year. Thus, project-related emissions would not have a significant direct or indirect impact on GHG and climate change.

### 4.1 STANDARD REGULATORY REQUIREMENTS/BEST AVAILABLE CONTROL MEASURES (BACMs)

Measures listed below (or equivalent language) shall appear on all Project grading plans, construction specifications and bid documents, and the County shall ensure such language is incorporated prior to issuance of any development permits.

SCAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 1113 (Architectural Coatings) (35); Rule 431.2 (Low Sulfur Fuel) (36); Rule 403 (Fugitive Dust) (37); and Rule 1186 / 1186.1 (Street Sweepers) (38). It should be noted that BACMs are not mitigation as they are standard regulatory requirements.

#### **BACM AQ-1**

The following measures shall be incorporated into Project plans and specifications as implementation of Rule 403 (4):

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.
- The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 miles per hour or less

### 4.2 MITIGATION MEASURES

No significant impacts were identified and no mitigation measures are required

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## 6 CERTIFICATION

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

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### EDUCATION

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

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

### PROFESSIONAL AFFILIATIONS

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

### PROFESSIONAL CERTIFICATIONS

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

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**APPENDIX 3.1:**  
**CALEEMOD EMISSIONS MODEL OUTPUTS**

**San Bernardino County FLOD**  
**San Bernardino-South Coast County, Annual**

## 1.0 Project Characteristics

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### 1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
City Park	779.80	Acre	779.80	33,968,088.00	0

### 1.2 Other Project Characteristics

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	32
<b>Climate Zone</b>	10			<b>Operational Year</b>	2015
<b>Utility Company</b>	Southern California Edison				
<b>CO2 Intensity (lb/MWhr)</b>	551.29	<b>CH4 Intensity (lb/MWhr)</b>	0.029	<b>N2O Intensity (lb/MWhr)</b>	0.006

### 1.3 User Entered Comments & Non-Default Data

Project Characteristics - Source: CPUC GHG Calculator version 3c, worksheet tab "CO2 Allocations," cells AH/AQ 35-44.

Land Use - based on information provided by the applicant

Construction Phase - based on consultation with the applicant

Off-road Equipment - based on consultation with the applicant

Vehicle Trips - operational emissions not modeled

Vehicle Emission Factors - operational emissions not modeled

Vehicle Emission Factors - operational emissions not modeled

Vehicle Emission Factors - operational emissions not modeled

Energy Use - operational emissions not modeled

Water And Wastewater - operational emissions not modeled

Construction Off-road Equipment Mitigation - tier 2 mitigation to all construction equipment greater than 150 HP

Off-road Equipment - based on information provided by the applicant

Off-road Equipment - based on information provided by the applicant

Off-road Equipment - based on information provided by the applicant

Grading -

Solid Waste - operational emissions not modeled

Table Name	Column Name	Default Value	New Value
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tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	3.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	3.00
tblConstEquipMitigation	Tier	No Change	Tier 2
tblConstEquipMitigation	Tier	No Change	Tier 2
tblConstEquipMitigation	Tier	No Change	Tier 2
tblConstEquipMitigation	Tier	No Change	Tier 2
tblConstEquipMitigation	Tier	No Change	Tier 2

tblConstructionPhase	NumDays	1,240.00	16.00
tblConstructionPhase	NumDays	1,240.00	6.00
tblConstructionPhase	NumDays	480.00	11.00
tblOffRoadEquipment	HorsePower	400.00	189.00
tblOffRoadEquipment	HorsePower	400.00	189.00
tblOffRoadEquipment	HorsePower	400.00	189.00
tblOffRoadEquipment	LoadFactor	0.38	0.50
tblOffRoadEquipment	LoadFactor	0.38	0.50
tblOffRoadEquipment	LoadFactor	0.38	0.50
tblOffRoadEquipment	OffRoadEquipmentType	Graders	Dumpers/Tenders
tblOffRoadEquipment	OffRoadEquipmentType	Excavators	Cement and Mortar Mixers
tblOffRoadEquipment	OffRoadEquipmentType	Rubber Tired Dozers	Dumpers/Tenders
tblOffRoadEquipment	OffRoadEquipmentType	Rubber Tired Dozers	Dumpers/Tenders
tblOffRoadEquipment	OffRoadEquipmentType	Scrapers	Rough Terrain Forklifts
tblOffRoadEquipment	OffRoadEquipmentType	Tractors/Loaders/Backhoes	Rubber Tired Loaders
tblOffRoadEquipment	OffRoadEquipmentType	Tractors/Loaders/Backhoes	Rough Terrain Forklifts
tblOffRoadEquipment	OffRoadEquipmentType	Tractors/Loaders/Backhoes	Graders
tblOffRoadEquipment	OffRoadEquipmentType		Rubber Tired Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Off-Highway Trucks
tblOffRoadEquipment	OffRoadEquipmentType		Skid Steer Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Air Compressors
tblOffRoadEquipment	OffRoadEquipmentType		Off-Highway Tractors
tblOffRoadEquipment	OffRoadEquipmentType		Off-Highway Trucks
tblOffRoadEquipment	OffRoadEquipmentType		Scrapers
tblOffRoadEquipment	OffRoadEquipmentType		Off-Highway Trucks
tblOffRoadEquipment	OffRoadEquipmentType		Skid Steer Loaders
tblOffRoadEquipment	OffRoadEquipmentType		Air Compressors
tblOffRoadEquipment	OffRoadEquipmentType		Off-Highway Tractors



tblProjectCharacteristics	CO2IntensityFactor	630.89	551.29
tblProjectCharacteristics	OperationalYear	2014	2015
tblSolidWaste	SolidWasteGenerationRate	67.06	0.00
tblVehicleEF	HHD	0.04	0.00
tblVehicleEF	HHD	0.04	0.00
tblVehicleEF	HHD	0.04	0.00
tblVehicleEF	LDA	0.47	0.00
tblVehicleEF	LDA	0.47	0.00
tblVehicleEF	LDA	0.47	0.00
tblVehicleEF	LDT1	0.07	0.00
tblVehicleEF	LDT1	0.07	0.00
tblVehicleEF	LDT1	0.07	0.00
tblVehicleEF	LDT2	0.17	0.00
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tblVehicleTrips	CNW_TL	6.90	0.00
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tblVehicleTrips	ST_TR	1.59	0.00
tblVehicleTrips	SU_TR	1.59	0.00
tblVehicleTrips	WD_TR	1.59	0.00
tblWater	ElectricityIntensityFactorForWastewaterTreatment	1,911.00	0.00
tblWater	ElectricityIntensityFactorToDistribute	1,272.00	0.00
tblWater	ElectricityIntensityFactorToSupply	9,727.00	0.00
tblWater	ElectricityIntensityFactorToTreat	111.00	0.00
tblWater	OutdoorWaterUseRate	929,117,156.47	0.00

## 2.0 Emissions Summary

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**2.2 Overall Operational**

**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	162.1052	1.0000e-004	0.0103	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0194	0.0194	6.0000e-005	0.0000	0.0205
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>162.1052</b>	<b>1.0000e-004</b>	<b>0.0103</b>	<b>0.0000</b>	<b>0.0000</b>	<b>4.0000e-005</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>4.0000e-005</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>0.0194</b>	<b>0.0194</b>	<b>6.0000e-005</b>	<b>0.0000</b>	<b>0.0205</b>

## 2.2 Overall Operational

### Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	162.1052	1.0000e-004	0.0103	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0194	0.0194	6.0000e-005	0.0000	0.0205
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>162.1052</b>	<b>1.0000e-004</b>	<b>0.0103</b>	<b>0.0000</b>	<b>0.0000</b>	<b>4.0000e-005</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>4.0000e-005</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>0.0194</b>	<b>0.0194</b>	<b>6.0000e-005</b>	<b>0.0000</b>	<b>0.0205</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

## 3.0 Construction Detail

### Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Removal of Vegetation / Graffiti Removal	Site Preparation	9/15/2015	9/29/2015	5	11	
2	Bank Repair / Stockpiling	Grading	9/30/2015	10/21/2015	5	16	
3	Ingress / Egress	Grading	10/22/2015	10/29/2015	5	6	

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Removal of Vegetation / Graffiti Removal	Rubber Tired Loaders	1	8.00	199	0.36
Removal of Vegetation / Graffiti Removal	Off-Highway Trucks	2	8.00	400	0.38
Removal of Vegetation / Graffiti Removal	Dumpers/Tenders	2	8.00	16	0.38
Bank Repair / Stockpiling	Rubber Tired Dozers	1	8.00	255	0.40
Bank Repair / Stockpiling	Dumpers/Tenders	8	8.00	16	0.38
Ingress / Egress	Cement and Mortar Mixers	1	8.00	9	0.56
Bank Repair / Stockpiling	Excavators	1	8.00	162	0.38
Removal of Vegetation / Graffiti Removal	Skid Steer Loaders	2	8.00	64	0.37
Removal of Vegetation / Graffiti Removal	Air Compressors	1	8.00	78	0.48
Ingress / Egress	Rubber Tired Dozers	1	8.00	255	0.40
Ingress / Egress	Dumpers/Tenders	6	8.00	16	0.38
Bank Repair / Stockpiling	Rough Terrain Forklifts	1	8.00	100	0.40
Ingress / Egress	Excavators	1	8.00	162	0.38

Removal of Vegetation / Graffiti Removal	Off-Highway Tractors	1	8.00	122	0.44
Bank Repair / Stockpiling	Rubber Tired Loaders	1	8.00	199	0.36
Ingress / Egress	Rough Terrain Forklifts	1	8.00	100	0.40
Removal of Vegetation / Graffiti Removal	Graders	1	8.00	174	0.41
Removal of Vegetation / Graffiti Removal	Off-Highway Trucks	1	8.00	189	0.50
Bank Repair / Stockpiling	Scrapers	2	8.00	361	0.48
Bank Repair / Stockpiling	Off-Highway Trucks	1	8.00	400	0.38
Bank Repair / Stockpiling	Skid Steer Loaders	2	8.00	64	0.37
Bank Repair / Stockpiling	Air Compressors	1	8.00	78	0.48
Bank Repair / Stockpiling	Off-Highway Tractors	1	8.00	122	0.44
Bank Repair / Stockpiling	Off-Highway Trucks	1	8.00	189	0.50
Bank Repair / Stockpiling	Graders	1	8.00	174	0.41
Ingress / Egress	Graders	1	8.00	174	0.41
Ingress / Egress	Rubber Tired Loaders	1	8.00	199	0.36
Ingress / Egress	Off-Highway Trucks	1	8.00	400	0.38
Ingress / Egress	Off-Highway Tractors	1	8.00	122	0.44
Ingress / Egress	Off-Highway Trucks	1	8.00	189	0.50
Removal of Vegetation / Graffiti Removal	Rubber Tired Dozers	0	8.00	255	0.40
Ingress / Egress	Scrapers	0	8.00	361	0.48
Bank Repair / Stockpiling	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Ingress / Egress	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Removal of Vegetation / Graffiti Removal	Tractors/Loaders/Backhoes	0	8.00	97	0.37

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Removal of Vegetation / Graffiti P	11	28.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Bank Repair / Stockpiling	21	53.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Ingress / Egress	15	38.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

### 3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Water Exposed Area

Clean Paved Roads

### 3.2 Removal of Vegetation / Graffiti Removal - 2015

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.9200e-003	0.0000	2.9200e-003	3.1000e-004	0.0000	3.1000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0316	0.3448	0.1642	3.4000e-004		0.0159	0.0159		0.0148	0.0148	0.0000	31.5437	31.5437	8.9900e-003	0.0000	31.7324
<b>Total</b>	<b>0.0316</b>	<b>0.3448</b>	<b>0.1642</b>	<b>3.4000e-004</b>	<b>2.9200e-003</b>	<b>0.0159</b>	<b>0.0188</b>	<b>3.1000e-004</b>	<b>0.0148</b>	<b>0.0151</b>	<b>0.0000</b>	<b>31.5437</b>	<b>31.5437</b>	<b>8.9900e-003</b>	<b>0.0000</b>	<b>31.7324</b>

### 3.2 Removal of Vegetation / Graffiti Removal - 2015

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.7000e-004	1.0000e-003	0.0105	2.0000e-005	1.6900e-003	1.0000e-005	1.7000e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5654	1.5654	9.0000e-005	0.0000	1.5673
<b>Total</b>	<b>6.7000e-004</b>	<b>1.0000e-003</b>	<b>0.0105</b>	<b>2.0000e-005</b>	<b>1.6900e-003</b>	<b>1.0000e-005</b>	<b>1.7000e-003</b>	<b>4.5000e-004</b>	<b>1.0000e-005</b>	<b>4.6000e-004</b>	<b>0.0000</b>	<b>1.5654</b>	<b>1.5654</b>	<b>9.0000e-005</b>	<b>0.0000</b>	<b>1.5673</b>

#### Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.1400e-003	0.0000	1.1400e-003	1.2000e-004	0.0000	1.2000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0251	0.3054	0.1702	3.4000e-004		0.0128	0.0128		0.0120	0.0120	0.0000	31.5437	31.5437	8.9900e-003	0.0000	31.7324
<b>Total</b>	<b>0.0251</b>	<b>0.3054</b>	<b>0.1702</b>	<b>3.4000e-004</b>	<b>1.1400e-003</b>	<b>0.0128</b>	<b>0.0139</b>	<b>1.2000e-004</b>	<b>0.0120</b>	<b>0.0121</b>	<b>0.0000</b>	<b>31.5437</b>	<b>31.5437</b>	<b>8.9900e-003</b>	<b>0.0000</b>	<b>31.7324</b>

### 3.2 Removal of Vegetation / Graffiti Removal - 2015

#### Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.7000e-004	1.0000e-003	0.0105	2.0000e-005	1.6900e-003	1.0000e-005	1.7000e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5654	1.5654	9.0000e-005	0.0000	1.5673
<b>Total</b>	<b>6.7000e-004</b>	<b>1.0000e-003</b>	<b>0.0105</b>	<b>2.0000e-005</b>	<b>1.6900e-003</b>	<b>1.0000e-005</b>	<b>1.7000e-003</b>	<b>4.5000e-004</b>	<b>1.0000e-005</b>	<b>4.6000e-004</b>	<b>0.0000</b>	<b>1.5654</b>	<b>1.5654</b>	<b>9.0000e-005</b>	<b>0.0000</b>	<b>1.5673</b>

### 3.3 Bank Repair / Stockpiling - 2015

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0694	0.0000	0.0694	0.0288	0.0000	0.0288	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0798	0.9028	0.5268	8.0000e-004		0.0411	0.0411		0.0381	0.0381	0.0000	74.6408	74.6408	0.0212	0.0000	75.0850
<b>Total</b>	<b>0.0798</b>	<b>0.9028</b>	<b>0.5268</b>	<b>8.0000e-004</b>	<b>0.0694</b>	<b>0.0411</b>	<b>0.1105</b>	<b>0.0288</b>	<b>0.0381</b>	<b>0.0669</b>	<b>0.0000</b>	<b>74.6408</b>	<b>74.6408</b>	<b>0.0212</b>	<b>0.0000</b>	<b>75.0850</b>

### 3.3 Bank Repair / Stockpiling - 2015

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.8300e-003	2.7500e-003	0.0289	6.0000e-005	4.6500e-003	4.0000e-005	4.6900e-003	1.2300e-003	3.0000e-005	1.2700e-003	0.0000	4.3100	4.3100	2.4000e-004	0.0000	4.3152
<b>Total</b>	<b>1.8300e-003</b>	<b>2.7500e-003</b>	<b>0.0289</b>	<b>6.0000e-005</b>	<b>4.6500e-003</b>	<b>4.0000e-005</b>	<b>4.6900e-003</b>	<b>1.2300e-003</b>	<b>3.0000e-005</b>	<b>1.2700e-003</b>	<b>0.0000</b>	<b>4.3100</b>	<b>4.3100</b>	<b>2.4000e-004</b>	<b>0.0000</b>	<b>4.3152</b>

#### Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0271	0.0000	0.0271	0.0112	0.0000	0.0112	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0430	0.6752	0.4317	8.0000e-004		0.0239	0.0239		0.0230	0.0230	0.0000	74.6407	74.6407	0.0212	0.0000	75.0849
<b>Total</b>	<b>0.0430</b>	<b>0.6752</b>	<b>0.4317</b>	<b>8.0000e-004</b>	<b>0.0271</b>	<b>0.0239</b>	<b>0.0510</b>	<b>0.0112</b>	<b>0.0230</b>	<b>0.0342</b>	<b>0.0000</b>	<b>74.6407</b>	<b>74.6407</b>	<b>0.0212</b>	<b>0.0000</b>	<b>75.0849</b>

### 3.3 Bank Repair / Stockpiling - 2015

#### Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.8300e-003	2.7500e-003	0.0289	6.0000e-005	4.6500e-003	4.0000e-005	4.6900e-003	1.2300e-003	3.0000e-005	1.2700e-003	0.0000	4.3100	4.3100	2.4000e-004	0.0000	4.3152
<b>Total</b>	<b>1.8300e-003</b>	<b>2.7500e-003</b>	<b>0.0289</b>	<b>6.0000e-005</b>	<b>4.6500e-003</b>	<b>4.0000e-005</b>	<b>4.6900e-003</b>	<b>1.2300e-003</b>	<b>3.0000e-005</b>	<b>1.2700e-003</b>	<b>0.0000</b>	<b>4.3100</b>	<b>4.3100</b>	<b>2.4000e-004</b>	<b>0.0000</b>	<b>4.3152</b>

### 3.4 Ingress / Egress - 2015

#### Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0197	0.0000	0.0197	0.0101	0.0000	0.0101	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0186	0.2054	0.1115	1.8000e-004		9.4000e-003	9.4000e-003		8.6800e-003	8.6800e-003	0.0000	17.0956	17.0956	4.8900e-003	0.0000	17.1982
<b>Total</b>	<b>0.0186</b>	<b>0.2054</b>	<b>0.1115</b>	<b>1.8000e-004</b>	<b>0.0197</b>	<b>9.4000e-003</b>	<b>0.0291</b>	<b>0.0101</b>	<b>8.6800e-003</b>	<b>0.0188</b>	<b>0.0000</b>	<b>17.0956</b>	<b>17.0956</b>	<b>4.8900e-003</b>	<b>0.0000</b>	<b>17.1982</b>

### 3.4 Ingress / Egress - 2015

#### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr										MT/yr						
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.9000e-004	7.4000e-004	7.7700e-003	1.0000e-005	1.2500e-003	1.0000e-005	1.2600e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.1588	1.1588	7.0000e-005	0.0000	1.1602	
<b>Total</b>	<b>4.9000e-004</b>	<b>7.4000e-004</b>	<b>7.7700e-003</b>	<b>1.0000e-005</b>	<b>1.2500e-003</b>	<b>1.0000e-005</b>	<b>1.2600e-003</b>	<b>3.3000e-004</b>	<b>1.0000e-005</b>	<b>3.4000e-004</b>	<b>0.0000</b>	<b>1.1588</b>	<b>1.1588</b>	<b>7.0000e-005</b>	<b>0.0000</b>	<b>1.1602</b>	

#### Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					7.6700e-003	0.0000	7.6700e-003	3.9400e-003	0.0000	3.9400e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0113	0.1622	0.0976	1.8000e-004		5.8400e-003	5.8400e-003		5.5400e-003	5.5400e-003	0.0000	17.0956	17.0956	4.8900e-003	0.0000	17.1982
<b>Total</b>	<b>0.0113</b>	<b>0.1622</b>	<b>0.0976</b>	<b>1.8000e-004</b>	<b>7.6700e-003</b>	<b>5.8400e-003</b>	<b>0.0135</b>	<b>3.9400e-003</b>	<b>5.5400e-003</b>	<b>9.4800e-003</b>	<b>0.0000</b>	<b>17.0956</b>	<b>17.0956</b>	<b>4.8900e-003</b>	<b>0.0000</b>	<b>17.1982</b>



**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

**4.3 Trip Type Information**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	0.00	0.00	0.00	33.00	48.00	19.00	66	28	6

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

**5.0 Energy Detail**

~~4.4 Fleet Mix~~

Historical Energy Use: N

**5.1 Mitigation Measures Energy**



### 5.2 Energy by Land Use - NaturalGas

#### Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Land Use	kBTU/yr	tons/yr										MT/yr						
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>								

### 5.3 Energy by Land Use - Electricity

#### Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

### 5.3 Energy by Land Use - Electricity

#### Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

### 6.0 Area Detail

#### 6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	162.1052	1.0000e-004	0.0103	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0194	0.0194	6.0000e-005	0.0000	0.0205
Unmitigated	162.1052	1.0000e-004	0.0103	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0194	0.0194	6.0000e-005	0.0000	0.0205

## 6.2 Area by SubCategory

### Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	39.3605					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	122.7437					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.0200e-003	1.0000e-004	0.0103	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0194	0.0194	6.0000e-005	0.0000	0.0205
<b>Total</b>	<b>162.1053</b>	<b>1.0000e-004</b>	<b>0.0103</b>	<b>0.0000</b>		<b>4.0000e-005</b>	<b>4.0000e-005</b>		<b>4.0000e-005</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>0.0194</b>	<b>0.0194</b>	<b>6.0000e-005</b>	<b>0.0000</b>	<b>0.0205</b>

### Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Consumer Products	122.7437					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.0200e-003	1.0000e-004	0.0103	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0194	0.0194	6.0000e-005	0.0000	0.0205
Architectural Coating	39.3605					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>162.1053</b>	<b>1.0000e-004</b>	<b>0.0103</b>	<b>0.0000</b>		<b>4.0000e-005</b>	<b>4.0000e-005</b>		<b>4.0000e-005</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>0.0194</b>	<b>0.0194</b>	<b>6.0000e-005</b>	<b>0.0000</b>	<b>0.0205</b>

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

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

### 7.2 Water by Land Use

#### Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

## 7.2 Water by Land Use

### Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

## 8.0 Waste Detail

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### 8.1 Mitigation Measures Waste

#### Category/Year

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

## 8.2 Waste by Land Use

### Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

### Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

## 9.0 Operational Offroad

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Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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## **10.0 Vegetation**

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