



Technical Appendix B

Greenhouse Gas Analysis
Urban Crossroads, Inc.
June 6, 2012



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**NORTH NEWPORT CENTER PLANNED COMMUNITY
GREENHOUSE GAS ANALYSIS
CITY OF NEWPORT BEACH, CALIFORNIA**

June 6, 2012

**JN:08210-05 GHG REPORT
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NORTH NEWPORT CENTER PLANNED COMMUNITY

GREENHOUSE GAS ANALYSIS

CITY OF NEWPORT BEACH, CALIFORNIA

1.0 INTRODUCTION

This report presents the results of the greenhouse gas analysis (GHGA) conducted by Urban Crossroads, Inc., for the proposed North Newport Center Planned Community (NNCPC) (referred to as “Project”).

1.1 PURPOSE OF REPORT

The purpose of this report is to satisfy CEQA Guidelines section 15168(c), which requires the City to analyze whether subsequent activities regarding the North Newport Center zoning require an additional environmental document beyond the Final Environmental Impact Report (“EIR”) for the City of Newport Beach General Plan 2006 Update (State Clearinghouse No. 200601119) (“General Plan EIR”), and the first North Newport Center Addendum to the Environmental Impact Report for the City of Newport Beach General Plan 2006 Update, approved by Resolution No. 2007-79 on December 11, 2007. The General Plan EIR was certified by the Newport Beach City Council on July 25, 2006, as adequately addressing the potential environmental impacts associated with the buildout of the City of Newport Beach, inclusive of North Newport Center. Pursuant to CEQA Guidelines section 15168(c), this report analyzes whether the Project would have effects that were not examined in the General Plan EIR and confirms that the Project will not result in new effects and will not require new mitigation measures so that the City can determine whether it is appropriate to approve the Project as within the scope of the General Plan EIR. As required by CEQA Guidelines section 15168(e), this report also analyzes whether: (i) the Project is within the scope of the General Plan 2006 Update; and (ii) the General Plan EIR adequately describes the subsequent activity for the purposes of CEQA.

CEQA Guidelines section 15164(a) states: “The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR have occurred.” Pursuant to CEQA Guidelines section 15162, no subsequent EIR may be required for the project unless the City determines, on the basis of substantial evidence, that one or more of the following conditions are met:

- (a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:*

- (1) *Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
- (2) *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
- (3) *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR, was certified as complete or the Negative Declaration was adopted, shows any of the following:*
 - (A) *The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*
 - (B) *Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
 - (C) *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
 - (D) *Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

In order to provide the analysis necessary for the City to make its determination under CEQA Guidelines section 15168(c), this GHGA evaluates Project-related construction and operational emissions and determines the level of greenhouse gas (GHG) impacts as a result of constructing and operating the proposed Project. Additional information beyond that required for the City's determination has been included at the request of the City in order to provide public information regarding how the Project standing alone would impact GHG emissions.

Crucial to the City's consideration of the above-stated factors in the GHG context is the fact that the proposed Project serves to implement principal goals of the 2006 General Plan. These goals and policies include the following:¹

A successful mixed-use district that integrates an economic and commercial center serving the needs of Newport Beach residents and the subregion, with expanded opportunities for residents to live close to jobs commerce entertainment, and recreation, and is supported by a pedestrian-friendly environment.

¹ City of Newport Beach, Final Environmental Impact Report for the General Plan 2006 Update (State Clearinghouse No. 2006011119), July 26, 2006, pages 3-97 to 3-98.

Provide the opportunity for limited residential, hotel, and office development in accordance with the limits specified by Tables LUI and LU2.

Provide the opportunity for an additional anchor tenant, other retail, and/or entertainment and supporting uses that complement, are integrated with and enhance the economic vitality of existing development.

Encourage that some new development be located and designed to orient to the inner side of Newport Center Drive, establishing physical and visual continuity that diminishes the dominance of surface parking lots and encourages pedestrian activity.

Encourage that pedestrian access and connections among uses within the district be improved with additional walkways and streetscape amenities concurrent with the development of expanded and new uses.

Full implementation of entitlements for North Newport Center consistent with the 2006 General Plan will assist the City in achieving its General Plan goals. Regarding long- term air quality impacts, the General Plan EIR states that the nature of North Newport Center has the potential to contribute to decreases in vehicle miles traveled because the project area promotes a mixed-use pedestrian-friendly district.² This report analyzes and confirms that the Project is not expected to result in any climate change impacts due to greenhouse gas emissions beyond the impacts of the development set forth in the General Plan EIR.

The General Plan EIR analyzed air quality impacts associated with buildout of future development in the City, inclusive of North Newport Center. The analysis included carbon dioxide (CO₂) and other greenhouse gas emissions. This report analyzes and confirms that the Project would not generate any new air quality impacts not already identified in the General Plan EIR, and that the Project is in conformance with the assumptions set forth in the General Plan EIR. This report will enable the City to confirm that implementation of the Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the General Plan EIR.

With respect to global climate change (GCC) resulting from greenhouse gas emissions, no new information of substantial importance on climate change is now available that was not known and could not have been known when the City approved the General Plan EIR in 2006. For example, in 1979 the National Research Council published Carbon Dioxide and Climate A Scientific Assessment," which concluded that climate change was an accelerating phenomenon partly due to human activity. Numerous studies conducted before and after the National Research Council report reached similar conclusions. The

² City of Newport Beach, Final Environmental impact Report for the General Plan 2006 Update (State Clearinghouse No. 2006011119), July 26, 2006, page 4.2-12.

State of California adopted legislation in 2002 requiring the California Air Resources Board to develop regulations limiting greenhouse gas emissions from automobiles.

Consideration of strategies to control emissions of greenhouse gases which may contribute in some manner to global climate change is under consideration at all regulatory levels; however, there is no one agency responsible for regulating greenhouse gases, and there are no established standards to evaluate the significance of greenhouse gas emissions. However, the most common greenhouse gas emissions are from vehicle emissions (both construction and operational) and operational emissions from energy consumption. These issues have been addressed in the General Plan EIR.

Analyses prepared for or by California State Agencies on climate change issues do not provide for the provision of specific measures to incorporate into particular projects to reduce greenhouse gas emissions, except for generalized recommendations about such matters as encouraging jobs/housing proximity. The California Energy Commission has explained that accessibility and mixed use are two factors that reduce vehicles trips, which are a major source of greenhouse gas emissions in California.³

In addition, the Project's incremental contribution to any cumulative global climate change impact is mitigated by various characteristics of the Project that serve to render its contribution less than cumulatively considerable. One of the main concerns raised by those concerned about the effect of greenhouse gases on climate change is that "leap frog"-type development would serve to potentially increase the number of vehicle miles traveled and consequently increase those vehicular emissions (i.e., CO₂ that contribute to greenhouse gases). The Project would allow for in-fill, mixed use development in an urbanized setting thereby providing opportunities to reduce vehicle trips.

While this GHGA indicates that the Project would produce GHG emissions, the potential GHG emissions associated with the Project would not exceed those estimated in 2006 because the Project is not larger in size or scope than the full buildout of the 2006 General Plan analyzed in the General Plan EIR. Thus, this report concludes that there are no new significant GHG impacts resulting from the Project nor is there any substantial increase in the severity of any previously identified GHG impacts.

1.2 PROJECT OVERVIEW

The NNCPD Development Plan currently allows for 430 multi-family residential units to be developed in areas of the NNCPD designated MU-H3 by the General Plan. In comparison, the General Plan allows a maximum of 450 units in the MU-H3 category throughout the Newport Center Statistical Area. In other words, of the 450 MU-H3 residential units allowed by the General Plan in the Newport Center Statistical Area, 430 are specifically assigned to the areas of the NNCPD designated by the NNCPD

³ California Energy Commission, The Role of Land Use in Meeting California's Energy and Climate Change Goals, Draft, June 26, 2007, pages 7, 17-19.

Development Plan as Block 500, Block 600 and San Joaquin Plaza. The remaining 20 units are allowed to be developed in any MU-H3 designated area in the Newport Center Statistical Area. Five (5) MU-H3 units have been assigned to the Golf Realty Fund Tennis Club development and the other 15 MU-H3 units are not assigned to any particular property.

In addition, certain areas of the City are identified on the General Plan Land Use Map as “Anomaly Locations,” where a maximum development intensity is allowed pursuant to General Plan Tables LU1 and LU2. Anomaly Location 43 in the Newport Center Statistical Area (Statistical Area L1) is developed with a 532 room resort hotel presently operated by Marriott Hotels and Resorts. General Plan Table LU2 allows a maximum of 611 hotel rooms in Anomaly Location 43; therefore, 79 hotel rooms allowed by the General Plan are un-built. The proposed Project would convert the 79 un-built hotel rooms to 79 multi-family residential units and then transfer them to the San Joaquin Plaza portion of the NNCP.

Under existing conditions, Block 500, Block 600, and San Joaquin Plaza are developed with commercial/office land uses and the Island Hotel. No multi-family residential units are constructed in these areas, although the NNCP Development Plan allows for up to 430 residential units. Thus, the City’s General Plan and NNCP Development Plan currently allow for the existing land uses in Block 500, Block 600 and San Joaquin Plaza to be supplemented by or partially replaced with multi-family residential housing.

The Project Applicant proposes an amendment to the NNCP Development Plan to increase the allowable residential development intensity by 94 units (comprising 15 un-assigned and un-built multi-family units and the 79 hotel units that would be converted to multi-family units) and to assign those 94 units, along with 430 units already allocated to the NNCCP, to the portion of the NNCCP designated as San Joaquin Plaza.

No specific development project is proposed at this time. A proposal to develop a specific residential project in the San Joaquin Plaza would be subject to the procedures for development specified in the NNCP Development Plan. There would be no change to the boundaries of the NNCP Development Plan area or any constituent blocks or sub-districts, and there would be no change in the permitted types of land uses, development regulations, or design guidelines resulting from approval of the proposed NNCP Development Plan Amendment.

Since no specific development is proposed at this time, and the exact location of the units is unknown, a specific calculation of emissions that may be associated with future construction-related GHG emissions is not possible and is not provided in this analysis. However, construction activities would be consistent with the assumptions made in the General Plan EIR and would not result in any new impacts or increase the severity of any impacts previously identified in the General Plan EIR. For purposes of this analysis, the greenhouse gas impacts centered on the on-going operations of the 94 units are evaluated.

1.3 SUMMARY OF FINDINGS

- The Project will not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- The Project will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

1.4 REQUIREMENTS

The issue of GHG emissions was not previously evaluated in the General Plan EIR; as such, no mitigation measures specifically related to GHG emissions was identified in the General Plan EIR. However, the General Plan includes several policies that would serve to reduce GHG emissions, and the proposed Project would be required to comply with all applicable General Plan goals and policies.

Additionally, although the Project will not result in a new significant GHG impact or increase the level of GHG emissions that would otherwise occur from buildout of the City's General Plan, the Project would be required to comply with all mandatory regulatory requirements imposed by the State of California and the South Coast Air Quality Management District aimed at the reduction of air quality emissions. Those that are particularly applicable to the Project and that would assist in the reduction of greenhouse gas emissions are:

- Global Warming Solutions Act of 2006 (AB32)
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (SB 375)
- Pavely Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles.
- Title 24 California Code of Regulations (California Building Code). Establishes energy efficiency requirements for new construction.
- Title 20 California Code of Regulations (Appliance Energy Efficiency Standards). Establishes energy efficiency requirements for appliances.
- Title 17 California Code of Regulations (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020.
- California Water Conservation in Landscaping Act of 2006 (AB1881). Requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or equivalent by January 1, 2010 to ensure efficient landscapes in new development and reduced water waste in existing landscapes.
- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions.

- Renewable Portfolio Standards (SB 1078). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2010 and 33 percent by 2020.

1.5 CONSTRUCTION ACTIVITY RECOMMENDED MITIGATION MEASURES

No significant impacts were identified and no mitigation measures are required.

1.6 OPERATIONAL ACTIVITY RECOMMENDED MITIGATION MEASURES

No significant impacts were identified and no mitigation measures are required.

2.0 BACKGROUND

2.1 INTRODUCTION TO GLOBAL CLIMATE CHANGE

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

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

2.2 GREENHOUSE GAS EMISSIONS INVENTORIES

Global

Worldwide anthropogenic (man-made) GHG emissions are tracked by the Intergovernmental Panel on Climate Change for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Man-made GHG emissions data for Annex I nations are available through 2009. Man-made GHG emissions data for Non-Annex I nations are available through 2007. For the Year 2009 the sum of these emissions totaled approximately 40,084 MMTCO₂e.⁴ Emissions from the top five countries and the European Union accounted for approximately 65 percent of the total global GHG

⁴ The global emissions are the sum of Annex I and non-Annex I countries, without counting Land-Use, Land-Use Change and Forestry (LULUCF). For countries without 2005 data, the UNFCCC data for the most recent year were used. United Nations Framework Convention on Climate Change, "Annex I Parties – GHG total without LULUCF," http://unfccc.int/ghg_emissions_data/ghg_data_from_unfccc/time_series/annex_i/items/3841.php and "Flexible GHG Data Queries" with selections for total GHG emissions excluding LULUCF/LUCF, all years, and non-Annex I countries, <http://unfccc.int/di/FlexibleQueries/Event.do?event=showProjection>. n.d.

emissions, according to the most recently available data (see Table 2-1, Top GHG Producer Countries and the European Union). The GHG emissions in more recent years may differ from the inventories presented in Table 2-1; however, the data is representative of currently available inventory data.

United States

As noted in Table 2-1, the United States was the number two producer of GHG emissions in 2009. The primary greenhouse gas emitted by human activities in the United States was CO₂, representing approximately 83 percent of total greenhouse gas emissions.⁵ Carbon dioxide from fossil fuel combustion, the largest source of US greenhouse gas emissions, accounted for approximately 78 percent of the GHG emissions.⁶

TABLE 2-1
TOP GHG PRODUCER COUNTRIES AND THE EUROPEAN UNION⁷

Emitting Countries	GHG Emissions (MMT CO ₂ e)
China	6,703
United States	6,608
European Union	8,338
Russian Federation	2,159
India	1,410
Japan	1,209
Total	26,427

State of California

CARB compiles GHG inventories for the State of California. Based upon the 2008 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2008 greenhouse gas emissions inventory, California emitted 474 MMTCO₂e **including** emissions resulting from imported electrical power in 2008.⁸ Based on the CARB inventory data and GHG inventories compiled by the World Resources Institute⁹, California's total statewide GHG emissions rank second in the United States (Texas is number one) with emissions of 417 MMTCO₂e **excluding** emissions related to imported power.

⁵ US Environmental Protection Agency, "Inventory of US Greenhouse Gas Emissions and Sinks 1990–2009," <http://www.epa.gov/climatechange/emissions/usgginventory.html>. 2011.

⁶ *ibid*

⁷ World Resources Institute, "Climate Analysis Indicator Tool (CAIT) Excludes emissions and removals from land use, land-use change and forestry (LULUCF) Emissions Inventory," <http://cait.wri.org>

⁸ California Air Resources Board, "California Greenhouse Gas 2000-2008 Inventory by Scoping Plan Category - Summary," <http://www.arb.ca.gov/cc/inventory/data/data.htm>. 2010.

⁹ World Resources Institute, "Climate Analysis Indicator Tool (CAIT)-US – Yearly Emissions Inventory," <http://cait.wri.org>

2.3 GLOBAL CLIMATE CHANGE DEFINED

Global Climate Change (GCC) refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO₂ (Carbon Dioxide), N₂O (Nitrous Oxide), CH₄ (Methane), hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the Earth's atmosphere, but prevent radioactive heat from escaping, thus warming the Earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages. According to the California Air Resources Board (CARB), the climate change since the industrial revolution differs from previous climate changes in both rate and magnitude (CARB, 2004, Technical Support document for Staff Proposal Regarding Reduction of Greenhouse Gas Emissions from Motor Vehicles).

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

Although California's rate of growth of greenhouse gas emissions is slowing, the state is still a substantial contributor to the U.S. emissions inventory total. In 2004, California is estimated to have produced 492 million gross metric tons of carbon dioxide equivalent (CO₂e) greenhouse gas emissions. Despite a population increase of 16 percent between 1990 and 2004, California has significantly slowed the rate of growth of greenhouse gas emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls.¹⁰

2.4 GREENHOUSE GASES

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

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

¹⁰ California Energy Commission, "Inventory of California Greenhouse Gas Emissions and Sinks," <http://www.energy.ca.gov/2005publications/CEC-600-2005-025/CEC-600-2005-025.PDF>. 2005.

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

TABLE 2-2 GLOBAL WARMING POTENTIALS AND ATMOSPHERIC LIFETIME OF SELECT GHGs		
Gas	Atmospheric Lifetime (years)	Global Warming Potential (100 year time horizon)
Carbon Dioxide	50-200	1
Methane	12 ± 3	21
Nitrous Oxide	120	310
HFC-23	264	11,700
HFC-134a	14.6	1,300
HFC-152a	1.5	140
PFC: Tetrafluoromethane (CH ₄)	50,000	6,500
PFC: Hexafluoroethane (C ₂ F ₆)	10,000	9,200
Sulfur Hexafluoride (SF ₆)	3,200	23,900
Source: EPA 2006 (URL: http://www.epa.gov/nonco2/econ-inv/table.html)		

Water Vapor: Water vapor (H₂O) is the most abundant, important, and variable greenhouse gas in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. A climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change.

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

There are no human health effects from water vapor itself; however, when some pollutants come in contact with water vapor, they can dissolve and the water vapor can then act as a pollutant-carrying agent. The main source of water vapor is evaporation from the oceans (approximately 85 percent).¹¹ Other sources include: evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves.

Carbon Dioxide: Carbon dioxide (CO₂) is an odorless and colorless GHG. Outdoor levels of carbon dioxide are not high enough to result in negative health effects. Carbon dioxide is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil, natural gas, and wood. Carbon dioxide is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks¹².

Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO₂ concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30 percent. Left unchecked, the concentration of carbon dioxide in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources.¹³

Methane: Methane (CH₄) is an extremely effective absorber of radiation, though its atmospheric concentration is less than carbon dioxide and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs. No health effects are known to occur from exposure to methane.

Methane has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other anthropogenic sources include fossil-fuel combustion and biomass burning.¹⁴

Nitrous Oxide: Nitrous oxide (N₂O), also known as laughing gas, is a colorless greenhouse gas. Nitrous oxide can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is

¹¹ *ibid.*

¹² On a warmer Earth, chemical weathering is promoted by more vigorous cycling of water through the atmosphere and higher temperatures. "More chemical weathering removes more CO₂ from the atmosphere as carbonic acid reacts with silicate minerals, producing bicarbonate ion." *Carbon Cycle and Climate Change* – J Bret Bennington, Hofstra University.

http://www.cengage.com/custom/enrichment_modules/data/Carbon_Cycle_0495738557_LowRes.pdf

¹³ International Panel on Climate Change 2007, "Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report,"

http://www.ipcc.ch/publications_and_data/publications_ipcc_fourth_assessment_report_wg1_report_the_physical_science_basis.htm

¹⁴ *ibid.*

considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage)¹⁵.

Concentrations of nitrous oxide also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb).¹⁶ Nitrous oxide is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant, i.e., in whipped cream bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. Nitrous oxide can be transported into the stratosphere, be deposited on the Earth's surface, and be converted to other compounds by chemical reaction

Chlorofluorocarbons: Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C₂H₆) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs are no longer being used; therefore, it is not likely that health effects would be experienced. Nonetheless, in confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.

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

Hydrofluorocarbons: Hydrofluorocarbons (HFCs) are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the greenhouse gases, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF₃), HFC-134a (CF₃CH₂F), and HFC-152a (CH₃CHF₂). Prior to 1990, the only significant emissions were of HFC-23. HFC-134a emissions are increasing due to its use as a refrigerant. The U.S. EPA estimates that concentrations of HFC-23 and HFC-134a are now about 10 parts per trillion (ppt) each; and that concentrations of HFC-152a are about 1 ppt.¹⁷ No health effects are known to result from exposure to HFCs, which are manmade for applications such as automobile air conditioners and refrigerants.

¹⁵ U.S. Department of Labor. Occupational Safety and Health Guideline for Nitrous Oxide. <http://www.osha.gov/SLTC/healthguidelines/nitrousoxide/recognition.html>

¹⁶ *ibid.*

¹⁷ U.S. EPA. High Global Warming Potential (GWP) Gases. <http://www.epa.gov/highgwp/scientific.html>

Perfluorocarbons: Perfluorocarbons (PFCs) have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above Earth's surface, are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF₄) and hexafluoroethane (C₂F₆). The U.S. EPA estimates that concentrations of CF₄ in the atmosphere are over 70 ppt.¹⁸

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

Sulfur Hexafluoride: Sulfur hexafluoride (SF₆) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900). The U.S. EPA indicates that concentrations in the 1990s were about 4 ppt.¹⁹ In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.

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

2.5 EFFECTS OF CLIMATE CHANGE IN CALIFORNIA

The California Environmental Protection Agency (CalEPA) published a report titled "Scenarios of Climate Change in California: An Overview" (Climate Scenarios report) in February 2006 (California Climate Change Center 2006), that while not adequate for a CEQA project-specific or cumulative analysis, is generally instructive about the statewide impacts of global warming.

The Climate Scenarios report uses a range of emissions scenarios developed by the Intergovernmental Panel on Climate Change (IPCC) to project a series of potential warming ranges (i.e., temperature increases) that may occur in California during the 21st century: lower warming range (3.0-5.5°F); medium warming range (5.5-8.0°F); and higher warming range (8.0-10.5°F). The Climate Scenarios report then presents an analysis of future climate in California under each warming range, that while uncertain, present a picture of the impacts of global climate change trends in California.

In addition, most recently on August 5, 2009, the State's Natural Resources Agency released a public review draft of its "California Climate Adaptation Strategy" report that details many vulnerabilities arising from climate change with respect to matters such as temperature extremes, sea level rise, wildfires, floods and droughts and precipitation changes. This report responds to the Governor's Executive Order S-13-2008 that called on state agencies to develop California's strategy to identify and prepare for expected climate impacts

¹⁸ *ibid.*

¹⁹ *ibid.*

According to the reports, substantial temperature increases arising from increased GHG emissions potentially could result in a variety of impacts to the people, economy, and environment of California associated with a projected increase in extreme conditions, with the severity of the impacts depending upon actual future emissions of GHGs and associated warming. Under the emissions scenarios of the Climate Scenarios report, the impacts of global warming in California have the potential to include, but are not limited to, the following areas:

Public Health

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

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

Water Resources

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

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

month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding.

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

Agriculture

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. First, California farmers could possibly lose as much as 25 percent of the water supply they need. Although higher CO₂ levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate O₃ pollution, which makes plants more susceptible to disease and pests and interferes with plant growth.

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

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

Forests and Landscapes

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

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

Rising Sea Levels

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

2.6 HUMAN HEALTH EFFECTS

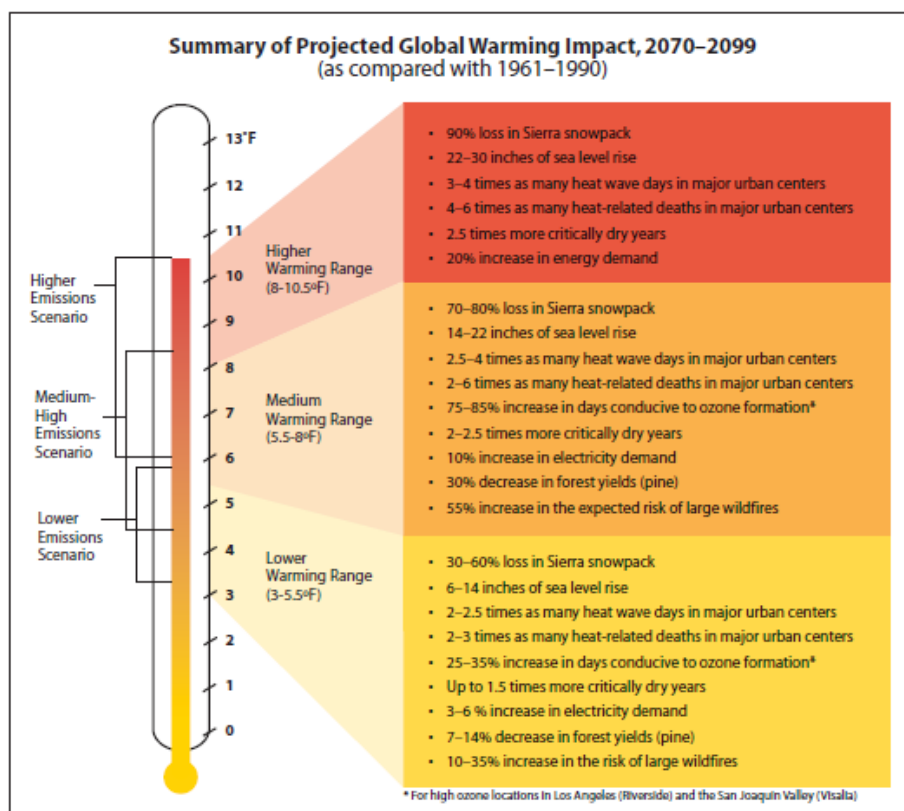
The potential health effects related directly to the emissions of carbon dioxide, methane, and nitrous oxide as they relate to development projects such as the proposed Project are still being debated in the scientific community. Their cumulative effects to global climate change have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport that higher ambient temperatures would increase disease survival rates and result in more widespread disease. Climate change will likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas (American Lung Association, 2004). Figure 1 presents the potential impacts of global warming.

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

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

Carbon Dioxide: According to the National Institute for Occupational Safety and Health (NIOSH) high concentrations of carbon dioxide can result in health effects such as: headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. It should be noted that current concentrations of carbon dioxide in the earth's atmosphere are estimated to be approximately 370 parts per million (ppm), the actual reference exposure level (level at which adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour workweek and short-term reference exposure levels of 30,000 ppm averaged over a 15 minute period (NIOSH 2005).

Figure 1



Source: California Energy Commission, 2006. Our Changing Climate, Assessing the Risks to California, 2006 Biennial Report.

Methane: Methane is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Methane is also an asphyxiant and may displace oxygen in an enclosed space (OSHA 2003).

Nitrous Oxide: Nitrous Oxide is often referred to as laughing gas; it is a colorless greenhouse gas. The health effects associated with exposure to elevated concentrations of nitrous oxide include dizziness, euphoria, slight hallucinations, and in extreme cases of elevated concentrations nitrous oxide can also cause brain damage (OSHA 1999).

Fluorinated Gases: High concentrations of fluorinated gases can also result in adverse health effects such as asphyxiation, dizziness, headache, cardiovascular disease, cardiac disorders, and in extreme cases, increased mortality (NIOSH 1989, 1997).

Aerosols: The health effects of aerosols are similar to that of other fine particulate matter. Thus aerosols can cause elevated respiratory and cardiovascular diseases as well as increased mortality (NASA 2002).

2.7 REGULATORY SETTING

International Regulation and the Kyoto Protocol:

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

The Kyoto protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Kyoto protocol are met, global GHG emissions could be reduced an estimated five percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the United States is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the United States is not bound by the Protocol's commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Kyoto.

Federal Regulation and the Clean Air Act:

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

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

Although global climate change did not become an international concern until the 1980s, efforts to reduce energy consumption began in California in response to the oil crisis in the 1970s, resulting in the

incidental reduction of greenhouse gas emissions. In order to manage the state's energy needs and promote energy efficiency, AB 1575 created the California Energy Commission (CEC) in 1975.

Title 24 Energy Standards:

The California Energy Commission (CEC) first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods. The latest revisions were adopted in 2008 and became effective on January 1, 2010.

Part 11 of the Title 24 Building Standards Code is referred to as the California Green Building Standards Code (CALGreen Code). The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality."²⁰ The CALGreen Code is not intended to substitute or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission (CBSC). The CBSC has released the *2010 California Green Building Standards Code* on its Web site.²¹ Unless otherwise noted in the regulation, all newly constructed buildings in California are subject of the requirements of the CALGreen Code.

California Assembly Bill No. 1493 (AB 1493):

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

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

²⁰ California Building Standards Commission, 2008 California Green Building Standards Code, (2009).

²¹ "CALGreen," <http://www.bsc.ca.gov/CALGreen/default.htm>. 2010

medium-duty passenger vehicle weight classes beginning with the 2009 model year. Emission limits are further reduced each model year through 2016.

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

The Obama administration subsequently directed the USEPA to re-examine their decision. On May 19, 2009, challenging parties, automakers, the State of California, and the federal government reached an agreement on a series of actions that would resolve these current and potential future disputes over the standards through model year 2016. In summary, the USEPA and the U.S. Department of Transportation agreed to adopt a federal program to reduce GHGs and improve fuel economy, respectively, from passenger vehicles in order to achieve equivalent or greater greenhouse gas benefits as the AB 1493 regulations for the 2012–2016 model years. Manufacturers agreed to ultimately drop current and forego similar future legal challenges, including challenging a waiver grant, which occurred on June 30, 2009. The State of California committed to (1) revise its standards to allow manufacturers to demonstrate compliance with the fleet-average GHG emission standard by "pooling" California and specified State vehicle sales; (2) revise its standards for 2012–2016 model year vehicles so that compliance with USEPA-adopted GHG standards would also comply with California's standards; and (3) revise its standards, as necessary, to allow manufacturers to use emissions data from the federal CAFE program to demonstrate compliance with the AB 1493 regulations (CARB 2009, <http://www.arb.ca.gov/regact/2009/ghgpv09/ghgpvisor.pdf>) both of these programs are aimed at light-duty auto and light-duty trucks.

Executive Order S-3-05:

Executive Order S-3-05, which was signed by Governor Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra's snowpack, further exacerbate California's air quality problems, and potentially

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

California Assembly Bill 32 (AB 32):

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

AB 32 requires that CARB adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrives at the cap; institute a schedule to meet the emissions cap; and develop tracking, reporting, and enforcement mechanisms to ensure that the state achieves reductions in GHG emissions necessary to meet the cap. AB 32 also includes guidance to institute emissions reductions in an economically efficient manner and conditions to ensure that businesses and consumers are not unfairly affected by the reductions.

In November 2007, CARB completed its estimates of 1990 GHG levels. Net emission 1990 levels were estimated at 427 MMTs (emission sources by sector were: transportation – 35 percent; electricity generation – 26 percent; industrial – 24 percent; residential – 7 percent; agriculture – 5 percent; and commercial – 3 percent)²². Accordingly, 427 MMTs of CO₂ equivalent was established as the emissions limit for 2020. For comparison, CARB's estimate for baseline GHG emissions was 473 MMT for 2000 and 532 MMT for 2010. "Business as usual" conditions (without the 30 percent reduction to be implemented by CARB regulations) for 2020 were projected to be 596 MMTs.

²² On a national level, the EPA's Endangerment Finding stated that electricity generation is the largest emitting sector (34%), followed by transportation (28%), and industry (19%).

In December 2007, CARB approved a regulation for mandatory reporting and verification of GHG emissions for major sources. This regulation covered major stationary sources such as cement plants, oil refineries, electric generating facilities/providers, and co-generation facilities, which comprise 94 percent of the point source CO₂ emissions in the State.

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

Table 2-3 shows the proposed reductions from regulations and programs outlined in the Scoping Plan. While local government operations were not accounted for in achieving the 2020 emissions reduction, local land use changes are estimated to result in a reduction of 5 MMTons of CO₂e, which is approximately 3 percent of the 2020 GHG emissions reduction goal. In recognition of the critical role local governments will play in successful implementation of AB 32, CARB is recommending GHG reduction goals of 15 percent of 2006 levels by 2020 to ensure that municipal and community-wide emissions match the state's reduction target. According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles by approximately 2 percent through land use planning, resulting in a potential GHG reduction of 2 MMTons tons of CO₂e (or approximately 1.2 percent of the GHG reduction target).

California Senate Bill No. 1368 (SB 1368):

In 2006, the State Legislature adopted Senate Bill 1368 ("SB 1368"), which was subsequently signed into law by the Governor. SB 1368 directs the California Public Utilities Commission ("CPUC") to adopt a greenhouse gas emission performance standard ("EPS") for the future power purchases of California utilities. SB 1368 seeks to limit carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. Due to the carbon content of its fuel source, a coal-fired plant cannot meet this standard because such plants emit roughly twice as much carbon as natural gas, combined cycle plants. Accordingly, the new law will effectively prevent California's utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. Thus, SB 1368 will lead to dramatically lower greenhouse gas emissions associated with California energy demand, as SB 1368 will effectively prohibit California utilities from purchasing power from out of state producers that cannot satisfy the EPS standard required by SB 1368.

TABLE 2-3
SCOPING PLAN GHG REDUCTION MEASURES TOWARD 2020 TARGET

<i>Recommended Reduction Measures</i>	<i>Reductions Counted toward 2020 Target of 169 MMT CO₂e</i>	<i>Percentage of Statewide 2020 Target</i>
Cap and Trade Program and Associated Measures		
California Light-Duty Vehicle GHG Standards	31.7	19%
Energy Efficiency	26.3	16%
Renewable Portfolio Standard (33 percent by 2020)	21.3	13%
Low Carbon Fuel Standard	15	9%
Regional Transportation-Related GHG Targets ¹	5	3%
Vehicle Efficiency Measures	4.5	3%
Goods Movement	3.7	2%
Million Solar Roofs	2.1	1%
Medium/Heavy Duty Vehicles	1.4	1%
High Speed Rail	1.0	1%
Industrial Measures	0.3	0%
Additional Reduction Necessary to Achieve Cap	34.4	20%
Total Cap and Trade Program Reductions	146.7	87%
Uncapped Sources/Sectors Measures		
High Global Warming Potential Gas Measures	20.2	12%
Sustainable Forests	5	3%
Industrial Measures (for sources not covered under cap and trade program)	1.1	1%
Recycling and Waste (landfill methane capture)	1	1%
Total Uncapped Sources/Sectors Reductions	27.3	16%
Total Reductions Counted toward 2020 Target	174	100%
Other Recommended Measures – Not Counted toward 2020 Target		
State Government Operations	1.0 to 2.0	1%
Local Government Operations	To Be Determined ²	NA
Green Buildings	26	15%
Recycling and Waste	9	5%
Water Sector Measures	4.8	3%
Methane Capture at Large Dairies	1	1%
Total Other Recommended Measures – Not Counted toward 2020 Target	42.8	NA

Source: CARB. 2008, MMTons CO₂e: million metric tons of CO₂e 1 Reductions represent an estimate of what may be achieved from local land use changes. It is not the SB 375 regional target. 2 According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles by approximately 2 percent through land use planning, resulting in a potential GHG reduction of 2 million metric tons of CO₂e (or approximately 1.2 percent of the GHG reduction target). However, these reductions were not included in the Scoping Plan reductions to achieve the 2020 Target

Senate Bill 97 (SB 97):

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

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

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

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

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

The CEQA Guideline amendments do not identify a threshold of significance for greenhouse gas emissions, nor do they prescribe assessment methodologies or specific mitigation measures. Instead, they call for a "good-faith effort, based on available information, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." The amendments encourage lead agencies to consider many factors in performing a CEQA analysis and preserve lead agencies'

discretion to make their own determinations based upon substantial evidence. The amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. Specific GHG language incorporated in the Guidelines' suggested Environmental Checklist (Guidelines Appendix G) is as follows:

VII. GREENHOUSE GAS EMISSIONS

Would the project:

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

Executive Order S-01-07:

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

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

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

Senate Bill 375:

SB 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation. SB 375 requires metropolitan planning organizations (MPOs) to adopt a sustainable communities strategy (SCS) or alternative planning strategy (APS) that will prescribe land use allocation in that MPO's regional transportation plan. ARB, in consultation with MPOs, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every 8 years but can be updated every 4 years if advancements in emissions technologies affect the reduction strategies to achieve the targets. ARB is also charged with reviewing each MPO's SCS or APS for consistency with its assigned targets. If MPOs do not meet the GHG reduction targets, transportation projects will not be eligible for funding programmed after January 1, 2012.

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

CARB’s Preliminary Draft Staff Proposal for Interim Significance Thresholds:

Separate from its Scoping Plan approved in December of 2008, CARB issued a Staff Proposal in October 2008, as its first step toward developing recommended statewide interim thresholds of significance for GHGs that may be adopted by local agencies for their own use. CARB staff’s objective in this proposal is to develop a threshold of significance that will result in the vast majority (approximately 90 percent statewide) of GHG emissions from new industrial projects being subject to CEQA’s requirement to impose feasible mitigation. The proposal does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that, collectively, are responsible for substantial GHG emissions – specifically, industrial, residential, and commercial projects. CARB is developing these thresholds in these sectors to advance climate objectives, streamline project review, and encourage consistency and uniformity in the CEQA analysis of GHG emissions throughout the state. These draft thresholds are under revision in response to comments. There is currently no timetable for finalized thresholds at this time.

As currently proposed by CARB, the threshold consists of a quantitative threshold of 7,000 metric tons (MT) of CO₂e per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions. These performance standards have not yet been developed.

However, CARB’s proposal is not yet final, and thus cannot be applied to the Project. Further, CARB’s proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as manufacturing plants, or uses that utilize combustion engines. Thus, mobile source emissions are not addressed. This Project’s GHG emissions are mostly from mobile sources, and as such, the CARB proposal is not applicable to the Project.²³

South Coast Air Quality Management District Recommendations for Significance Thresholds:

In April 2008, the South Coast Air Quality Management District (SCAQMD), in order to provide guidance to local lead agencies on determining the significance of GHG emissions identified in CEQA documents, convened a “GHG CEQA Significance Threshold Working Group.”²⁴ The goal of the working group is to develop and reach consensus on an acceptable CEQA significance threshold for

²³ <http://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf>

²⁴ For more information visit: <http://www.aqmd.gov/ceqa/handbook/GHG/GHG.html>.

GHG emissions that would be utilized on an interim basis until CARB (or some other state agency) develops statewide guidance on assessing the significance of GHG emissions under CEQA.

Initially, SCAQMD staff presented the working group with a significance threshold that could be applied to various types of projects—residential; non-residential; industrial; etc. However, the threshold is still under development. In December 2008, staff presented the SCAQMD Governing Board with a significance threshold for stationary source projects where it is the lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 metric tons of carbon dioxide equivalent (MTCO₂e) as a screening numerical threshold for stationary sources.

In September 2010, the Working Group released additional revisions which recommended either a 3,000 MTCO₂e threshold for all land use types or a land-use specific threshold of 3,500 MTCO₂e for residential projects, 1,400 MTCO₂e for commercial projects, and 3,000 MTCO₂e for mixed use projects, additionally the working group identified project-level efficiency target of 4.8 MTCO₂e per service population as a 2020 target and 3.0 MTCO₂e per service population as a 2035 target. The recommended plan-level target for 2020 was 6.6 MTCO₂e and the plan level target for 2035 was 4.1 MTCO₂e. The SCAQMD has not announced when staff is expecting to present a finalized version of these thresholds to the Governing Board. The SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG reductions; however, these rules are currently applicable to boilers and process heaters, forestry, and manure management projects.

2.9 DISCUSSION ON ESTABLISHMENT OF SIGNIFICANCE THRESHOLDS

In order to assess the significance of a proposed project's environmental impacts it is necessary to identify quantitative or qualitative thresholds which, if exceeded, would constitute a finding of significance. As discussed above, while project-related GHG emissions can be estimated, the direct impacts of such emissions on climate change and global warming cannot be determined on the basis of available science. There is no evidence at this time that would indicate that the emissions from a project the size of the proposed Project would directly affect global climate change. The SCAQMD has adopted a quantitative GHG emission significance thresholds to assess direct impacts from industrial projects for which the SCAQMD is the lead agency. The SCAQMD and other air quality agencies concur that GHG and climate change should be evaluated as a potentially significant cumulative rather than project-specific impact.

AB 32 states, in part, that "[g]lobal warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California." Because global warming is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, global climate change is considered to be a significant cumulative impact. GHG emissions from the project would contribute to cumulative GHG emissions in California and to the potential adverse environmental impacts of climate change.

As previously discussed, the CEQA guidelines indicate that a project would potentially result in a significant impact on climate change if a project were to: a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, or b) conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Based on the analysis set forth above, for the purposes of this analysis, implementation of the proposed project may have a significant adverse impact on GHG emissions if it would result in any of the following:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance.
 - a. A potentially significant impact would occur if the project exceeds the SCAQMD's 3,000 MTCO₂e per year screening threshold. For purposes of this analysis, the 3,000 MTCO₂e per year screening threshold is used since it is the most conservative threshold under consideration by SCAQMD for a residential land use.
2. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.
 - a. Fail to show consistency with AB 32's Scoping Plan.

2.10 CITY OF NEWPORT BEACH 2006 GENERAL PLAN UPDATE FINAL PROGRAM EIR

Although climate change impacts due to greenhouse gas (GHG) emissions were not specifically evaluated as part of the Program EIR prepared in support of the City's 2006 General Plan Update, the General Plan EIR analyzed air quality impacts associated with buildout of the City, inclusive of carbon dioxide (CO₂) and other GHG emissions. The General Plan EIR also addressed vehicle emissions (both construction and operational) and operational emissions from energy consumption, which are the most common sources of greenhouse gas emissions.

As such, GHG emissions and the issue of global climate change (GCC) do not represent new information of substantial importance which was not known and could not have been known at the time that the General Plan EIR was certified. Information on the effect of GHG emissions on climate was known long before the City certified the General Plan EIR. GCC and GHG emissions were identified as

environmental issues since as early as 1978 when the U.S. Congress enacted the National Climate Program Act (Pub L 95-367, 92 Stat 601). In 1979 the National Research Council published "*Carbon Dioxide and Climate: A Scientific Assessment*," which concluded that climate change was an accelerating phenomenon partly due to human activity. Numerous studies conducted before and after the National Research Council report reached similar conclusions. Information also was widely published in a series of reports by the Intergovernmental Panel on Climate Change (IPPC) dating back to the 1990s, including IPPC's "2001 Third Assessment Report." In California, the State adopted legislation in 2002 requiring the California Air Resources Board to develop regulations limiting greenhouse gas emissions from automobiles. As such, information about GCC and GHG emissions was available with the exercise of reasonable diligence at the time the General Plan EIR was certified in 2006. During the public review period and public hearings associated with the General Plan EIR, no objections or concerns were raised regarding the EIR's analysis of GHG emissions, and no legal challenge was filed within the statute of limitations period established by Public Resources Code §21167(c). Similarly, no objections were raised on the topics of GHG emissions and GCC as part of Addendum No. 1 to the General Plan EIR in 2007. Based on CEQA case law²⁵ and CEQA Guidelines Section 15162(a)(3), the issue of project-related GHG emissions does not provide new information of substantial importance or substantial evidence of a new impact to the environment that was not or could not have been known at the time General Plan EIR was certified.

²⁵ *CREED v. City of San Diego* (2011), Super. Ct. No. 37-2009-00085307-CU-MC-CTL.

3.0 PROJECT GREENHOUSE GAS IMPACT

3.1 PROJECT RELATED GREENHOUSE GAS EMISSIONS

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

On February 3, 2011, the SCAQMD released the California Emissions Estimator Model (CALEEMOD) Emissions Inventory Model™. The purpose of this model is to more accurately calculate air quality and greenhouse gas (GHG) emissions from direct and indirect sources and quantify applicable air quality and GHG reductions achieved from mitigation measures. As such, the February 2011 CALEEMOD™ was used for this Project. The CalEEMod™ model includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water.

3.2 LIFE-CYCLE ANALYSIS

A full life-cycle analysis (LCA) is not included in this analysis due to the lack of consensus guidance on LCA methodology at this time.²⁶ Life-cycle analysis (i.e., assessing economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in the project development and infrastructure) depends on emission factors or econometric factors that are not well established for all processes. At this time a LCA would be extremely speculative and thus has not been prepared.

3.3 CONSTRUCTION EMISSIONS

Since no specific development project is proposed at this time and the exact location of proposed development is unknown, a calculation of GHG emissions that may be associated with future construction activities is not possible and is not provided in this analysis. Regardless, construction activities that may be associated with future residential development on the Project site would clearly fall within the scope of analysis provided in the General Plan EIR because the General Plan EIR anticipated the construction of 430 multi-family units within the NNCP, 15 multi-family units within Newport Center, and 79 hotel units at General Plan Anomaly Location 43. Therefore, the conversion of 79 hotel units to multi-family residential units and the conduct of construction activities to the specific location of San Joaquin Plaza represent the Project's only potential to create new construction-related greenhouse gas emission impacts because construction of the remaining 445 multi-family units in Newport Center were assumed and previously evaluated by the General Plan EIR.

The construction of 79 multi-family residential units instead of 79 hotel units would not represent any measurable difference in construction-related greenhouse gas emissions. The types of construction equipment, material use, and duration of construction activities would be very similar for hotel units or

²⁶ California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97*, December 2009.

multi-family units. Also, GHG contributions to GCC are cumulative in nature and thus the specific location of the emissions source, whether it be Newport Center generally or San Joaquin Plaza specifically, has no material bearing. Accordingly, future Project-related construction emissions of greenhouse gases would not represent new information of substantial importance which was not known and could not have been known at the time that the General Plan EIR was certified. There would be no new or more severe construction related GHG emissions impact than would otherwise occur with implementation of the City's General Plan, as analyzed in the General Plan EIR

3.4 OPERATIONAL EMISSIONS

As previously noted, the Applicant proposes an amendment to the NNCPC Development Plan to increase the allowable residential development intensity by 94 units and to assign those 94 units, along with 430 units already allocated to the NNCPC, to the portion of the NNCPC designated as San Joaquin Plaza. It should be noted that of the 94 units, 15 dwelling units are currently assigned to Newport Center and impacts from these dwelling units were accounted for by the General Plan EIR. The remaining 79 units consist of hotel units that would be converted to multi-family residential units.

In order to provide consistency with the traffic study, this analysis relates to the proposed increase of 94 dwelling units allowed within the San Joaquin Plaza (as is done for the traffic study), and represents a "worst case" (conservative) analysis since there would be no credit taken for the reduction of 79 hotel rooms or for the 15 units already allowed by the General Plan.

Operational activities associated with the proposed Project will result in emissions of CO₂, CH₄, and N₂O from the following primary sources:

- Building Energy Use
- Water Supply, Treatment and Distribution
- Solid Waste
- Mobile Source Emissions

3.4.1 BUILDING ENERGY USE

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO₂ and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. Unless otherwise noted, CalEEMod™ default parameters were used.

3.4.2 WATER SUPPLY, TREATMENT AND DISTRIBUTION

Indirect GHG emissions result from the production of electricity used to convey, treat and distribute water and wastewater. The amount of electricity required to convey, treat and distribute water depends on the volume of water as well as the sources of the water. Unless otherwise noted, CalEEMod™ default parameters were used.

3.4.3 SOLID WASTE

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

3.4.4 MOBILE SOURCE EMISSIONS

GHG emissions will also result from mobile sources associated with the Project. These mobile source emissions will result from the typical daily operation of motor vehicles by visitors, employees, and customers.

Project mobile source emissions are dependent on both overall daily vehicle trip generation. Trip characteristics available from the report, North Newport Center San Joaquin Plaza TPO Traffic Analysis (Stantec, May 2012) were utilized in this analysis.

3.5 EMISSIONS SUMMARY

The summary of annual operational GHG emissions from 94 dwelling units is reported in Table 3-1. The operational GHG emissions for the Project are estimated to be 935.04 MTCO₂e per year.

TABLE 3-1
TOTAL PROJECT GREENHOUSE GAS EMISSIONS (ANNUAL) (METRIC TONS PER YEAR)

Emission Source	Emissions (metric tons per year)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ E
Area Source Emissions	69.88	0.03	--	71.00
Energy	244.28	0.01	--	245.79
Mobile Sources	556.77	0.02	--	557.25
Waste	8.78	0.52	--	19.67
Water Usage	35.74	0.19	0.01	41.33
Total CO₂E (All Sources)		935.04		
Threshold MT CO₂E/Yr		3,000		
Significant?		NO		

Source: CalEEMod™ model output, See Appendix "A" for detailed model outputs.
Note: Totals obtained from CalEEMod™ and may not total 100% due to rounding.

3.6 GREENHOUSE GAS EMISSIONS FINDINGS AND RECOMMENDATIONS

FACTOR NO. 1: The extent to which the project may generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance.

Less Than Significant Impact. Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact. The State of California, through its governor and its legislature, has established a comprehensive framework for the substantial reduction of GHG emissions over the next 40-plus years. This will occur primarily through the implementation of Assembly Bill (AB 32) and Senate Bill (SB 375), which will address GHG emissions on a statewide cumulative basis.

GHG emissions generated by the project are associated with the new area sources (natural gas use, landscape equipment, etc.) from the new building structures, transportation emissions associated with vehicles traveling to and from the project site, and indirect emissions associated with purchased energy, energy associated with water (conveyance, treatment, distribution, and treatment of wastewater), and waste disposal. GHG emissions from project-related operational activities are included in Table 3-1.

The proposed project would generate approximately 935.04 metric tons (MTons) of GHG emissions per year. Currently, there are no adopted thresholds for GHG emissions for projects within the SCAQMD region. However, SCAQMD has convened a Working Group to identify GHG thresholds for use in the SoCAB. For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, SCAQMD requires an assessment of GHG emissions. SCAQMD is proposing a screening level threshold of 3,000 MTons annually for all land use types. This threshold is based on a review of the Governor's Office of Planning and Research database of CEQA projects. Based on their review, 90 percent of CEQA projects would exceed 3,000 MTons per year. Projects that exceed the screening threshold would require additional technical analysis to determine the level of significance. Because the GHG emissions associated with the project would be below the SCAQMD's proposed screening threshold, the proposed project's cumulative contribution to GHG emissions would be less than significant and would not comprise a new significant environmental effect. Additionally, because the Project's GHG emissions would be below SCAQMD's screening threshold, the Project's GHG emissions would not represent a significant increase as compared to the level of GHG emissions that would otherwise occur from implementation of the City's General Plan. In conclusion, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as analyzed in the General Plan EIR. No mitigation measures are necessary.

FACTOR NO. 2: The extent to which the project may conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

No Impact. CARB adopted the Scoping Plan on December 11, 2008. The Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target established by AB 32, which is 1990 levels by year 2020. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard (LCFS), California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the corporate average fuel economy (CAFE) standards, and other early action measures would ensure the state is on target to achieve the GHG emissions reduction goals of AB 32. The project's GHG emissions would be further reduced from compliance with these statewide measures.

The state of California recently adopted the 2008 Building and Energy Efficiency Standards and the 2010 Green Building Code, which require a greater degree of energy efficiency than the 2005 version of the state building code that was in effect when the General Plan EIR was certified in 2006. Although no specific development project is proposed at San Joaquin Plaza at this time, future construction activities would be required to comply with all applicable building codes. Currently, development activities are required to achieve the energy efficiency standards of the 2008 Building and Energy Efficiency Standards. The 2008 Standard is 15 percent more energy efficient compared to the 2005 Building and Energy Efficiency Standards. CARB and the EPA have also adopted new fuel efficiency standards for model years 2012 through 2016. The Scoping Plan also calls for more stringent fuel efficiency standards model years 2016 through 2020 under Pavley II. Because the proposed project would not exceed the SCAQMD's proposed screening threshold for GHG emissions and residential development in San Joaquin Plaza would be required to achieve efficiency standards mandated as part of the state building code in effect at the time of future construction, the proposed project would not have the potential to interfere with the State of California's ability to achieve GHG reduction goals and strategies. Furthermore, the proposed Project would result in fewer GHG emissions than would have been assumed in the General Plan EIR since the 2008 efficiency standards and other statewide measures to reduce GHG emissions were not in place at the time the General Plan EIR was certified.

Various characteristics of the Project serve to render its contribution to GCC less than cumulatively considerable. One of the main issues raised by those concerned about the effect of greenhouse gases on climate change is that "leap frog"-type development would potentially increase the number of vehicle miles traveled and consequently increase vehicular emissions (i.e., CO₂ that contribute to greenhouse gases). The Project is an infill, mixed use development in an urbanized setting thereby providing opportunities to reduce vehicle trips.

In conclusion, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the General Plan EIR.

3.7 REQUIREMENTS

The issue of GHG emissions was not previously evaluated in the General Plan EIR; as such, no mitigation measures specifically related to GHG emissions was identified in the General Plan EIR. However, the General Plan includes several policies that would serve to reduce GHG emissions, including, but not limited to, the following Policies: LU 6.4.6 (Approaches for a Livable Neighborhood); LU 6.15.19 (Walkable Streets); LU 6.15.20 (Connected Streets); NR 6.1 (Walkable Neighborhoods); NR 6.2 (Mixed-Use Development); NR 6.3 (Vehicle-Trip Reduction Measures); NR 6.4 (Transportation Demand Management Ordinance); NR 6.5 (Local Transit Agency Collaboration); NR 6.6 (Traffic Signal Synchronization); NR 6.7 (City Fleet Vehicles); NR 6.8 (Accessible Alternative Fuel Infrastructure); NR 6.9 (Education on Mobile Source Emission Reduction Techniques); NR 7.1 (Fuel Efficient Equipment); NR 7.2 (Source Emission Reduction Best Management Practices); NR 7.3 (Incentives for Air Pollution Reduction); NR 7.4 (Use of Blowers); NR 8.1 (Construction Equipment); NR 8.2 (Maintenance of Construction Equipment); NR 8.3 (Construction Equipment Operation); NR 9.1 (Efficient Airport Operations); NR 9.2 (Aircraft and Equipment Emission Reduction); CE 1.1.1 (Comprehensive Transportation System); CE 1.2.2 (Shuttle Service); CE 1.2.4 (Public Transit); CE 4.1.1 (Public Transit Efficiency); CE 4.1.4 (Land Use Densities Supporting Public Transit); CE 4.1.5 (Airport Shuttles); CE 4.1.6 (Transit Support Facilities); CE 5.1.1 (Trail System); CE 5.1.2 (Pedestrian Connectivity); CE 5.1.3 (Pedestrian Improvements in New Development Projects); CE 5.1.4 (Linkages to Citywide Trail System and Neighborhoods); CE 5.1.5 (Bikeway System); CE 5.1.6 (Bicycle Supporting Facilities); CE 5.1.9 (Integrated Bicycle Improvements); CE 5.1.11 (School Access); CE 5.1.12 (Pedestrian Street Crossings); CE 5.1.14 (Newport Harbor Trails and Walkways); CE 6.1.1 (Traffic Signals); CE 6.1.2 (Intelligent Transportation Systems); CE 6.2.1 (Alternative Transportation Modes); CE 6.2.2 (Support Facilities for Alternative Modes); and CE 6.2.3 (Project Site Design Supporting Alternative Modes).

Additionally, and although the Project will not result in a new significant GHG impact or increase the level of GHG emissions that would otherwise occur from buildout of the City's General Plan, the Project would be required to comply with all mandatory regulatory requirements imposed by the State of California and the South Coast Air Quality Management District aimed at the reduction of air quality emissions. Those that are particularly applicable to the Project and that would assist in the reduction of greenhouse gas emissions are:

- Global Warming Solutions Act of 2006 (AB32)
- Regional GHG Emissions Reduction Targets/Sustainable Communities Strategies (SB 375)
- Pavely Fuel Efficiency Standards (AB1493). Establishes fuel efficiency ratings for new vehicles.
- Title 24 California Code of Regulations (California Building Code). Establishes energy efficiency requirements for new construction.

- Title 20 California Code of Regulations (Appliance Energy Efficiency Standards). Establishes energy efficiency requirements for appliances.
- Title 17 California Code of Regulations (Low Carbon Fuel Standard). Requires carbon content of fuel sold in California to be 10% less by 2020.
- California Water Conservation in Landscaping Act of 2006 (AB1881). Requires local agencies to adopt the Department of Water Resources updated Water Efficient Landscape Ordinance or equivalent by January 1, 2010 to ensure efficient landscapes in new development and reduced water waste in existing landscapes.
- Statewide Retail Provider Emissions Performance Standards (SB 1368). Requires energy generators to achieve performance standards for GHG emissions.
- Renewable Portfolio Standards (SB 1078). Requires electric corporations to increase the amount of energy obtained from eligible renewable energy resources to 20 percent by 2010 and 33 percent by 2020.

3.8 CONSTRUCTION ACTIVITY RECOMMENDED MITIGATION MEASURES

No significant impacts were identified and no mitigation measures are required.

3.9 OPERATIONAL ACTIVITY RECOMMENDED MITIGATION MEASURES

No significant impacts were identified and no mitigation measures are required.

4.0 REFERENCES

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APPENDIX A

GHG Emissions Calculations

North Newport Center Planned Community Amendment Orange County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric
Condo/Townhouse High Rise	94	Dwelling Unit

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Utility Company	Southern California Edison
Climate Zone	8	Precipitation Freq (Days)	30		

1.3 User Entered Comments

Project Characteristics -

Land Use -

Construction Phase -

Off-road Equipment - the project does not require emissions for the construction phase

Trips and VMT - the project does not require emissions for the construction phase

Vehicle Trips - trip rate data was sourced from Trip Generation 8th Edition, Institute of Transportation Engineers (ITE 232)

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2011	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2011	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.73	0.02	2.04	0.00		0.00	0.10		0.00	0.10	9.98	59.90	69.88	0.03	0.00	71.00
Energy	0.01	0.11	0.05	0.00		0.00	0.01		0.00	0.01	0.00	244.28	244.28	0.01	0.00	245.79
Mobile	0.33	0.61	3.23	0.01	0.70	0.03	0.73	0.03	0.03	0.06	0.00	556.77	556.77	0.02	0.00	557.25
Waste						0.00	0.00		0.00	0.00	8.78	0.00	8.78	0.52	0.00	19.67
Water						0.00	0.00		0.00	0.00	0.00	35.74	35.74	0.19	0.01	41.33
Total	1.07	0.74	5.32	0.01	0.70	0.03	0.84	0.03	0.03	0.17	18.76	896.69	915.45	0.77	0.01	935.04

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.73	0.02	2.04	0.00		0.00	0.10		0.00	0.10	9.98	59.90	69.88	0.03	0.00	71.00
Energy	0.01	0.11	0.05	0.00		0.00	0.01		0.00	0.01	0.00	244.28	244.28	0.01	0.00	245.79
Mobile	0.33	0.61	3.23	0.01	0.70	0.03	0.73	0.03	0.03	0.06	0.00	556.77	556.77	0.02	0.00	557.25
Waste						0.00	0.00		0.00	0.00	8.78	0.00	8.78	0.52	0.00	19.67
Water						0.00	0.00		0.00	0.00	0.00	35.74	35.74	0.19	0.01	41.33
Total	1.07	0.74	5.32	0.01	0.70	0.03	0.84	0.03	0.03	0.17	18.76	896.69	915.45	0.77	0.01	935.04

3.0 Construction Detail

3.1 Mitigation Measures Construction

3.2 Demolition - 2011

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	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.2 Demolition - 2011

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	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00		0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

4.0 Mobile Detail

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	0.33	0.61	3.23	0.01	0.70	0.03	0.73	0.03	0.03	0.06	0.00	556.77	556.77	0.02	0.00	557.25
Unmitigated	0.33	0.61	3.23	0.01	0.70	0.03	0.73	0.03	0.03	0.06	0.00	556.77	556.77	0.02	0.00	557.25
Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Condo/Townhouse High Rise	392.92	405.14	322.42	1,280,920	1,280,920
Total	392.92	405.14	322.42	1,280,920	1,280,920

4.3 Trip Type Information

Land Use	Miles			Trip %		
	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
Condo/Townhouse High Rise	12.70	7.00	9.50	40.20	19.20	40.60

5.0 Energy Detail

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						0.00	0.00		0.00	0.00	0.00	115.76	115.76	0.01	0.00	116.48
Electricity Unmitigated						0.00	0.00		0.00	0.00	0.00	115.76	115.76	0.01	0.00	116.48
NaturalGas Mitigated	0.01	0.11	0.05	0.00		0.00	0.01		0.00	0.01	0.00	128.52	128.52	0.00	0.00	129.30
NaturalGas Unmitigated	0.01	0.11	0.05	0.00		0.00	0.01		0.00	0.01	0.00	128.52	128.52	0.00	0.00	129.30
Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU	tons/yr										MT/yr					
Condo/Townhouse High Rise	2.4084e+006	0.01	0.11	0.05	0.00		0.00	0.01		0.00	0.01	0.00	128.52	128.52	0.00	0.00	129.30
Total		0.01	0.11	0.05	0.00		0.00	0.01		0.00	0.01	0.00	128.52	128.52	0.00	0.00	129.30

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU	tons/yr										MT/yr					
Condo/Townhouse High Rise	2.4084e+006	0.01	0.11	0.05	0.00		0.00	0.01		0.00	0.01	0.00	128.52	128.52	0.00	0.00	129.30
Total		0.01	0.11	0.05	0.00		0.00	0.01		0.00	0.01	0.00	128.52	128.52	0.00	0.00	129.30

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
Condo/Townhouse High Rise	397969					115.76	0.01	0.00	116.48
Total						115.76	0.01	0.00	116.48

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	kWh	tons/yr				MT/yr			
Condo/Townhouse High Rise	397969					115.76	0.01	0.00	116.48
Total						115.76	0.01	0.00	116.48

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	0.73	0.02	2.04	0.00		0.00	0.10		0.00	0.10	9.98	59.90	69.88	0.03	0.00	71.00
Unmitigated	0.73	0.02	2.04	0.00		0.00	0.10		0.00	0.10	9.98	59.90	69.88	0.03	0.00	71.00
Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

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	0.04					0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Consumer Products	0.34					0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hearth	0.31	0.01	0.59	0.00		0.00	0.09		0.00	0.09	9.98	57.56	67.55	0.03	0.00	68.61
Landscaping	0.05	0.02	1.45	0.00		0.00	0.01		0.00	0.01	0.00	2.34	2.34	0.00	0.00	2.39
Total	0.74	0.03	2.04	0.00		0.00	0.10		0.00	0.10	9.98	59.90	69.89	0.03	0.00	71.00

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	0.04					0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Consumer Products	0.34					0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hearth	0.31	0.01	0.59	0.00		0.00	0.09		0.00	0.09	9.98	57.56	67.55	0.03	0.00	68.61
Landscaping	0.05	0.02	1.45	0.00		0.00	0.01		0.00	0.01	0.00	2.34	2.34	0.00	0.00	2.39
Total	0.74	0.03	2.04	0.00		0.00	0.10		0.00	0.10	9.98	59.90	69.89	0.03	0.00	71.00

7.0 Water Detail

7.1 Mitigation Measures Water

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr				MT/yr			
Mitigated					35.74	0.19	0.01	41.33
Unmitigated					35.74	0.19	0.01	41.33
Total	NA	NA	NA	NA	NA	NA	NA	NA

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	tons/yr				MT/yr			
Condo/Townhouse / High Rise	6.12448 / 3.86108					35.74	0.19	0.01	41.33
Total						35.74	0.19	0.01	41.33

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	tons/yr				MT/yr			
Condo/Townhouse / High Rise	6.12448 / 3.86108					35.74	0.19	0.01	41.33
Total						35.74	0.19	0.01	41.33

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
	tons/yr				MT/yr			
Mitigated					8.78	0.52	0.00	19.67
Unmitigated					8.78	0.52	0.00	19.67
Total	NA	NA	NA	NA	NA	NA	NA	NA

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	tons	tons/yr				MT/yr			
Condo/Townhouse High Rise	43.24					8.78	0.52	0.00	19.67
Total						8.78	0.52	0.00	19.67

Mitigated

	Waste Disposed	ROG	NOx	CO	SO2	Total CO2	CH4	N2O	CO2e
Land Use	tons	tons/yr				MT/yr			
Condo/Townhouse High Rise	43.24					8.78	0.52	0.00	19.67
Total						8.78	0.52	0.00	19.67

9.0 Vegetation
