



Pioneertown Motel Expansion

GREENHOUSE GAS ANALYSIS

COUNTY OF SAN BERNARDINO

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LIST OF ABBREVIATED TERMS

(1)	Reference
%	Percent
AB	Assembly Bill
AB 32	Global Warming Solutions Act of 2006
AB 1493	Pavley Fuel Efficiency Standards
AB 1881	California Water Conservation in Landscaping Act of 2006
APA	Administrative Procedure Act
AQIA	Air Quality Impact Analysis
BAU	Business As Usual
BSC	Building Standards Commission
CAA	Federal Clean Air Act
CalEEMod	California Emissions Estimator Model™
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGAPS	California LBNL GHG Analysis of Policies Spreadsheet
CALGreen	Californina Green Building Standards Code
CalRecycle	California's Department of Resources Recycling and Recovery
CalSTA	California State Transportation Agency
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resource Board
CCR	California Code of Regulations
CDFA	California Department of Food and Agriculture
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFC	Chlorofluorocarbons
CH ₄	Methane
CNRA	California Natural Resources Agency
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
Convention	United Nations Framework Convention on Climate Change
COP	UNCFCC Conference of the Parties
County	Coutny of San Bernardino

CPUC	California Public Utilities Commission
CTC	California Transportation Commission
DOF	Department of Finance
EPA	Environmental Protection Agency
FED	Functional Equivelent Document
GCC	Global Climate Change
Gg	Gigagram
GHG	Greenhouse Gas
GHGA	Greenhouse Gas Analysis
Gpd/acre	Gallons per Day per Acre
GO-Biz	Governor's Office of Business and Economic Development
GWP	Global Warming Potential
H ₂ O	Water Vapor
HD	Heavy-Duty
HFC	Hydrofluorocarbons
IBank	California Infrastructure and Economic Development Bank
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Resource Planning
LBNL	Lawrence Berkeley National Laboratory
LCA	Life-Cycle Analysis
LCFS	Low Carbon Fuel Standard
MD	Medium-Duty
MDAQMD	Mojave Desert Air Quality Management District
MMT	Million Metric Tons
MMTCO ₂ e	Million Metric Ton of Carbon Dioxide Equivalent
MPG	Miles Per Gallon
MT	Metric Tons
MT/yr	Metric Tons per Year
MTCO ₂ e	Metric Ton of Carbon Dioxide Equivalent
MY	Model Year
N ₂ O	Nitrogen Dioxide
NDC	Nationally Determined Contributions
NHTSA	National Highway Traffic Safety Administration
NO _x	Oxides of Nitrogen
NF ₃	Nitrogen Trifluoride
OAL	Office of Administrative Law
Ordinance	Model Water Efficient Landscape Ordinance
OPR	Govenor's Office of Planning and Research

PDF	Project Design Features
PFC	Perfluorocarbons
PM ₁₀	Particulate Matter 10 microns in diameter or less
PM _{2.5}	Particulate Matter 2.5 microns in diameter or less
ppb	Parts Per Billion
ppm	Parts Per Million
ppt	Parts Per Trillion
Project	Pioneertown Motel Expansion
PSD	Prevention Significant Deterioration
RPS	Renewables Portfolio Standard
SB	Senate Bill
SB 32	Senate Bill 32
SB 375	Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies
SCAQMD	South Coast Air Quality Management District
Scoping Plan	CARB's Climate Change Scoping Plan
sf	Square Feet
SF ₆	Sulfur Hexafluoride
SGC	Strategic Growth Council
SLPS	Short-Lived Climate Pollutant Strategy
SO _x	Oxides of Sulfur
SWRCB	California State Water Resources Control Board
tpy	Tons Per Year
TSF	Thousand Square Feet
UNFCCC	United Nations' Framework Convention on Climate Change
Update	CARB approved First Updated to the Scoping Plan
VMT	Vehicle-Miles Traveled
VOC	Volatile Organic Compounds
ZE/NZE	Zero- and near-zero-emission
ZEV	Zero Emission Vehicle

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EXECUTIVE SUMMARY

ES.1 SUMMARY OF FINDINGS

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

TABLE ES-1: SUMMARY OF CEQA SIGNIFICANCE FINDINGS

Analysis	Report Section	Significance Findings	
		Unmitigated	Mitigated
GHG Impact #1: The Project would not generate direct or indirect GHG emission that would result in a significant impact on the environment.	3.7	<i>Less Than Significant</i>	<i>n/a</i>
GHG Impact #2: The Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.	3.7	<i>Less Than Significant</i>	<i>n/a</i>

ES.2 REGULATORY REQUIREMENTS

The Project would be required to comply with all mandates imposed by the State of California and the Mojave Desert Air Quality Management District (MDAQMD). Those that are applicable to the Project and that would assist in the reduction of GHG emissions are:

- Global Warming Solutions Act of 2006 (AB 32) (2).
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (SB 375) (3).
- Pavley Fuel Efficiency Standards (AB 1493). Establishes fuel efficiency ratings for new vehicles (4).
- Title 24 California Code of Regulations (California Building Code). Establishes energy efficiency requirements for new construction (5).
- Title 20 California Code of Regulations (Appliance Energy Efficiency Standards). Establishes energy efficiency requirements for appliances (6).
- Title 17 California Code of Regulations (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020 (7).
- California Water Conservation in Landscaping Act of 2006 (AB 1881). Requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or

equivalent by January 1, 2010 to ensure efficient landscapes in new development and reduced water waste in existing landscapes (8).

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

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1 INTRODUCTION

This report presents the results of the GHGA prepared by Urban Crossroads, Inc., for the Pioneertown Motel Expansion (Project).

The purpose of this GHGA is to evaluate Project-related construction and operational emissions and determine the level of GHG impacts as a result of constructing and operating the proposed Project.

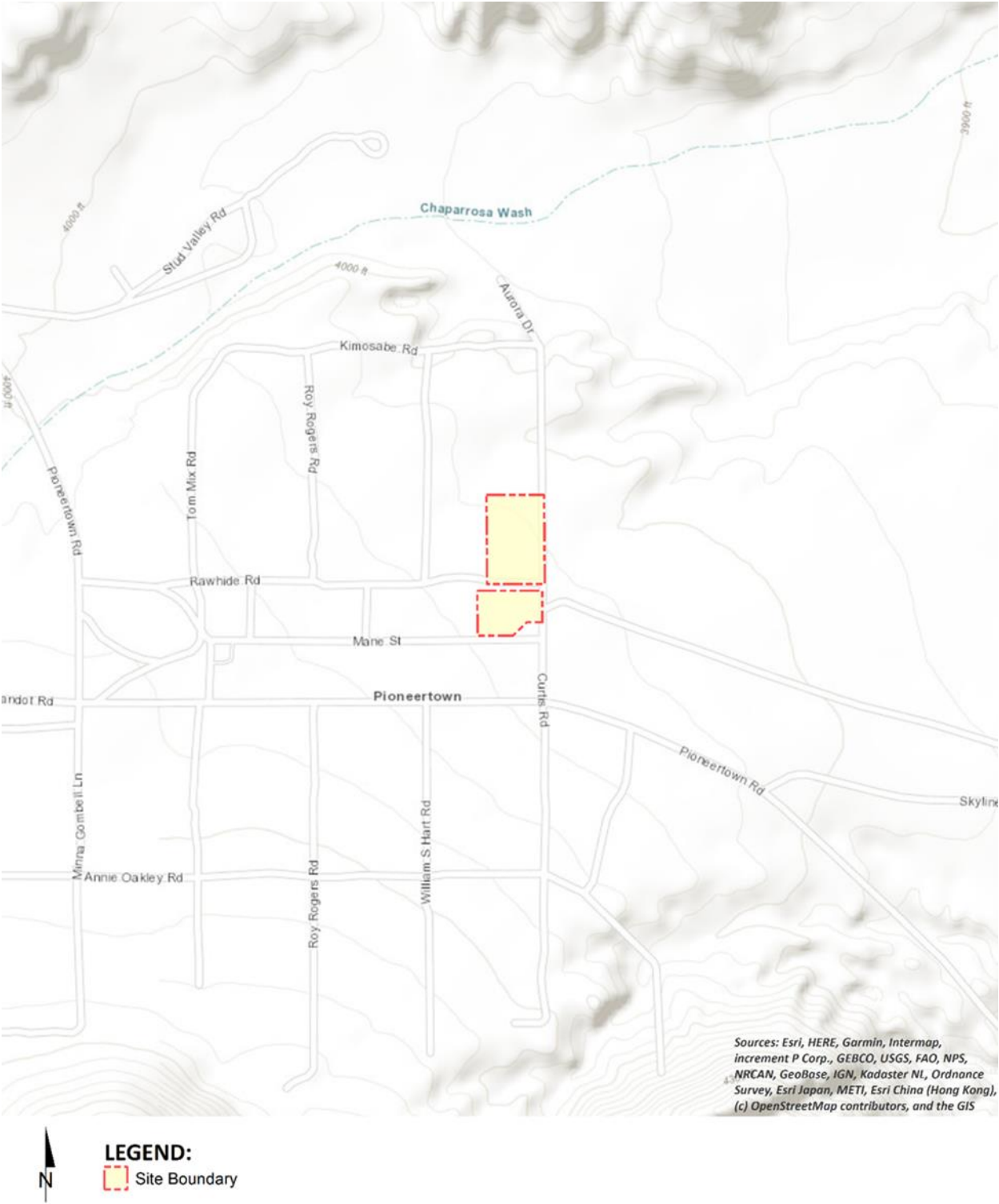
1.1 SITE LOCATION

The proposed Pioneertown Motel Expansion Project is located at 5240 Curtis Road in the County of San Bernardino, as shown on Exhibit 1-A. The area surrounding the Project Site includes residential dwellings to the north, retail shops and a restaurant located on Mane Street and Pioneertown road to the south. Vacant land and residential homes are located east of the Project site with addition rural residential homes located to the west.

1.2 PROJECT DESCRIPTION

Pioneertown Motel Expansion will expand the existing use to include 67 additional motel rooms for a total proposed development area of 2.79 acres. As proposed the Pioneertown Motel will include event space, offices, an equestrian lot, a horse loafing shed, a pool and spa. The facility will be open to guests, with some portions available to the public. The facility will be staffed 24 hours a day, seven days a week. The site plan for the proposed Project is shown on Exhibit 1-B.

EXHIBIT 1-A: LOCATION MAP



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2 CLIMATE CHANGE SETTING

2.1 INTRODUCTION TO GLOBAL CLIMATE CHANGE

GCC is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years.

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

2.2 GLOBAL CLIMATE CHANGE DEFINED

GCC refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO₂, N₂O, CH₄, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), nitrogen trifluoride (NF₃), and sulfur hexafluoride (SF₆). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radioactive heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages.

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

2.3 GHGs

2.3.1 GHGs AND HEALTH EFFECTS

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. Many gases demonstrate these properties and as discussed in Table 2-1. For the purposes of this analysis, emissions of CO₂, CH₄, and N₂O were evaluated (see Table 3-1 later in

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

TABLE 2-1: GHGS

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

GHGs	Description	Sources	Health Effects
	feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the earth's surface and heat it up) (12).		
CO ₂	CO ₂ is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO ₂ concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30%. Left unchecked, the concentration of CO ₂ in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources (13).	CO ₂ is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil, natural gas, and wood. CO ₂ is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks (14).	Outdoor levels of CO ₂ are not high enough to result in negative health effects. According to the National Institute for Occupational Safety and Health (NIOSH) high concentrations of CO ₂ can result in health effects such as: headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. It should be noted that current concentrations of CO ₂ in the earth's atmosphere are estimated to be approximately 370 ppm, the actual reference exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour workweek and short-term reference exposure levels of 30,000 ppm averaged over a 15 minute period (15).

GHGs	Description	Sources	Health Effects
CH ₄	CH ₄ is an extremely effective absorber of radiation, although its atmospheric concentration is less than CO ₂ and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs.	CH ₄ has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of CH ₄ . Other anthropogenic sources include fossil-fuel combustion and biomass burning (16).	CH ₄ is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to high levels of CH ₄ can cause asphyxiation, loss of consciousness, headache and dizziness, nausea and vomiting, weakness, loss of coordination, and an increased breathing rate.
N ₂ O	N ₂ O, also known as laughing gas, is a colorless GHG. Concentrations of N ₂ O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb).	N ₂ O 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	N ₂ O can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage) (17).

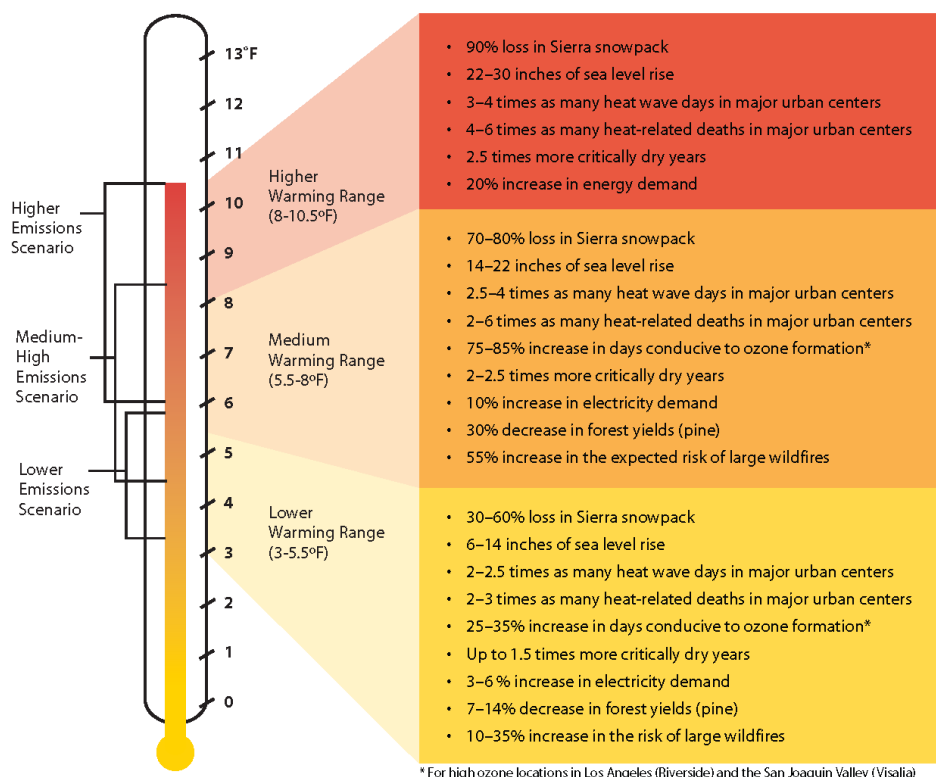
GHGs	Description	Sources	Health Effects
		used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. N ₂ O can be transported into the stratosphere, be deposited on the earth's surface, and be converted to other compounds by chemical reaction (17).	
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in CH ₄ or ethane (C ₂ H ₆) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the earth's surface).	CFCs have no natural source but were first synthesized in 1928. They were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years (18).	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.

GHGs	Description	Sources	Health Effects
HFCs	HFCs are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential (GWP). The HFCs with the largest measured atmospheric abundances are (in order), Fluoroform (HFC-23), 1,1,1,2-tetrafluoroethane (HFC-134a), and 1,1-difluoroethane (HFC-152a). Prior to 1990, the only significant emissions were of HFC-23. HFC-134a emissions are increasing due to its use as a refrigerant.	HFCs are manmade for applications such as automobile air conditioners and refrigerants.	No health effects are known to result from exposure to HFCs.
PFCs	PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above earth's surface, are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF ₄) and hexafluoroethane (C ₂ F ₆). The EPA estimates that concentrations of CF ₄ in the atmosphere are over 70 parts per trillion (ppt).	The two main sources of PFCs are primary aluminum production and semiconductor manufacture.	No health effects are known to result from exposure to PFCs.
SF ₆	SF ₆ is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900) (19). The EPA indicates that concentrations in the 1990s were about 4 ppt.	SF ₆ is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.	In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.

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

The potential health effects related directly to the emissions of CO₂, CH₄, and N₂O as they relate to development projects such as the proposed Project are still being debated in the scientific community. Their cumulative effects to GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport that higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change will likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas (22). Exhibit 2-A presents the potential impacts of global warming (23).

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



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

2.4 GLOBAL WARMING POTENTIAL

GHGs have varying GWP values. GWP of a GHG indicates the amount of warming a gas causes over a given period of time and represents the potential of a gas to trap heat in the atmosphere. CO₂ is utilized as the reference gas for GWP, and thus has a GWP of 1. CO₂ equivalent (CO₂e) is defined as the number of metric tons of CO₂ emissions with the same GWP as one metric ton of another GHG.

The atmospheric lifetime and GWP of selected GHGs are summarized at Table 2-2. As shown in the table below, GWP for the 2nd Assessment Report, the Intergovernmental Panel on Climate Change (IPCC)'s scientific and socio-economic assessment on climate change, range from 1 for CO₂ to 23,900 for SF₆ and GWP for the IPCC's 5th Assessment Report range from 1 for CO₂ to 23,500 for SF₆ (24).

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

Gas	Atmospheric Lifetime (years)	GWP (100-year time horizon)	
		2 nd Assessment Report	5 th Assessment Report
CO ₂	See*	1	1
CH ₄	12 .4	21	28
N ₂ O	121	310	265
HFC-23	222	11,700	12,400
HFC-134a	13.4	1,300	1,300
HFC-152a	1.5	140	138
SF ₆	3,200	23,900	23,500

*As per Appendix 8.A. of IPCC's 5th Assessment Report, no single lifetime can be given.

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

2.5 GHG EMISSIONS INVENTORIES

2.5.1 GLOBAL

Worldwide anthropogenic GHG emissions are tracked by the IPCC for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2018. Based on the latest available data, the sum of these emissions totaled approximately 28,768,440 gigagram (Gg) CO₂e¹ (25) (26) as summarized on Table 2-3.

¹ The global emissions are the sum of Annex I and non-Annex I countries, without counting Land-Use, Land-Use Change and Forestry (LULUCF). For countries without 2018 data, the United Nations' Framework Convention on Climate Change (UNFCCC) data for the most recent year were used U.N. Framework Convention on Climate Change, "Annex I Parties – GHG total without LULUCF," The most recent GHG emissions for China and India are from 2014 and 2010, respectively.

2.5.2 UNITED STATES

As noted in Table 2-3, the United States, as a single country, was the number two producer of GHG emissions in 2018.

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

Emitting Countries	GHG Emissions (Gg CO₂e)
China	12,300,200
United States	6,676,650
European Union (28-member countries)	4,232,274
Russian Federation	2,220,123
India	2,100,850
Japan	1,238,343
Total	28,768,440

2.5.3 STATE OF CALIFORNIA

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the United States (U.S.) emissions inventory total (27). The California Air Resource Board (CARB) compiles GHG inventories for the State of California. Based upon the 2019 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2018 GHG emissions period, California emitted an average 425.3 million metric tons of CO₂e per year (MMTCO₂e/yr) or 425,320 Gg CO₂e (6.37% of the total United States GHG emissions) (28).

2.6 EFFECTS OF CLIMATE CHANGE IN CALIFORNIA

2.6.1 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% under the lower warming range to 75 to 85% 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% more frequent if GHG emissions are not significantly reduced (29).

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a large increase over historical patterns and approximately twice the increase projected if temperatures

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

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 (29).

2.6.2 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 the 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 (29).

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%. 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. Winter tourism could be adversely affected, 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 (29).

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 (29).

2.6.3 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% of the water supply needed. Although higher CO₂ levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth (29).

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 (29).

In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion could occur in many species while range contractions may be less likely in rapidly evolving species with significant populations already established. Should range contractions occur, new or different weed species could fill the emerging gaps. Continued GCC could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates (29).

2.6.4 FORESTS AND LANDSCAPES

GCC has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55%, 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% due to decreased precipitation (29).

Moreover, continued GCC has the potential to alter natural ecosystems and biological diversity within the state. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80% by the end of the century as a result of increasing temperatures. The productivity of the state's forests has the potential to decrease as a result of GCC (29).

2.6.5 RISING SEA LEVELS

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the state's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12-14 inches (29).

2.7 REGULATORY SETTING

2.7.1 INTERNATIONAL

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

IPCC

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

UNITED NATION'S FRAMEWORK CONVENTION ON CLIMATE CHANGE (CONVENTION)

On March 21, 1994, the U.S. joined a number of countries around the world in signing the Convention. Under the Convention, governments gather and share information on GHG emissions, national policies, and best practices; launch national strategies for addressing GHG emissions and adapting to expected impacts, including the provision of financial and technological support to developing countries; and cooperate in preparing for adaptation to the impacts of climate change.

INTERNATIONAL CLIMATE CHANGE TREATIES

The Kyoto Protocol is an international agreement linked to the Convention. The major feature of the Kyoto Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions at an average of 5% against 1990 levels over the five-year period 2008–2012. The Convention (as discussed above) encouraged industrialized countries to stabilize emissions; however, the Protocol commits them to do so. Developed countries have contributed more emissions over the last 150 years; therefore, the Protocol places a heavier burden on developed nations under the principle of “common but differentiated responsibilities.”

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

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

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

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

- Reaffirm the goal of limiting global temperature increase well below 2°C, while urging efforts to limit the increase to 1.5 degrees;
- Establish binding commitments by all parties to make “nationally determined contributions” (NDCs), and to pursue domestic measures aimed at achieving them;
- Commit all countries to report regularly on their emissions and “progress made in implementing and achieving” their NDCs, and to undergo international review;
- Commit all countries to submit new NDCs every five years, with the clear expectation that they will “represent a progression” beyond previous ones;
- Reaffirm the binding obligations of developed countries under the UNFCCC to support the efforts of developing countries, while for the first time encouraging voluntary contributions by developing countries too;
- Extend the current goal of mobilizing \$100 billion a year in support by 2020 through 2025, with a new, higher goal to be set for the period after 2025;
- Extend a mechanism to address “loss and damage” resulting from climate change, which explicitly will not “involve or provide a basis for any liability or compensation;”
- Require parties engaging in international emissions trading to avoid “double counting;” and
- Call for a new mechanism, similar to the Clean Development Mechanism under the Kyoto Protocol, enabling emission reductions in one country to be counted toward another country’s NDC (C2ES 2015a) (30).

On November 4, 2019, the Trump administration formally notified the U.N. that the U.S. would withdraw from the Paris Agreement. It should be noted that withdrawal would be effective one year after notification in 2020.

2.7.2 NATIONAL

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

GHG ENDANGERMENT

In *Massachusetts v. Environmental Protection Agency* (EPA) 549 U.S. 497 (2007), decided on April 2, 2007, the U.S. Supreme Court (Supreme Court) found that four GHGs, including CO₂, are air pollutants subject to regulation under Section 202(a)(1) of the Federal Clean Air Act (CAA). The Court held that the EPA Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under section 202(a) of the CAA:

- **Endangerment Finding:** The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs— CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆—in the atmosphere threaten the public health and welfare of current and future generations.
- **Cause or Contribute Finding:** The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles, as discussed in the section “Clean Vehicles” below. After a lengthy legal challenge, the Supreme Court declined to review an Appeals Court ruling that upheld the EPA Administrator’s findings (31).

CLEAN VEHICLES

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

The first phase of the national program applies to passenger cars, light-duty trucks, and medium-duty (MD) passenger vehicles, covering model years 2012 through 2016. They require these vehicles to meet an estimated combined average emissions level of 250 grams of CO₂ per mile, equivalent to 35.5 miles per gallon (mpg) if the automobile industry were to meet this CO₂ level solely through fuel economy improvements. Together, these standards would cut CO₂ emissions by an estimated 960 MMT and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012–2016). The EPA and the NHTSA issued final rules on a second-phase joint rulemaking establishing national standards for light-duty vehicles for model years 2017 through 2025 in August 2012. The new standards for model years 2017 through 2025 apply to passenger cars, light-duty trucks, and MD passenger vehicles. The final standards are projected to result in an average industry fleetwide level of 163 grams/mile of CO₂ in model year 2025, which is equivalent to 54.5 mpg if achieved exclusively through fuel economy improvements.

The EPA and the U.S. Department of Transportation issued final rules for the first national standards to reduce GHG emissions and improve fuel efficiency of heavy-duty trucks (HDT) and buses on September 15, 2011, effective November 14, 2011. For combination tractors, the agencies are proposing engine and vehicle standards that begin in the 2014 model year and achieve up to a 20% reduction in CO₂ emissions and fuel consumption by the 2018 model year. For HDT and vans, the agencies are proposing separate gasoline and diesel truck standards, which phase in starting in the 2014 model year and achieve up to a 10% reduction for gasoline vehicles and a 15% reduction for diesel vehicles by the 2018 model year (12 and 17% respectively if accounting for air conditioning leakage). Lastly, for vocational vehicles, the engine and vehicle

standards would achieve up to a 10% reduction in fuel consumption and CO₂ emissions from the 2014 to 2018 model years.

On August 2, 2018, the NHTSA in conjunction with the EPA, released a notice of proposed rulemaking, the *Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule). The SAFE Vehicles Rule was proposed to amend existing CAFE and tailpipe CO₂ standards for passenger cars and light trucks and to establish new standards covering model years 2021 through 2026. As of March 31, 2020, the NHTSA and EPA finalized the SAFE Vehicle Rule which increased stringency of CAFE and CO₂ emissions standards by 1.5% each year through model year 2026 (32).

MANDATORY REPORTING OF GHGs

The Consolidated Appropriations Act of 2008, passed in December 2007, requires the establishment of mandatory GHG reporting requirements. On September 22, 2009, the EPA issued the Final Mandatory Reporting of GHGs Rule, which became effective January 1, 2010. The rule requires reporting of GHG emissions from large sources and suppliers in the U.S. and is intended to collect accurate and timely emissions data to inform future policy decisions. Under the rule, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons per year (MT/yr) or more of GHG emissions are required to submit annual reports to the EPA.

NEW SOURCE REVIEW

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

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

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

STANDARDS OF PERFORMANCE FOR GHG EMISSIONS FOR NEW STATIONARY SOURCES: ELECTRIC UTILITY GENERATING UNITS

As required by a settlement agreement, the EPA proposed new performance standards for emissions of CO₂ for new, affected, fossil fuel-fired electric utility generating units on March 27, 2012. New sources greater than 25 megawatts (MW) would be required to meet an output-based standard of 1,000 pounds (lbs) of CO₂ per MW-hour (MWh), based on the performance of widely used natural gas combined cycle technology. It should be noted that on February 9, 2016 the Supreme Court issued a stay of this regulation pending litigation. Additionally, the current EPA Administrator has also signed a measure to repeal the Clean Power Plan, including the CO₂ standards. The Clean Power Plan was officially repealed on June 19, 2019, when the EPA issued the final Affordable Clean Energy rule (ACE). Under ACE, new state emission guidelines were established that provided existing coal-fired electric utility generating units with achievable standards.

CAP-AND-TRADE

Cap-and-trade refers to a policy tool where emissions are limited to a certain amount and can be traded or provides flexibility on how the emitter can comply. Successful examples in the U.S. include the Acid Rain Program and the N₂O Budget Trading Program and Clean Air Interstate Rule in the northeast. There is no federal GHG cap-and-trade program currently; however, some states have joined to create initiatives to provide a mechanism for cap-and-trade.

The Regional GHG Initiative is an effort to reduce GHGs among the states of Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont. Each state caps CO₂ emissions from power plants, auctions CO₂ emission allowances, and invests the proceeds in strategic energy programs that further reduce emissions, save consumers money, create jobs, and build a clean energy economy. The Initiative began in 2008 and in 2020 has retained all participating states.

The Western Climate Initiative (WCI) partner jurisdictions have developed a comprehensive initiative to reduce regional GHG emissions to 15% below 2005 levels by 2020. The partners were originally California, British Columbia, Manitoba, Ontario, and Quebec. However, Manitoba and Ontario are not currently participating. California linked with Quebec's cap-and-trade system January 1, 2014, and joint offset auctions took place in 2015. While the WCI has yet to publish whether it has successfully reached the 2020 emissions goal initiative set in 2007, SB 32, requires that California, a major partner in the WCI, adopt the goal of reducing statewide GHG emissions to 40% below the 1990 level by 2030.

SMARTWAY PROGRAM

The SmartWay Program is a public-private initiative between the EPA, large and small trucking companies, rail carriers, logistics companies, commercial manufacturers, retailers, and other federal and state agencies. Its purpose is to improve fuel efficiency and the environmental performance (reduction of both GHG emissions and air pollution) of the goods movement supply chains. SmartWay is comprised of four components (33):

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

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

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

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

2.7.3 CALIFORNIA

2.7.3.1 LEGISLATIVE ACTIONS TO REDUCE GHGs

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation such as the landmark AB 32 was specifically enacted to address GHG emissions. Other legislation such as Title 24 and Title 20 energy standards were originally adopted for other purposes such as energy and water

conservation, but also provide GHG reductions. This section describes the major provisions of the legislation.

EXECUTIVE ORDER S-3-05

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

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

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

AB 32

The California State Legislature enacted AB 32, which requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. “GHGs” as defined under AB 32 include CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆. Since AB 32 was enacted, a seventh chemical, nitrogen trifluoride, has also been added to the list of GHGs. CARB is the state agency charged with monitoring and regulating sources of GHGs. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 states the following:

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

CARB approved the 1990 GHG emissions level of 427 MMTCO₂e on December 6, 2007 (34). Therefore, emissions generated in California in 2020 are required to be equal to or less than 427 MMTCO₂e. Emissions in 2020 in a “business as usual” (BAU) scenario were estimated to be 596 MMTCO₂e, which do not account for reductions from AB 32 regulations (35). At that level, a 28.4% reduction was required to achieve the 427 MMTCO₂e 1990 inventory. In October 2010, CARB prepared an updated 2020 forecast to account for the recession and slower forecasted growth. The forecasted inventory without the benefits of adopted regulation is now estimated at 545 MMTCO₂e. Therefore, under the updated forecast, a 21.7% reduction from BAU is required to achieve 1990 levels (36).

PROGRESS IN ACHIEVING AB 32 TARGETS AND REMAINING REDUCTIONS REQUIRED

The State has made steady progress in implementing AB 32 and achieving targets included in Executive Order S-3-05. The progress is shown in updated emission inventories prepared by CARB for 2000 through 2012 (37). The State has achieved the Executive Order S-3-05 target for 2010 of reducing GHG emissions to 2000 levels. As shown below, the 2010 emission inventory achieved this target.

- 1990: 427 MMTCO₂e (AB 32 2020 target)
- 2000: 463 MMTCO₂e (an average 8% reduction needed to achieve 1990 base)
- 2010: 450 MMTCO₂e (an average 5% reduction needed to achieve 1990 base)

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

- 2020: 545 MMTCO₂e BAU (an average 21.7% reduction from BAU needed to achieve 1990 base)

SB 375 – THE SUSTAINABLE COMMUNITIES AND CLIMATE PROTECTION ACT OF 2008

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

SB 375 also requires Metropolitan Planning Organizations (MPOs) to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. Although SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.

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

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

3. Incorporates the mitigation measures required by an applicable prior environmental document.

AB 1493

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

The standards phase in during the 2009 through 2016 model years. When fully phased in, the near-term (2009–2012) standards will result in about a 22% reduction compared with the 2002 fleet, and the mid-term (2013–2016) standards will result in about a 30% reduction. Several technologies stand out as providing significant reductions in emissions at favorable costs. These include discrete variable valve lift or camless valve actuation to optimize valve operation rather than relying on fixed valve timing and lift as has historically been done; turbocharging to boost power and allow for engine downsizing; improved multi-speed transmissions; and improved air conditioning systems that operate optimally, leak less, and/or use an alternative refrigerant.

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

SB 350— CLEAN ENERGY AND POLLUTION REDUCTION ACT OF 2015

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

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40% by 2024, and 25% by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.

- Reorganize the Independent System Operator to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

SB 32

On September 8, 2016, Governor Jerry Brown signed the Senate Bill (SB) 32 and its companion bill, AB 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80% below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature (11).

CARB SCOPING PLAN

CARB's Climate Change Scoping Plan (Scoping Plan) contains measures designed to reduce the State's emissions to 1990 levels by the year 2020 to comply with AB 32 (35). The Scoping Plan identifies recommended measures for multiple GHG emission sectors and the associated emission reductions needed to achieve the year 2020 emissions target—each sector has a different emission reduction target. Most of the measures target the transportation and electricity sectors. As stated in the Scoping Plan, the key elements of the strategy for achieving the 2020 GHG target include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
- Achieving a statewide renewables energy mix of 33%;
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system;
- Establishing targets for transportation related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets;
- Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, goods movement measures, and the LCFS; and
- Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State's long-term commitment to AB 32 implementation.

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

a path that would achieve the long term 2050 goal of Executive Order S-3-05 for emissions to decline to 80% below 1990 levels by 2050 (37).

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

As part of CEQA compliance for the Scoping Plan, CARB prepared a Supplemental Functional Equivalent Document (FED) in 2011. The FED included an updated 2020 BAU emissions inventory projection based on current economic forecasts (i.e., as influenced by the economic downturn) and emission reduction measures already in place, replacing its prior 2020 BAU emissions inventory. CARB staff derived the updated emissions estimates by projecting emissions growth, by sector, from the state’s average emissions from 2006–2008. The new BAU estimate includes emission reductions for the million-solar-roofs program, the AB 1493 motor vehicle GHG emission standards, and the LCFS. In addition, CARB factored into the 2020 BAU inventory emissions reductions associated with 33% RPS for electricity generation. The updated BAU estimate of 507 MMTCO₂e by 2020 requires a reduction of 80 MMTCO₂e, or a 16% reduction below the estimated BAU levels to return to 1990 levels (i.e., 427 MMTCO₂e) by 2020.

In order to provide a BAU reduction that is consistent with the original definition in the Scoping Plan and with threshold definitions used in thresholds adopted by lead agencies for CEQA purposes and many CAPs, the updated inventory without regulations was also included in the Supplemental FED. CARB 2020 BAU projection for GHG emissions in California was originally estimated to be 596 MMTCO₂e. The updated CARB 2020 BAU projection in the Supplemental FED is 545 MMTCO₂e. Considering the updated BAU estimate of 545 MMTCO₂e by 2020, CARB estimates a 21.7% reduction below the estimated statewide BAU levels is necessary to return to 1990 emission levels (i.e., 427 MMTCO₂e) by 2020, instead of the approximate 28.4% BAU reduction previously reported under the original Climate Change Scoping Plan (35).

2017 CLIMATE CHANGE SCOPING PLAN UPDATE

In compliance with AB 32 and the 2008 Scoping Plan, the target year 2020 has been fulfilled and will look onward to the 2017 Scoping Plan that should be in compliance by 2030.

In November 2017, CARB released the 2017 Scoping Plan Update, which identifies the State’s post-2020 reduction strategy. The 2017 Scoping Plan Update reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the LCFS, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce CH₄ emissions from agricultural and other wastes.

The 2017 Scoping Plan Update establishes a new emissions limit of 260 MMTCO₂e for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030.

California’s climate strategy will require contributions from all sectors of the economy, including the land base, and will include enhanced focus on zero- and near-zero-emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (CH₄, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries will further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California’s local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the 2017 Scoping Plan framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing ZEV buses and trucks.
- LCFS, with an increased stringency (18% by 2030).
- Implementing SB 350, which expands the RPS to 50% RPS and doubles energy efficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of zero-emission vehicles (ZEV) trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing CH₄ and hydrofluorocarbon emissions by 40% and anthropogenic black carbon emissions by 50% by year 2030.
- Continued implementation of SB 375.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- 20% reduction in GHG emissions from refineries by 2030.
- Development of a Natural and Working Lands Action Plan to secure California’s land base as a net carbon sink.

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

“[a]chieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA.”

In addition to the statewide strategies listed above, the 2017 Scoping Plan Update also identifies local governments as essential partners in achieving the State’s long-term GHG reduction goals and identifies local actions to reduce GHG emissions. As part of the recommended actions, CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 metric tons of CO₂e (MTCO₂e) or less per capita by 2030 and 2 MTCO₂e or less per capita by 2050. For CEQA projects, CARB states that lead agencies may develop evidenced-based bright-line numeric thresholds—consistent with the Scoping Plan and the State’s long-term GHG

goals—and projects with emissions over that amount may be required to incorporate on-site design features and mitigation measures that avoid or minimize project emissions to the degree feasible; or, a performance-based metric using a CAP or other plan to reduce GHG emissions is appropriate.

According to research conducted by the Lawrence Berkeley National Laboratory (LBNL) and supported by CARB, California, under its existing and proposed GHG reduction policies, is on track to meet the 2020 reduction targets under AB 32 and could achieve the 2030 goals under SB 32. The research utilized a new, validated model known as the California LBNL GHG Analysis of Policies Spreadsheet (CALGAPS), which simulates GHG and criteria pollutant emissions in California from 2010 to 2050 in accordance to existing and future GHG-reducing policies. The CALGAPS model showed that GHG emissions through 2020 could range from 317 to 415 MTCO₂e per year (MTCO₂e/yr), “indicating that existing state policies will likely allow California to meet its target [of 2020 levels under AB 32].” CALGAPS also showed that by 2030, emissions could range from 211 to 428 MTCO₂e/yr, indicating that “even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40% below the 1990 level [of SB 32].” CALGAPS analyzed emissions through 2050 even though it did not generally account for policies that might be put in place after 2030. Although the research indicated that the emissions would not meet the State’s 80% reduction goal by 2050, various combinations of policies could allow California’s cumulative emissions to remain very low through 2050 (38) (39).

CAP-AND-TRADE PROGRAM

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

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

Covered entities that emit more than 25,000 MTCO₂e/yr must comply with the Cap-and-Trade Program. Triggering of the 25,000 MTCO₂e/yr “inclusion threshold” is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of GHG Emissions (Mandatory Reporting Rule or “MRR”).

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities.

Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender “compliance instruments” (30) for each MTCO_{2e} of GHG they emit. There also are requirements to surrender compliance instruments covering 30% of the prior year’s compliance obligation by November of each year. For example, in November 2014, a covered entity was required to submit compliance instruments to cover 30% of its 2013 GHG emissions.

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

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

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

“The Cap-and-Trade Program establishes an overall limit on GHG emissions from most of the California economy—the “capped sectors.” Within the capped sectors, some of the reductions are being accomplished through direct regulations, such as improved building and appliance efficiency standards, the [Low Carbon Fuel Standard] LCFS, and the 33% [Renewables Portfolio Standard] RPS. Whatever additional reductions are needed to bring emissions within the cap is accomplished through price incentives posed by emissions allowance prices. Together, direct regulation and price incentives assure that emissions are brought down cost-effectively to the level of the overall cap. The Cap-and-Trade Regulation provides assurance that California’s 2020 limit will be met because the regulation sets a firm limit on 85% of California’s GHG emissions. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site specific or project-level, GHG emissions reductions. Also, due to the regulatory architecture adopted by CARB in

AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures (37)."

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

The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. While the Cap-and-Trade Program technically covered fuel suppliers as early as 2012, they did not have a compliance obligation (i.e., they were not fully regulated) until 2015. The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with vehicle miles traveled (VMT) are covered by the Cap-and-Trade Program (40). In addition, the Scoping Plan differentiates between "capped" and "uncapped" strategies. "Capped" strategies are subject to the proposed cap-and-trade program. The Scoping Plan states that the inclusion of these emissions within the Program will help ensure that the year 2020 emission targets are met despite some degree of uncertainty in the emission reduction estimates for any individual measure. Implementation of the capped strategies is calculated to achieve a sufficient amount of reductions by 2020 to achieve the emission target contained in AB 32. "Uncapped" strategies that will not be subject to the cap-and-trade emissions caps and requirements are provided as a margin of safety by accounting for additional GHG emission reductions.³

2.7.3.2 EXECUTIVE ORDERS RELATED TO GHG EMISSIONS

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

EXECUTIVE ORDER S-13-08

Executive Order S-13-08 states that "climate change in California during the next century is expected to shift precipitation patterns, accelerate sea level rise and increase temperatures, thereby posing a serious threat to California's economy, to the health and welfare of its

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

population and to its natural resources.” Pursuant to the requirements in the Order, the 2009 California Climate Adaptation Strategy was adopted, which is the “...first statewide, multi-sector, region-specific, and information-based climate change adaptation strategy in the United States.” Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

EXECUTIVE ORDER B-30-15

On April 29, 2015, Governor Edmund G. Brown Jr. issued an executive order to establish a California GHG reduction target of 40% below 1990 levels by 2030. The Governor’s executive order aligns California’s GHG reduction targets with those of leading international governments ahead of the United Nations Climate Change Conference in Paris late 2015. The Order sets a new interim statewide GHG emission reduction target to reduce GHG emissions to 40% below 1990 levels by 2030 in order to ensure California meets its target of reducing GHG emissions to 80% below 1990 levels by 2050 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of MMTCO₂e. The Order also requires the state’s climate adaptation plan to be updated every three years, and for the State to continue its climate change research program, among other provisions. As with Executive Order S-3-05, this Order is not legally enforceable for local governments and the private sector. Legislation that would update AB 32 to make post 2020 targets and requirements a mandate is in process in the State Legislature.

EXECUTIVE ORDER S-01-07 – LCFS

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

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

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

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

EXECUTIVE ORDER B-55-18 AND SB 100

Executive Order B-55-18 was signed by Governor Brown on September 10, 2018. The order establishes an additional Statewide policy to achieve carbon neutrality by 2045 and maintain net negative emissions thereafter. As per Executive Order B-55-18, CARB is directed to work with relevant State agencies to develop a framework for implementation and accounting that tracks progress toward this goal and to ensure future Climate Change Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.

2.7.3.3 CALIFORNIA REGULATIONS AND BUILDING CODES

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

TITLE 20 CCR

CCR, Title 20: Division 2, Chapter 4, Article 4, Sections 1601-1608: Appliance Efficiency Regulations regulates the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. 23 categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles or other mobile equipment (CEC 2012).

TITLE 24 CCR

CCR Title 24 Part 6: The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption.

The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the California Building Standards Commission.

CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that became effective January 1, 2020. Local jurisdictions are permitted to adopt more stringent requirements, as state law provides methods for local enhancements. CALGreen recognizes that many jurisdictions have developed existing construction waste and demolition ordinances and defers to them as the ruling guidance provided they establish a minimum 65% diversion requirement. The code also provides exemptions for areas not served by construction waste and demolition recycling infrastructure. The State Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy, which is generally enforced by the local building official. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2019 version of Title 24 was adopted by the California Energy Commission (CEC) and became effective on January 1, 2020.

The 2019 Title 24 standards will result in less energy use, thereby reducing air pollutant emissions associated with energy consumption in the Mojave Desert Air Basin (MDAB) and across the State of California. For example, the 2019 Title 24 standards will require solar photovoltaic systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting requirements for nonresidential buildings.

The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar photovoltaic systems, homes built under the 2019 standards will use about 53% less energy than homes built under the 2016 standards. Nonresidential buildings (such as the Project) will use approximately 30% less energy due to lighting upgrade requirements (19).

Because the Project will be constructed after January 1, 2019, the 2019 CALGreen standards are applicable to the Project and require, among other items (20):

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- Designated parking for clean air vehicles. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3).

- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8)
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
 - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
 - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
 - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- Outdoor portable water use in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (5.303.1.1 and 5.303.1.2).
- Outdoor water use in rehabilitated landscape projects equal or greater than 2,500 sf. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).

- Commissioning. For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

MWELO

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

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

TRACTOR-TRAILER GHG REGULATION

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

PHASE I AND 2 HEAVY-DUTY VEHICLE GHG STANDARDS

CARB has adopted a new regulation for GHG emissions from HDTs and engines sold in California. It establishes GHG emission limits on truck and engine manufacturers and harmonizes with the EPA rule for new trucks and engines nationally. Existing HD vehicle regulations in California include engine criteria emission standards, tractor-trailer GHG requirements to implement SmartWay strategies (i.e., the Heavy-Duty Tractor-Trailer GHG Regulation), and in-use fleet retrofit requirements such as the Truck and Bus Regulation. In September 2011, the EPA adopted their new rule for HDTs and engines. The EPA rule has compliance requirements for new compression and spark ignition engines, as well as trucks from Class 2b through Class 8. Compliance requirements begin with model year 2014 with stringency levels increasing through

model year 2018. The rule organizes truck compliance into three groupings, which include a) HD pickups and vans; b) vocational vehicles; and c) combination tractors. The EPA rule does not regulate trailers.

CARB staff has worked jointly with the EPA and the NHTSA on the next phase of federal GHG emission standards for medium-duty trucks (MDT) and HDT vehicles, called federal Phase 2. The federal Phase 2 standards were built on the improvements in engine and vehicle efficiency required by the Phase 1 emission standards and represent a significant opportunity to achieve further GHG reductions for 2018 and later model year HDT vehicles, including trailers. But as discussed above, the EPA and NHTSA have proposed to roll back GHG and fuel economy standards for cars and light-duty trucks, which suggests a similar rollback of Phase 2 standards for MDT and HDT vehicles may be pursued.

In February 2019, the OAL approved the Phase 2 Heavy-Duty Vehicle GHG Standards and became effective April 1, 2019. The Phase 2 GHG standards are needed to offset projected VMT growth and keep heavy-duty truck CO₂ emissions declining. The federal Phase 2 standards establish for the first time, federal emissions requirements for trailers hauled by heavy-duty tractors. The federal Phase 2 standards are more technology-forcing than the federal Phase 1 standards, requiring manufacturers to improve existing technologies or develop new technologies to meet the standards. The federal Phase 2 standards for tractors, vocational vehicles, and heavy-duty pick-up trucks and vans (PUVs) will be phased-in from 2021-2027, additionally for trailers, the standards are phased-in from 2018 (2020 in California) through 2027 (41).

SB 97 AND THE CEQA GUIDELINES UPDATE

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

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

Section 1506.4 was amended to state that in determining the significance of a project’s GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project’s emissions to the effects of climate change. A project’s incremental

contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. Additionally, a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use (42).

CALIFORNIA RPS PROGRAM (SB 100)

Under the existing RPS, 25% of retail sales are required to be from renewable sources by December 31, 2016, 33% by December 31, 2020, 40% by December 31, 2024, 45% by December 31, 2027, and 50% by December 31, 2030. SB 100 raises California's RPS requirement to 50% renewable resources target by December 31, 2026, and to achieve a 60% target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44% of retail sales by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California Environmental Protection Agency (CalEPA), the Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

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3 PROJECT GHG IMPACT

3.1 INTRODUCTION

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

3.2 STANDARDS OF SIGNIFICANCE

The criteria used to determine the significance of potential Project-related GHG impacts are taken from the Initial Study Checklist in Appendix G of the State *CEQA Guidelines* (14 CCR §§15000, et seq.). Based on these thresholds, a project would result in a significant impact related to GHG if it would (43):

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

3.3 MODELS EMPLOYED TO ANALYZE GHG EMISSIONS

Land uses such as the Project affect GHGs through construction-source and operational-source emissions.

3.3.1 CALIFORNIA EMISSIONS ESTIMATOR MODEL™

In May 2021, the South Coast Air Quality Management District (SCAQMD), in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the CalEEMod Version 2020.4.0. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}) and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from MMs (44). Accordingly, the latest version of CalEEMod has been used for this Project to determine construction and operational air quality emissions. Output from the model runs for both construction and operational activity are provided in Appendix 3.1.

3.4 CONSTRUCTION EMISSIONS

Project construction activities would generate CO₂ and CH₄ emissions. The report *Pioneertown Motel Expansion Air Quality Impact Analysis Report* (Urban Crossroads, Inc.) (AQIA) contains detailed information regarding Project construction activities (45). As discussed in the AQIA, Construction related emissions are expected from the following construction activities:

- Demolition
- Site Preparation
- Grading

- Building Construction
- Paving
- Architectural Coating

3.4.1 CONSTRUCTION DURATION

Construction is expected to commence in June 2022 and will last through May 2024. Construction duration by phase is shown on Table 3-1. The construction schedule utilized in the analysis represents a “worst-case” analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.⁴ The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per *CEQA Guidelines*. The duration of construction activity was based on the 2024 opening year.

TABLE 3-1: CONSTRUCTION DURATION

Phase Name	Start Date	End Date	Days
Demolition	06/22/2022	07/19/2022	20
Site Preparation	07/20/2022	9/13/2022	40
Grading	09/14/2022	12/06/2022	60
Building Construction	08/02/2022	04/08/2024	440
Paving	04/09/2024	04/22/2024	10
Architectural Coating	04/23/2024	05/06/2024	10

3.4.2 CONSTRUCTION EQUIPMENT

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

⁴ As shown in the California Emissions Estimator Model (CalEEMod) User’s Guide Version 2016.3.2, Section 4.3 “OFFROAD Equipment” as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

TABLE 3-2: CONSTRUCTION EQUIPMENT ASSUMPTIONS

Phase Name	Equipment	Number	Hours Per Day
Demolition	Concrete/Industrial Saws	1	8
	Rubber Tired Dozers	1	8
	Tractors/Loaders/Backhoes	3	8
Site Preparation	Graders	1	8
	Scrapers	1	8
	Tractors/Loaders/Backhoes	1	7
Grading	Graders	1	8
	Rubber Tired Dozers	1	8
	Tractors/Loaders/Backhoes	2	7
Building Construction	Cranes	1	8
	Forklifts	2	7
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	1	6
	Welders	3	8
Paving	Cement and Mortar Mixers	1	8
	Pavers	1	8
	Paving Equipment	1	8
	Rollers	2	8
	Tractors/Loaders/Backhoes	1	8
Architectural Coating	Air Compressors	1	6

3.4.3 CONSTRUCTION EMISSIONS SUMMARY

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

TABLE 3-3: AMORTIZED ANNUAL CONSTRUCTION EMISSIONS

Year	Emissions (MT/yr)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ e
2022	286.51	0.06	3.93E-03	289.18
2023	382.99	0.05	8.53E-03	386.88
2024	114.30	0.02	2.30E-03	115.41
Amortized Construction Emissions (MTCO₂e)	26.13	0.004	4.92E-04	26.38

3.5 OPERATIONAL EMISSIONS

Project operations would generate CO₂, CH₄, and N₂O emissions. Primary emissions sources would include:

- Area Source (landscape and site maintenance activities)
- Energy Source (combustion emissions associated with natural gas and electricity)
- Mobile Source (vehicles)
- Solid Waste
- Water Supply, Treatment, and Distribution

3.5.1 AREA SOURCE EMISSIONS

LANDSCAPE MAINTENANCE EQUIPMENT

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

3.5.2 ENERGY SOURCE

COMBUSTION EMISSIONS ASSOCIATED WITH NATURAL GAS AND ELECTRICITY

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO₂ and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building; the building energy use emissions do not include street lighting⁵. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. GHG emissions associated with the natural gas and electricity usage associated with the Project were calculated by CalEEMod using default parameters.

⁵ The CalEEMod emissions inventory model does not include indirect emission related to street lighting. Indirect emissions related to street lighting are expected to be negligible and cannot be accurately quantified at this time as there is insufficient information as to the number and type of street lighting that would occur.

3.5.3 MOBILE SOURCE

VEHICLES

Project-related operational air quality impacts derive primarily from vehicle trips generated by the Project. Trip characteristics available from the report, *Pioneertown Motel, San Bernardino County, California – Trip Generation Analysis* (Translutions, Inc.) (TGA) were utilized in this analysis (47).

3.5.4 SOLID WASTE

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

3.5.5 WATER SUPPLY, TREATMENT, AND DISTRIBUTION

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

3.6 EMISSIONS SUMMARY

As shown on Table 3-4, without accounting for applicable regulatory requirements and PDFs, the Project would result in 746.09 MTCO₂e/yr.

TABLE 3-4: PROJECT GHG EMISSIONS SUMMARY

Emission Source	Emissions (MT/yr)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ e
Annual construction-related emissions amortized over 30 years	26.12	0.004	4.92E-04	26.38
Area Source	2.42E-03	1.00E-05	0.00	2.58E-03
Energy Source	569.12	0.029	8.14E-03	572.28
Mobile Sources	124.34	8.46E-03	6.89E-03	126.60
Waste	6.34	0.37	0.00	15.72
Water Usage	3.75	0.04	1.02E-03	5.12
Total MTCO₂e (All Sources)	746.09			

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

3.7 GHG EMISSIONS FINDINGS AND RECOMMENDATIONS

3.7.1 GHG IMPACT #1

The Project would not generate direct or indirect GHG emission that would result in a significant impact on the environment.

The County of San Bernardino adopted the GHG Plan in September 2011, which provides guidance on how to analyze GHG emissions and determine significance during the CEQA review of proposed development projects within the County of San Bernardino (48).

The County includes a GHG Development Review Process (DRP) that specifies a two-step approach in quantifying GHG emissions (49). First, a screening threshold of 3,000 MTCO₂e/yr is used to determine if additional analysis is required. Projects that exceed the 3,000 MTCO₂e/yr will be required to either achieve a minimum 100 points per the Screening Tables or a 31% reduction over 2007 emissions levels. Consistent with CEQA guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions.

As shown in Table 3-6, the Project will result in approximately 746.09 MTCO₂e/yr; the proposed project would not exceed the screening threshold of 3,000 MTCO₂e per year. As such, the Project would result in a less than significant impact and no further analysis is required consistent with the County's DRP methodology.

3.7.2 GHG IMPACT #2

The Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

The Project's consistency with AB 32 and SB 32 are discussed below.

SB 32/2017 SCOPING PLAN CONSISTENCY

The 2017 Scoping Plan Update reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Table 3-5 summarizes the project's consistency with the 2017 Scoping Plan. As summarized, the project will not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories.

TABLE 3-5: 2017 SCOPING PLAN CONSISTENCY SUMMARY⁶

Action	Responsible Parties	Consistency
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	Consistent. The Project would use energy from Southern California Edison (SCE). SCE has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. The Project would not interfere with or obstruct SCE energy source diversification efforts.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		Consistent. The Project would be designed and constructed to implement the energy efficiency measures for new commercial developments and would include several measures designed to reduce energy consumption. The Project would not interfere with or obstruct policies or strategies to establish annual targets for statewide energy efficiency savings and demand reduction.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly- owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		Consistent. The proposed Project would be designed and constructed to implement the energy efficiency measures, where applicable by including several measures designed to reduce energy consumption. The proposed Project includes energy efficient field lighting and fixtures that meet the current Title 24 Standards throughout the Project Site and would be a modern development with energy efficient boilers, heaters, and air conditioning systems.
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plug-in hybrid light-duty EVs by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies	Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2025 targets.
At least 4.2 million zero emission and plug-in hybrid light-duty EVs by 2030.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2030 targets.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty

⁶ Source California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017 and CARB, Climate Change Scoping Plan, December 2008.

Action	Responsible Parties	Consistency
		vehicles beyond existing Advanced Clean cars regulations.
Medium- and Heavy-Duty GHG Phase 2.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to implement Medium- and Heavy-Duty GHG Phase 2
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO _x standard.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts improve transit-source emissions.
Last Mile Delivery: New regulation that would result in the use of low NO _x or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve last mile delivery emissions.
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document “Potential VMT Reduction Strategies for Discussion.”		Consistent. This Project would not obstruct or interfere with implementation of SB 375 and would therefore not conflict with this measure.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).

Action	Responsible Parties	Consistency
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GO- Biz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	Consistent. The Project would not obstruct or interfere with agency efforts to harmonize transportation facility project performance with emissions reductions and increase competitiveness of transit and active transportation modes.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	Consistent. The Project would not obstruct or interfere with agency efforts to develop pricing policies to support low-GHG transportation.
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	Consistent. This measure would apply to all trucks accessing the Project site, this may include existing trucks or new trucks that are part of the statewide goods movement sector. The Project would not obstruct or interfere with agency efforts to Improve freight system efficiency.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.		Consistent. The Project would not obstruct or interfere with agency efforts to deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	Consistent. When adopted, this measure would apply to all fuel purchased and used by the Project in the state. The Project would not obstruct or interfere

Action	Responsible Parties	Consistency
		with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, California State Water Resource Control Board (SWRCB), Local Air Districts	Consistent. The Project would be required to comply with this measure and reduce any Project-source SLPS emissions accordingly. The Project would not obstruct or interfere agency efforts to reduce SLPS emissions.
50% reduction in black carbon emissions below 2013 levels.		
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	Consistent. The Project would implement waste reduction and recycling measures consistent with State and City requirements. The Project would not obstruct or interfere agency efforts to support organic waste landfill reduction goals in the SLCP and SB 1383.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	Consistent. The Project would be required to comply with any applicable Cap-and-Trade Program provisions. The Project would not obstruct or interfere agency efforts to implement the post-2020 Cap-and-Trade Program.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	Consistent. The Project would not obstruct or interfere agency efforts to protect land from conversion through conservation easements and other incentives.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity		Consistent. The Project site is vacant disturbed property and does not comprise an area that would effectively provide for carbon sequestration. The Project would not obstruct or interfere agency efforts to increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments		Consistent. Where appropriate, Project designs will incorporate wood or wood products. The Project would not obstruct or interfere agency efforts to encourage use of wood and agricultural products to

Action	Responsible Parties	Consistency
		increase the amount of carbon stored in the natural and built environments.
Establish scenario projections to serve as the foundation for the Implementation Plan		Consistent. The Project would not obstruct or interfere agency efforts to establish scenario projections to serve as the foundation for the Implementation Plan.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	Consistent. The Project would not obstruct or interfere agency efforts to establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	Consistent. The Project would not obstruct or interfere agency efforts to implement the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	Consistent. The Project would not obstruct or interfere agency efforts to identify and expand funding and financing mechanisms to support GHG reductions across all sectors.

As shown above, the Project would not conflict with any of the *2017 Scoping Plan* elements as any regulations adopted would apply directly or indirectly to the Project. Further, recent studies show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40% below 1990 levels by 2030 (38).

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5 CERTIFICATION

The contents of this greenhouse gas study report represent an accurate depiction of the GHG impacts associated with the proposed Pioneertown Motel Expansion Project. The information contained in this GHG report is based on the best available data at the time of preparation. If you have any questions, please contact me directly at (714) 612-6664.

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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
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APPENDIX 3.1:

CALEEMOD ANNUAL CONSTRUCTION EMISSIONS MODEL OUTPUTS

Pioneertown Motel - San Bernardino-Mojave Desert County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Pioneertown Motel
San Bernardino-Mojave Desert County, Annual

1.0 Project Characteristics**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Motel	46.00	Room	1.96	90,169.20	0
Regional Shopping Center	0.79	1000sqft	0.02	785.00	0
Parking Lot	88.00	Space	0.79	35,200.00	0
Recreational Swimming Pool	0.92	1000sqft	0.02	923.00	0

1.2 Other Project Characteristics

Urbanization	Rural	Wind Speed (m/s)	2.6	Precipitation Freq (Days)	32
Climate Zone	10			Operational Year	2024
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Motel lot acreage adjusted to equal total proposed development area lot acreage.

Construction Phase - Construction schedule revised based on information provided by the Project team which identifies construction start 06/22 through 05/24.

Demolition -

Grading -

Architectural Coating - MDAQMD Rule 1113 Building Envelope Coatings = 50g/l

Vehicle Trips - Recreational Swimming Pool is part of the Motel.

Construction Off-road Equipment Mitigation -

Pioneertown Motel - San Bernardino-Mojave Desert County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	250.00	50.00
tblArchitecturalCoating	EF_Nonresidential_Interior	250.00	50.00
tblConstructionPhase	NumDays	220.00	440.00
tblConstructionPhase	NumDays	6.00	60.00
tblConstructionPhase	NumDays	3.00	40.00
tblConstructionPhase	PhaseEndDate	7/3/2023	5/6/2024
tblConstructionPhase	PhaseEndDate	6/5/2023	4/8/2024
tblConstructionPhase	PhaseEndDate	8/1/2022	12/6/2022
tblConstructionPhase	PhaseEndDate	6/19/2023	4/22/2024
tblConstructionPhase	PhaseEndDate	7/22/2022	9/13/2022
tblConstructionPhase	PhaseStartDate	6/20/2023	4/23/2024
tblConstructionPhase	PhaseStartDate	7/23/2022	9/14/2022
tblConstructionPhase	PhaseStartDate	6/6/2023	4/9/2024
tblLandUse	LotAcreage	2.07	1.96
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblVehicleTrips	ST_TR	9.10	0.00
tblVehicleTrips	SU_TR	13.60	0.00
tblVehicleTrips	WD_TR	28.82	0.00

2.0 Emissions Summary

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**2.1 Overall Construction****Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2022	0.2080	1.8476	1.5563	3.3000e-003	0.2948	0.0816	0.3764	0.1198	0.0767	0.1965	0.0000	286.5086	286.5086	0.0602	3.9300e-003	289.1852
2023	0.2519	1.8890	2.1392	4.4500e-003	0.1028	0.0809	0.1837	0.0277	0.0775	0.1052	0.0000	382.9867	382.9867	0.0539	8.5300e-003	386.8769
2024	0.2958	0.5340	0.6472	1.3200e-003	0.0297	0.0217	0.0514	7.9900e-003	0.0207	0.0287	0.0000	114.3021	114.3021	0.0170	2.3000e-003	115.4127
Maximum	0.2958	1.8890	2.1392	4.4500e-003	0.2948	0.0816	0.3764	0.1198	0.0775	0.1965	0.0000	382.9867	382.9867	0.0602	8.5300e-003	386.8769

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2022	0.2080	1.8476	1.5563	3.3000e-003	0.1458	0.0816	0.2274	0.0550	0.0767	0.1317	0.0000	286.5083	286.5083	0.0602	3.9300e-003	289.1849
2023	0.2519	1.8890	2.1392	4.4500e-003	0.1028	0.0809	0.1837	0.0277	0.0775	0.1052	0.0000	382.9863	382.9863	0.0539	8.5300e-003	386.8765
2024	0.2958	0.5340	0.6472	1.3200e-003	0.0297	0.0217	0.0514	7.9900e-003	0.0207	0.0287	0.0000	114.3020	114.3020	0.0170	2.3000e-003	115.4126
Maximum	0.2958	1.8890	2.1392	4.4500e-003	0.1458	0.0816	0.2274	0.0550	0.0775	0.1317	0.0000	382.9863	382.9863	0.0602	8.5300e-003	386.8765

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	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	34.88	0.00	24.37	41.67	0.00	19.61	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	6-22-2022	9-21-2022	0.9033	0.9033
2	9-22-2022	12-21-2022	1.0842	1.0842
3	12-22-2022	3-21-2023	0.5346	0.5346
4	3-22-2023	6-21-2023	0.5404	0.5404
5	6-22-2023	9-21-2023	0.5402	0.5402
6	9-22-2023	12-21-2023	0.5355	0.5355
7	12-22-2023	3-21-2024	0.5084	0.5084
8	3-22-2024	6-21-2024	0.3784	0.3784
		Highest	1.0842	1.0842

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**2.2 Overall Operational****Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.4686	1.0000e-005	1.2500e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.4200e-003	2.4200e-003	1.0000e-005	0.0000	2.5800e-003
Energy	0.0289	0.2629	0.2208	1.5800e-003		0.0200	0.0200		0.0200	0.0200	0.0000	569.1199	569.1199	0.0294	8.1400e-003	572.2802
Mobile	0.0753	0.1008	0.6556	1.3200e-003	0.1359	1.1000e-003	0.1370	0.0363	1.0300e-003	0.0373	0.0000	124.3367	124.3367	8.4600e-003	6.8900e-003	126.6017
Waste						0.0000	0.0000		0.0000	0.0000	6.3435	0.0000	6.3435	0.3749	0.0000	15.7157
Water						0.0000	0.0000		0.0000	0.0000	0.4060	3.3472	3.7532	0.0420	1.0200e-003	5.1065
Total	0.5728	0.3637	0.8777	2.9000e-003	0.1359	0.0211	0.1570	0.0363	0.0210	0.0573	6.7495	696.8062	703.5557	0.4547	0.0161	719.7066

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.4686	1.0000e-005	1.2500e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.4200e-003	2.4200e-003	1.0000e-005	0.0000	2.5800e-003
Energy	0.0289	0.2629	0.2208	1.5800e-003		0.0200	0.0200		0.0200	0.0200	0.0000	569.1199	569.1199	0.0294	8.1400e-003	572.2802
Mobile	0.0753	0.1008	0.6556	1.3200e-003	0.1359	1.1000e-003	0.1370	0.0363	1.0300e-003	0.0373	0.0000	124.3367	124.3367	8.4600e-003	6.8900e-003	126.6017
Waste						0.0000	0.0000		0.0000	0.0000	6.3435	0.0000	6.3435	0.3749	0.0000	15.7157
Water						0.0000	0.0000		0.0000	0.0000	0.4060	3.3472	3.7532	0.0420	1.0200e-003	5.1065
Total	0.5728	0.3637	0.8777	2.9000e-003	0.1359	0.0211	0.1570	0.0363	0.0210	0.0573	6.7495	696.8062	703.5557	0.4547	0.0161	719.7066

	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	Demolition	Demolition	6/22/2022	7/19/2022	5	20	
2	Site Preparation	Site Preparation	7/20/2022	9/13/2022	5	40	
3	Grading	Grading	9/14/2022	12/6/2022	5	60	

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4	Building Construction	Building Construction	8/2/2022	4/8/2024	5	440
5	Paving	Paving	4/9/2024	4/22/2024	5	10
6	Architectural Coating	Architectural Coating	4/23/2024	5/6/2024	5	10

Acres of Grading (Site Preparation Phase): 60**Acres of Grading (Grading Phase): 60****Acres of Paving: 0.79****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 137,714; Non-Residential Outdoor: 45,905; Striped Parking Area: 2,112 (Architectural Coating – sqft)****OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Scrapers	1	8.00	367	0.48
Site Preparation	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Building Construction	Cranes	1	8.00	231	0.29
Building Construction	Forklifts	2	7.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45
Paving	Cement and Mortar Mixers	1	8.00	9	0.56
Paving	Pavers	1	8.00	130	0.42
Paving	Paving Equipment	1	8.00	132	0.36

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Paving	Rollers	2	8.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	8	53.00	21.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	11.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.2 Demolition - 2022****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					2.0000e-005	0.0000	2.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0169	0.1662	0.1396	2.4000e-004		8.3800e-003	8.3800e-003		7.8300e-003	7.8300e-003	0.0000	21.0777	21.0777	5.3700e-003	0.0000	21.2120
Total	0.0169	0.1662	0.1396	2.4000e-004	2.0000e-005	8.3800e-003	8.4000e-003	0.0000	7.8300e-003	7.8300e-003	0.0000	21.0777	21.0777	5.3700e-003	0.0000	21.2120

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	5.3000e-004	4.3000e-004	5.1700e-003	1.0000e-005	1.6300e-003	1.0000e-005	1.6400e-003	4.3000e-004	1.0000e-005	4.4000e-004	0.0000	1.3034	1.3034	3.0000e-005	4.0000e-005	1.3151
Total	5.3000e-004	4.3000e-004	5.1700e-003	1.0000e-005	1.6300e-003	1.0000e-005	1.6400e-003	4.3000e-004	1.0000e-005	4.4000e-004	0.0000	1.3034	1.3034	3.0000e-005	4.0000e-005	1.3151

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.2 Demolition - 2022****Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0169	0.1662	0.1396	2.4000e-004		8.3800e-003	8.3800e-003		7.8300e-003	7.8300e-003	0.0000	21.0777	21.0777	5.3700e-003	0.0000	21.2119
Total	0.0169	0.1662	0.1396	2.4000e-004	1.0000e-005	8.3800e-003	8.3900e-003	0.0000	7.8300e-003	7.8300e-003	0.0000	21.0777	21.0777	5.3700e-003	0.0000	21.2119

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	5.3000e-004	4.3000e-004	5.1700e-003	1.0000e-005	1.6300e-003	1.0000e-005	1.6400e-003	4.3000e-004	1.0000e-005	4.4000e-004	0.0000	1.3034	1.3034	3.0000e-005	4.0000e-005	1.3151
Total	5.3000e-004	4.3000e-004	5.1700e-003	1.0000e-005	1.6300e-003	1.0000e-005	1.6400e-003	4.3000e-004	1.0000e-005	4.4000e-004	0.0000	1.3034	1.3034	3.0000e-005	4.0000e-005	1.3151

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.3 Site Preparation - 2022****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					0.0318	0.0000	0.0318	3.4400e-003	0.0000	3.4400e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0276	0.3134	0.2011	4.9000e-004		0.0119	0.0119		0.0110	0.0110	0.0000	43.0941	43.0941	0.0139	0.0000	43.4426
Total	0.0276	0.3134	0.2011	4.9000e-004	0.0318	0.0119	0.0437	3.4400e-003	0.0110	0.0144	0.0000	43.0941	43.0941	0.0139	0.0000	43.4426

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	6.6000e-004	5.3000e-004	6.3600e-003	2.0000e-005	2.0000e-003	1.0000e-005	2.0200e-003	5.3000e-004	1.0000e-005	5.4000e-004	0.0000	1.6041	1.6041	4.0000e-005	4.0000e-005	1.6186
Total	6.6000e-004	5.3000e-004	6.3600e-003	2.0000e-005	2.0000e-003	1.0000e-005	2.0200e-003	5.3000e-004	1.0000e-005	5.4000e-004	0.0000	1.6041	1.6041	4.0000e-005	4.0000e-005	1.6186

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.3 Site Preparation - 2022****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					0.0124	0.0000	0.0124	1.3400e-003	0.0000	1.3400e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0276	0.3134	0.2011	4.9000e-004		0.0119	0.0119		0.0110	0.0110	0.0000	43.0941	43.0941	0.0139	0.0000	43.4425
Total	0.0276	0.3134	0.2011	4.9000e-004	0.0124	0.0119	0.0243	1.3400e-003	0.0110	0.0123	0.0000	43.0941	43.0941	0.0139	0.0000	43.4425

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	6.6000e-004	5.3000e-004	6.3600e-003	2.0000e-005	2.0000e-003	1.0000e-005	2.0200e-003	5.3000e-004	1.0000e-005	5.4000e-004	0.0000	1.6041	1.6041	4.0000e-005	4.0000e-005	1.6186
Total	6.6000e-004	5.3000e-004	6.3600e-003	2.0000e-005	2.0000e-003	1.0000e-005	2.0200e-003	5.3000e-004	1.0000e-005	5.4000e-004	0.0000	1.6041	1.6041	4.0000e-005	4.0000e-005	1.6186

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.4 Grading - 2022****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					0.2125	0.0000	0.2125	0.1027	0.0000	0.1027	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0462	0.5095	0.2766	6.2000e-004		0.0223	0.0223		0.0205	0.0205	0.0000	54.3081	54.3081	0.0176	0.0000	54.7473
Total	0.0462	0.5095	0.2766	6.2000e-004	0.2125	0.0223	0.2348	0.1027	0.0205	0.1232	0.0000	54.3081	54.3081	0.0176	0.0000	54.7473

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	1.2300e-003	9.9000e-004	0.0119	3.0000e-005	3.7600e-003	2.0000e-005	3.7800e-003	1.0000e-003	2.0000e-005	1.0200e-003	0.0000	3.0078	3.0078	8.0000e-005	8.0000e-005	3.0348
Total	1.2300e-003	9.9000e-004	0.0119	3.0000e-005	3.7600e-003	2.0000e-005	3.7800e-003	1.0000e-003	2.0000e-005	1.0200e-003	0.0000	3.0078	3.0078	8.0000e-005	8.0000e-005	3.0348

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.4 Grading - 2022****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					0.0829	0.0000	0.0829	0.0401	0.0000	0.0401	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0462	0.5095	0.2766	6.2000e-004		0.0223	0.0223		0.0205	0.0205	0.0000	54.3081	54.3081	0.0176	0.0000	54.7472
Total	0.0462	0.5095	0.2766	6.2000e-004	0.0829	0.0223	0.1051	0.0401	0.0205	0.0606	0.0000	54.3081	54.3081	0.0176	0.0000	54.7472

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	1.2300e-003	9.9000e-004	0.0119	3.0000e-005	3.7600e-003	2.0000e-005	3.7800e-003	1.0000e-003	2.0000e-005	1.0200e-003	0.0000	3.0078	3.0078	8.0000e-005	8.0000e-005	3.0348
Total	1.2300e-003	9.9000e-004	0.0119	3.0000e-005	3.7600e-003	2.0000e-005	3.7800e-003	1.0000e-003	2.0000e-005	1.0200e-003	0.0000	3.0078	3.0078	8.0000e-005	8.0000e-005	3.0348

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.5 Building Construction - 2022****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1011	0.7959	0.7823	1.3600e-003		0.0383	0.0383		0.0367	0.0367	0.0000	113.1857	113.1857	0.0218	0.0000	113.7316
Total	0.1011	0.7959	0.7823	1.3600e-003		0.0383	0.0383		0.0367	0.0367	0.0000	113.1857	113.1857	0.0218	0.0000	113.7316

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.9000e-003	0.0511	0.0184	2.1000e-004	6.9100e-003	5.7000e-004	7.4800e-003	1.9900e-003	5.5000e-004	2.5400e-003	0.0000	19.9679	19.9679	5.4000e-004	2.9600e-003	20.8629
Worker	0.0119	9.5400e-003	0.1149	3.1000e-004	0.0362	1.9000e-004	0.0364	9.6100e-003	1.8000e-004	9.7900e-003	0.0000	28.9598	28.9598	7.7000e-004	8.1000e-004	29.2204
Total	0.0138	0.0606	0.1333	5.2000e-004	0.0431	7.6000e-004	0.0439	0.0116	7.3000e-004	0.0123	0.0000	48.9277	48.9277	1.3100e-003	3.7700e-003	50.0833

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2022

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1011	0.7959	0.7823	1.3600e-003		0.0383	0.0383		0.0367	0.0367	0.0000	113.1855	113.1855	0.0218	0.0000	113.7314
Total	0.1011	0.7959	0.7823	1.3600e-003		0.0383	0.0383		0.0367	0.0367	0.0000	113.1855	113.1855	0.0218	0.0000	113.7314

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.9000e-003	0.0511	0.0184	2.1000e-004	6.9100e-003	5.7000e-004	7.4800e-003	1.9900e-003	5.5000e-004	2.5400e-003	0.0000	19.9679	19.9679	5.4000e-004	2.9600e-003	20.8629
Worker	0.0119	9.5400e-003	0.1149	3.1000e-004	0.0362	1.9000e-004	0.0364	9.6100e-003	1.8000e-004	9.7900e-003	0.0000	28.9598	28.9598	7.7000e-004	8.1000e-004	29.2204
Total	0.0138	0.0606	0.1333	5.2000e-004	0.0431	7.6000e-004	0.0439	0.0116	7.3000e-004	0.0123	0.0000	48.9277	48.9277	1.3100e-003	3.7700e-003	50.0833

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.5 Building Construction - 2023****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2228	1.7711	1.8479	3.2500e-003		0.0798	0.0798		0.0764	0.0764	0.0000	270.0127	270.0127	0.0511	0.0000	271.2893
Total	0.2228	1.7711	1.8479	3.2500e-003		0.0798	0.0798		0.0764	0.0764	0.0000	270.0127	270.0127	0.0511	0.0000	271.2893

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	3.0300e-003	0.0979	0.0403	4.7000e-004	0.0165	6.9000e-004	0.0172	4.7500e-003	6.6000e-004	5.4200e-003	0.0000	45.7155	45.7155	1.1900e-003	6.7600e-003	47.7592
Worker	0.0261	0.0200	0.2510	7.2000e-004	0.0863	4.3000e-004	0.0868	0.0229	4.0000e-004	0.0233	0.0000	67.2585	67.2585	1.6500e-003	1.7700e-003	67.8284
Total	0.0292	0.1179	0.2913	1.1900e-003	0.1028	1.1200e-003	0.1039	0.0277	1.0600e-003	0.0287	0.0000	112.9740	112.9740	2.8400e-003	8.5300e-003	115.5876

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.5 Building Construction - 2023****Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2228	1.7711	1.8479	3.2500e-003		0.0798	0.0798		0.0764	0.0764	0.0000	270.0124	270.0124	0.0511	0.0000	271.2889
Total	0.2228	1.7711	1.8479	3.2500e-003		0.0798	0.0798		0.0764	0.0764	0.0000	270.0124	270.0124	0.0511	0.0000	271.2889

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	3.0300e-003	0.0979	0.0403	4.7000e-004	0.0165	6.9000e-004	0.0172	4.7500e-003	6.6000e-004	5.4200e-003	0.0000	45.7155	45.7155	1.1900e-003	6.7600e-003	47.7592
Worker	0.0261	0.0200	0.2510	7.2000e-004	0.0863	4.3000e-004	0.0868	0.0229	4.0000e-004	0.0233	0.0000	67.2585	67.2585	1.6500e-003	1.7700e-003	67.8284
Total	0.0292	0.1179	0.2913	1.1900e-003	0.1028	1.1200e-003	0.1039	0.0277	1.0600e-003	0.0287	0.0000	112.9740	112.9740	2.8400e-003	8.5300e-003	115.5876

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.5 Building Construction - 2024****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0567	0.4552	0.5006	8.9000e-004		0.0191	0.0191		0.0183	0.0183	0.0000	73.7384	73.7384	0.0137	0.0000	74.0818
Total	0.0567	0.4552	0.5006	8.9000e-004		0.0191	0.0191		0.0183	0.0183	0.0000	73.7384	73.7384	0.0137	0.0000	74.0818

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	8.1000e-004	0.0270	0.0108	1.3000e-004	4.5000e-003	1.9000e-004	4.6800e-003	1.3000e-003	1.8000e-004	1.4800e-003	0.0000	12.3119	12.3119	3.2000e-004	1.8200e-003	12.8620
Worker	6.6400e-003	4.8300e-003	0.0639	1.9000e-004	0.0236	1.1000e-004	0.0237	6.2600e-003	1.0000e-004	6.3600e-003	0.0000	17.9758	17.9758	4.1000e-004	4.5000e-004	18.1197
Total	7.4500e-003	0.0318	0.0747	3.2000e-004	0.0281	3.0000e-004	0.0284	7.5600e-003	2.8000e-004	7.8400e-003	0.0000	30.2877	30.2877	7.3000e-004	2.2700e-003	30.9817

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Building Construction - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0567	0.4552	0.5006	8.9000e-004		0.0191	0.0191		0.0183	0.0183	0.0000	73.7384	73.7384	0.0137	0.0000	74.0817
Total	0.0567	0.4552	0.5006	8.9000e-004		0.0191	0.0191		0.0183	0.0183	0.0000	73.7384	73.7384	0.0137	0.0000	74.0817

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	8.1000e-004	0.0270	0.0108	1.3000e-004	4.5000e-003	1.9000e-004	4.6800e-003	1.3000e-003	1.8000e-004	1.4800e-003	0.0000	12.3119	12.3119	3.2000e-004	1.8200e-003	12.8620
Worker	6.6400e-003	4.8300e-003	0.0639	1.9000e-004	0.0236	1.1000e-004	0.0237	6.2600e-003	1.0000e-004	6.3600e-003	0.0000	17.9758	17.9758	4.1000e-004	4.5000e-004	18.1197
Total	7.4500e-003	0.0318	0.0747	3.2000e-004	0.0281	3.0000e-004	0.0284	7.5600e-003	2.8000e-004	7.8400e-003	0.0000	30.2877	30.2877	7.3000e-004	2.2700e-003	30.9817

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.6 Paving - 2024****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	4.2100e-003	0.0405	0.0585	9.0000e-005		1.9800e-003	1.9800e-003		1.8300e-003	1.8300e-003	0.0000	7.7574	7.7574	2.4600e-003	0.0000	7.8188
Paving	1.0300e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	5.2400e-003	0.0405	0.0585	9.0000e-005		1.9800e-003	1.9800e-003		1.8300e-003	1.8300e-003	0.0000	7.7574	7.7574	2.4600e-003	0.0000	7.8188

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.6000e-004	1.9000e-004	2.5500e-003	1.0000e-005	9.4000e-004	0.0000	9.4000e-004	2.5000e-004	0.0000	2.5000e-004	0.0000	0.7166	0.7166	2.0000e-005	2.0000e-005	0.7223
Total	2.6000e-004	1.9000e-004	2.5500e-003	1.0000e-005	9.4000e-004	0.0000	9.4000e-004	2.5000e-004	0.0000	2.5000e-004	0.0000	0.7166	0.7166	2.0000e-005	2.0000e-005	0.7223

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.6 Paving - 2024****Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	4.2100e-003	0.0405	0.0585	9.0000e-005		1.9800e-003	1.9800e-003		1.8300e-003	1.8300e-003	0.0000	7.7573	7.7573	2.4600e-003	0.0000	7.8188
Paving	1.0300e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	5.2400e-003	0.0405	0.0585	9.0000e-005		1.9800e-003	1.9800e-003		1.8300e-003	1.8300e-003	0.0000	7.7573	7.7573	2.4600e-003	0.0000	7.8188

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.6000e-004	1.9000e-004	2.5500e-003	1.0000e-005	9.4000e-004	0.0000	9.4000e-004	2.5000e-004	0.0000	2.5000e-004	0.0000	0.7166	0.7166	2.0000e-005	2.0000e-005	0.7223
Total	2.6000e-004	1.9000e-004	2.5500e-003	1.0000e-005	9.4000e-004	0.0000	9.4000e-004	2.5000e-004	0.0000	2.5000e-004	0.0000	0.7166	0.7166	2.0000e-005	2.0000e-005	0.7223

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.7 Architectural Coating - 2024****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.2250					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.0000e-004	6.0900e-003	9.0500e-003	1.0000e-005		3.0000e-004	3.0000e-004		3.0000e-004	3.0000e-004	0.0000	1.2766	1.2766	7.0000e-005	0.0000	1.2784
Total	0.2259	6.0900e-003	9.0500e-003	1.0000e-005		3.0000e-004	3.0000e-004		3.0000e-004	3.0000e-004	0.0000	1.2766	1.2766	7.0000e-005	0.0000	1.2784

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	1.9000e-004	1.4000e-004	1.8700e-003	1.0000e-005	6.9000e-004	0.0000	6.9000e-004	1.8000e-004	0.0000	1.9000e-004	0.0000	0.5255	0.5255	1.0000e-005	1.0000e-005	0.5297
Total	1.9000e-004	1.4000e-004	1.8700e-003	1.0000e-005	6.9000e-004	0.0000	6.9000e-004	1.8000e-004	0.0000	1.9000e-004	0.0000	0.5255	0.5255	1.0000e-005	1.0000e-005	0.5297

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.7 Architectural Coating - 2024****Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.2250					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.0000e-004	6.0900e-003	9.0500e-003	1.0000e-005		3.0000e-004	3.0000e-004		3.0000e-004	3.0000e-004	0.0000	1.2766	1.2766	7.0000e-005	0.0000	1.2784
Total	0.2259	6.0900e-003	9.0500e-003	1.0000e-005		3.0000e-004	3.0000e-004		3.0000e-004	3.0000e-004	0.0000	1.2766	1.2766	7.0000e-005	0.0000	1.2784

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	1.9000e-004	1.4000e-004	1.8700e-003	1.0000e-005	6.9000e-004	0.0000	6.9000e-004	1.8000e-004	0.0000	1.9000e-004	0.0000	0.5255	0.5255	1.0000e-005	1.0000e-005	0.5297
Total	1.9000e-004	1.4000e-004	1.8700e-003	1.0000e-005	6.9000e-004	0.0000	6.9000e-004	1.8000e-004	0.0000	1.9000e-004	0.0000	0.5255	0.5255	1.0000e-005	1.0000e-005	0.5297

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0753	0.1008	0.6556	1.3200e-003	0.1359	1.1000e-003	0.1370	0.0363	1.0300e-003	0.0373	0.0000	124.3367	124.3367	8.4600e-003	6.8900e-003	126.6017
Unmitigated	0.0753	0.1008	0.6556	1.3200e-003	0.1359	1.1000e-003	0.1370	0.0363	1.0300e-003	0.0373	0.0000	124.3367	124.3367	8.4600e-003	6.8900e-003	126.6017

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Motel	154.10	154.10	154.10	308,386	308,386
Regional Shopping Center	29.63	36.20	16.56	52,045	52,045
Parking Lot	0.00	0.00	0.00		
Recreational Swimming Pool	0.00	0.00	0.00		
Total	183.73	190.30	170.66	360,431	360,431

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
Motel	14.70	6.60	6.60	19.00	62.00	19.00	58	38	4
Regional Shopping Center	14.70	6.60	6.60	16.30	64.70	19.00	54	35	11
Parking Lot	14.70	6.60	6.60	0.00	0.00	0.00	0	0	0

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	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Recreational Swimming Pool	14.70	6.60	6.60	33.00	48.00	19.00	52	39	9

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Motel	0.540566	0.056059	0.172680	0.136494	0.026304	0.007104	0.011680	0.017449	0.000554	0.000251	0.025076	0.000954	0.004830
Regional Shopping Center	0.540566	0.056059	0.172680	0.136494	0.026304	0.007104	0.011680	0.017449	0.000554	0.000251	0.025076	0.000954	0.004830
Parking Lot	0.540566	0.056059	0.172680	0.136494	0.026304	0.007104	0.011680	0.017449	0.000554	0.000251	0.025076	0.000954	0.004830
Recreational Swimming Pool	0.540566	0.056059	0.172680	0.136494	0.026304	0.007104	0.011680	0.017449	0.000554	0.000251	0.025076	0.000954	0.004830

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	282.9198	282.9198	0.0239	2.8900e-003	284.3793
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	282.9198	282.9198	0.0239	2.8900e-003	284.3793
NaturalGas Mitigated	0.0289	0.2629	0.2208	1.5800e-003		0.0200	0.0200		0.0200	0.0200	0.0000	286.2001	286.2001	5.4900e-003	5.2500e-003	287.9009
NaturalGas Unmitigated	0.0289	0.2629	0.2208	1.5800e-003		0.0200	0.0200		0.0200	0.0200	0.0000	286.2001	286.2001	5.4900e-003	5.2500e-003	287.9009

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**5.2 Energy by Land Use - NaturalGas****Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Motel	5.36146e+006	0.0289	0.2628	0.2208	1.5800e-003		0.0200	0.0200		0.0200	0.0200	0.0000	286.1080	286.1080	5.4800e-003	5.2500e-003	287.8082
Parking Lot	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
Recreational Swimming Pool	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
Regional Shopping Center	1727	1.0000e-005	8.0000e-005	7.0000e-005	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	0.0922	0.0922	0.0000	0.0000	0.0927
Total		0.0289	0.2629	0.2208	1.5800e-003		0.0200	0.0200		0.0200	0.0200	0.0000	286.2001	286.2001	5.4800e-003	5.2500e-003	287.9009

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**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					
Motel	5.36146e+006	0.0289	0.2628	0.2208	1.5800e-003		0.0200	0.0200		0.0200	0.0200	0.0000	286.1080	286.1080	5.4800e-003	5.2500e-003	287.8082
Parking Lot	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
Recreational Swimming Pool	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
Regional Shopping Center	1727	1.0000e-005	8.0000e-005	7.0000e-005	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	0.0922	0.0922	0.0000	0.0000	0.0927
Total		0.0289	0.2629	0.2208	1.5800e-003		0.0200	0.0200		0.0200	0.0200	0.0000	286.2001	286.2001	5.4800e-003	5.2500e-003	287.9009

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**5.3 Energy by Land Use - Electricity****Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Motel	1.57345e+006	279.0448	0.0236	2.8500e-003	280.4843
Parking Lot	12320	2.1849	1.8000e-004	2.0000e-005	2.1962
Recreational Swimming Pool	0	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	9529.9	1.6901	1.4000e-004	2.0000e-005	1.6988
Total		282.9198	0.0239	2.8900e-003	284.3793

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**5.3 Energy by Land Use - Electricity****Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Motel	1.57345e+006	279.0448	0.0236	2.8500e-003	280.4843
Parking Lot	12320	2.1849	1.8000e-004	2.0000e-005	2.1962
Recreational Swimming Pool	0	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	9529.9	1.6901	1.4000e-004	2.0000e-005	1.6988
Total		282.9198	0.0239	2.8900e-003	284.3793

6.0 Area Detail**6.1 Mitigation Measures Area**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.4686	1.0000e-005	1.2500e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.4200e-003	2.4200e-003	1.0000e-005	0.0000	2.5800e-003
Unmitigated	0.4686	1.0000e-005	1.2500e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.4200e-003	2.4200e-003	1.0000e-005	0.0000	2.5800e-003

6.2 Area by SubCategory**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1076					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.3608					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.1000e-004	1.0000e-005	1.2500e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.4200e-003	2.4200e-003	1.0000e-005	0.0000	2.5800e-003
Total	0.4686	1.0000e-005	1.2500e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.4200e-003	2.4200e-003	1.0000e-005	0.0000	2.5800e-003

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**6.2 Area by SubCategory****Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1076					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.3608					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.1000e-004	1.0000e-005	1.2500e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.4200e-003	2.4200e-003	1.0000e-005	0.0000	2.5800e-003
Total	0.4686	1.0000e-005	1.2500e-003	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.4200e-003	2.4200e-003	1.0000e-005	0.0000	2.5800e-003

7.0 Water Detail**7.1 Mitigation Measures Water**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	3.7532	0.0420	1.0200e-003	5.1065
Unmitigated	3.7532	0.0420	1.0200e-003	5.1065

7.2 Water by Land Use**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Motel	1.16687 / 0.129652	3.3202	0.0383	9.3000e-004	4.5535
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	0.0544117 / 0.0333491	0.2086	1.7900e-003	4.0000e-005	0.2664
Regional Shopping Center	0.0585173 / 0.0358654	0.2244	1.9200e-003	5.0000e-005	0.2865
Total		3.7532	0.0420	1.0200e-003	5.1065

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**7.2 Water by Land Use****Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Motel	1.16687 / 0.129652	3.3202	0.0383	9.3000e-004	4.5535
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	0.0544117 / 0.0333491	0.2086	1.7900e-003	4.0000e-005	0.2664
Regional Shopping Center	0.0585173 / 0.0358654	0.2244	1.9200e-003	5.0000e-005	0.2865
Total		3.7532	0.0420	1.0200e-003	5.1065

8.0 Waste Detail**8.1 Mitigation Measures Waste**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	6.3435	0.3749	0.0000	15.7157
Unmitigated	6.3435	0.3749	0.0000	15.7157

8.2 Waste by Land Use**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Motel	25.18	5.1113	0.3021	0.0000	12.6631
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	5.24	1.0637	0.0629	0.0000	2.6352
Regional Shopping Center	0.83	0.1685	9.9600e-003	0.0000	0.4174
Total		6.3435	0.3749	0.0000	15.7157

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**8.2 Waste by Land Use****Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Motel	25.18	5.1113	0.3021	0.0000	12.6631
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	5.24	1.0637	0.0629	0.0000	2.6352
Regional Shopping Center	0.83	0.1685	9.9600e-003	0.0000	0.4174
Total		6.3435	0.3749	0.0000	15.7157

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

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

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

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Equipment Type	Number
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11.0 Vegetation

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