

Appendix F

## **Greenhouse Gas Emissions Assessment**

**Greenhouse Gas Emissions Assessment  
North King Road Project  
City of San José, California**

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**LIST OF ABBREVIATED TERMS**

AB	Assembly Bill
CARB	California Air Resource Board
CCR	California Code of Regulations
CalEEMod	California Emissions Estimator Model
CEQA	California Environmental Quality Act
CALGreen	California Green Building Standards
CPUC	California Public Utilities Commission
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
CFC	Chlorofluorocarbon
CPP	Clean Power Plan
CCSP	Climate Change Scoping Plan
cy	cubic yard
EPA	Environmental Protection Agency
FAAA	Federal Clean Air Act
FR	Federal Register
GHG	greenhouse gas
HCFC	Hydrochlorofluorocarbon
HFC	Hydrofluorocarbon
LCFS	Low Carbon Fuel Standard
CH <sub>4</sub>	Methane
MMTCO <sub>2</sub> e	million metric tons of carbon dioxide equivalent
MTCO <sub>2</sub> e	million tons of carbon dioxide equivalent
NHTSA	National Highway Traffic Safety Administration
NF <sub>3</sub>	nitrogen trifluoride
N <sub>2</sub> O	nitrous oxide
PFC	Perfluorocarbon
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
Sf	square foot
SF <sub>6</sub>	sulfur hexafluoride
TAC	toxic air contaminants

## 1 INTRODUCTION

This report describes effects of climate change and greenhouse gas (GHG) emissions that would be caused by implementation of the 650 North King Road Project. The study area for climate change and the analysis of GHG emissions is broad because climate change is influenced by world-wide emissions and their global effects. However, the study area is also limited by the CEQA Guidelines [Section 15064(d)], which directs lead agencies to consider an “indirect physical change” only if that change is a reasonably foreseeable impact that may be caused by the project. This report limits discussion to those physical changes to the environment that are not speculative and are reasonably foreseeable.

### 1.1 PROJECT LOCATION

The proposed project is located on 650 North King Road in San José. Figure 1: Regional Vicinity and Figure 2: Site Vicinity, depict the project site in a regional and local context. The project site is located in an urban area with a mix of surrounding uses including commercial, office, residential and industrial uses. The proposed project’s existing land use designation is Light Industrial (LI) and existing zoning designation is Light Industrial (LI).

Currently, the project site is developed with four office/warehouse buildings. The four buildings consist of approximately 135,044<sup>1</sup> square feet of warehouse and office space. The existing buildings are located in the center of the parcel and includes loading docks along the northern elevation. Surface parking is available throughout the site, with vehicle parking along the eastern (La Plumas Avenue) and southern (North King Road) frontages and truck parking along the northern and eastern frontages. There is existing landscaping and trees along the western, eastern and southern boundaries of the project site. The project site also has existing surface lighting.

### 1.2 PROJECT DESCRIPTION

The proposed 650 North King Road project (project) is designed and proposed as a warehouse facility. The project would demolish the four existing building onsite and construct a new 225,280 square feet office/warehouse industrial building on a total site area of 466,421 square feet (10.71 acres). Construction of the project is expected to commence in July 2022 and last for approximately 12 months. The proposed development would contain approximately 191,488 square feet of warehouse space, 16,897 square feet of office space on the ground level and 16,895 square feet of office space on the second floor, see Figure 3: Site Plan. The enclosed area of the project would be 225,280 square feet compared to the existing 221,816 square feet warehouse buildings.

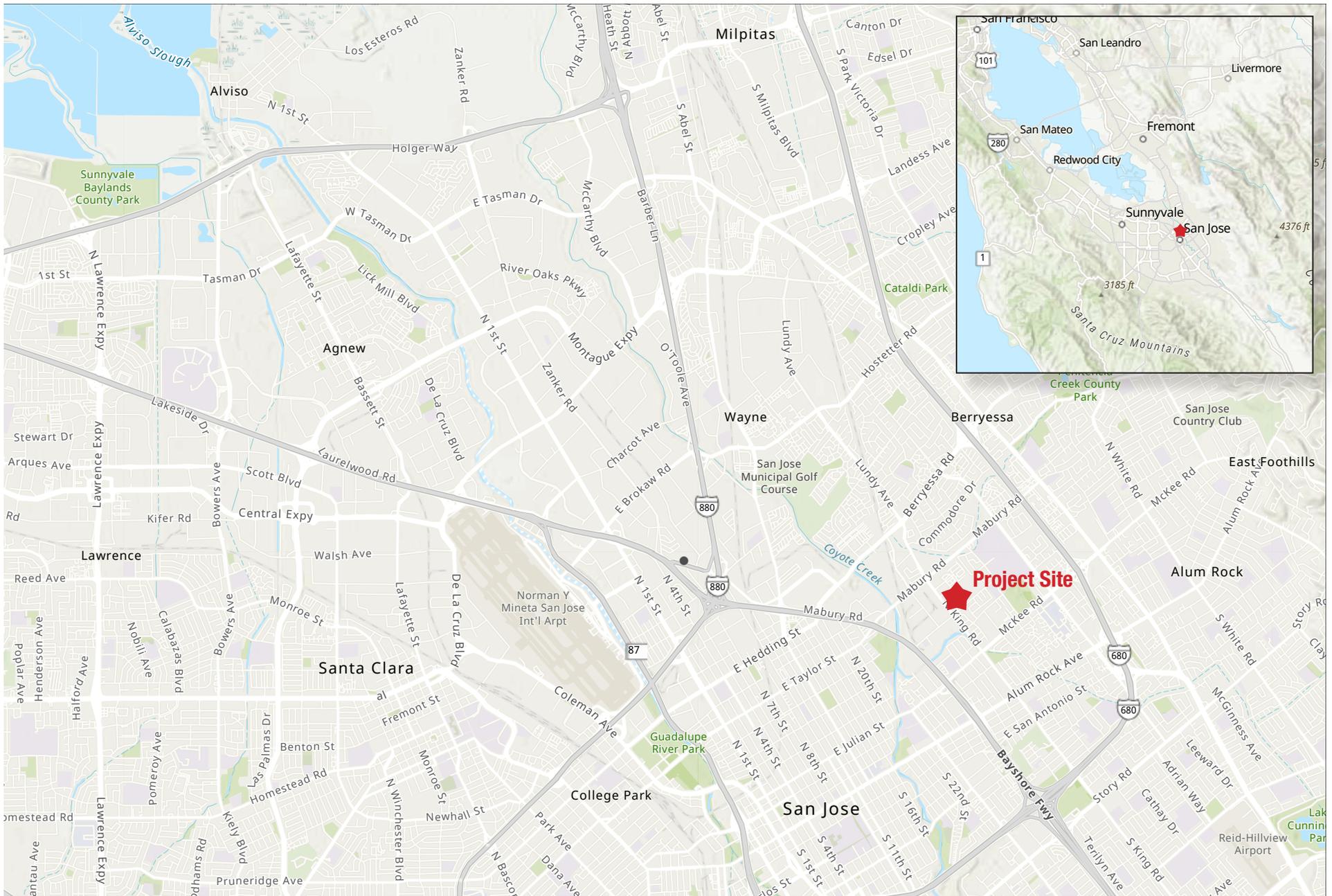
The proposed warehouse building would include 27 loading dock doors for trailer, box, and recycling trucks on the western side of the warehouse building. The proposed project also includes surface parking with 47 trailer stalls and 119 automobile stalls on site. Of the 119 automobile spaces provided, 48 spaces would be Electric Vehicle (EV) capable. Automobile parking would be located east of the warehouse building while the trailer parking would be located west of the warehouse building. Additionally, 13 motorcycle parking spaces and 7 bicycle racks would be located around the office space. The primary pedestrian entrance to the building would be provided from Las Plumas. Access to the project site would be provided from two driveways on Las Plumas Avenue and one driveway on North King Road.

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<sup>1</sup> Per email communication with Project Applicant on December 7, 2021.

The existing site has mature landscape vegetation including trees and shrubs along the site boundary. Project implementation would remove existing vegetation on site, including 163 trees. No existing trees would remain. The removed trees would be replaced according to tree replacement ratios required by the City. Additional landscaping throughout the site would include a mix of trees, shrubs and groundcover. Landscape coverage would be provided along the eastern, southern, and western boundaries of the building.

The project site is designated as Light Industrial (LI) by the General Plan, which allows for warehousing uses. The project site is zoned as Light Industrial (LI). The LI Zoning District allows for warehouse, light to medium manufacturing, and wholesale establishments.



Source: USGS, 2021

**Figure 1: Regional Map**  
650 North King Road Project



Not to scale

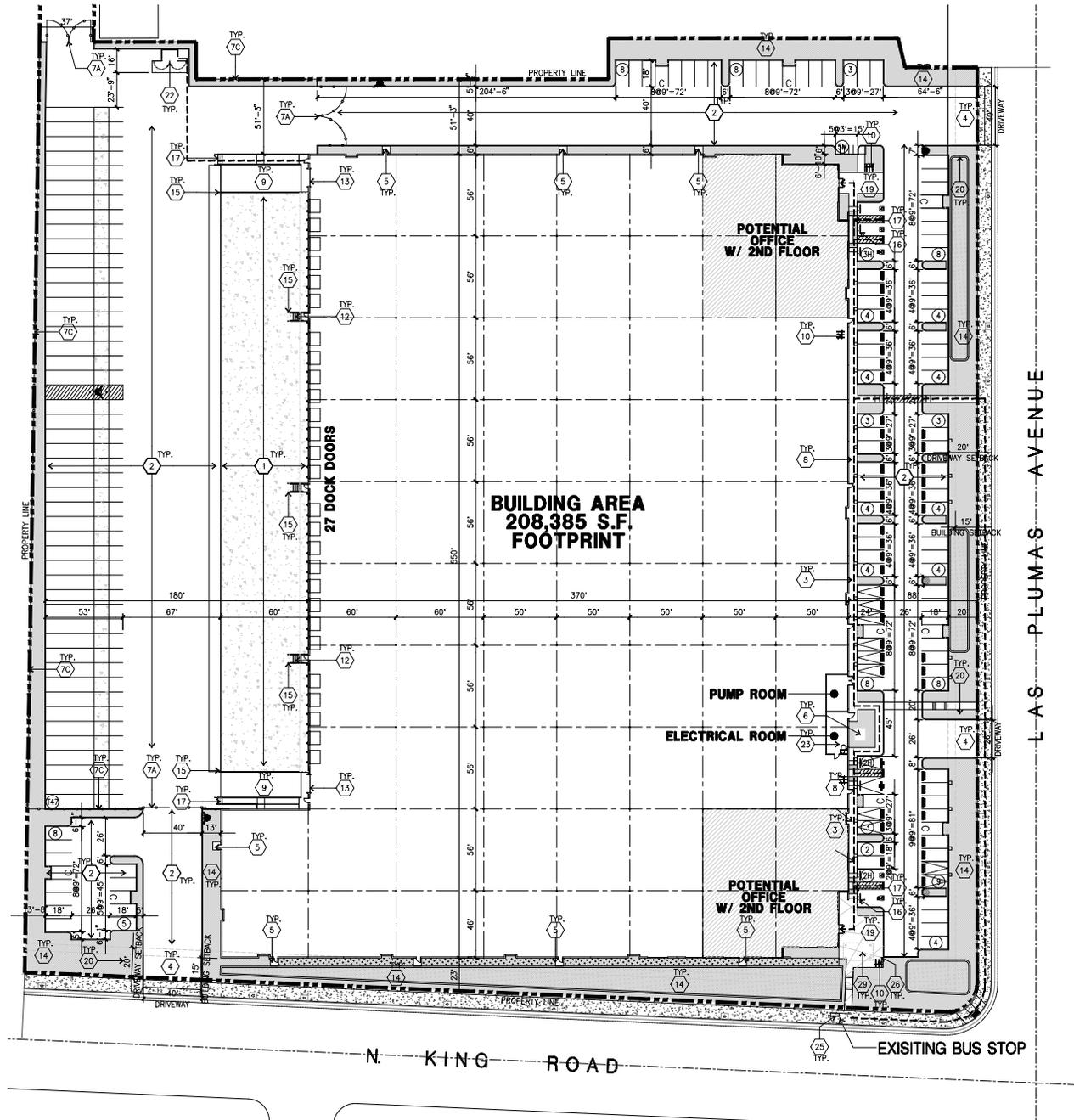


Source: USGS, 2021

**Figure 2: Project Vicinity Map**  
650 North King Road Project



Not to scale



Source: Project Plans for SP20-033, 2021

**Figure 3: Site Plan**  
650 North King Road Project



## 2 ENVIRONMENTAL SETTING

### 2.1 GREENHOUSE GASES AND CLIMATE CHANGE

Certain gases in the earth's atmosphere classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride (NF<sub>3</sub>); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of a GHG molecule is dependent on multiple variables and cannot be pinpointed, more CO<sub>2</sub> is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms of carbon sequestration. Of the total annual human-caused CO<sub>2</sub> emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO<sub>2</sub> emissions remains stored in the atmosphere (Intergovernmental Panel on Climate Change, 2013). Table 1: Description of Greenhouse Gases, describes the primary GHGs attributed to global climate change, including their physical properties.

**Table 1: Description of Greenhouse Gases**

Greenhouse Gas	Description
Carbon Dioxide (CO <sub>2</sub> )	CO <sub>2</sub> is a colorless, odorless gas that is emitted naturally and through human activities. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood. The largest source of CO <sub>2</sub> emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. The atmospheric lifetime of CO <sub>2</sub> is variable because it is readily exchanged in the atmosphere. CO <sub>2</sub> is the most widely emitted GHG and is the reference gas (Global Warming Potential of 1) for determining Global Warming Potentials for other GHGs.
Nitrous Oxide (N <sub>2</sub> O)	N <sub>2</sub> O is largely attributable to agricultural practices and soil management. Primary human-related sources of N <sub>2</sub> O include agricultural soil management, sewage treatment, combustion of fossil fuels, and adipic and nitric acid production. N <sub>2</sub> O is produced from biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N <sub>2</sub> O is approximately 120 years. The Global Warming Potential of N <sub>2</sub> O is 298.
Methane (CH <sub>4</sub> )	CH <sub>4</sub> , a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Methane is the major component of natural gas, approximately 87 percent by volume. Human-related sources include fossil fuel production, animal husbandry, rice cultivation, biomass burning, and waste management. Natural sources of CH <sub>4</sub> include wetlands, gas hydrates, termites, oceans, freshwater bodies, non-wetland soils, and wildfires. The atmospheric lifetime of CH <sub>4</sub> is approximately 12 years and the Global Warming Potential is 25.
Hydrofluorocarbons (HFCs)	HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is increasing, as the continued phase out of CFCs and HCFCs gains momentum. The 100-year Global Warming Potential of HFCs range from 124 for HFC-152 to 14,800 for HFC-23.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and only break down by ultraviolet rays approximately 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Two main sources of PFCs are primary aluminum production and semiconductor manufacturing. Global Warming Potentials range from 6,500 to 9,200.
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. They are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. The Montreal Protocol on Substances that Deplete the Ozone Layer prohibited their production in 1987. Global Warming Potentials for CFCs range from 3,800 to 14,400.
Sulfur Hexafluoride (SF <sub>6</sub> )	SF <sub>6</sub> is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas. The Global Warming Potential of SF <sub>6</sub> is 23,900.
Hydrochlorofluorocarbons (HCFCs)	HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, HCFCs are subject to a consumption cap and gradual phase out. The United States is scheduled to achieve a 100 percent reduction to the cap by 2030. The 100-year Global Warming Potentials of HCFCs range from 90 for HCFC-123 to 1,800 for HCFC-142b.
Nitrogen Trifluoride (NF <sub>3</sub> )	NF <sub>3</sub> was added to Health and Safety Code section 38505(g)(7) as a GHG of concern. This gas is used in electronics manufacture for semiconductors and liquid crystal displays. It has a high global warming potential of 17,200.
Source: Compiled from U.S. EPA, <i>Overview of Greenhouse Gases</i> , April 11, 2018 ( <a href="https://www.epa.gov/ghgemissions/overview-greenhouse-gases">https://www.epa.gov/ghgemissions/overview-greenhouse-gases</a> ); U.S. EPA, <i>Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016</i> , 2018; Intergovernmental Panel on Climate Change, <i>Climate Change 2007: The Physical Science Basis</i> , 2007; National Research Council, <i>Advancing the Science of Climate Change</i> , 2010; U.S. EPA, <i>Methane and Nitrous Oxide Emission from Natural Sources</i> , April 2010.	

### 3 REGULATORY SETTING

#### 3.1 FEDERAL

To date, national standards have not been established for nationwide GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level. Various efforts have been promulgated at the federal level to improve fuel economy and energy efficiency to address climate change and its associated effects.

**Energy Independence and Security Act of 2007.** The Energy Independence and Security Act of 2007 (December 2007), among other key measures, requires the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

**U.S. Environmental Protection Agency Endangerment Finding.** The U.S. Environmental Protection Agency's (EPA) authority to regulate GHG emissions stems from the U.S. Supreme Court decision in *Massachusetts v. EPA* (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Federal Clean Air Act (FCAA) and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the EPA finalized an endangerment finding in December 2009. Based on scientific evidence, it found that six GHGs (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub>) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing FCAA and the EPA's assessment of the scientific evidence that form the basis for the EPA's regulatory actions.

**Federal Vehicle Standards.** In response to the U.S. Supreme Court ruling discussed above, Executive Order 13432 was issued in 2007 directing the EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and in 2010, the EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, an Executive Memorandum was issued directing the Department of Transportation, Department of Energy, EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO<sub>2</sub> in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were

achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021, and NHTSA intends to set standards for model years 2022–2025 in a future rulemaking. On January 12, 2017, the EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks. It should be noted that the EPA is currently proposing to freeze the vehicle fuel efficiency standards at their planned 2020 level (37 mpg), canceling any future strengthening (currently 54.5 mpg by 2026).

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO<sub>2</sub> emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baseline.

In August 2016, the EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO<sub>2</sub> emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program.

In 2018, the EPA stated their intent to halt various Federal regulatory activities to reduce GHG emissions, including the phase two program. California and other states have stated their intent to challenge federal actions that would delay or eliminate GHG reduction measures and have committed to cooperating with other countries to implement global climate change initiatives. On September 27, 2019, the EPA and the NHTSA published the “Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program.” (84 Fed. Reg. 51,310 (Sept. 27, 2019.)) The Part One Rule revokes California’s authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. On March 31, 2020, the EPA and NHTSA finalized rulemaking for SAFE Part Two sets CO<sub>2</sub> emissions standards and corporate average fuel economy (CAFE) standards for passenger vehicles and light duty trucks, covering model years 2021-2026.

## 3.2 STATE OF CALIFORNIA

### California Air Resources Board

The California Air Resources Board (CARB) is responsible for the coordination and oversight of State and local air pollution control programs in California. Various statewide and local initiatives to reduce California’s contribution to GHG emissions have raised awareness about climate change and its potential for severe long-term adverse environmental, social, and economic effects. California is a significant emitter of CO<sub>2</sub>e in the world and produced 440 million gross metric tons of CO<sub>2</sub>e in 2015. In the state, the transportation sector is the largest emitter of GHGs, followed by industrial operations such as manufacturing and oil and gas extraction.

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 California Global Warming Solutions Act of 2006, was specifically enacted to address GHG emissions. Other legislation, such

as Title 24 building efficiency standards and Title 20 appliance energy standards, were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions. This section describes the major legislation related to GHG emissions reduction.

**Assembly Bill 32 (California Global Warming Solutions Act of 2006).** AB 32 instructs the CARB to develop and enforce regulations for the reporting and verification of statewide GHG emissions. AB 32 also directed CARB to set a GHG emissions limit based on 1990 levels, to be achieved by 2020. It set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

**CARB Scoping Plan.** CARB adopted the Scoping Plan to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that would be adopted to reduce California's GHG emissions. CARB determined that achieving the 1990 emissions level would require a reduction of GHG emissions of approximately 29 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as "business-as-usual"). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates early actions and additional GHG reduction measures by both CARB and the state's Climate Action Team, identifies additional measures to be pursued as regulations, and outlines the adopted role of a cap-and-trade program. Additional development of these measures and adoption of the appropriate regulations occurred through the end of 2013. Key elements of the Scoping Plan include:

- Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards.
- Achieving a statewide renewables energy mix of 33 percent by 2020.
- Developing a California cap-and-trade program that links with other programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions (adopted in 2011).
- Establishing targets for transportation-related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets (several sustainable community strategies have been adopted).
- Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, heavy-duty truck measures, the Low Carbon Fuel Standard (amendments to the Pavley Standard adopted 2009; Advanced Clean Car standard adopted 2012), goods movement measures, and the Low Carbon Fuel Standard (adopted 2009).
- Creating targeted fees, including a public goods charge on water use, fees on gasses with high global warming potential, and a fee to fund the administrative costs of California's long-term commitment to AB 32 implementation.

In 2012, CARB released revised estimates of the expected 2020 emissions reductions. The revised analysis relied on emissions projections updated considering current economic forecasts that accounted for the economic downturn since 2008, reduction measures already approved and put in place relating to future fuel and energy demand, and other factors. This update reduced the projected 2020 emissions from 596 million metric tons of CO<sub>2</sub>e (MMTCO<sub>2</sub>e) to 545 MMTCO<sub>2</sub>e. The reduction in forecasted 2020 emissions means that the revised business-as-usual reduction necessary to achieve AB 32's goal of reaching 1990 levels by 2020 is now 21.7 percent, down from 29 percent. CARB also provided a lower 2020 inventory

forecast that incorporated state-led GHG emissions reduction measures already in place. When this lower forecast is considered, the necessary reduction from business-as-usual needed to achieve the goals of AB 32 is approximately 16 percent.

CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan summarizes the most recent science related to climate change, including anticipated impacts to California and the levels of GHG emissions reductions necessary to likely avoid risking irreparable damage. It identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. By 2016, California had reduced GHG emissions below 1990 levels, achieving AB 32's 2020 goal four years ahead of schedule.

In January 2017, CARB released the 2017 Climate Change Scoping Plan Update (Second Update) for public review and comment (CARB, 2017). The Second Update sets forth CARB's strategy for achieving the state's 2030 GHG target as established in Senate Bill (SB) 32 (discussed below). The Second Update was approved by CARB's Governing Board on December 14, 2017.

**Senate Bill 32 (California Global Warming Solutions Act of 2006: Emissions Limit).** Signed into law in September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

With SB 32, the Legislature passed companion legislation, AB 197, which provides additional direction for developing the Scoping Plan. On December 14, 2017, CARB adopted a second update to the Scoping Plan (CARB, 2017b). The 2017 Scoping Plan details how the State will reduce GHG emissions to meet the 2030 target set by Executive Order B-30-15 and codified by SB 32. Other objectives listed in the 2017 Scoping Plan are to provide direct GHG emissions reductions; support climate investment in disadvantaged communities; and support the Clean Power Plan and other Federal actions.

**SB 375 (The Sustainable Communities and Climate Protection Act of 2008).** Signed into law on September 30, 2008, SB 375 provides a process to coordinate land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction goals established by AB 32. SB 375 requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, aligns planning for transportation and housing, and creates specified incentives for the implementation of the strategies. The applicable sustainable community strategy in the Bay Area is Plan Bay Area 2040.

**AB 1493 (Pavley Regulations and Fuel Efficiency Standards).** 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 regulations establish one set of emission standards for model years 2009–2016 and a second set of emissions standards for model years 2017 to 2025. By 2025, when all rules will be fully implemented, new automobiles will emit 34 percent fewer CO<sub>2</sub>e emissions and 75 percent fewer smog-forming emissions.

**SB 1368 (Emission Performance Standards).** SB 1368 is the companion bill of AB 32, which directs the California Public Utilities Commission (CPUC) to adopt a performance standard for GHG emissions for the future power purchases of California utilities. SB 1368 limits carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than 5 years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. The new law effectively prevents California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the state. The CPUC adopted the regulations required by SB 1368 on August 29, 2007. The regulations implementing SB 1368 establish a standard for baseload generation owned by, or under long-term contract to publicly owned utilities, for 1,100 pounds of CO<sub>2</sub> per megawatt-hour.

**SB 1078 and SBX1-2 (Renewable Electricity Standards).** SB 1078 required California to generate 20 percent of its electricity from renewable energy by 2017. This goal was accelerated with SB 107, which changed the due date to 2010 instead of 2017. On November 17, 2008, Executive Order S-14-08 established a Renewable Portfolio Standard target for California requiring that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. Executive Order S-21-09 also directed CARB to adopt a regulation by July 31, 2010, requiring the state's load serving entities to meet a 33 percent renewable energy target by 2020. CARB approved the Renewable Electricity Standard on September 23, 2010 by Resolution 10-23. SB X1-2 codified the 33 percent by 2020 goal.

**SB 350 (Clean Energy and Pollution Reduction Act of 2015).** Signed into law on October 7, 2015, SB 350 implements the goals of Executive Order B-30-15. The objectives of SB 350 are to increase the procurement of electricity from renewable sources from 33 percent to 50 percent (with interim targets of 40 percent by 2024, and 45 percent by 2027) and to double the energy efficiency savings in electricity and natural gas end uses of retail customers through energy efficiency and conservation. SB 350 also reorganizes the Independent System Operator to develop more regional electricity transmission markets and improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

**AB 398 (Market-Based Compliance Mechanisms).** Signed on July 25, 2017, AB 398 extended the duration of the Cap-and-Trade program from 2020 to 2030. AB 398 required CARB to update the Scoping Plan and for all GHG rules and regulations adopted by the State. It also designated CARB as the statewide regulatory body responsible for ensuring that California meets its statewide carbon pollution reduction targets, while retaining local air districts' responsibility and authority to curb toxic air contaminants and criteria pollutants from local sources that severely impact public health. AB 398 also decreased free carbon allowances over 40 percent by 2030 and prioritized Cap-and-Trade spending to various programs including reducing diesel emissions in impacted communities.

**SB 150 (Regional Transportation Plans).** Signed on October 10, 2017, SB 150 aligns local and regional GHG reduction targets with State targets (i.e., 40 percent below their 1990 levels by 2030). SB 150 creates a process to include communities in discussions on how to monitor their regions' progress on meeting these goals. The bill also requires the CARB to regularly report on that progress, as well as on the successes and the challenges regions experience associated with achieving their targets. SB 150 provides for accounting of climate change efforts and GHG reductions and identify effective reduction strategies.

**SB 100 (California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases).** Signed into Law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent

by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

### Executive Orders Related to GHG Emissions

California's Executive Branch has taken several actions to reduce GHGs using executive orders. Although not regulatory, they set the state's tone and guide the actions of state agencies.

**Executive Order S-3-05.** Executive Order S-3-05 was issued on June 1, 2005, which established the following GHG emissions reduction targets:

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

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

**Executive Order S-01-07.** Issued on January 18, 2007, Executive Order S-01-07 mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. The executive order established a Low Carbon Fuel Standard (LCFS) and directed the Secretary for Environmental Protection to coordinate the actions of the California Energy Commission, CARB, the University of California, and other agencies to develop and propose protocols for measuring the "life-cycle carbon intensity" of transportation fuels. CARB adopted the LCFS on April 23, 2009

**Executive Order S-13-08.** Issued on November 14, 2008, Executive Order S-13-08 facilitated the California Natural Resources Agency development of the 2009 California Climate Adaptation Strategy. 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 S-14-08.** Issued on November 17, 2008, Executive Order S-14-08 expands the state's Renewable Energy Standard to 33 percent renewable power by 2020. Additionally, Executive Order S-21-09 (signed on September 15, 2009) directs CARB to adopt regulations requiring 33 percent of electricity sold in the state come from renewable energy by 2020. CARB adopted the Renewable Electricity Standard on September 23, 2010, which requires 33 percent renewable energy by 2020 for most publicly owned electricity retailers.

**Executive Order S-21-09.** Issued on July 17, 2009, Executive Order S-21-09 directs CARB to adopt regulations to increase California's Renewable Portfolio Standard (RPS) to 33 percent by 2020. This builds upon SB 1078 (2002), which established the California RPS program, requiring 20 percent renewable energy by 2017, and SB 107 (2006), which advanced the 20 percent deadline to 2010, a goal which was expanded to 33 percent by 2020 in the 2005 Energy Action Plan II.

**Executive Order B-30-15.** Issued on April 29, 2015, Executive Order B-30-15 established a California GHG reduction target of 40 percent below 1990 levels by 2030 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of CO<sub>2</sub>e (MMTCO<sub>2</sub>e). The 2030

target acts as an interim goal on the way to achieving reductions of 80 percent below 1990 levels by 2050, a goal set by Executive Order S-3-05. The executive 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. With the enactment of SB 32 in 2016, the Legislature codified the goal of reducing GHG emissions by 2030 to 40 percent below 1990 levels.

**Executive Order B-55-18.** Issued on September 10, 2018, Executive Order B-55-18 establishes a goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. This goal is in addition to the existing statewide targets of reducing GHG emissions. The executive order requires CARB to work with relevant state agencies to develop a framework for implementing this goal. It also requires CARB to update the Scoping Plan to identify and recommend measures to achieve carbon neutrality. The executive order also requires state agencies to develop sequestration targets in the Natural and Working Lands Climate Change Implementation Plan.

### California Regulations and Building Codes

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

**Title 20 Appliance Efficiency Regulations.** The appliance efficiency regulations (California Code of Regulations [CCR] Title 20, Sections 1601-1608) include standards for new appliances. Twenty-three categories of appliances are included in the scope of these regulations. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

**Title 24 Building Energy Efficiency Standards.** California's Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6), was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2016 Building Energy Efficiency Standards approved on January 19, 2016 went into effect on January 1, 2017. The 2019 Building Energy Efficiency Standards were adopted on May 9, 2018 and took effect on January 1, 2020. Under the 2019 standards, residential dwellings are required to use approximately 53 percent less energy and nonresidential buildings are required to use approximately 30 percent less energy than buildings under the 2016 standards.

**Title 24 California Green Building Standards Code.** The California Green Building Standards Code (CCR Title 24, Part 11 code) commonly referred to as CALGreen, is a statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. The CALGreen standards require new residential and nonresidential buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in the five green building topics. The latest CALGreen Code took effect on January 1, 2020 (2019 CALGreen). The 2019 CALGreen standards will continue to improve upon the existing standards for new construction of, and additions and alterations to, residential and nonresidential

buildings. The new 2019 CALGreen standards require residential buildings are required to be solar ready through solar panels (refer to Section 110.10 in the 2019 Building Energy Efficiency Standards for more details).

### 3.3 REGIONAL

#### **Bay Area Air Quality Management District Thresholds**

The BAAQMD is the regional agency with jurisdiction over the nine-county region located in the Basin. The Association of Bay Area Governments (ABAG), Metropolitan Transportation Commission (MTC), county transportation agencies, cities and counties, and various nongovernmental organizations also join in the efforts to improve air quality through a variety of programs. These programs include the adoption of regulations and policies, as well as implementation of extensive education and public outreach programs.

Under CEQA, the BAAQMD is a commenting responsible agency on air quality within its jurisdiction or impacting its jurisdiction. The BAAQMD reviews projects to ensure that they would: (1) support the primary goals of the latest Air Quality Plan; (2) include applicable control measures from the Air Quality Plan; and (3) not disrupt or hinder implementation of any Air Quality Plan control measures.

In May 2010, the BAAQMD adopted its updated California Environmental Quality Act (CEQA) Air Quality Guidelines as a guidance document to provide lead government agencies, consultants, and project proponents with uniform procedures for assessing air quality impacts and preparing the air quality sections of environmental documents for projects subject to CEQA. The BAAQMD CEQA Guidelines include methodologies and thresholds for addressing project and program level air quality and GHG emissions. The Guidelines were called into question by an order issued March 5, 2012, in California Building Industry Association (CBIA) v. BAAQMD (Alameda Superior Court Case No. RGI0548693). The Alameda County Superior Court issued a judgment finding that the BAAQMD had failed to comply with CEQA when it adopted the thresholds. The court also issued a writ of mandate ordering the BAAQMD to set aside the thresholds and cease dissemination of them until the BAAQMD had complied with CEQA. Notably, the court's ruling was based solely on BAAQMD's failure to comply with CEQA. The court did not reach any issues relating to the validity of the scientific reasoning underlying the recommended significance thresholds.

In August 2013, the Appellate Court struck down the lower court's order to set aside the thresholds. CBIA sought review by the California Supreme Court on three issues, including the appellate court's decision to uphold the BAAQMD's adoption of the thresholds, and the Court granted review on just one: Under what circumstances, if any, does CEQA require an analysis of how existing environmental conditions will impact future residents or users of a proposed project? In December 2015, the California Supreme Court confirmed that CEQA, with several specific exceptions, is concerned with the impacts of a project on the environment, not the effects the existing environment may have on a project. The BAAQMD published a new version of the Guidelines dated May 2017, which includes revisions made to address the Supreme Court's opinion. The BAAQMD is currently working to revise any outdated information in the Guidelines as part of its update to the CEQA Guidelines and thresholds of significance.

#### **Clean Air Plan**

Air quality plans developed to meet federal requirements are referred to as State Implementation Plans. The federal and state Clean Air Acts require plans to be developed for areas designated as nonattainment (with the exception of areas designated as nonattainment for the state  $PM_{10}$  standard). The 2017 Clean Air Plan: Spare the Air, Cool the Climate was adopted on April 19, 2019, by the BAAQMD.

The 2017 Clean Air Plan provides a regional strategy to protect public health and protect the climate. To protect public health, the plan describes how the BAAQMD will continue progress toward attaining all state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities. To protect the climate, the 2017 Clean Air Plan defines a vision for transitioning the region to a post-carbon economy needed to achieve ambitious greenhouse gas (GHG) reduction targets for 2030 and 2050, and provides a regional climate protection strategy that will put the Bay Area on a pathway to achieve those GHG reduction targets.

The 2017 Clean Air Plan includes a wide range of control measures designed to decrease emissions of the air pollutants that are most harmful to Bay Area residents, such as particulate matter, ozone, and toxic air contaminants; to reduce emissions of methane and other “super-GHGs” that are potent climate pollutants in the near-term; and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

### 3.4 LOCAL

#### **Santa Clara County Climate Action Plan**

The Santa Clara County Climate Action Plan (CAP) approved in 2009 focuses on County operations, facilities and employee actions that will reduce not only GHG emissions but also energy and water consumption, solid waste and fuel consumption. The GHG emission reduction goals require a change from “business as usual” to attain them. The goals were to stop increasing the amount of emissions by 2010, decrease emissions by 10 percent every 5 years from 2010 – 2050, and reach an 80 percent reduction by 2050. The CAP is being issued in the context of legislative and regulatory action at the federal and state level. California’s climate change goals are set forth in AB 32, the Global Warming Solutions Act of 2006. This legislation requires a reduction of California GHG emissions to 1990 levels by 2020. In December 2008, CARB approved the Climate Change Scoping Plan Document required by AB 32. The Scoping Plan Document, which provides a roadmap for California to reduce its GHG emissions, recognizes the importance of development and implementation of Climate Action Plans by California cities and counties. Executive Order S-03-05 goes even further by requiring statewide reductions in GHG emissions to 80 percent below 1990 by the year 2050.

#### **City of San José Municipal Code**

The City’s Municipal Code includes the following regulations that would reduce GHG emissions from future development:

- Green Building Regulations for Private Development (Chapter 17.84)
- Water Efficient Landscape Standards for New and Rehabilitated Landscaping (Chapter 15.10)
- Transportation Demand Programs for employers with more than 100 employees (Chapter 11.105)
- Construction and Demolition Diversion Deposit Program (Chapter 9.10)
- Wood Burning Ordinance (Chapter 9.10)

## City of San José General Plan

The General Plan includes a GHG Reduction Strategy that is designed to help the City sustain its natural resources, grow efficiently, and meet California legal requirements for GHG emissions reduction. Multiple policies and actions in the General Plan have GHG implications including those targeting land use, housing, transportation, water usage, solid waste generation and recycling, and reuse of historic buildings. The policies also include a monitoring component that allows for adaptation and adjustment of City programs and initiatives related to sustainability and associated reductions in GHG emissions. The GHG Reduction Strategy is intended to meet the mandates as outlined in the CEQA Guidelines and the recent standards for “qualified plans” as set forth by BAAQMD.

The GHG Reduction Strategy was re-adopted by the San José City Council in December 2015. The environmental impacts of the GHG Reduction Strategy were analyzed in the General Plan FPEIR and a 2015 Supplement to the General Plan FPEIR. The City’s projected emissions and the GHG Reduction Strategy are consistent with the measures necessary to meet state-wide 2020 goals established by AB 32 and addressed in the Climate Change Scoping Plan. Measures have not been identified that would ensure GHG emissions would be consistent with state-wide 2050 goals; however, the City adopted overriding considerations for identified future impacts associated with buildout of the City’s General Plan.

The General Plan includes the following GHG reduction policies, which are applicable to the project. These policies are also described within the City’s GHG Reduction Strategy.

- Policy MS – 1.1** Demonstrate leadership in the development and implementation of green building policies and practices. Ensure that all projects are consistent with or exceed the City’s Green Building Ordinance and City Council Policies as well as State and/or regional policies which require that projects incorporate various green building principles into their design and construction.
- Policy MS – 1.4:** Foster awareness of San José’s business and residential communities of the economic and environmental benefits of green building practices. Encourage design and construction of environmentally responsible commercial and residential buildings that are also operated and maintained to reduce waste, conserve water, and meet other environmental objectives.
- Policy MS-2.3:** Encourage consideration of solar orientation, including building placement, landscaping, design, and construction techniques for new construction to minimize energy consumption.
- Policy MS – 2.6:** Promote roofing design and surface treatments that reduce the heat island effect of new and existing development and support reduced energy use, reduced air pollution, and a healthy urban forest. Connect businesses and residents with cool roof rebate programs through City outreach efforts.
- Policy MS-2.11:** Require new development to incorporate green building practices, including those required by the Green Building Ordinance. Specifically, target reduced energy use through construction techniques (e.g., design of building envelopes and systems to maximize energy performance), through architectural design (e.g. design to maximize cross ventilation and interior daylight) and through site design

techniques (e.g. orienting buildings on sites to maximize the effectiveness of passive solar design).

- Policy MS – 5.5:** Maximize recycling and composting from all residents, businesses, and institutions in the City.
- Policy MS – 5.6:** Enhance the construction and demolition debris recycling program to increase diversion from the building sector.
- Policy MS-14.4:** Implement the City’s Green Building Policies so that new construction and rehabilitation of existing buildings fully implements industry best practices, including the use of optimized energy systems, selection of materials and resources, water efficiency, sustainable site selection, passive solar building design, and planting of trees and other landscape materials to reduce energy consumption.
- Policy MS – 21.2:** Manage the Community Forest to achieve San José’s environmental goals for water and energy conservation, wildlife habitat preservation, stormwater retention, heat reduction in urban areas, energy conservation, and the removal of carbon dioxide from the atmosphere.
- Policy CD-2.10:** Recognize that finite land area exists for development and that density supports retail vitality and transit ridership. Use land regulations to require compact, low-impact development that efficiently uses land planned for growth, particularly for residential development which tends to have a long life-span. Strongly discourage small-lot and single-family detached residential product types in growth areas.
- Policy CD-2.11:** Within the Downtown and Urban Village Overlay areas, consistent with the minimum density requirements of the pertaining Land Use/Transportation Diagram designation, avoid the construction of surface parking lots except as an interim use, so that long-term development of the site will result in a cohesive urban form. In these areas, whenever possible, use structured parking, rather than surface parking, to fulfill parking requirements. Encourage the incorporation of alternative uses, such as parks, above parking structures.
- Policy CD-3.2:** Prioritize pedestrian and bicycle connections to transit, community facilities (including schools), commercial areas, and other areas serving daily needs. Ensure that the design of new facilities can accommodate significant anticipated future increases in bicycle and pedestrian activity.
- Policy CD-5.1:** Design areas to promote pedestrian and bicycle movements and to facilitate interaction between community members and to strengthen the sense of community.
- Policy LU-5.4:** Require new commercial development to facilitate pedestrian and bicycle access through techniques such as minimizing building separation from public sidewalks; providing safe, accessible, convenient, and pleasant pedestrian connections; and including secure and convenient bike storage.

- Policy TR– 1.16:** Develop a strategy to construct a network of public and private alternative fuel vehicle charging/fueling stations city wide. Revise parking standards to require the installation of electric charging infrastructure at new large employment sites and large, multiple family residential developments.
- Policy TR-2.18:** Provide bicycle storage facilities as identified in the Bicycle Master Plan.
- Policy TR-3.3:** As part of the development review process, require that new development along existing and planned transit facilities consist of land use and development types and intensities that contribute toward transit ridership. In addition, require that new development is designed to accommodate and to provide direct access to transit facilities.

### **City of San José Greenhouse Gas Reduction Strategy**

The City of San José updated its Greenhouse Gas Reduction Strategy, to the 2030 Greenhouse Gas Reduction Strategy (GHGRS), in August 2020, in alignment with SB 32. SB 23 has established an interim statewide greenhouse gas reduction goal for 2030 to meet the long-term target of carbon neutrality by 2045 (EO B-55-18). SB 32 expands upon AB 32, the Global Warming Solutions Act of 2006, and requires a reduction in greenhouse gas emissions of at least 40 percent below the 1990 levels by 2030.

The 2030 GHGRS allows for tiering and streamlining of GHG analyses under CEQA because it serves as a qualified Climate Action Plan for the City of San José. The 2030 GHGRS identifies major General Plan strategies and polices to be implemented by development project such as green building practices, transportation strategies, energy use, water conservation, waste reduction and diversion, and other sectors that contribute to GHG reductions and advancements of the City’s broad sustainability goals.

The GHG Reduction Strategy identifies GHG emissions reduction measures to be implemented by development projects in three categories: built environment and energy, land use and transportation, and recycling and waste reduction. Some measures are mandatory for all proposed development projects and others are voluntary. Voluntary measures could be incorporated as mitigation measures for proposed projects, at the City’s discretion.

Compliance with the mandatory measures and voluntary measures required by the City would ensure an individual project’s consistency with the 2030 GHGRS. Implementation of the proposed General Plan through 2030 would not constitute a cumulatively considerable contribution to global climate change.

### **City of San José Private Sector Green Building Policy (6-32)**

In October 2008, the City adopted the Private Sector Green Building Policy (6-32) that establishes baseline green building standards for private sector new construction and provides framework for the implementation of these standards. This policy requires that applicable projects achieve minimum green building performance levels using the Council adopted standards. Future development under the proposed Downtown Strategy 2040 would be subject to this policy.

**Climate Smart San José**

Climate Smart San José was developed by the City to reduce air pollution, save water, and create a healthier community. The plan contains nine strategies to reduce carbon emissions consistent with the Paris Climate Agreement. These strategies include use of renewable energy, densification of neighborhoods, electrification and sharing of vehicle fleets, investments in public infrastructure, creating local jobs, and improving building energy-efficiency.

**Reach Building Code**

In 2019, the San José City Council approved Ordinance No. 30311 and adopted Reach Code Ordinance (Reach Code) to reduce energy-related GHG emissions consistent with the goals of Climate Smart San José. The Reach Code applies to new construction projects in San José. It requires new residential construction to be outfitted with entirely electric fixtures. Mixed-fuel buildings (i.e., use of natural gas) are required to demonstrate increased energy efficiency through a higher Energy Design Ratings and be electrification ready. In addition, the Reach Code requires EV charging infrastructure for all building types (above current CALGreen requirements), and solar readiness for non-residential buildings.

## 4 SIGNIFICANCE CRITERIA AND METHODOLOGY

### 4.1 THRESHOLDS AND SIGNIFICANCE CRITERIA

Based upon the criteria derived from State CEQA Guidelines Appendix G, a project normally would have a significant effect on the environment if it would:

- GHG-1           Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
  
- GHG-2           Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The Bay Area Air Quality Management District's (BAAQMD's) approach to developing a threshold of significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move towards climate stabilization. If a project would generate GHG emissions above the threshold level, it would be considered to contribute considerably to a significant cumulative impact. Stationary-source projects include land uses that would accommodate processes and equipment that emit GHG emissions and would require an Air District permit to operate. If annual emissions of operational-related GHGs exceed these levels, the proposed project would result in a cumulatively considerable contribution to a cumulatively significant impact to global climate change. BAAQMD is currently working to provide updated threshold guidance to address updated GHG regulations such as SB 32 and case law that has found efficiency metric thresholds based on state-wide data must be supported by substantial evidence that the threshold is appropriate for a specific location and specific project type.

BAAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, the BAAQMD recommends quantification and disclosure of construction GHG emissions. The BAAQMD also recommends that the Lead Agency should make a determination on the significance of these construction generated GHG emission impacts in relation to meeting AB 32 GHG reduction goals, as required by the Public Resources Code, Section 21082.2. The Lead Agency is encouraged to incorporate best management practices to reduce GHG emissions during construction, as feasible and applicable.

The City of San José has established consistency with their 2030 Greenhouse Gas Reduction Strategy would result in a less than significant impact. The City of San José does not have construction-related GHG emission thresholds.

### 4.2 METHODOLOGY

Global climate change is, by definition, a cumulative impact of GHG emissions. Therefore, there is no project-level analysis. The baseline against which to compare potential impacts of the project includes the natural and anthropogenic drivers of global climate change, including world-wide GHG emissions from human activities which almost doubled between 1970 and 2010 from approximately 27 gigatonnes (Gt)

of CO<sub>2</sub>/year to nearly 49 GtCO<sub>2</sub>/year.<sup>2</sup> As such, the geographic extent of climate change and GHG emissions' cumulative impact discussion is worldwide.

The project's construction and operational emissions were calculated using the California Emissions Estimator Model version 2020.4.0 (CalEEMod). Details of the modeling assumptions and emission factors are provided in [Appendix A: Greenhouse Gas Emissions Data](#). For construction, CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. The project's construction-related GHG emissions were forecasted based on the proposed construction schedule and applying the mobile-source and fugitive dust emissions factors derived from CalEEMod. The project's construction-related GHG emissions would be generated from off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles.

The project's operations-related GHG emissions would be generated by vehicular traffic, area sources (e.g., landscaping maintenance, consumer products), electrical generation, natural gas consumption, water supply and wastewater treatment, and solid waste. Details of the modeling assumptions and emission factors are provided in [Appendix A](#), and a summary of adjustments is provided below.

CalEEMod default emission factors incorporate compliance with some, but not all, applicable rules and regulations regarding energy efficiency and vehicle fuel efficiency, and other GHG reduction policies, as described in the CalEEMod User's Guide (CAPCOA, 2016). The reductions obtained from each regulation and the source of the reduction amount used in the analysis are described below.

The following regulations are incorporated into the CalEEMod emission factors:

- Pavley I motor vehicle emission standards
- Low Carbon Fuel Standard (LCFS)
- 2016 title 24 Energy Efficiency Standards

The following regulations have not been incorporated into the CalEEMod emission factors:

- Pavley II (LEV III) Advanced Clean Cars Program (extends to model year 2025)
- Renewable Portfolio Standards (RPS)
- Green Building Code Standards (indoor water use)
- California Model Water Efficient Landscape Ordinance (Outdoor Water)
- 2019 Title 24 Energy Efficiency Standards (effective January 1, 2020)

As RPS is not accounted for in the current version of CalEEMod. Reductions from RPS are addressed by revising the electricity emission intensity factor in CalEEMod to account for the utility complying with the 33 percent renewable mandate by 2020. As of 2018 (latest available), Pacific Gas and Electric's (PG&E) power mix was at 39 percent renewable energy and will be required to achieve the 60 percent renewable energy goal by 2030 established by SB 100. The CalEEMod carbon intensity factor was adjusted within the model to represent PG&E's current emissions rate.

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<sup>2</sup> Intergovernmental Panel on Climate Change, *Climate Change 2014 Mitigation of Climate Change Working Group III Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2014.

Energy savings from water conservation resulting from the Green Building Code Standards for indoor water use and California Model Water Efficient Landscape Ordinance for outdoor water use are not included in CalEEMod. The Water Conservation Act of 2009 mandates a 20 percent reduction in urban water use that is implemented with these regulations. Benefits of the water conservation regulations are applied in the CalEEMod mitigation component. Adjustments were also made for project design features that would reduce GHG emissions. The proposed project would also be constructed in conformance with CALGreen, which requires high-efficiency water fixtures for indoor plumbing and water efficient irrigation systems.

The 2019 Building Energy Efficiency Standards (adopted on May 9, 2018) took effect on January 1, 2020. Under the 2019 standards, homes would use about 53 percent less energy and nonresidential buildings would use about 30 percent less energy than buildings under the 2016 standards. To be conservative, adjustments were not made in CalEEMod.

The mitigated output from CalEEMod show reductions from existing regulatory requirements and project design features that are termed “mitigation” within the model; however, those modeling components associated with locational measures and compliance with existing regulations are not considered mitigation under CEQA, but rather are treated as project design features.

## 5 POTENTIAL IMPACTS AND MITIGATION

### 5.1 GREENHOUSE GAS EMISSIONS

#### **Impact GHG-1 Would the Project generate greenhouse gas emissions, either directly or indirectly, that could have a significant impact on the environment?**

##### **Short-Term Construction Greenhouse Gas Emissions**

Construction of the proposed project would result in minor increases in GHG emissions from on-site equipment and emissions from construction workers' personal vehicle travelling to and from the project construction site. Construction-related GHG emissions vary depending on the level of activity, length of the construction period, specific construction operations, types of equipment, and number of construction workers. Neither the City of San José nor BAAQMD have an adopted threshold of significance for construction-related GHG emissions; however, BAAQMD recommends quantifying emissions and disclosing that GHG emissions would occur during construction. The CalEEMod outputs prepared for the proposed project (refer to Appendix A) calculated emissions with project construction to be 424 MTCO<sub>2</sub>e for the total construction period (twelve months). Because project construction will be a temporary condition (a total of twelve months) and would not result in a permanent increase in emissions that would interfere with the implementation of AB32, the temporary increase in emissions would be less than significant.

##### **Long-Term Operational Greenhouse Gas Emissions**

The proposed project would include the demolition of the existing buildings and construction of one industrial building, totaling 225,280 sf. Operational or long-term emissions would occur over the project's life. GHG emissions would result from direct emissions such as project generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power over the life of the project, the energy required to convey water to, and wastewater from the project site, the emissions associated with solid waste generated from the project site, and any fugitive refrigerants from air conditioning or refrigerators. It should be noted that the project would comply with the 2019 Title 24 Part 6 Building Energy Efficiency Standards. The standards require updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and nonresidential lighting requirements that would cut residential energy use by more than 50 percent (with solar) and nonresidential energy use by 30 percent. The standards also encourage demand responsive technologies including battery storage and heat pump water heaters and improve the building's thermal envelope through high performance attics, walls and windows to improve comfort and energy savings (California Energy Commission, March 2018). The project would also comply with the appliance energy efficiency standards in Title 20 of the California Code of Regulations. The Title 20 standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances. The project would be constructed according to the standards for high-efficiency water fixtures for indoor plumbing and water efficient irrigation systems required in 2019 Title 24, Part 11 (CALGreen).

At the State and global level, improvements in technology, policy, and social behavior can also influence and reduce operational emissions generated by a project. The state is currently on a pathway to achieving

the Renewable Portfolio Standards goal of 33 percent renewables by 2020 and 60 percent renewables by 2030 per SB 100.

The majority of project emissions would occur from mobile and energy sources. Energy and mobile sources are targeted by statewide measures such as low carbon fuels, cleaner vehicles, strategies to promote sustainable communities and improved transportation choices that result in reducing VMT, continued implementation of the Renewable Portfolio Standard (the target is now set at 60 percent renewables by 2030), and extension of the Cap and Trade program (requires reductions from industrial sources, energy generation, and fossil fuels). The Cap and Trade program covers approximately 85 percent of California's GHG emissions as of January 2015. The statewide cap for GHG emissions from the capped sectors (i.e., electricity generation, industrial sources, petroleum refining, and cement production) commenced in 2013 and will decline approximately three percent each year, achieving GHG emission reductions throughout the program's duration. The passage of AB 398 in July 2017 extended the duration of the Cap and Trade program from 2020 to 2030. With continued implementation of various statewide measures, the project's operational energy and mobile source emissions would continue to decline in the future.

As discussed in Impact Statement GHG-2, below, the proposed development would be constructed in compliance with the City's Council Policy 6-32 and the City's Green Building Ordinance which will ensure operational emissions reductions consistent with the 2030 GHG Reduction Strategy. The proposed project, therefore, would be consistent with the City's GHG Reduction and General Plan and would have a less than significant GHG emissions impact.

**Mitigation Measures:** No mitigation is required.

**Level of Significance:** Less than significant impact.

## 5.2 GREENHOUSE GAS REDUCTION PLAN COMPLIANCE

**Impact GHG-2: Would the Project conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing greenhouse gas emissions?**

### **City of San José Greenhouse Gas Reduction Strategy Compliance Checklist**

The City of San José 2030 Greenhouse Gas Reduction Strategy outlines the actions the City will undertake to achieve its proportional share of State GHG emission reductions for the interim target year 2030. For this purpose, the City has implemented a Greenhouse Gas Reduction Strategy Compliance Checklist.

Prior to project approval, the applicant is required to complete the Greenhouse Gas Reduction Strategy Compliance Checklist to demonstrate the project's compliance with the City of San José 2030 Greenhouse Gas Reduction Strategy, refer to Appendix B. Compliance with the checklist is demonstrated by completing Section A (General Plan Policy Conformance) and Section B (Greenhouse Gas Reduction Strategies). Projects that propose alternative GHG mitigation measures must also complete Section C (Alternative Project Measures and Additional GHG Reductions). As discussed above, the project would be constructed in accordance with the latest California Building Code and green building regulations/CalGreen. The proposed development would be constructed in compliance with the City's Council Policy 6-32 and the City's Green Building Ordinance. The project would include a ride sharing travel demand measure (TDM). This TDM Program would help reduce vehicle miles traveled (VMT) and mobile greenhouse gas emissions.

Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project’s incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the Greenhouse Gas Reduction Strategy.

As shown Table 2: 2030 GHGRSTable A - Project Compliance with General Plan Polices and Table 3: 2030 GHGRSTable B GHGRSCompliance, the project would comply with the 2030 GHG Reduction Strategy.

**Table 2: 2030 GHGRS Table A - Project Compliance with General Plan Polices**

General Plan Measures	General Plan Policies	Project Compliance
<b>1) Consistency with the Land Use/Transportation Diagram (Land Use and Density)</b>	<i>Is the proposed Project consistent with the Land Use/Transportation Diagram?</i>	<b>Consistent.</b> The proposed project is consistent with the Land Use/Transportation Diagram.
<b>2) Implementation of Green Building Measures</b>	<b>MS-2.2:</b> <i>Encourage maximized use of on-site generation of renewable energy for all new and existing buildings.</i>	<b>Consistent.</b> The project would be solar-ready by including building roof space and conduit infrastructure for a “Future PV Array” per California Code. The project would also enroll in San José Clean Energy (SJCE) GreenSource program which includes 55 percent renewable energy.
	<b>MS-2.3:</b> <i>Encourage consideration of solar orientation, including building placement, landscaping, design and construction techniques for new construction to minimize energy consumption.</i>	<b>Consistent.</b> The project would comply with the latest energy efficiency standards. The State goal is to increase the use of green building practices. The project would implement required green building strategies through existing regulation that requires the project to comply with various CalGreen requirements. Additionally, the project would be enrolled in San José Clean Energy (SJCE) GreenSource program which includes 55 percent renewable energy.
	<b>MS-2.7:</b> <i>Encourage the installation of solar panels or other clean energy power generation sources over parking areas.</i>	<b>Consistent.</b> This measure is to increase solar throughout California, which is being done by various electricity providers and existing solar programs. The project would be solar-ready by including building roof space and conduit infrastructure for a “Future PV Array” per California Code. Future tenants within the project would be able to take advantage of incentives that are in place at the time of construction.
	<b>MS-2.11:</b> <i>Require new development to incorporate green building practices, including</i>	<b>Consistent.</b> The State goal is to increase the use of green building practices. The

General Plan Measures	General Plan Policies	Project Compliance
	<p><i>those required by the Green Building Ordinance. Specifically, target reduced energy use through construction techniques (e.g., design of building envelopes and systems to maximize energy performance), through architectural design (e.g., design to maximize cross ventilation and interior daylight) and through site design techniques (e.g., orienting buildings on sites to maximize the effectiveness of passive solar design).</i></p>	<p>project would implement required green building strategies through existing regulation that requires the project to comply with various CalGreen requirements to reduce energy use. Per Energy analysis prepared for the project, the project would use approximately 1,455 MWh per year which is approximately 0.01 percent of Santa Clara County’s total electricity use. The project anticipated natural gas usage would be approximately 22,645 therms of natural gas per year or 0.005 percent of the County’s natural gas demand. Therefore, the project would have a nominal electricity demand compared to the County.</p>
	<p><b>MS-16.2:</b> <i>Promote neighborhood-based distributed clean/renewable energy generation to improve local energy security and to reduce the amount of energy wasted in transmitting electricity over long distances.</i></p>	<p><b>Consistent.</b> The project would be solar-ready by ensuring roof space and conduit infrastructure for “Future PV Array” per California Code. Additionally, the project would be enrolled in San José Clean Energy (SJCE) GreenSource program which includes 55 percent renewable energy.</p>
	<p><b>CD-2.1:</b> <i>Promote the Circulation Goals and Policies in the Envision San José 2040 General Plan. Create streets that promote pedestrian and bicycle transportation by following applicable goals and policies in the Circulation section of the Envision San José 2040 General Plan.</i></p>	<p><b>Not Applicable.</b> The proposed project is in a heavy industrial area. There are existing Class II bike lanes on both sides of N. King Road that will remain. The project would not alter existing street, pedestrian walkways or bike lanes. However, the proposed project would include 12 bicycle racks as well as bicycle and pedestrian access on the driveways. Additionally, the project would include TDM measures discussed below.</p>
<p><b>3) Pedestrian, Bicycle &amp; Transit Site Design Measures</b></p>	<p><b>CD-2.5:</b> <i>Integrate Green Building Goals and Policies of the Envision San José 2040 General Plan into site design to create healthful environments. Consider factors such as shaded parking areas, pedestrian connections, minimization of impervious surfaces, incorporation of stormwater treatment measures, appropriate building orientations, etc.</i></p>	<p><b>Consistent.</b> The proposed project would include landscaping and shading of the parking areas and walkways. Additionally, 9.83 percent of the site would be pervious. The project would comply with all applicable stormwater regulations.</p>
	<p><b>CD-2.11:</b> <i>Within the Downtown and Urban</i></p>	<p><b>Not Applicable.</b> The proposed project is</p>

General Plan Measures	General Plan Policies	Project Compliance
	<p><i>Village Overlay areas, consistent with the minimum density requirements of the pertaining Land Use/Transportation Diagram designation, avoid the construction of surface parking lots except as an interim use, so that long-term development of the site will result in a cohesive urban form. In these areas, whenever possible, use structured parking, rather than surface parking, to fulfill parking requirements. Encourage the incorporation of alternative uses, such as parks, above parking structures.</i></p>	<p>not located within the Downtown or Urban Village Overlay areas.</p>
	<p><b>CD-3.2:</b> <i>Prioritize pedestrian and bicycle connections to transit, community facilities (including schools), commercial areas, and other areas serving daily needs. Ensure that the design of new facilities can accommodate significant anticipated future increases in bicycle and pedestrian activity.</i></p>	<p><b>Consistent.</b> The proposed project would include 12 bicycle parking spaces as well as bicycle and pedestrian access on the driveways.</p>
	<p><b>CD-3.4:</b> <i>Encourage pedestrian cross-access connections between adjacent properties and require pedestrian and bicycle connections to streets and other public spaces, with particular attention and priority given to providing convenient access to transit facilities. Provide pedestrian and vehicular connections with cross-access easements within and between new and existing developments to encourage walking and minimize interruptions by parking areas and curb cuts.</i></p>	<p><b>Consistent</b> As discussed above, the proposed project would include bicycle parking spaces as well as access for bicyclists and pedestrian to access the site. The project would include day use lockers. This would promote safety and encourage employees to use alternative sources of transportation.</p>
	<p><b>LU-3.5:</b> <i>Balance the need for parking to support a thriving Downtown with the need to minimize the impacts of parking upon a vibrant pedestrian and transit oriented urban environment. Provide for the needs of bicyclists and pedestrians, including adequate bicycle parking areas and design measures to promote bicyclist and pedestrian safety.</i></p>	<p><b>Not Applicable.</b> The project is not located in the Downtown area.</p>
	<p><b>TR-2.8:</b> <i>Require new development to provide on-site facilities such as bicycle storage and showers, provide connections to existing and planned facilities, dedicate land to expand existing facilities or provide new facilities such as sidewalks and/or bicycle lanes/paths, or share in the cost of improvements.</i></p>	<p><b>Consistent.</b> The project includes connections to existing bicycle lane facilities and bicycle parking.</p>
	<p><b>TR-7.1:</b> <i>Require large employers to develop TDM programs to reduce the vehicle trips and vehicle miles generated by their employees</i></p>	<p><b>Consistent.</b> The project would include pedestrian and transit improvements to the existing facilities along the project</p>

General Plan Measures	General Plan Policies	Project Compliance
	<p><i>through the use of shuttles, provision for car-sharing, bicycle sharing, carpool, parking strategies, transit incentives and other measures.</i></p>	<p>frontages on North King Road and Las Plumas Avenue. These improvements would include installing pedestrian pathway between the VTA transit stop and project parking lot, as well as replacing the existing transit stop bench.</p>
	<p><b>TR-8.5:</b> <i>Promote participation in car share programs to minimize the need for parking spaces in new and existing development.</i></p>	<p><b>Consistent.</b> The project would be located near existing transit and bicycle facilities which would encourage alternative transportation. Additionally, the project includes bike parking spaces.</p>
	<p><b>MS-3.1:</b> <i>Require water-efficient landscaping, which conforms to the State’s Model Water Efficient Landscape Ordinance, for all new commercial, institutional, industrial and developer-installed residential development unless for recreation needs or other area functions.</i></p>	<p><b>Consistent.</b> The proposed project would comply with the State’s Model Water Efficient Landscape Ordinance and the City’s Water-Efficient Landscape Ordinance (Chapter 15.11 of the San José Municipal Code). Project landscaping would include all water efficient landscaping.</p>
<p><b>4) Water Conservation and Urban Forestry Measures</b></p>	<p><b>MS-3.2:</b> <i>Promote the use of green building technology or techniques that can help reduce the depletion of the City’s potable water supply, as building codes permit. For example, promote the use of captured rainwater, graywater, or recycled water as the preferred source for non-potable water needs such as irrigation and building cooling, consistent with Building Codes or other regulations.</i></p>	<p><b>Consistent.</b> The project includes low-flow fixtures and appliances. These measures are required by City Code. The project would comply with measures to increase water efficiency and green building techniques per building codes.</p>
	<p><b>MS-19.4:</b> <i>Require the use of recycled water wherever feasible and cost-effective to serve existing and new development.</i></p>	<p><b>Not Applicable.</b> The City does not provide recycled water in the vicinity of the project site. The project would utilize recycled water for the outdoor landscaping based on availability.</p>
	<p><b>MS-21.3:</b> <i>Ensure that San José’s Community Forest is comprised of species that have low water requirements and are well adapted to its Mediterranean climate. Select and plant diverse species to prevent monocultures that are vulnerable to pest invasions. Furthermore, consider the appropriate placement of tree species and their lifespan to ensure the perpetuation of the Community Forest.</i></p>	<p><b>Consistent.</b> The project would comply with City landscaping requirements through plan check and design review processes. This would include water-efficient landscaping, pest resistance, and diversity requirements.</p>
<p><b>MS-26.1:</b> <i>As a condition of new development, require the planting and maintenance of both street trees and trees on private property to achieve a level of tree coverage in compliance</i></p>	<p><b>Consistent.</b> The project would comply with City landscaping requirements and criteria to incorporate existing trees with new landscaping.</p>	

General Plan Measures	General Plan Policies	Project Compliance
	<p><i>with and that implements City laws, policies or guidelines.</i></p> <p><b>ER-8.7:</b> <i>Encourage stormwater reuse for beneficial uses in existing infrastructure and future development through the installation of rain barrels, cisterns, or other water storage and reuse facilities.</i></p>	<p><b>Consistent.</b> The Municipal Regional Permit (MRP) allows development projects to use infiltration, evapotranspiration, harvesting and use, or biotreatment to treat full water quality design flow or volume of stormwater runoff, as specified in MRP Provision C.3.d. Project applicants are no longer required to evaluate the feasibility of infiltration of rainwater harvesting and use before proceeding to biotreatment. If a project applicant desires to use rainwater harvesting systems to meet LID treatment requirements, there must be sufficient demand on the project site to use the water quality design volume, i.e., 80% of the average annual rainfall runoff, from the collection area. Appendix I from SCVURPPP provides guidance on how to estimate the required landscaping or toilet flushing demand to meet C.3.d requirements. If the project appears to have sufficient demand for captured rainwater, Appendix I provides guidance on sizing the cistern (or other storage facility) to achieve the appropriate combination of drawdown time and cistern volume.</p>

**Table 3: 2030 GHGRS Table B GHGRS Compliance**

GHGRS Strategy and Consistency Options	Project Consistency
<p><b>Renewable Energy Development</b></p> <ol style="list-style-type: none"> <li>1. <i>Install solar panels, solar hot water, or other clean energy power generation sources on development sites,</i> or</li> <li>2. <i>Participate in community solar programs to support development of renewable energy in the community,</i> or</li> <li>3. <i>Participate in San José Clean Energy at the Total Green level (i.e., 100% carbon-free electricity) for electricity accounts associated with the project.</i></li> </ol> <p><b>Supports Strategies:</b> GHGRS #1, GHGRS #3</p>	<p><b>Alternative Measure Proposed.</b> The project would be enrolled in San José Clean Energy (SJCE) GreenSource program which includes 55 percent renewable energy.</p>
<p><b>Building Retrofits – Natural Gas<sup>3</sup></b></p> <p>This strategy only applies to projects that include a retrofit of an existing building. If the proposed project does not include a retrofit, select “Not Applicable” in the Project Conformance column.</p> <ol style="list-style-type: none"> <li>1. <i>Replace an existing natural gas appliance with an electric alternative (e.g., space heater, water heater, clothes dryer),</i> or</li> <li>2. <i>Replace an existing natural gas appliance with a high-efficiency model</i></li> </ol> <p><b>Supports Strategies:</b> GHGRS #4</p>	<p><b>Not applicable.</b> The project does not include a retrofit. Therefore, this strategy is not applicable to the project.</p>
<p><b>Zero Waste Goal</b></p> <ol style="list-style-type: none"> <li>1. <i>Provide space for organic waste (e.g., food scraps, yard waste) collection containers, and/or</i></li> <li>2. <i>Exceed the City’s construction &amp; demolition waste diversion requirement.</i></li> </ol> <p><b>Supports Strategies:</b> GHGRS #5</p>	<p><b>Consistent.</b> The proposed development includes an exterior trash enclosure with space for recycling and organic waste collection. Additionally, construction and demolition waste would be diverted to meet City requirements.</p>
<p><b>Caltrain Modernization</b></p> <ol style="list-style-type: none"> <li>1. <i>For projects located within ½ mile of a Caltrain station, establish a program through which to provide project tenants and/or residents with free or reduced Caltrain passes</i> or</li> <li>2. <i>Develop a program that provides project tenants</i></li> </ol>	<p><b>Not Applicable.</b> The proposed project is not located within ½ mile of a Caltrain station. Therefore, this strategy is not applicable to the project.</p>

<sup>3</sup> GHGRS Strategy #4 applies to existing building retrofits and not to new construction; Strategy #2 applies to new construction to reduce natural gas related GHG emissions.

<p><i>and/or residents with options to reduce their vehicle miles traveled (e.g., a TDM program), which could include transit passes, bike lockers and showers, or other strategies to reduce project related VMT.</i></p> <p><b>Supports Strategies:</b> GHGRS #6</p>	
<p><b>Water Conservation</b></p> <ol style="list-style-type: none"> <li><i>1. Install high-efficiency appliances/fixtures to reduce water use, and/or include water-sensitive landscape design, and/or</i></li> <li><i>2. Provide access to reclaimed water for outdoor water use on the project site.</i></li> </ol> <p><b>Supports Strategies:</b> GHGRS#7</p>	<p><b>Proposed.</b> The proposed project would comply with water conservation per the California Green Building Standards Code, which requires a 20 percent reduction in indoor water use. The project would include low flow appliances and fixtures. The project would also comply with the City’s Water-Efficient Landscape Ordinance (Chapter 15.11 of the San José Municipal Code).</p>

As demonstrated in [Table 2](#) and [Table 3](#), the project would not conflict with the 2030 GHG Reduction Strategy. GHG emissions caused by long-term operation of the proposed would be less than significant.

**CARB Scoping Plan**

The California State Legislature adopted AB 32 in 2006. AB 32 focuses on reducing GHGs (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride) to 1990 levels by the year 2020. Pursuant to the requirements in AB 32, CARB adopted the Climate Change Scoping Plan (Scoping Plan) in 2008, which outlines actions recommended to obtain that goal. The Scoping Plan provides a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as the cap-and-trade program, and an AB 32 implementation fee to fund the program.

The latest CARB Climate Change Scoping Plan (2017) outlines the state’s strategy to reduce state’s GHG emissions to return to 40 percent below 1990 levels by 2030 pursuant to SB 32. The CARB Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

The 2017 Scoping Plan Update identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the First Update to the Climate Change Scoping Plan (2013). Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions would be adopted as required to achieve statewide GHG emissions targets. As shown in

Table 4: Project Consistency with Applicable CARB Scoping Plan Measures the project is consistent with most of the strategies, while others are not applicable to the project.

**Table 4: Project Consistency with Applicable CARB Scoping Plan Measures**

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
<p><b>Transportation</b></p>	<p>California Cap-and-Trade Program Linked to Western Climate Initiative</p>	<p>Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanism October 20, 2015 (CCR 95800)</p>	<p><b>Consistent.</b> The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers. However, the regulation indirectly affects people who use the products and services produced by these industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers. 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.</p>
	<p>California Light-Duty Vehicle Greenhouse Gas Standards</p>	<p>Pavley I 2005 Regulations to Control GHG Emissions from Motor Vehicles</p>	<p><b>Consistent.</b> This measure applies to all new vehicles starting with model year 2012. The project would not conflict with its implementation as it would apply to all new passenger vehicles purchased in California. Passenger vehicles, model year 2012 and later, associated with construction and operation of the project would be required to comply with the Pavley emissions standards.</p>
		<p>2012 LEV III Amendments to the California Greenhouse Gas and Criteria Pollutant Exhaust and Evaporative Emission Standards</p>	<p><b>Consistent.</b> The LEV III amendments provide reductions from new vehicles sold in California between 2017 and 2025. Passenger vehicles associated with the site would comply with LEV III standards.</p>

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
	Low Carbon Fuel Standard	2009 readopted in 2015. Regulations to Achieve Greenhouse Gas Emission Reductions Subarticle 7. Low Carbon Fuel Standard CCR 95480	<b>Consistent.</b> This measure applies to transportation fuels utilized by vehicles in California. The project would not conflict with implementation of this measure. Motor vehicles associated with construction and operation of the project would utilize low carbon transportation fuels as required under this measure.
	Regional Transportation-Related Greenhouse Gas Targets	SB 375. Cal. Public Resources Code §§ 21155, 21155.1, 21155.2, 21159.28	<b>Consistent.</b> The project would provide development in the region that is consistent with the growth projections in the Regional Transportation Plan/Sustainable Communities Strategy (SCS) (Plan Bay Area 2040).
	Goods Movement	Goods Movement Action Plan January 2007	<b>Not applicable.</b> The project does not propose any changes to maritime, rail, or intermodal facilities or forms of transportation.
	Medium/Heavy-Duty Vehicle	2010 Amendments to the Truck and Bus Regulation, the Drayage Truck Regulation and the Tractor-Trailer Greenhouse Gas Regulation	<b>Consistent.</b> This measure applies to medium and heavy-duty vehicles that operate in the state. The project would not conflict with implementation of this measure. Medium and heavy-duty vehicles associated with construction and operation of the project would be required to comply with the requirements of this regulation.
	High Speed Rail	Funded under SB 862	<b>Not applicable.</b> This is a statewide measure that cannot be implemented by a project Applicant or Lead Agency.
Electricity and Natural Gas	Energy Efficiency	Title 20 Appliance Efficiency Regulation	<b>Consistent.</b> The project would not conflict with implementation of this measure. The project would comply with the latest energy efficiency standards.
		Title 24 Part 6 Energy Efficiency Standards for Residential and Non-Residential Building	
		Title 24 Part 11 California Green Building Code Standards	

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
	Renewable Portfolio Standard/Renewable Electricity Standard.	2010 Regulation to Implement the Renewable Electricity Standard (33% 2020)	<b>Consistent.</b> The project would obtain electricity from the electric utility company, PG&E through SJCE. PG&E obtained 39 percent of its power supply from renewable sources in 2018. However, the project would obtain electricity through SJCE Greensource program. Therefore, the utility would provide power when needed on site that is composed of a greater percentage of renewable sources.
		SB 350 Clean Energy and Pollution Reduction Act of 2015 (50% 2030)	
	Million Solar Roofs Program	Tax incentive program	<b>Consistent.</b> This measure is to increase solar throughout California, which is being done by various electricity providers and existing solar programs. Future tenants within the project would be able to take advantage of incentives that are in place at the time of construction.
Water	Water	Title 24 Part 11 California Green Building Code Standards	<b>Consistent.</b> The project would comply with the California Green Building Standards Code, which requires a 20 percent reduction in indoor water use. The project would also comply with the City’s Water-Efficient Landscape Ordinance (Chapter 15.11 of the San José Municipal Code).
		SBX 7-7—The Water Conservation Act of 2009	
		Model Water Efficient Landscape Ordinance	
Green Buildings	Green Building Strategy	Title 24 Part 11 California Green Building Code Standards	<b>Consistent.</b> The State goal is to increase the use of green building practices. The project would implement required green building strategies through existing regulation that requires the project to comply with various CalGreen requirements.
Industry	Industrial Emissions	2010 CARB Mandatory Reporting Regulation	<b>Consistent.</b> The project includes light industrial uses such as a warehouse. However, the project would comply with CARB Mandatory Reporting Regulation.
Recycling and Waste Management	Recycling and Waste	Title 24 Part 11 California Green Building Code Standards	<b>Consistent.</b> The project would not conflict with implementation of these measures. The project is required to achieve the recycling mandates via

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
		AB 341 Statewide 75 Percent Diversion Goal	compliance with the CALGreen code. The City has consistently achieved its state recycling mandates.
Forests	Sustainable Forests	Cap and Trade Offset Projects	<b>Not applicable.</b> The project site is an existing disturbed site located in an urban area. No forested lands exist on-site.
High Global Warming Potential	High Global Warming Potential Gases	CARB Refrigerant Management Program CCR 95380	<b>Not applicable.</b> The regulations are applicable to refrigerants used by large air conditioning systems and large commercial and industrial refrigerators and cold storage system. The project is not expected to use large systems subject to the refrigerant management regulations adopted by CARB.
Agriculture	Agriculture	Cap and Trade Offset Projects for Livestock and Rice Cultivation	<b>Not applicable.</b> The project site is an infill site. No grazing, feedlot or other agricultural activities that generate manure currently exist on-site or are proposed to be implemented by the project.
Source: California Air Resources Board (CARB), <i>California's 2017 Climate Change Scoping Plan</i> , 2017b and CARB, <i>Climate Change Scoping Plan</i> , December 2008.			

As discussed above, the Scoping Plan reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. GHG emissions caused by long-term operation of the proposed would be less than significant.

Appendix B, Local Action, of the 2017 CARB Scoping Plan lists potential actions that support the State's climate goals. However, the Scoping Plan notes that the applicability and performance of the actions may vary across the regions. The document is organized into two categories (A) examples of plan-level GHG reduction actions that could be implemented by local governments and (B) examples of on-site project design features, mitigation measures, that could be required of individual projects under CEQA, if feasible, when the local jurisdiction is the lead agency.

The project would implement a number of the Standard Permit Conditions during construction. For example, a few of the construction measures include enforcing idling time restrictions on construction vehicles, use of added exhaust muffling and filtering devices, replant vegetation in disturbed areas as quickly as possible, and posting a publicly visible sign with the telephone number and person at the lead agency to contact regarding dust complaints. As indicated above, GHG reductions are also achieved as a result of State of California energy and water efficiency requirements for new non-residential developments. These efficiency improvements correspond to reductions in secondary GHG emissions. For example, in California, most of the electricity that powers homes is derived from natural gas combustion.

Therefore, energy saving measures, such as Title 24, reduces GHG emissions from the power generation facilities by reducing load demand.

The project would be required to comply with existing regulations, including applicable measures from the City's General Plan, or would be directly affected by the outcomes (vehicle trips and energy consumption would be less carbon intensive due to statewide compliance with future low carbon fuel standard amendments and increasingly stringent Renewable Portfolio Standards). As such, the project would not conflict with any other state-level regulations pertaining to GHGs.

Regarding goals for 2050 under Executive Order S-3-05, at this time it is not possible to quantify the emissions savings from future regulatory measures, as they have not yet been developed; nevertheless, it can be anticipated that operation of the project would benefit from implementation of current and potential future regulations (e.g., improvements in vehicle emissions, SB 100/renewable electricity portfolio improvements, etc.) enacted to meet an 80 percent reduction below 1990 levels by 2050.

### **Plan Bay Area**

The project would be consistent with the overall goals of Plan Bay Area 2040 to provide housing, healthy and safe communities, and climate protection with an overall goal to reduce VMT. As noted above, the project would develop the project site with light industrial uses consistent with the General Plan. The project would add some additional employment, trips related to employees that work directly at the project site. Thus, implementation of the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and this impact would be less than significant.

**Mitigation Measures:** No mitigation is required.

**Level of Significance:** Less than significant impact.

## **5.3 CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES**

### **Cumulative Setting**

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately one day), GHGs have much longer atmospheric lifetimes of one year to several thousand years that allow them to be dispersed around the globe.

### **Cumulative Impacts and Mitigation Measures**

It is generally the case that an individual project of the project's size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of project-related GHG emissions would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. In addition, the project as well as other cumulative related projects, would be subject to all applicable regulatory requirements, which would further reduce GHG emissions. As shown in [Table 3](#) and [Table 4](#), the project would be consistent with the 2030 GHG Reduction Strategy. Thus, the project would

not conflict with any GHG reduction plan. Therefore, the project's cumulative contribution of GHG emissions would be less than significant and the project's cumulative GHG impacts would also be less than cumulatively considerable.

**Mitigation Measures:** No mitigation is required.

**Level of Significance:** Less than significant impact.

## 6 REFERENCES

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# Appendix A

## Greenhouse Gas Emissions Data

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N King Road - Santa Clara County, Annual

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

**N King Road  
Santa Clara County, Annual**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Manufacturing	65.49	1000sqft	1.50	65,488.00	0
Unrefrigerated Warehouse-No Rail	159.90	1000sqft	3.67	159,897.00	0
Parking Lot	241.14	1000sqft	5.54	241,137.00	0

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	58
<b>Climate Zone</b>	4			<b>Operational Year</b>	2023
<b>Utility Company</b>	Pacific Gas and Electric Company				
<b>CO2 Intensity (lb/MW hr)</b>	203.98	<b>CH4 Intensity (lb/MW hr)</b>	0.033	<b>N2O Intensity (lb/MW hr)</b>	0.004

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

- Project Characteristics -
- Land Use - Per site plan
- Construction Phase - Per construction questionnaire
- Demolition -
- Grading - 11,500 cy import, plus 1,500 soil export
- Vehicle Trips - Per transportation study
- Vehicle Emission Factors -
- Vehicle Emission Factors -
- Vehicle Emission Factors -
- Construction Off-road Equipment Mitigation - BAAQMD rule compliance
- Water Mitigation -
- Waste Mitigation - per AB 939



N King Road - Santa Clara County, Annual

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

tblConstructionPhase	NumDays	20.00	57.00
tblConstructionPhase	NumDays	300.00	138.00
tblConstructionPhase	NumDays	20.00	22.00
tblConstructionPhase	NumDays	30.00	65.00
tblConstructionPhase	NumDays	20.00	22.00
tblConstructionPhase	NumDays	10.00	14.00
tblFleetMix	HHD	6.3620e-003	0.60
tblFleetMix	LDA	0.57	0.00
tblFleetMix	LDT1	0.06	0.00
tblFleetMix	LDT2	0.19	0.00
tblFleetMix	LHD1	0.02	0.00
tblFleetMix	LHD2	5.0410e-003	0.17
tblFleetMix	MCY	0.02	0.00
tblFleetMix	MDV	0.12	0.00
tblFleetMix	MH	2.8380e-003	0.00
tblFleetMix	MHD	7.8170e-003	0.23
tblFleetMix	OBUS	9.1200e-004	0.00
tblFleetMix	SBUS	9.2700e-004	0.00
tblFleetMix	UBUS	3.8900e-004	0.00
tblGrading	MaterialExported	0.00	1,500.00
tblGrading	MaterialImported	0.00	10,000.00
tblGrading	MaterialImported	0.00	1,500.00
tblLandUse	LandUseSquareFeet	65,490.00	65,488.00
tblLandUse	LandUseSquareFeet	159,900.00	159,897.00
tblLandUse	LandUseSquareFeet	241,140.00	241,137.00
tblVehicleTrips	CC_TTP	28.00	0.00
tblVehicleTrips	CNW_TTP	13.00	0.00
tblVehicleTrips	CNW_TTP	41.00	0.00
tblVehicleTrips	CW_TL	9.50	40.00
tblVehicleTrips	CW_TTP	59.00	100.00
tblVehicleTrips	CW_TTP	0.00	100.00

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tblVehicleTrips	CW_TTP	59.00	100.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	PR_TP	0.00	100.00
tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	ST_TR	6.42	3.14
tblVehicleTrips	ST_TR	0.00	0.53
tblVehicleTrips	ST_TR	1.74	1.00
tblVehicleTrips	SU_TR	5.09	3.14
tblVehicleTrips	SU_TR	0.00	0.53
tblVehicleTrips	SU_TR	1.74	1.00
tblVehicleTrips	WD_TR	3.93	3.14
tblVehicleTrips	WD_TR	0.00	0.53
tblVehicleTrips	WD_TR	1.74	1.00



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

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	7-1-2022	9-30-2022	1.4019	0.3144
2	10-1-2022	12-31-2022	1.1731	0.2676
3	1-1-2023	3-31-2023	0.6557	0.2453
4	4-1-2023	6-30-2023	1.8266	1.4065
		Highest	1.8266	1.4065

**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	1.0188	4.0000e-005	4.2900e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	8.3400e-003	8.3400e-003	2.0000e-005	0.0000	8.8800e-003
Energy	0.0122	0.1110	0.0933	6.7000e-004		8.4400e-003	8.4400e-003		8.4400e-003	8.4400e-003	0.0000	229.5118	229.5118	0.0199	4.3500e-003	231.3044
Mobile	0.2748	4.7725	2.9728	0.0283	1.2784	0.0422	1.3206	0.3548	0.0402	0.3950	0.0000	2,744.6637	2,744.6637	0.0817	0.3589	2,853.6669
Waste						0.0000	0.0000		0.0000	0.0000	46.9965	0.0000	46.9965	2.7774	0.0000	116.4318
Water						0.0000	0.0000		0.0000	0.0000	16.5357	26.0944	42.6301	1.7026	0.0406	97.2981
<b>Total</b>	<b>1.3058</b>	<b>4.8836</b>	<b>3.0703</b>	<b>0.0290</b>	<b>1.2784</b>	<b>0.0506</b>	<b>1.3290</b>	<b>0.3548</b>	<b>0.0487</b>	<b>0.4035</b>	<b>63.5322</b>	<b>3,000.2782</b>	<b>3,063.8103</b>	<b>4.5816</b>	<b>0.4039</b>	<b>3,298.7100</b>

**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					



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

**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	7/1/2022	8/1/2022	5	22	
2	Site Preparation	Site Preparation	8/2/2022	8/20/2022	5	14	
3	Grading	Grading	8/21/2022	11/20/2022	5	65	
4	Building Construction	Building Construction	11/21/2022	5/31/2023	5	138	
5	Architectural Coating	Architectural Coating	4/3/2023	6/20/2023	5	57	
6	Paving	Paving	6/1/2023	6/30/2023	5	22	

**Acres of Grading (Site Preparation Phase): 21**

**Acres of Grading (Grading Phase): 195**

**Acres of Paving: 5.54**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 338,078; Non-Residential Outdoor: 112,693; Striped Parking Area: 14,468**

**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	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74

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Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38

**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	6	15.00	0.00	1,430.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	375.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	1,250.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	196.00	76.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	39.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**

- Use Cleaner Engines for Construction Equipment
- Replace Ground Cover
- Water Exposed Area
- Reduce Vehicle Speed on Unpaved Roads
- Clean Paved Roads

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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					0.1548	0.0000	0.1548	0.0234	0.0000	0.0234	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0290	0.2829	0.2265	4.3000e-004		0.0137	0.0137		0.0127	0.0127	0.0000	37.3893	37.3893	0.0105	0.0000	37.6518
<b>Total</b>	<b>0.0290</b>	<b>0.2829</b>	<b>0.2265</b>	<b>4.3000e-004</b>	<b>0.1548</b>	<b>0.0137</b>	<b>0.1685</b>	<b>0.0234</b>	<b>0.0127</b>	<b>0.0361</b>	<b>0.0000</b>	<b>37.3893</b>	<b>37.3893</b>	<b>0.0105</b>	<b>0.0000</b>	<b>37.6518</b>

**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	3.3800e-003	0.1238	0.0260	4.6000e-004	0.0121	1.1200e-003	0.0133	3.3400e-003	1.0700e-003	4.4000e-003	0.0000	45.0020	45.0020	1.5500e-003	7.1300e-003	47.1660
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	4.4000e-004	3.2000e-004	3.9800e-003	1.0000e-005	1.3100e-003	1.0000e-005	1.3200e-003	3.5000e-004	1.0000e-005	3.5000e-004	0.0000	1.0348	1.0348	3.0000e-005	3.0000e-005	1.0445
<b>Total</b>	<b>3.8200e-003</b>	<b>0.1241</b>	<b>0.0300</b>	<b>4.7000e-004</b>	<b>0.0134</b>	<b>1.1300e-003</b>	<b>0.0146</b>	<b>3.6900e-003</b>	<b>1.0800e-003</b>	<b>4.7500e-003</b>	<b>0.0000</b>	<b>46.0368</b>	<b>46.0368</b>	<b>1.5800e-003</b>	<b>7.1600e-003</b>	<b>48.2105</b>

**Mitigated Construction On-Site**

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	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					0.0662	0.0000	0.0662	0.0100	0.0000	0.0100	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	5.0900e-003	0.0220	0.2561	4.3000e-004		6.8000e-004	6.8000e-004		6.8000e-004	6.8000e-004	0.0000	37.3892	37.3892	0.0105	0.0000	37.6518
<b>Total</b>	<b>5.0900e-003</b>	<b>0.0220</b>	<b>0.2561</b>	<b>4.3000e-004</b>	<b>0.0662</b>	<b>6.8000e-004</b>	<b>0.0669</b>	<b>0.0100</b>	<b>6.8000e-004</b>	<b>0.0107</b>	<b>0.0000</b>	<b>37.3892</b>	<b>37.3892</b>	<b>0.0105</b>	<b>0.0000</b>	<b>37.6518</b>

**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	3.3800e-003	0.1238	0.0260	4.6000e-004	0.0116	1.1200e-003	0.0127	3.2000e-003	1.0700e-003	4.2700e-003	0.0000	45.0020	45.0020	1.5500e-003	7.1300e-003	47.1660
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	4.4000e-004	3.2000e-004	3.9800e-003	1.0000e-005	1.2400e-003	1.0000e-005	1.2500e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0348	1.0348	3.0000e-005	3.0000e-005	1.0445
<b>Total</b>	<b>3.8200e-003</b>	<b>0.1241</b>	<b>0.0300</b>	<b>4.7000e-004</b>	<b>0.0128</b>	<b>1.1300e-003</b>	<b>0.0140</b>	<b>3.5300e-003</b>	<b>1.0800e-003</b>	<b>4.6100e-003</b>	<b>0.0000</b>	<b>46.0368</b>	<b>46.0368</b>	<b>1.5800e-003</b>	<b>7.1600e-003</b>	<b>48.2105</b>

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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					0.1378	0.0000	0.1378	0.0707	0.0000	0.0707	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0222	0.2316	0.1379	2.7000e-004		0.0113	0.0113		0.0104	0.0104	0.0000	23.4076	23.4076	7.5700e-003	0.0000	23.5968
<b>Total</b>	<b>0.0222</b>	<b>0.2316</b>	<b>0.1379</b>	<b>2.7000e-004</b>	<b>0.1378</b>	<b>0.0113</b>	<b>0.1491</b>	<b>0.0707</b>	<b>0.0104</b>	<b>0.0811</b>	<b>0.0000</b>	<b>23.4076</b>	<b>23.4076</b>	<b>7.5700e-003</b>	<b>0.0000</b>	<b>23.5968</b>

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	8.9000e-004	0.0325	6.8200e-003	1.2000e-004	3.1800e-003	2.9000e-004	3.4700e-003	8.7000e-004	2.8000e-004	1.1500e-003	0.0000	11.8012	11.8012	4.1000e-004	1.8700e-003	12.3687
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	3.4000e-004	2.5000e-004	3.0400e-003	1.0000e-005	1.0000e-003	1.0000e-005	1.0000e-003	2.7000e-004	0.0000	2.7000e-004	0.0000	0.7902	0.7902	2.0000e-005	2.0000e-005	0.7976
<b>Total</b>	<b>1.2300e-003</b>	<b>0.0327</b>	<b>9.8600e-003</b>	<b>1.3000e-004</b>	<b>4.1800e-003</b>	<b>3.0000e-004</b>	<b>4.4700e-003</b>	<b>1.1400e-003</b>	<b>2.8000e-004</b>	<b>1.4200e-003</b>	<b>0.0000</b>	<b>12.5914</b>	<b>12.5914</b>	<b>4.3000e-004</b>	<b>1.8900e-003</b>	<b>13.1663</b>

Mitigated Construction On-Site

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	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					0.0589	0.0000	0.0589	0.0302	0.0000	0.0302	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.2600e-003	0.0141	0.1461	2.7000e-004		4.3000e-004	4.3000e-004		4.3000e-004	4.3000e-004	0.0000	23.4076	23.4076	7.5700e-003	0.0000	23.5968
<b>Total</b>	<b>3.2600e-003</b>	<b>0.0141</b>	<b>0.1461</b>	<b>2.7000e-004</b>	<b>0.0589</b>	<b>4.3000e-004</b>	<b>0.0593</b>	<b>0.0302</b>	<b>4.3000e-004</b>	<b>0.0307</b>	<b>0.0000</b>	<b>23.4076</b>	<b>23.4076</b>	<b>7.5700e-003</b>	<b>0.0000</b>	<b>23.5968</b>

**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	8.9000e-004	0.0325	6.8200e-003	1.2000e-004	3.0400e-003	2.9000e-004	3.3300e-003	8.4000e-004	2.8000e-004	1.1200e-003	0.0000	11.8012	11.8012	4.1000e-004	1.8700e-003	12.3687
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	3.4000e-004	2.5000e-004	3.0400e-003	1.0000e-005	9.5000e-004	1.0000e-005	9.5000e-004	2.5000e-004	0.0000	2.6000e-004	0.0000	0.7902	0.7902	2.0000e-005	2.0000e-005	0.7976
<b>Total</b>	<b>1.2300e-003</b>	<b>0.0327</b>	<b>9.8600e-003</b>	<b>1.3000e-004</b>	<b>3.9900e-003</b>	<b>3.0000e-004</b>	<b>4.2800e-003</b>	<b>1.0900e-003</b>	<b>2.8000e-004</b>	<b>1.3800e-003</b>	<b>0.0000</b>	<b>12.5914</b>	<b>12.5914</b>	<b>4.3000e-004</b>	<b>1.8900e-003</b>	<b>13.1663</b>

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**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					0.2997	0.0000	0.2997	0.1188	0.0000	0.1188	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1178	1.2624	0.9439	2.0200e-003		0.0531	0.0531		0.0489	0.0489	0.0000	177.2375	177.2375	0.0573	0.0000	178.6705
<b>Total</b>	<b>0.1178</b>	<b>1.2624</b>	<b>0.9439</b>	<b>2.0200e-003</b>	<b>0.2997</b>	<b>0.0531</b>	<b>0.3528</b>	<b>0.1188</b>	<b>0.0489</b>	<b>0.1677</b>	<b>0.0000</b>	<b>177.2375</b>	<b>177.2375</b>	<b>0.0573</b>	<b>0.0000</b>	<b>178.6705</b>

**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	2.9600e-003	0.1082	0.0227	4.0000e-004	0.0106	9.8000e-004	0.0116	2.9200e-003	9.3000e-004	3.8500e-003	0.0000	39.3374	39.3374	1.3500e-003	6.2300e-003	41.2290
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	1.7400e-003	1.2800e-003	0.0157	4.0000e-005	5.1600e-003	3.0000e-005	5.1800e-003	1.3700e-003	2.0000e-005	1.4000e-003	0.0000	4.0764	4.0764	1.3000e-004	1.2000e-004	4.1146
<b>Total</b>	<b>4.7000e-003</b>	<b>0.1095</b>	<b>0.0384</b>	<b>4.4000e-004</b>	<b>0.0158</b>	<b>1.0100e-003</b>	<b>0.0168</b>	<b>4.2900e-003</b>	<b>9.5000e-004</b>	<b>5.2500e-003</b>	<b>0.0000</b>	<b>43.4138</b>	<b>43.4138</b>	<b>1.4800e-003</b>	<b>6.3500e-003</b>	<b>45.3436</b>

**Mitigated Construction On-Site**

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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					
Fugitive Dust					0.1281	0.0000	0.1281	0.0508	0.0000	0.0508	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0248	0.1073	1.0725	2.0200e-003		3.3000e-003	3.3000e-003		3.3000e-003	3.3000e-003	0.0000	177.2372	177.2372	0.0573	0.0000	178.6703
<b>Total</b>	<b>0.0248</b>	<b>0.1073</b>	<b>1.0725</b>	<b>2.0200e-003</b>	<b>0.1281</b>	<b>3.3000e-003</b>	<b>0.1314</b>	<b>0.0508</b>	<b>3.3000e-003</b>	<b>0.0541</b>	<b>0.0000</b>	<b>177.2372</b>	<b>177.2372</b>	<b>0.0573</b>	<b>0.0000</b>	<b>178.6703</b>

**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	2.9600e-003	0.1082	0.0227	4.0000e-004	0.0101	9.8000e-004	0.0111	2.8000e-003	9.3000e-004	3.7300e-003	0.0000	39.3374	39.3374	1.3500e-003	6.2300e-003	41.2290
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	1.7400e-003	1.2800e-003	0.0157	4.0000e-005	4.8900e-003	3.0000e-005	4.9100e-003	1.3100e-003	2.0000e-005	1.3300e-003	0.0000	4.0764	4.0764	1.3000e-004	1.2000e-004	4.1146
<b>Total</b>	<b>4.7000e-003</b>	<b>0.1095</b>	<b>0.0384</b>	<b>4.4000e-004</b>	<b>0.0150</b>	<b>1.0100e-003</b>	<b>0.0160</b>	<b>4.1100e-003</b>	<b>9.5000e-004</b>	<b>5.0600e-003</b>	<b>0.0000</b>	<b>43.4138</b>	<b>43.4138</b>	<b>1.4800e-003</b>	<b>6.3500e-003</b>	<b>45.3436</b>

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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	0.0256	0.2342	0.2455	4.0000e-004		0.0121	0.0121		0.0114	0.0114	0.0000	34.7588	34.7588	8.3300e-003	0.0000	34.9670
<b>Total</b>	<b>0.0256</b>	<b>0.2342</b>	<b>0.2455</b>	<b>4.0000e-004</b>		<b>0.0121</b>	<b>0.0121</b>		<b>0.0114</b>	<b>0.0114</b>	<b>0.0000</b>	<b>34.7588</b>	<b>34.7588</b>	<b>8.3300e-003</b>	<b>0.0000</b>	<b>34.9670</b>

**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	2.5200e-003	0.0643	0.0188	2.4000e-004	7.5000e-003	6.7000e-004	8.1800e-003	2.1700e-003	6.4000e-004	2.8100e-003	0.0000	23.6451	23.6451	5.3000e-004	3.4900e-003	24.6981
Worker	7.8700e-003	5.7700e-003	0.0710	2.0000e-004	0.0233	1.2000e-004	0.0234	6.2000e-003	1.1000e-004	6.3100e-003	0.0000	18.4377	18.4377	5.7000e-004	5.3000e-004	18.6107
<b>Total</b>	<b>0.0104</b>	<b>0.0700</b>	<b>0.0897</b>	<b>4.4000e-004</b>	<b>0.0308</b>	<b>7.9000e-004</b>	<b>0.0316</b>	<b>8.3700e-003</b>	<b>7.5000e-004</b>	<b>9.1200e-003</b>	<b>0.0000</b>	<b>42.0828</b>	<b>42.0828</b>	<b>1.1000e-003</b>	<b>4.0200e-003</b>	<b>43.3088</b>

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

**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	8.4100e-003	0.0404	0.2649	4.0000e-004		1.5300e-003	1.5300e-003		1.5300e-003	1.5300e-003	0.0000	34.7588	34.7588	8.3300e-003	0.0000	34.9669
<b>Total</b>	<b>8.4100e-003</b>	<b>0.0404</b>	<b>0.2649</b>	<b>4.0000e-004</b>		<b>1.5300e-003</b>	<b>1.5300e-003</b>		<b>1.5300e-003</b>	<b>1.5300e-003</b>	<b>0.0000</b>	<b>34.7588</b>	<b>34.7588</b>	<b>8.3300e-003</b>	<b>0.0000</b>	<b>34.9669</b>

**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	2.5200e-003	0.0643	0.0188	2.4000e-004	7.1900e-003	6.7000e-004	7.8600e-003	2.0900e-003	6.4000e-004	2.7400e-003	0.0000	23.6451	23.6451	5.3000e-004	3.4900e-003	24.6981
Worker	7.8700e-003	5.7700e-003	0.0710	2.0000e-004	0.0221	1.2000e-004	0.0222	5.9000e-003	1.1000e-004	6.0200e-003	0.0000	18.4377	18.4377	5.7000e-004	5.3000e-004	18.6107
<b>Total</b>	<b>0.0104</b>	<b>0.0700</b>	<b>0.0897</b>	<b>4.4000e-004</b>	<b>0.0293</b>	<b>7.9000e-004</b>	<b>0.0301</b>	<b>7.9900e-003</b>	<b>7.5000e-004</b>	<b>8.7600e-003</b>	<b>0.0000</b>	<b>42.0828</b>	<b>42.0828</b>	<b>1.1000e-003</b>	<b>4.0200e-003</b>	<b>43.3088</b>

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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	0.0849	0.7768	0.8772	1.4600e-003		0.0378	0.0378		0.0356	0.0356	0.0000	125.1746	125.1746	0.0298	0.0000	125.9190
<b>Total</b>	<b>0.0849</b>	<b>0.7768</b>	<b>0.8772</b>	<b>1.4600e-003</b>		<b>0.0378</b>	<b>0.0378</b>		<b>0.0356</b>	<b>0.0356</b>	<b>0.0000</b>	<b>125.1746</b>	<b>125.1746</b>	<b>0.0298</b>	<b>0.0000</b>	<b>125.9190</b>

**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	4.5000e-003	0.1828	0.0576	8.4000e-004	0.0270	1.0700e-003	0.0281	7.8100e-003	1.0300e-003	8.8400e-003	0.0000	81.6000	81.6000	1.7200e-003	0.0120	85.2153
Worker	0.0265	0.0184	0.2369	7.0000e-004	0.0839	4.2000e-004	0.0844	0.0223	3.8000e-004	0.0227	0.0000	64.7061	64.7061	1.8400e-003	1.7800e-003	65.2825
<b>Total</b>	<b>0.0310</b>	<b>0.2013</b>	<b>0.2945</b>	<b>1.5400e-003</b>	<b>0.1110</b>	<b>1.4900e-003</b>	<b>0.1124</b>	<b>0.0301</b>	<b>1.4100e-003</b>	<b>0.0316</b>	<b>0.0000</b>	<b>146.3061</b>	<b>146.3061</b>	<b>3.5600e-003</b>	<b>0.0138</b>	<b>150.4978</b>

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

**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	0.0291	0.1432	0.9526	1.4600e-003		5.0200e-003	5.0200e-003		5.0200e-003	5.0200e-003	0.0000	125.1744	125.1744	0.0298	0.0000	125.9188
<b>Total</b>	<b>0.0291</b>	<b>0.1432</b>	<b>0.9526</b>	<b>1.4600e-003</b>		<b>5.0200e-003</b>	<b>5.0200e-003</b>		<b>5.0200e-003</b>	<b>5.0200e-003</b>	<b>0.0000</b>	<b>125.1744</b>	<b>125.1744</b>	<b>0.0298</b>	<b>0.0000</b>	<b>125.9188</b>

**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	4.5000e-003	0.1828	0.0576	8.4000e-004	0.0259	1.0700e-003	0.0269	7.5300e-003	1.0300e-003	8.5600e-003	0.0000	81.6000	81.6000	1.7200e-003	0.0120	85.2153
Worker	0.0265	0.0184	0.2369	7.0000e-004	0.0796	4.2000e-004	0.0800	0.0213	3.8000e-004	0.0216	0.0000	64.7061	64.7061	1.8400e-003	1.7800e-003	65.2825
<b>Total</b>	<b>0.0310</b>	<b>0.2013</b>	<b>0.2945</b>	<b>1.5400e-003</b>	<b>0.1055</b>	<b>1.4900e-003</b>	<b>0.1070</b>	<b>0.0288</b>	<b>1.4100e-003</b>	<b>0.0302</b>	<b>0.0000</b>	<b>146.3061</b>	<b>146.3061</b>	<b>3.5600e-003</b>	<b>0.0138</b>	<b>150.4978</b>

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

**3.6 Architectural Coating - 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					
Archit. Coating	1.2255					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	5.4600e-003	0.0371	0.0516	8.0000e-005		2.0200e-003	2.0200e-003		2.0200e-003	2.0200e-003	0.0000	7.2768	7.2768	4.4000e-004	0.0000	7.2877
<b>Total</b>	<b>1.2310</b>	<b>0.0371</b>	<b>0.0516</b>	<b>8.0000e-005</b>		<b>2.0200e-003</b>	<b>2.0200e-003</b>		<b>2.0200e-003</b>	<b>2.0200e-003</b>	<b>0.0000</b>	<b>7.2768</b>	<b>7.2768</b>	<b>4.4000e-004</b>	<b>0.0000</b>	<b>7.2877</b>

**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	2.7800e-003	1.9400e-003	0.0249	7.0000e-005	8.8200e-003	4.0000e-005	8.8600e-003	2.3400e-003	4.0000e-005	2.3800e-003	0.0000	6.7952	6.7952	1.9000e-004	1.9000e-004	6.8558
<b>Total</b>	<b>2.7800e-003</b>	<b>1.9400e-003</b>	<b>0.0249</b>	<b>7.0000e-005</b>	<b>8.8200e-003</b>	<b>4.0000e-005</b>	<b>8.8600e-003</b>	<b>2.3400e-003</b>	<b>4.0000e-005</b>	<b>2.3800e-003</b>	<b>0.0000</b>	<b>6.7952</b>	<b>6.7952</b>	<b>1.9000e-004</b>	<b>1.9000e-004</b>	<b>6.8558</b>

**Mitigated Construction On-Site**

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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					
Archit. Coating	1.2255					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	8.5000e-004	3.6700e-003	0.0522	8.0000e-005		1.1000e-004	1.1000e-004		1.1000e-004	1.1000e-004	0.0000	7.2768	7.2768	4.4000e-004	0.0000	7.2877
<b>Total</b>	<b>1.2264</b>	<b>3.6700e-003</b>	<b>0.0522</b>	<b>8.0000e-005</b>		<b>1.1000e-004</b>	<b>1.1000e-004</b>		<b>1.1000e-004</b>	<b>1.1000e-004</b>	<b>0.0000</b>	<b>7.2768</b>	<b>7.2768</b>	<b>4.4000e-004</b>	<b>0.0000</b>	<b>7.2877</b>

**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	2.7800e-003	1.9400e-003	0.0249	7.0000e-005	8.3600e-003	4.0000e-005	8.4000e-003	2.2300e-003	4.0000e-005	2.2700e-003	0.0000	6.7952	6.7952	1.9000e-004	1.9000e-004	6.8558
<b>Total</b>	<b>2.7800e-003</b>	<b>1.9400e-003</b>	<b>0.0249</b>	<b>7.0000e-005</b>	<b>8.3600e-003</b>	<b>4.0000e-005</b>	<b>8.4000e-003</b>	<b>2.2300e-003</b>	<b>4.0000e-005</b>	<b>2.2700e-003</b>	<b>0.0000</b>	<b>6.7952</b>	<b>6.7952</b>	<b>1.9000e-004</b>	<b>1.9000e-004</b>	<b>6.8558</b>

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

3.7 Paving - 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	0.0114	0.1121	0.1604	2.5000e-004		5.6100e-003	5.6100e-003		5.1600e-003	5.1600e-003	0.0000	22.0296	22.0296	7.1200e-003	0.0000	22.2077
Paving	7.2600e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0186</b>	<b>0.1121</b>	<b>0.1604</b>	<b>2.5000e-004</b>		<b>5.6100e-003</b>	<b>5.6100e-003</b>		<b>5.1600e-003</b>	<b>5.1600e-003</b>	<b>0.0000</b>	<b>22.0296</b>	<b>22.0296</b>	<b>7.1200e-003</b>	<b>0.0000</b>	<b>22.2077</b>

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	4.1000e-004	2.9000e-004	3.6900e-003	1.0000e-005	1.3100e-003	1.0000e-005	1.3200e-003	3.5000e-004	1.0000e-005	3.5000e-004	0.0000	1.0087	1.0087	3.0000e-005	3.0000e-005	1.0177
<b>Total</b>	<b>4.1000e-004</b>	<b>2.9000e-004</b>	<b>3.6900e-003</b>	<b>1.0000e-005</b>	<b>1.3100e-003</b>	<b>1.0000e-005</b>	<b>1.3200e-003</b>	<b>3.5000e-004</b>	<b>1.0000e-005</b>	<b>3.5000e-004</b>	<b>0.0000</b>	<b>1.0087</b>	<b>1.0087</b>	<b>3.0000e-005</b>	<b>3.0000e-005</b>	<b>1.0177</b>

Mitigated Construction On-Site

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	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	3.0900e-003	0.0134	0.1903	2.5000e-004		4.1000e-004	4.1000e-004		4.1000e-004	4.1000e-004	0.0000	22.0295	22.0295	7.1200e-003	0.0000	22.2077
Paving	7.2600e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>0.0104</b>	<b>0.0134</b>	<b>0.1903</b>	<b>2.5000e-004</b>		<b>4.1000e-004</b>	<b>4.1000e-004</b>		<b>4.1000e-004</b>	<b>4.1000e-004</b>	<b>0.0000</b>	<b>22.0295</b>	<b>22.0295</b>	<b>7.1200e-003</b>	<b>0.0000</b>	<b>22.2077</b>

**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	4.1000e-004	2.9000e-004	3.6900e-003	1.0000e-005	1.2400e-003	1.0000e-005	1.2500e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0087	1.0087	3.0000e-005	3.0000e-005	1.0177
<b>Total</b>	<b>4.1000e-004</b>	<b>2.9000e-004</b>	<b>3.6900e-003</b>	<b>1.0000e-005</b>	<b>1.2400e-003</b>	<b>1.0000e-005</b>	<b>1.2500e-003</b>	<b>3.3000e-004</b>	<b>1.0000e-005</b>	<b>3.4000e-004</b>	<b>0.0000</b>	<b>1.0087</b>	<b>1.0087</b>	<b>3.0000e-005</b>	<b>3.0000e-005</b>	<b>1.0177</b>

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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	0.2748	4.7725	2.9728	0.0283	1.2784	0.0422	1.3206	0.3548	0.0402	0.3950	0.0000	2,744.6637	2,744.6637	0.0817	0.3589	2,853.6669
Unmitigated	0.2748	4.7725	2.9728	0.0283	1.2784	0.0422	1.3206	0.3548	0.0402	0.3950	0.0000	2,744.6637	2,744.6637	0.0817	0.3589	2,853.6669

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Manufacturing	205.64	205.64	205.64	711,098	711,098
Parking Lot	127.80	127.80	127.80	1,860,829	1,860,829
Unrefrigerated Warehouse-No Rail	159.90	159.90	159.90	552,934	552,934
<b>Total</b>	<b>493.34</b>	<b>493.34</b>	<b>493.34</b>	<b>3,124,862</b>	<b>3,124,862</b>

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
Manufacturing	9.50	7.30	7.30	100.00	0.00	0.00	100	0	0
Parking Lot	40.00	7.30	7.30	100.00	0.00	0.00	100	0	0
Unrefrigerated Warehouse-No	9.50	7.30	7.30	100.00	0.00	0.00	100	0	0

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4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Manufacturing	0.571175	0.055403	0.188166	0.116095	0.020429	0.005041	0.007817	0.006362	0.000912	0.000389	0.024445	0.000927	0.002838
Parking Lot	0.000000	0.000000	0.000000	0.000000	0.000000	0.170000	0.230000	0.600000	0.000000	0.000000	0.000000	0.000000	0.000000
Unrefrigerated Warehouse-No Rail	0.571175	0.055403	0.188166	0.116095	0.020429	0.005041	0.007817	0.006362	0.000912	0.000389	0.024445	0.000927	0.002838

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	108.6683	108.6683	0.0176	2.1300e-003	109.7428
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	108.6683	108.6683	0.0176	2.1300e-003	109.7428
Natural Gas Mitigated	0.0122	0.1110	0.0933	6.7000e-004		8.4400e-003	8.4400e-003		8.4400e-003	8.4400e-003	0.0000	120.8435	120.8435	2.3200e-003	2.2200e-003	121.5616
Natural Gas Unmitigated	0.0122	0.1110	0.0933	6.7000e-004		8.4400e-003	8.4400e-003		8.4400e-003	8.4400e-003	0.0000	120.8435	120.8435	2.3200e-003	2.2200e-003	121.5616

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5.2 Energy by Land Use - Natural Gas

Unmitigated

	Natural Gas 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					
Manufacturing	1.71448e+006	9.2400e-003	0.0840	0.0706	5.0000e-004		6.3900e-003	6.3900e-003		6.3900e-003	6.3900e-003	0.0000	91.4910	91.4910	1.7500e-003	1.6800e-003	92.0346
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
Unrefrigerated Warehouse-No	550046	2.9700e-003	0.0270	0.0227	1.6000e-004		2.0500e-003	2.0500e-003		2.0500e-003	2.0500e-003	0.0000	29.3525	29.3525	5.6000e-004	5.4000e-004	29.5270
<b>Total</b>		<b>0.0122</b>	<b>0.1110</b>	<b>0.0933</b>	<b>6.6000e-004</b>		<b>8.4400e-003</b>	<b>8.4400e-003</b>		<b>8.4400e-003</b>	<b>8.4400e-003</b>	<b>0.0000</b>	<b>120.8435</b>	<b>120.8435</b>	<b>2.3100e-003</b>	<b>2.2200e-003</b>	<b>121.5616</b>

Mitigated

	Natural Gas 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					
Manufacturing	1.71448e+006	9.2400e-003	0.0840	0.0706	5.0000e-004		6.3900e-003	6.3900e-003		6.3900e-003	6.3900e-003	0.0000	91.4910	91.4910	1.7500e-003	1.6800e-003	92.0346
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
Unrefrigerated Warehouse-No	550046	2.9700e-003	0.0270	0.0227	1.6000e-004		2.0500e-003	2.0500e-003		2.0500e-003	2.0500e-003	0.0000	29.3525	29.3525	5.6000e-004	5.4000e-004	29.5270
<b>Total</b>		<b>0.0122</b>	<b>0.1110</b>	<b>0.0933</b>	<b>6.6000e-004</b>		<b>8.4400e-003</b>	<b>8.4400e-003</b>		<b>8.4400e-003</b>	<b>8.4400e-003</b>	<b>0.0000</b>	<b>120.8435</b>	<b>120.8435</b>	<b>2.3100e-003</b>	<b>2.2200e-003</b>	<b>121.5616</b>

5.3 Energy by Land Use - Electricity

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**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Manufacturing	530453	49.0795	7.9400e-003	9.6000e-004	49.5648
Parking Lot	84397.9	7.8088	1.2600e-003	1.5000e-004	7.8860
Unrefrigerated Warehouse-No	559640	51.7800	8.3800e-003	1.0200e-003	52.2920
<b>Total</b>		<b>108.6683</b>	<b>0.0176</b>	<b>2.1300e-003</b>	<b>109.7428</b>

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

**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Manufacturing	530453	49.0795	7.9400e-003	9.6000e-004	49.5648
Parking Lot	84397.9	7.8088	1.2600e-003	1.5000e-004	7.8860
Unrefrigerated Warehouse-No	559640	51.7800	8.3800e-003	1.0200e-003	52.2920
<b>Total</b>		<b>108.6683</b>	<b>0.0176</b>	<b>2.1300e-003</b>	<b>109.7428</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.0188	4.0000e-005	4.2900e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	8.3400e-003	8.3400e-003	2.0000e-005	0.0000	8.8800e-003
Unmitigated	1.0188	4.0000e-005	4.2900e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	8.3400e-003	8.3400e-003	2.0000e-005	0.0000	8.8800e-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

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	0.1226					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.8958					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	4.0000e-004	4.0000e-005	4.2900e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	8.3400e-003	8.3400e-003	2.0000e-005	0.0000	8.8800e-003
<b>Total</b>	<b>1.0188</b>	<b>4.0000e-005</b>	<b>4.2900e-003</b>	<b>0.0000</b>		<b>2.0000e-005</b>	<b>2.0000e-005</b>		<b>2.0000e-005</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>8.3400e-003</b>	<b>8.3400e-003</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>8.8800e-003</b>

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1226					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.8958					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	4.0000e-004	4.0000e-005	4.2900e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	8.3400e-003	8.3400e-003	2.0000e-005	0.0000	8.8800e-003
<b>Total</b>	<b>1.0188</b>	<b>4.0000e-005</b>	<b>4.2900e-003</b>	<b>0.0000</b>		<b>2.0000e-005</b>	<b>2.0000e-005</b>		<b>2.0000e-005</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>8.3400e-003</b>	<b>8.3400e-003</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>8.8800e-003</b>

7.0 Water Detail

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**7.1 Mitigation Measures Water**

Use Water Efficient Irrigation System

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	42.6301	1.7026	0.0406	97.2981
Unmitigated	42.6301	1.7026	0.0406	97.2981

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Manufacturing	15.1446 / 0	12.3867	0.4947	0.0118	28.2712
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No	36.9769 / 0	30.2434	1.2079	0.0288	69.0269
<b>Total</b>		<b>42.6301</b>	<b>1.7026</b>	<b>0.0406</b>	<b>97.2981</b>

**Mitigated**

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	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Manufacturing	15.1446 / 0	12.3867	0.4947	0.0118	28.2712
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No	36.9769 / 0	30.2434	1.2079	0.0288	69.0269
<b>Total</b>		<b>42.6301</b>	<b>1.7026</b>	<b>0.0406</b>	<b>97.2981</b>

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

**8.0 Waste Detail**

**8.1 Mitigation Measures Waste**

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	46.9965	2.7774	0.0000	116.4318
Unmitigated	46.9965	2.7774	0.0000	116.4318

**8.2 Waste by Land Use**

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Manufacturing	81.21	16.4849	0.9742	0.0000	40.8406
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No	150.31	30.5116	1.8032	0.0000	75.5911
<b>Total</b>		<b>46.9965</b>	<b>2.7774</b>	<b>0.0000</b>	<b>116.4318</b>

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**Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Manufacturing	81.21	16.4849	0.9742	0.0000	40.8406
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No	150.31	30.5116	1.8032	0.0000	75.5911
<b>Total</b>		<b>46.9965</b>	<b>2.7774</b>	<b>0.0000</b>	<b>116.4318</b>

**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
----------------	--------	-----------	------------	-------------	-------------	-----------

**Boilers**

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

Equipment Type	Number
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**11.0 Vegetation**

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

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## **Appendix B**

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### **2030 Greenhouse Gas Reduction Strategy Checklist**



## DEPARTMENT OF PLANNING, BUILDING AND CODE ENFORCEMENT

### Purpose of the Compliance Checklist

In 2020, the City adopted a Greenhouse Gas Reduction Strategy (GHGRS) that outlines the actions the City will undertake to achieve its proportional share of State greenhouse gas (GHG) emission reductions for the interim target year 2030. The purpose of the Greenhouse Gas Reduction Strategy Compliance Checklist (Checklist) is to:

- Implement GHG reduction strategies from the 2030 GHGRS to new development projects.
- Provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to the California Environmental Quality Act (CEQA).

The 2030 GHGRS presents the City's comprehensive path to reduce GHG emissions to achieve the 2030 reduction target, based on SB 32, BAAQMD, and OPR. Additionally, the 2030 GHGRS leverages other important City plans and policies; including the General Plan, Climate Smart San José, and the City Municipal Code in identifying reductions strategies that achieve the City's target. CEQA Guidelines Section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of greenhouse gases. Accordingly, the City of San José's 2030 GHGRS represents San José's qualified climate action plan in compliance with CEQA.

As described in the 2030 GHGRS, these GHG reductions will occur through a combination of City initiatives in various plans and policies and will provide reductions from both existing and new developments. This Compliance Checklist specifically applies to proposed discretionary projects that require environmental review pursuant to CEQA. Therefore, the Checklist is a critical implementation tool in the City's overall strategy to reduce GHG emissions. Implementation of applicable reduction actions in new development projects will help the City achieve incremental reductions toward its target. Per the 2030 GHGRS, the City will monitor strategy implementation and make updates, as necessary, to maintain an appropriate trajectory to the 2030 GHG target.

Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the GHGRS.

# Instructions for Compliance Checklist

Applicants shall complete the following sections to demonstrate conformance with the City of San José 2030 Greenhouse Gas Reduction Strategy for the proposed project. All projects must complete Section

A. General Plan Policy Conformance and Section B. Greenhouse Gas Reduction Strategies. Projects that propose alternative GHG mitigation measures must also complete Section C. Alternative Project Measures and Additional GHG Reductions.

## A. General Plan Policy Compliance

Projects need to demonstrate consistency with the Envision San José 2040 General Plan's relevant policies for Land Use & Design, Transportation, Green Building, and Water Conservation, enumerated in Table A. All applicants shall complete the following steps.

1. Complete Table A, Item #1 to demonstrate the project's consistency with the General Plan Land Use and Circulation Diagram.
2. Complete Table A, Items #2 through #4 to demonstrate the project's consistency with General Plan policies<sup>1</sup> related to green building; pedestrian, bicycle & transit site design; and water conservation and urban forestry, as applicable. For each policy listed, mark the relevant yes/no check boxes to indicate project consistency, and provide a qualitative description of how the policy is implemented in the proposed project or why the policy is not applicable to the proposed project. Qualitative descriptions can be included in Table A or provided as separate attachments. This explanation will provide the basis for analysis in the CEQA document.

## B. Greenhouse Gas Reduction Strategies

Table B identifies the GHGRS strategies and recommended consistency options. Projects need to demonstrate consistency with the GHGRS reduction strategies listed in Table B or document why the strategies are not applicable or are infeasible. The corresponding GHGRS strategies are indicated in the table to provide additional context, with the full text of the strategies preceding Table B.

Residential projects must complete Table B, Part 1 and 2; Non-residential projects must complete Table B, Part 2 only. All applicants shall complete the following steps for Table B.

1. Review the project consistency options described in the column titled 'GHGRS Strategy and Consistency Options'.
2. Use the check boxes in the column titled "Project Conformance" to indicate if the strategy is 'Proposed', 'Not Applicable', 'Not Feasible', or if there is an 'Alternative Measure Proposed'.

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<sup>1</sup>The lists in items # 2-4 do not represent all General Plan policies but allow projects to demonstrate consistency and achievement of policies that are related to quantified reduction estimates in the 2030 GHGRS.

3. Provide a qualitative analysis of the proposed project's compliance with the GHGRS strategies in the column titled "Description of Project Measure". This will be the basis for CEQA analysis to demonstrate compliance with the 2030 GHGRS and by extension, with SB 32. The qualitative analysis should provide:
  - a. A description of which consistency options are included as part of the proposed project, or
  - b. A description of why the strategy is not applicable to the proposed project, or
  - c. A description of why the consistency options are infeasible. If applicants select 'Not Feasible' or 'Alternative Measure Proposed', they must complete Table C to document what alternative project measures will be implemented to achieve a similar level of greenhouse gas reduction and how those reduction estimates were calculated.

### **C. Alternative Project Measures and Additional GHG Reductions**

Projects that propose alternative GHG mitigation measures to those identified in Table B or propose to include additional GHG mitigation measures beyond those described in Tables A and B, shall provide a summary explanation of the proposed measures and demonstrate efficiency or greenhouse gas reductions achievable through the proposed measures. Documentation for these alternative or additional project measures shall be documented in Table C. Any applicants who select 'Not Feasible' or 'Alternative Measure Proposed' in Table B must complete the following steps for Table C.

1. In the column titled "Description of Proposed Measure" provide a qualitative description of what measure will be implemented, why it is proposed, and how it will reduce GHG emissions.
2. In the column titled "Description of GHG Reduction Estimate" demonstrate how the alternative project measure would achieve the same or greater level of greenhouse gas reductions as the GHGRS strategy it replaces. Documentation or calculation files can be attached separately.
3. In the column titled "Proposed Measure Implementation" identify how the measure will be implemented: incorporated as part of the project design or as an additional measure that is not part of the project (e.g., purchase of carbon offsets).

# Compliance Checklist

## Evaluation of Project Conformance with the 2030 Greenhouse Gas Reduction Strategy

### Table A: General Plan Consistency

**Development Type:**  Commercial  Residential  Office  Other: [Specify here]

<b>1) Consistency with the Land Use/Transportation Diagram (Land Use and Density)</b>	<b>Yes</b>	<b>No</b>
<i>Is the proposed Project consistent with the Land Use/Transportation Diagram?</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>If not, and the proposed project includes a General Plan Amendment, does the proposed amendment decrease GHG emissions (in absolute terms or per capita, per employee, per service population) below the level assumed in the GHGRS based on the existing planned land use? (The project could have a higher density, mix of uses, or other features that would reduce GHG emissions compared to the planned land use).<sup>2</sup></i>	<input type="checkbox"/>	<input type="checkbox"/>
<i>If not, would the proposed project and the General Plan Amendment increase GHG emissions (in absolute terms or per capita, per employee, per service population)? Project is not consistent with GHGRS and further modeling will be required to determine if additional mitigation measures are necessary.</i>	<input type="checkbox"/>	<input type="checkbox"/>

**Response documentation:**

*The proposed project is consistent with the Land Use/Transportation Diagram.*

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<sup>2</sup> For example, a General Plan Amendment to change use from single-family residential to multi-family residential or a General Plan Amendment to change the use from regional-serving commercial to mixed-use urban in a transit-served area might reduce travel demand, and therefore GHG emissions from mobile sources.

2) Implementation of Green Building Measures	Yes	No
<b>MS-2.2:</b> Encourage maximized use of on-site generation of renewable energy for all new and existing buildings.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Not applicable	<input type="checkbox"/>	<input type="checkbox"/>
Describe how the project is consistent or why the measure is not applicable. <i>The project would be solar-ready by including building roof space and conduit infrastructure for a “Future PV Array” per California Code. The project would also enroll in San José Clean Energy (SJCE) GreenSource program which includes 55 percent renewable energy.</i>		
<b>MS-2.3:</b> Encourage consideration of solar orientation, including building placement, landscaping, design and construction techniques for new construction to minimize energy consumption.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Not applicable	<input type="checkbox"/>	<input type="checkbox"/>
Describe how the project is consistent or why the measure is not applicable. <i>The project would comply with the latest energy efficiency standards. The State goal is to increase the use of green building practices. The project would implement required green building strategies through existing regulation that requires the project to comply with various CalGreen requirements. Additionally, the project would be enrolled in San José Clean Energy (SJCE) GreenSource program which includes 55 percent renewable energy.</i>		
<b>MS-2.7:</b> Encourage the installation of solar panels or other clean energy power generation sources over parking areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Not applicable	<input type="checkbox"/>	<input type="checkbox"/>
Describe how the project is consistent or why the measure is not applicable. <i>This measure is to increase solar throughout California, which is being done by various electricity providers and existing solar programs. Future tenants within the project would be able to take advantage of incentives that are in place at the time of construction.</i>		
<b>MS-2.11:</b> Require new development to incorporate green building practices, including those required by the Green Building Ordinance. Specifically, target reduced energy use through construction techniques (e.g., design of building envelopes and systems to maximize energy performance), through architectural design (e.g., design to maximize cross ventilation and interior daylight) and through site design techniques (e.g., orienting buildings on sites to maximize the effectiveness of passive solar design).	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Not applicable	<input type="checkbox"/>	<input type="checkbox"/>
Describe how the project is consistent or why the measure is not applicable. <i>The State goal is to increase the use of green building practices. The project would implement required green building strategies through existing regulation that requires the project to comply with various CalGreen requirements to reduce energy use.</i>		
<b>MS-16.2:</b> Promote neighborhood-based distributed clean/renewable energy generation to improve local energy security and to reduce the amount of energy wasted in transmitting electricity over long distances.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Not applicable	<input type="checkbox"/>	<input type="checkbox"/>
Describe how the project is consistent or why the measure is not applicable. <i>The project would be solar-ready by ensuring roof space and conduit infrastructure for “Future PV Array” per California Code. Additionally, the project would be enrolled in San José Clean Energy (SJCE) GreenSource program which includes 55 percent renewable energy.</i>		

3) Pedestrian, Bicycle & Transit Site Design Measures	Yes	No
<b>CD-2.1:</b> Promote the Circulation Goals and Policies in the Envision San José 2040 General Plan. Create streets that promote pedestrian and bicycle transportation by following applicable goals and policies in the Circulation section of the Envision San José 2040 General Plan.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Design the street network for its safe shared use by pedestrians, bicyclists, and vehicles. Include elements that increase driver awareness.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a comfortable and safe pedestrian environment by implementing wider sidewalks, shade structures, attractive street furniture, street trees, reduced traffic speeds, pedestrian-oriented lighting, mid-block pedestrian crossings, pedestrian-activated crossing lights, bulb-outs and curb extensions at intersections, and on-street parking that buffers pedestrians from vehicles.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Consider support for reduced parking requirements, alternative parking arrangements, and Transportation Demand Management strategies to reduce area dedicated to parking and increase area dedicated to employment, housing, parks, public art, or other amenities. Encourage de-coupled parking to ensure that the value and cost of parking are considered in real estate and business transactions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Not applicable	<input type="checkbox"/>	<input type="checkbox"/>
<p>Describe how the project is consistent or why the measure is not applicable.</p> <p><i>The proposed project is in a heavy industrial area. There are existing Class II bike lanes on both sides of N. King Road that will remain. The project would not alter existing street, pedestrian walkways or bike lanes. However, the proposed project would include 14 bicycle parking spaces as well as bicycle and pedestrian access on the driveways. Additionally, the project would include TDM measures discussed below.</i></p>		
<b>CD-2.5:</b> Integrate Green Building Goals and Policies of the Envision San José 2040 General Plan into site design to create healthful environments. Consider factors such as shaded parking areas, pedestrian connections, minimization of impervious surfaces, incorporation of stormwater treatment measures, appropriate building orientations, etc.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Not applicable	<input type="checkbox"/>	<input type="checkbox"/>
<p>Describe how the project is consistent or why the measure is not applicable.</p> <p><i>The proposed project would include landscaping and shading of the parking areas and walkways. Additionally, 9.83 percent of the site would be pervious. The project would comply with all applicable stormwater regulations.</i></p>		
<b>CD-2.11:</b> Within the Downtown and Urban Village Overlay areas, consistent with the minimum density requirements of the pertaining Land Use/Transportation Diagram designation, avoid the construction of surface parking lots except as an interim use, so that long-term development of the site will result in a cohesive urban form. In these areas, whenever possible, use structured parking, rather than surface parking, to fulfill parking requirements. Encourage the incorporation of alternative uses, such as parks, above parking structures.	<input type="checkbox"/>	<input type="checkbox"/>
Not Applicable	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Describe how the project is consistent or why the measure is not applicable.</p> <p><i>The proposed project is not located within the Downtown or Urban Village Overlay areas.</i></p>		
<b>CD-3.2:</b> Prioritize pedestrian and bicycle connections to transit, community facilities (including schools), commercial areas, and other areas serving daily needs. Ensure that the design of new facilities can accommodate significant anticipated future increases in bicycle and pedestrian activity.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Not applicable	<input type="checkbox"/>	<input type="checkbox"/>
<p>Describe how the project is consistent or why the measure is not applicable.</p> <p><i>The proposed project would include 14 bicycle parking spaces as well as bicycle and pedestrian access on the driveways.</i></p>		

<p><b>CD-3.4:</b> Encourage pedestrian cross-access connections between adjacent properties and require pedestrian and bicycle connections to streets and other public spaces, with particular attention and priority given to providing convenient access to transit facilities. Provide pedestrian and vehicular connections with cross-access easements within and between new and existing developments to encourage walking and minimize interruptions by parking areas and curb cuts.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Not applicable</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Describe how the project is consistent or why the measure is not applicable.  <i>As discussed above, the proposed project would include bicycle parking spaces as well as access for bicyclists and pedestrian to access the site. This would promote safety and encourage employees to use alternative sources of transportation.</i></p>		
<p><b>LU-3.5:</b> Balance the need for parking to support a thriving Downtown with the need to minimize the impacts of parking upon a vibrant pedestrian and transit oriented urban environment. Provide for the needs of bicyclists and pedestrians, including adequate bicycle parking areas and design measures to promote bicyclist and pedestrian safety.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Not applicable</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Describe how the project is consistent or why the measure is not applicable.  <i>The project is not located in the Downtown area.</i></p>		
<p><b>TR-2.8:</b> Require new development to provide on-site facilities such as bicycle storage and showers, provide connections to existing and planned facilities, dedicate land to expand existing facilities or provide new facilities such as sidewalks and/or bicycle lanes/paths, or share in the cost of improvements.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Not applicable</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Describe how the project is consistent or why the measure is not applicable.  <i>The project includes connections to existing bicycle lane facilities and bicycle parking.</i></p>		
<p><b>TR-7.1:</b> Require large employers to develop TDM programs to reduce the vehicle trips and vehicle miles generated by their employees through the use of shuttles, provision for car-sharing, bicycle sharing, carpool, parking strategies, transit incentives and other measures.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Not applicable</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Describe how the project is consistent or why the measure is not applicable.  <i>The project would include pedestrian and transit improvements to the existing facilities along the project frontages on North King Road and Las Plumas Avenue. These improvements would include installing pedestrian pathway between the VTA transit stop and project parking lot, as well as replacing the existing transit stop bench.</i></p>		
<p><b>TR-8.5:</b> Promote participation in car share programs to minimize the need for parking spaces in new and existing development.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Not applicable</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Describe how the project is consistent or why the measure is not applicable.  <i>The project would be located near existing transit and bicycle facilities which would encourage alternative transportation. Additionally, the project includes bike parking spaces.</i></p>		

4) Water Conservation and Urban Forestry Measures	Yes	No
<p><b>MS-3.1:</b> Require water-efficient landscaping, which conforms to the State’s Model Water Efficient Landscape Ordinance, for all new commercial, institutional, industrial and developer-installed residential development unless for recreation needs or other area functions.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Not applicable</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Describe how the project is consistent or why the measure is not applicable.  <i>The proposed Project would comply with the State’s Model Water Efficient Landscape Ordinance and the City’s Water-Efficient Landscape Ordinance (Chapter 15.11 of the San José Municipal Code). Project landscaping would include all water efficient landscaping.</i></p>		
<p><b>MS-3.2:</b> Promote the use of green building technology or techniques that can help reduce the depletion of the City’s potable water supply, as building codes permit. For example, promote the use of captured rainwater, graywater, or recycled water as the preferred source for non-potable water needs such as irrigation and building cooling, consistent with Building Codes or other regulations.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Not applicable</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Describe how the project is consistent or why the measure is not applicable.  <i>The project includes low-flow fixtures and appliances. These measures are required by City Code. The project would comply with measures to increase water efficiency and green building techniques per building codes.</i></p>		
<p><b>MS-19.4:</b> Require the use of recycled water wherever feasible and cost-effective to serve existing and new development.</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Not applicable</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Describe how the project is consistent or why the measure is not applicable.  <i>The City does not provide recycled water in the vicinity of the project site. The project would utilize recycled water for the outdoor landscaping based on availability.</i></p>		
<p><b>MS-21.3:</b> Ensure that San José’s Community Forest is comprised of species that have low water requirements and are well adapted to its Mediterranean climate. Select and plant diverse species to prevent monocultures that are vulnerable to pest invasions. Furthermore, consider the appropriate placement of tree species and their lifespan to ensure the perpetuation of the Community Forest.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Not applicable</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Describe how the project is consistent or why the measure is not applicable.  <i>The project would comply with City landscaping requirements through plan check and design review processes. This would include water-efficient landscaping, pest resistance, and diversity requirements.</i></p>		
<p><b>MS-26.1:</b> As a condition of new development, require the planting and maintenance of both street trees and trees on private property to achieve a level of tree coverage in compliance with and that implements City laws, policies or guidelines.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Not applicable</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Describe how the project is consistent or why the measure is not applicable.  <i>The project would comply with City landscaping requirements and criteria to incorporate existing trees with new landscaping.</i></p>		
<p><b>ER-8.7:</b> Encourage stormwater reuse for beneficial uses in existing infrastructure and future development through the installation of rain barrels, cisterns, or other water storage and reuse facilities.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Not applicable</p>	<input type="checkbox"/>	<input type="checkbox"/>

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*Describe how the project is consistent or why the measure is not applicable.*

*The Municipal Regional Permit (MRP) allows development projects to use infiltration, evapotranspiration, harvesting and use, or biotreatment to treat full water quality design flow or volume of stormwater runoff, as specified in MRP Provision C.3.d. Project applicants are no longer required to evaluate the feasibility of infiltration of rainwater harvesting and use before proceeding to biotreatment. If a project applicant desires to use rainwater harvesting systems to meet LID treatment requirements, there must be sufficient demand on the project site to use the water quality design volume, i.e., 80% of the average annual rainfall runoff, from the collection area. Appendix I from SCVURPPP provides guidance on how to estimate the required landscaping or toilet flushing demand to meet C.3.d requirements. If the project appears to have sufficient demand for captured rainwater, Appendix I provides guidance on sizing the cistern (or other storage facility) to achieve the appropriate combination of drawdown time and cistern volume.*

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## GHGRS Strategies

**GHGRS #1:** The City will implement the San José Clean Energy program to provide residents and businesses access to cleaner energy at competitive rates.

**GHGRS #2:** The City will implement its building reach code ordinance (adopted September 2019) and its prohibition of natural gas infrastructure ordinance (adopted October 2019) to guide the city's new construction toward zero net carbon (ZNC) buildings.

**GHGRS #3:** The City will expand development of rooftop solar energy through the provision of technical assistance and supportive financial incentives to make progress toward the Climate Smart San José goal of becoming a one-gigawatt solar city.

**GHGRS #4:** The City will support a transition to building decarbonization through increased efficiency improvements in the existing building stock and reduced use of natural gas appliances and equipment.

**GHGRS #5:** As an expansion to Climate Smart San José, the City will update its Zero Waste Strategic Plan and reassess zero waste strategies. Throughout the development of the update, the City will continue to divert 90 percent of waste away from landfills through source reduction, recycling, food recovery and composting, and other strategies.

**GHGRS #6:** The City will continue to be a partner in the Caltrain Modernization Project to enhance local transit opportunities while simultaneously improving the city's air quality.

**GHGRS #7:** The City will expand its water conservation efforts to achieve and sustain long-term per capita reductions that ensure a reliable water supply with a changing climate, through regional partnerships, sustainable landscape designs, green infrastructure, and water-efficient technology and systems.

**Table B: 2030 Greenhouse Gas Reduction Strategy Compliance**

GHGRS Strategy and Consistency Options	Description of Project Measure	Project Conformance
<b>PART 1: RESIDENTIAL PROJECTS ONLY</b>		
<p><b>Zero Net Carbon Residential Construction</b></p> <ol style="list-style-type: none"> <li>Achieve/exceed the City’s Reach Code, and</li> <li>Exclude natural gas infrastructure in new construction, or</li> <li>Install on-site renewable energy systems or participate in a community solar program to offset 100% of the project’s estimated energy demand, or</li> <li>Participate in San José Clean Energy at the Total Green level (i.e., 100% carbon-free electricity) for electricity accounts associated with the project until which time SJCE achieves 100% carbon-free electricity for all accounts.</li> </ol> <p><b>Supports Strategies:</b> GHGRS #1, GHGRS #2, GHGRS #3</p>	<p><i>Describe which, if any, project consistency options from the leftmost column you are implementing.</i></p> <p>OR,</p> <p><i>Describe why this strategy is not applicable to your project.</i></p> <p>OR,</p> <p><i>Describe why such measures are infeasible.</i></p>	<p><input type="checkbox"/>Proposed  <input type="checkbox"/>Not Applicable  <input type="checkbox"/>Not Feasible*  <input type="checkbox"/>Alternative Measure Proposed</p> <p><i>*The 2030 GHGRS assumed this strategy would be feasible for 50% of residential units constructed between 2020 and 2030.</i></p>
<b>PART 2: RESIDENTIAL AND NON-RESIDENTIAL PROJECTS</b>		
<p><b>Renewable Energy Development</b></p> <ol style="list-style-type: none"> <li>Install solar panels, solar hot water, or other clean energy power generation sources on development sites, or</li> <li>Participate in community solar programs to support development of renewable energy in the community, or</li> <li>Participate in San José Clean Energy at the Total Green level (i.e., 100% carbon-free electricity) for electricity accounts associated with the project.</li> </ol> <p><b>Supports Strategies:</b> GHGRS #1, GHGRS #3</p>	<p><b>Alternative Measure Proposed.</b> The project would be enrolled in San José Clean Energy (SJCE) GreenSource program which includes 55 percent renewable energy.</p>	<p><input type="checkbox"/>See Part 1 (Residential projects only)  <input type="checkbox"/>Proposed  <input type="checkbox"/>Not Applicable  <input type="checkbox"/>Not Feasible  <input checked="" type="checkbox"/>Alternative Measure Proposed</p>

<p><b>Building Retrofits – Natural Gas<sup>3</sup></b>                  This strategy only applies to projects that include a retrofit of an existing building. If the proposed project does not include a retrofit, select “Not Applicable” in the Project Conformance column.</p> <p>1. Replace an existing natural gas appliance with an electric alternative (e.g., space heater, water heater, clothes dryer),                  or</p> <p>2. Replace an existing natural gas appliance with a high-efficiency model</p> <p><b>Supports Strategies:</b>                  GHGRS #4</p>	<p><b>Not Applicable.</b> The project does not include a retrofit. Therefore, this strategy is not applicable to the project.</p>	<p><input type="checkbox"/> Proposed  <input checked="" type="checkbox"/> Not Applicable  <input type="checkbox"/> Not Feasible  <input type="checkbox"/> Alternative Measure Proposed</p>
<p><b>Zero Waste Goal</b></p> <p>1. Provide space for organic waste (e.g., food scraps, yard waste) collection containers,                  and/or</p> <p>2. Exceed the City’s construction &amp; demolition waste diversion requirement.</p> <p><b>Supports Strategies:</b>                  GHGRS #5</p>	<p><b>Consistent.</b> The proposed development includes an exterior trash enclosure with space for recycling and organic waste collection. Additionally, construction and demolition waste would be diverted to meet City requirements.</p>	<p><input checked="" type="checkbox"/> Proposed  <input type="checkbox"/> Not Applicable  <input type="checkbox"/> Not Feasible  <input type="checkbox"/> Alternative Measure Proposed</p>
<p><b>Caltrain Modernization</b></p> <p>1. For projects located within ½ mile of a Caltrain station, establish a program through which to provide project tenants and/or residents with free or reduced Caltrain passes or</p> <p>2. Develop a program that provides project tenants and/or residents with options to reduce their vehicle miles traveled (e.g., a TDM program), which could include transit passes, bike lockers and showers, or other strategies to reduce project related VMT.</p> <p><b>Supports Strategies:</b>                  GHGRS #6</p>	<p><b>Not Applicable.</b> The proposed project is not located within ½ mile of a Caltrain station. Therefore, this strategy is not applicable to the project.</p>	<p><input type="checkbox"/> Proposed  <input checked="" type="checkbox"/> Not Applicable  <input type="checkbox"/> Not Feasible  <input type="checkbox"/> Alternative Measure Proposed</p>

<sup>3</sup> GHGRS Strategy #4 applies to existing building retrofits and not to new construction; Strategy #2 applies to new construction to reduce natural gas related GHG emissions.

<p><b>Water Conservation</b></p> <p>1. Install high-efficiency appliances/fixtures to reduce water use, and/or include water-sensitive landscape design, and/or</p> <p>2. Provide access to reclaimed water for outdoor water use on the project site.</p> <p><b>Supports Strategies:</b> GHGRS #7</p>	<p><b>Proposed.</b> The proposed project would comply with water conservation per the California Green Building Standards Code, which requires a 20 percent reduction in indoor water use. The project would include low flow appliances and fixtures. The project would also comply with the City’s Water-Efficient Landscape Ordinance (Chapter 15.11 of the San José Municipal Code).</p>	<p><input checked="" type="checkbox"/> Proposed</p> <p><input type="checkbox"/> Not Applicable</p> <p><input type="checkbox"/> Not Feasible</p> <p><input type="checkbox"/> Alternative Measure Proposed</p>
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### Table C: Applicant Proposed Greenhouse Gas Reduction Measures

Description of Proposed Measure	Description of GHG Reduction Estimate	Proposed Measure Implementation
<p><i>[Describe the proposed project measure and why it is proposed]</i></p> <p><b>Supports Strategies/Sectors:</b> GHGRS #</p>	<p><i>[Demonstrate the effectiveness of the proposed measure to reduce the project’s GHG emissions.</i></p> <p><i>Include a description of how your measure will reduce emissions and provide supporting quantification documentation/assumptions.]</i></p>	<p><input type="checkbox"/>Part of Design</p> <p><input type="checkbox"/>Additional Measure</p>
<p><i>[Describe the proposed project measure and why it is proposed]</i></p> <p><b>Supports Strategies/Sectors:</b> GHGRS #</p>	<p><i>[Demonstrate the effectiveness of the proposed measure to reduce the project’s GHG emissions.</i></p> <p><i>Include a description of how your measure will reduce emissions and provide supporting quantification documentation/assumptions.]</i></p>	<p><input type="checkbox"/>Part of Design</p> <p><input type="checkbox"/>Additional Measure</p>
<p><i>[Describe the proposed project measure and why it is proposed]</i></p> <p><b>Supports Strategies/Sectors:</b> GHGRS #</p>	<p><i>[Demonstrate the effectiveness of the proposed measure to reduce the project’s GHG emissions.</i></p> <p><i>Include a description of how your measure will reduce emissions and provide supporting quantification documentation/assumptions.]</i></p>	<p><input type="checkbox"/>Part of Design</p> <p><input type="checkbox"/>Additional Measure</p>
<p><i>[Describe the proposed project measure and why it is proposed]</i></p> <p><b>Supports Strategies/Sectors:</b> GHGRS #</p>	<p><i>[Demonstrate the effectiveness of the proposed measure to reduce the project’s GHG emissions.</i></p> <p><i>Include a description of how your measure will reduce emissions and provide supporting quantification documentation/assumptions.]</i></p>	<p><input type="checkbox"/>Part of Design</p> <p><input type="checkbox"/>Additional Measure</p>