

## 3.7 GREENHOUSE GAS EMISSIONS

This section evaluates the potential greenhouse gas (GHG) emission impacts that would be generated by construction and operation of the Potrero Logistics Center Warehouse Project (Project). The ambient GHG of the local and regional area is described, along with relevant Federal, State, and local air pollutant regulations. A site specific GHG assessment including emission modeling results for the Project are provided in **Appendix G: Greenhouse Gas Emissions Assessment**.

### 3.7.1 ENVIRONMENTAL SETTING

#### GREENHOUSE GASES AND CLIMATE CHANGE

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

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

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

atmosphere.<sup>1</sup> **Table 3.7-1: Description of Greenhouse Gases**, describes the primary GHGs attributed to global climate change, including their physical properties.

**Table 3.7-1: Description of Greenhouse Gases**

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

<sup>1</sup> Intergovernmental Panel on Climate Change, *Carbon and Other Biogeochemical Cycles*. In: *Climate Change 2013: The Physical Science Basis, Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2013. <https://www.ipcc.ch/report/ar5/wg1/>.

Greenhouse Gas	Description
Nitrogen Trifluoride (NF <sub>3</sub> )	NF <sub>3</sub> was added to Health and Safety Code section 38505(g)(7) as a GHG of concern. This gas is used in electronics manufacture for semiconductors and liquid crystal displays. It has a high global warming potential of 17,200.
Source: Compiled from U.S. EPA, <i>Overview of Greenhouse Gases</i> , ( <a href="https://www.epa.gov/ghgemissions/overview-greenhouse-gases">https://www.epa.gov/ghgemissions/overview-greenhouse-gases</a> ), accessed 2-5-2020; U.S. EPA, <i>Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016</i> , 2018; Intergovernmental Panel on Climate Change, <i>Climate Change 2007: The Physical Science Basis</i> , 2007; National Research Council, <i>Advancing the Science of Climate Change</i> , 2010; U.S. EPA, <i>Methane and Nitrous Oxide Emission from Natural Sources</i> , April 2010.	

## 3.7.2 REGULATORY SETTING

### FEDERAL

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

#### Energy Independence and Security Act of 2007

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

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

#### U.S. Environmental Protection Agency Endangerment Finding

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

## Federal Vehicle Standards

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

In 2010, an Executive Memorandum was issued directing the Department of Transportation, Department of Energy, U.S. EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the U.S. EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO<sub>2</sub> in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 mpg if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021, and NHTSA intends to set standards for model years 2022–2025 in a future rulemaking. On January 12, 2017, the U.S. EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks. It should be noted that the U.S. EPA is currently proposing to freeze the vehicle fuel efficiency standards at their planned 2020 level (37 mpg), canceling any future strengthening (currently 54.5 mpg by 2026).

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

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

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

vehicles and light duty trucks, covering model years 2021-2026. The U.S. EPA is currently reconsidering the SAFE rule.

## STATE

### California Air Resources Board

The California Air Resources Board (CARB) is responsible for the coordination and oversight of State and local air pollution control programs in California. Various statewide and local initiatives to reduce California's contribution to GHG emissions have raised awareness about climate change and its potential for severe long-term adverse environmental, social, and economic effects. California is a significant emitter of CO<sub>2</sub> equivalents (CO<sub>2</sub>e) in the world and produced 459 million gross metric tons of CO<sub>2</sub>e in 2013. In the State, the transportation sector is the largest emitter of GHGs, followed by industrial operations such as manufacturing and oil and gas extraction.

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation, such as the landmark Assembly Bill (AB) 32, *California Global Warming Solutions Act of 2006*, was specifically enacted to address GHG emissions. Other legislation, such as Title 24 building efficiency standards and Title 20 appliance energy standards, were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions. This section describes the major provisions of the legislation.

#### ***Assembly Bill 32 (California Global Warming Solutions Act of 2006)***

AB 32 was codified in § 38500 of Division 25.5 in the Health and Safety Code and instructs CARB to develop and enforce regulations for the reporting and verification of statewide GHG emissions. AB 32 also directed CARB to set a GHG emissions limit based on 1990 levels, to be achieved by 2020. It set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

#### ***CARB Scoping Plan***

CARB adopted the Scoping Plan to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that would be adopted to reduce California's GHG emissions. CARB determined that achieving the 1990 emissions level would require a reduction of GHG emissions of approximately 29 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as "business-as-usual").<sup>2</sup> The Scoping Plan evaluates opportunities for sector-specific reductions, integrates early actions and additional GHG reduction measures by both CARB and the State's Climate Action Team, identifies additional measures to be pursued as regulations, and outlines the adopted role of a cap-and-trade program.<sup>3</sup> Additional development of these measures and adoption

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<sup>2</sup> CARB defines business-as-usual (BAU) in its Scoping Plan as emissions levels that would occur if California continued to grow and add new GHG emissions but did not adopt any measures to reduce emissions. Projections for each emission-generating sector were compiled and used to estimate emissions for 2020 based on 2002–2004 emissions intensities. Under CARB's definition of BAU, new growth is assumed to have the same carbon intensities as was typical from 2002 through 2004.

<sup>3</sup> The Climate Action Team, led by the secretary of the California Environmental Protection Agency, is a group of State agency secretaries and heads of agencies, boards, and departments. Team members work to coordinate statewide efforts to implement global warming emissions reduction programs and the State's Climate Adaptation Strategy.

of the appropriate regulations occurred through the end of 2013. Key elements of the Scoping Plan include:

- Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards.
- Achieving a statewide renewables energy mix of 33 percent by 2020.
- Developing a California cap-and-trade program that links with other programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions (adopted in 2011).
- Establishing targets for transportation-related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets (several sustainable community strategies have been adopted).
- Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, heavy-duty truck measures, the Low Carbon Fuel Standard (amendments to the Pavley Standard adopted 2009; Advanced Clean Car standard adopted 2012), goods movement measures, and the Low Carbon Fuel Standard (adopted 2009).
- Creating targeted fees, including a public goods charge on water use, fees on gases with high global warming potential, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.
- The California Sustainable Freight Action Plan was developed in 2016 and provides a vision for California's transition to a more efficient, more economically competitive, and less polluting freight transport system. This transition of California's freight transport system is essential to supporting the State's economic development in coming decades while reducing pollution.
- CARB's Mobile Source Strategy demonstrates how the State can simultaneously meet air quality standards, achieve GHG emission reduction targets, decrease health risk from transportation emissions, and reduce petroleum consumption over the next 15 years. The mobile Source Strategy includes increasing zero emission vehicle (ZEV) buses and trucks.

In 2012, CARB released revised estimates of the expected 2020 emissions reductions. The revised analysis relied on emissions projections updated in light of current economic forecasts that accounted for the economic downturn since 2008, reduction measures already approved and put in place relating to future fuel and energy demand, and other factors. This update reduced the projected 2020 emissions from 596 million metric tons of CO<sub>2</sub>e (MMT<sub>CO<sub>2</sub>e</sub>) to 545 MMT<sub>CO<sub>2</sub>e</sub>. The reduction in forecasted 2020 emissions means that the revised business-as-usual reduction necessary to achieve AB 32's goal of reaching 1990 levels by 2020 is now 21.7 percent, down from 29 percent. CARB also provided a lower 2020 inventory forecast that incorporated State-led GHG emissions reduction measures already in place. When this lower forecast is considered, the necessary reduction from business-as-usual needed to achieve the goals of AB 32 is approximately 16 percent.

CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan summarizes the most recent science related to climate change, including anticipated impacts to California and the levels of GHG emissions reductions necessary to likely avoid risking irreparable damage. It

identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32.

In 2016, the Legislature passed Senate Bill (SB) 32, which codifies a 2030 GHG emissions reduction target of 40 percent below 1990 levels. With SB 32, the Legislature passed companion legislation, AB 197, which provides additional direction for developing the Scoping Plan. On December 14, 2017, CARB adopted a second update to the Scoping Plan.<sup>4</sup> The 2017 Scoping Plan details how the State will reduce GHG emissions to meet the 2030 target set by Executive Order B-30-15 and codified by SB 32. Other objectives listed in the 2017 Scoping plan are to provide direct GHG emissions reductions; support climate investment in disadvantaged communities; and, support the Clean Power Plan and other Federal actions.

### ***Health & Safety Code § 38566, SB 32 (California Global Warming Solutions Act of 2006: Emissions Limit)***

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

### ***SB 375 (The Sustainable Communities and Climate Protection Act of 2008)***

Signed into law on September 30, 2008, SB 375 provides a process to coordinate land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction goals established by AB 32. SB 375 requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, aligns planning for transportation and housing, and creates specified incentives for the implementation of the strategies.

### ***AB 1493 (Pavley Regulations and Fuel Efficiency Standards)***

AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the U.S. EPA's denial of an implementation waiver. The U.S. EPA subsequently granted the requested waiver in 2009, which was upheld by the by the U.S. District Court for the District of Columbia in 2011. The regulations establish one set of emission standards for model years 2009–2016 and a second set of emissions standards for model years 2017 to 2025. By 2025, when all rules will be fully implemented, new automobiles will emit 34 percent fewer CO<sub>2</sub>e emissions and 75 percent fewer smog-forming emissions.

### ***SB 1368 (Emission Performance Standards)***

SB 1368 is the companion bill of AB 32, which directs the California Public Utilities Commission (CPUC) to adopt a performance standard for GHG emissions for the future power purchases of California utilities. SB 1368 limits carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed the emissions of a relatively clean, combined-cycle natural gas power plant. The new law effectively prevents California's

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<sup>4</sup> California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, [https://www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf). Accessed May 9, 2018.

utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. The CPUC adopted the regulations required by SB 1368 on August 29, 2007. The regulations implementing SB 1368 establish a standard for baseload generation owned by, or under long-term contract to publicly owned utilities, for 1,100 pounds of CO<sub>2</sub> per megawatt-hour.

### ***SB 1078 and SBX1-2 (Renewable Electricity Standards)***

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

### ***SB 350 (Clean Energy and Pollution Reduction Act of 2015)***

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

### ***AB 398 (Market-Based Compliance Mechanisms)***

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

### ***SB 150 (Regional Transportation Plans)***

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



### ***SB 100 (California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases)***

Signed into Law in September 2018, SB 100 increased California’s renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

### ***Executive Orders Related to GHG Emissions***

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

#### ***Executive Order S-3-05***

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

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

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

#### ***Executive Order S-01-07***

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

#### ***Executive Order S-13-08***

Issued on November 14, 2008, Executive Order S-13-08 facilitated the California Natural Resources Agency development of the 2009 California Climate Adaptation Strategy. Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

#### ***Executive Order S-14-08***

Issued on November 17, 2008, Executive Order S-14-08 expands the State’s Renewable Energy Standard to 33 percent renewable power by 2020. Additionally, Executive Order S-21-09 (signed on September 15, 2009) directs CARB to adopt regulations requiring 33 percent of electricity sold in the State come from renewable energy by 2020. CARB adopted the Renewable Electricity Standard on September 23, 2010, which requires 33 percent renewable energy by 2020 for most publicly-owned electricity retailers.

### *Executive Order S-21-09*

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

### *Executive Order B-30-15*

Issued on April 29, 2015, Executive Order B-30-15 established a California GHG reduction target of 40 percent below 1990 levels by 2030 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of CO<sub>2</sub>e (MMTCO<sub>2</sub>e). The 2030 target acts as an interim goal on the way to achieving reductions of 80 percent below 1990 levels by 2050, a goal set by Executive Order S-3-05. The executive order also requires the State's climate adaptation plan to be updated every three years and for the State to continue its climate change research program, among other provisions. With the enactment of SB 32 in 2016, the Legislature codified the goal of reducing GHG emissions by 2030 to 40 percent below 1990 levels.

### *Executive Order B-55-18*

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

## ***California Regulations and Building Codes***

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

### *Title 20 Appliance Efficiency Regulations*

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

### *Title 24 Building Energy Efficiency Standards*

California's Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6), was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy-efficient technologies and methods. Energy-efficient buildings require less electricity; therefore, increased

energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2016 Building Energy Efficiency Standards approved on January 19, 2016 went into effect on January 1, 2017. The 2019 Building Energy Efficiency Standards were adopted on May 9, 2018 and took effect on January 1, 2020. Under the 2019 standards, homes will use about 53 percent less energy and nonresidential buildings will use about 30 percent less energy than buildings under the 2016 standards.

### *Title 24 California Green Building Standards Code*

The California Green Building Standards Code (CCR Title 24, Part 11) commonly referred to as the CALGreen Code, is a statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. The CALGreen standards require new residential and commercial buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code went into effect January 1, 2017. Updates to the 2016 CALGreen Code took effect on January 1, 2020 (2019 CALGreen). The 2019 CALGreen standards continue to improve upon the existing standards for new construction of, and additions and alterations to, residential and nonresidential buildings.

## **REGIONAL**

### **South Coast Air Quality Management District**

The South Coast Air Quality Management District (SCAQMD) formed a GHG California Environmental Quality Act (CEQA) Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. This working group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research, CARB, the Attorney General's Office, a variety of city and county planning departments in the South Coast Air Basin (SCAB), various utilities such as sanitation and power companies throughout the SCAB, industry groups, and environmental and professional organizations. The Working Group has proposed a tiered approach to evaluating GHG emissions for development projects where SCAQMD is not the lead agency, wherein projects are evaluated sequentially through a series of "tiers" to determine whether the project is likely to result in a potentially significant impact due to GHG emissions. With the tiered approach, a project is compared against the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact.

Tier 4 consists of three decision tree options. Under the Tier 4 first option, SCAQMD initially outlined that a project would be excluded if design features and/or mitigation measures resulted in emissions 30 percent lower than business as usual emissions. However, the Working Group did not provide a

recommendation for this approach. The Working Group folded the Tier 4 second option into the third option. Under the Tier 4 third option, a project would be excluded if it was below an efficiency-based threshold of 4.8 MTCO<sub>2</sub>e per service population per year. Tier 5 would exclude projects that implement off-site mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

### *Tier 3 Screening Thresholds*

When the tiered approach is applied to a proposed Project, and the Project is found not to comply with Tier 1 or Tier 2, the project's emissions are compared against a screening threshold, as described above, for Tier 3. The screening threshold formally adopted by SCAQMD is an "interim" screening threshold for stationary source industrial projects where the SCAQMD is the lead agency under CEQA. The threshold was termed "interim" because, at the time, SCAQMD anticipated that CARB would be adopting a statewide significance threshold that would inform and provide guidance to SCAQMD in its adoption of a final threshold. However, no statewide threshold was ever adopted and the interim threshold remains in effect.

For projects for which SCAQMD is not a lead agency, no screening thresholds have been formally adopted. However, the SCAQMD Working Group has recommended a threshold of 10,000 MTCO<sub>2</sub>e/year for industrial projects and 3,000 MTCO<sub>2</sub>e/year for residential and commercial projects. SCAQMD determined that these thresholds would "capture" 90 percent of GHG emissions from these sectors, "capture" meaning that 90 percent of total emissions from all new projects would be subject to some type of CEQA analysis (i.e., found potentially significant).<sup>5</sup>

## **Southern California Association of Governments**

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted *Connect SoCal (2020 - 2045 Regional Transportation Plan/ Sustainable Communities Strategy [RTP/SCS])*. The RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The strategy was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The RTP/SCS is a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals. The SCAG region strives toward sustainability through integrated land use and transportation planning. The SCAG region must achieve specific federal air quality standards and is required by state law to lower regional GHG emissions.

## **LOCAL**

### **City of Beaumont Climate Action Plan**

The goal of the City of Beaumont Climate Action Plan (CAP) *Sustainable Beaumont: The City's Roadmap to Greenhouse Gas Reductions* is to provide a more livable, equitable, economically vibrant community

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<sup>5</sup> SCAQMD, "Staff Report: Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans," December 5, 2008, Attachment E: "Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold," October 2008, p. 3-2.

through the incorporation of energy efficiency features and reduction of GHG emissions. The CAP goals, measures, and actions applicable to the Project include the following:

**Goal 4: Increase Energy Efficiency in New Commercial Development**

Measure 4.1: Encourage or require energy efficiency standards exceeding state requirements

Actions:

- Educate City staff, developers, etc., on future Title 24 updates and the additional energy efficiency opportunities for new commercial development
- Promote Tier 1, Tier 2, Green Building Ratings such as LEED, Build It Green/Green Point Rating System, or EnergyStar certified buildings
- By 2030 consider establishing online permitting to facilitate upgrades
- Create an Energy award program for net-zero-net energy homes

**Goal 5: Increase Energy Efficiency Through Water Efficiency**

Measure 5.1: Support water efficiency through enhanced implementation of SB X7-7

Actions:

- Require low-irrigation landscaping

Measure 5.2: Exceed water efficiency standards

Actions:

- Staff time dedicated to work with HOAs, businesses, and other groups for outreach
- Allow recycled or grey water uses for non-municipal uses
- Work with Water District to increase recycled water potential
- Promote rainwater harvesting rebates and demonstrations

**Goal 7: Decrease GHG Emissions Through Reducing Vehicle Miles Traveled**

Measure 7.4: Promote ride sharing programs within businesses

Actions:

- Promote ridesharing and facilitate air district incentives for ride sharing
- Require businesses of a certain size to have facilities (bike racks, showers, etc.)

Measure 7.5: Electrify the Fleet

Actions:

- Work with Community groups and business to install e-chargers
- Require or incentivize new commercial development to install e-chargers

### 3.7.3 STANDARDS OF SIGNIFICANCE

#### THRESHOLD AND SIGNIFICANCE CRITERIA

Addressing GHG emissions generation impacts requires an agency to determine what constitutes a significant impact. The amendments to the CEQA Guidelines specifically allow lead agencies to determine

thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency is left to determine whether a project's GHG emissions will have a "significant" impact on the environment. The guidelines direct that agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissions.<sup>6</sup>

State CEQA Guidelines Appendix G contains the Environmental Checklist Form, which includes questions concerning GHGs. The questions presented in the Environmental Checklist Form have been utilized as significance criteria in this section:

- a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance; or
- b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

The City of Beaumont has not adopted project-specific GHG emissions significance thresholds, and instead relies on SCAQMD's recommended Tier 3 screening thresholds to determine the significance of a project's GHG emissions. Although this Project proposes an industrial warehouse, the considerable majority of GHG emissions generated in relation to the project would result from mobile truck emissions, and not stationary industrial sources. Therefore, to provide the most conservative analysis, the City will apply the 3,000 MTCO<sub>2</sub>e/year screening threshold recommended by SCAQMD for residential and commercial projects, the emissions of which primarily are the result of mobile, and not stationary, sources.

## METHODOLOGY

Global climate change is, by definition, a cumulative impact of GHG emissions. Therefore, there is no project-level analysis. The baseline against which to compare potential impacts of the project includes the natural and anthropogenic drivers of global climate change, including world-wide GHG emissions from human activities which almost doubled between 1970 and 2010 from approximately 27 gigatonnes (Gt) of CO<sub>2</sub>/year to nearly 49 GtCO<sub>2</sub>/year.<sup>7</sup> As such, the geographic extent of climate change and GHG emissions' cumulative impact discussion is worldwide.

The Project's construction and operational emissions were calculated using the California Emissions Estimator Model version 2016.3.2 (CalEEMod). Details of the modeling assumptions and emission factors are provided in **Appendix G** of this EIR. For construction, CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecasted based on the proposed construction schedule and applying the mobile-source and fugitive dust emissions factors derived from CalEEMod. The Project's construction-related GHG emissions would be generated from off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. The Project's operations-related GHG emissions would be generated by vehicular traffic, area sources (e.g., landscaping maintenance, consumer

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<sup>6</sup> 14 California Code of Regulations, Section 15064.4a

<sup>7</sup> Intergovernmental Panel on Climate Change, Climate Change 2014 Mitigation of Climate Change Working Group III Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, 2014.

products), electrical generation, natural gas consumption, water supply and wastewater treatment, and solid waste.

It should be noted that CalEEMod emission factors incorporate compliance with some, but not all, applicable rules and regulations regarding energy efficiency and vehicle fuel efficiency, and other GHG reduction policies, as described in the CalEEMod User's Guide (November 2017). For example, RPS is not accounted for in the current version of CalEEMod. Reductions from RPS are addressed by revising the electricity emission intensity factor in CalEEMod to account for the utility complying with the 33 percent renewable mandate by 2020. As of 2019, Southern California Edison's (SCE) power mix was at 35 percent renewable energy<sup>8</sup> and will be required to achieve the 60 percent renewable energy goal by 2030 established by SB 100. The CalEEMod carbon intensity factor was adjusted within the model to represent SCE's current emissions rate.

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

The 2019 Building Energy Efficiency Standards (adopted on May 9, 2018) took effect on January 1, 2020. Under the 2019 standards, homes would use about 53 percent less energy and nonresidential buildings would use about 30 percent less energy than buildings under the 2016 standards. Adjustments were made for PDFs that would reduce GHG emissions.

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

### 3.7.4 PROJECT IMPACTS AND MITIGATION MEASURES

***Impact 3.7-1: Would the Project generate GHG emissions, either directly or indirectly, that could have a significant impact on the environment?***

***Level of Significance: Significant and Unavoidable Impact***

### SHORT-TERM CONSTRUCTION GREENHOUSE GAS EMISSIONS

The Project would result in direct emissions of GHGs from construction. The approximate quantity of daily GHG emissions generated by construction equipment utilized to build the Project is depicted in **Table 3.7-2: Construction-Related Greenhouse Gas Emissions.**

<sup>8</sup> California Energy Commission, 2019 Power Content Label, October 2020.

**Table 3.7-2: Construction-Related Greenhouse Gas Emissions.**

Category	MTCO <sub>2</sub> e
Construction	1,428
30-Year Amortized Construction	47.60

Source: CalEEMod version 2016.3.2. Refer to *Appendix G* for model outputs.

As shown, the Project would result in the generation of approximately 1,428 MTCO<sub>2</sub>e over the course of construction. Once construction is complete, the generation of these GHG emissions would cease. Construction GHG emissions are typically summed and amortized over a 30-year period and then added to annual operational emissions.<sup>9</sup> The amortized Project construction emissions would be 47.6 MTCO<sub>2</sub>e per year.

### LONG-TERM OPERATIONAL GREENHOUSE GAS EMISSIONS

Operational or long-term emissions occur over the life of the Project. GHG emissions would result from direct emissions such as Project generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, the emissions associated with solid waste generated from the Project, and any fugitive refrigerants from air conditioning or refrigerators.

Several PDFs and standard conditions of approval applicable to the Project would help to reduce GHG emissions. Some of the PDFs included to reduce energy consumption also would reduce GHG emissions. PDFs that would directly result in a reduction of GHG emissions include the following:

- Buildings will be designed to provide CALGreen Standards with Leadership in Energy and Environmental Design (LEED) features for potential certification and will employ energy and water conservation measures in accordance with such standards. This includes design considerations related to the building envelope; heating, ventilating, and air conditioning; lighting; and power systems;
- Surface parking lots will be well landscaped to reduce heat island effect. Parking lot landscaping will be planted with 15-gallon trees, at a rate of one per every four parking stalls. The trees may be clustered, but a minimum of one cluster will be provided for each 100 feet of parking row. Trees will be selected and placed to provide canopy and shade for the parking lots;
- Electrical outlets will be provided in loading dock areas to provide power for trucks.; and
- All outdoor cargo handling equipment (including yard trucks, hostlers, yard goats, pallet jacks, and forklifts) would be powered by non-diesel fueled engines and all indoor forklifts would be powered by electricity.

In addition, prior to issuance of a building permit, the City of Beaumont would review and verify that the Project plans demonstrate compliance with the current version of the Building and Energy Efficiency

<sup>9</sup> The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13*, August 26, 2009).



Standards. The Project would also be required to adhere to the provisions of CALGreen, which establishes planning and design standards for sustainable site development, and energy efficiency. Construction activities would be required to monitor air quality emissions using applicable regulatory guidance such as the SCAQMD Rules.

Total GHG emissions associated with the Project are summarized in **Table 3.7-3: Project Greenhouse Gas Emissions**. Along with the emissions calculated by CALCEMOD the GHG emissions analysis in **Appendix G**, includes emissions from transport refrigeration units (TRU) and CO<sub>2</sub> sequestration associated with the planting of approximately 414 trees described in the landscape plan.

As described above, the significance of the Project’s thresholds is determined by comparing the total annual GHG emissions (including both operational and amortized construction emissions) against the SCAQMD’s recommended Tier 3 screening threshold of 3,000 MTCO<sub>2</sub>e/year for residential and commercial projects.

As discussed in **Appendix G** and reflected in this section, the Project would generate approximately 13,638.93 MTCO<sub>2</sub>e annually, including both the amortized construction emissions and operational emissions of the Project. Thus, Project-related GHG emissions would exceed the 3,000 MTCO<sub>2</sub>e per year threshold.

**Table 3.7-3: Project Greenhouse Gas Emissions**

Emissions Source	MTCO <sub>2</sub> e per Year	
	Unmitigated	Mitigated
Construction Amortized Over 30 Years	47.60	47.60
Area Source	0.03	0.03
Energy	3,642.47	3,585.64 <sup>1</sup>
Mobile	8,631.96	8,427.66 <sup>2</sup>
Transport Refrigeration Units	68.79	68.79
Off-road	376.03	376.03
Waste	273.38	273.38
Water and Wastewater	608.30	490.28 <sup>3</sup>
CO <sub>2</sub> Sequestration from Trees	-9.63	-9.63
<b>Total</b>	<b>13,638.93</b>	<b>13,259.79</b>
<i>Threshold of Significance</i>	<i>3,000</i>	<i>3,000</i>
<b>Exceeds Threshold?</b>	<b>Yes</b>	<b>Yes</b>
1. 2019 Building Energy Efficiency Standards improve upon the 2016 Energy Standards used by CalEEMod as default. 2. Mitigation Measure AQ-3 (refer to the Projects Air Quality Assessment) requires implementation of a TDM program. 3. Energy savings from water conservation resulting from the Green Building Code Standards for indoor water use and California Model Water Efficient Landscape Ordinance for outdoor water use are not included in CalEEMod. These are regulatory measures have been incorporated into the CalEEMod mitigation module. Source: CalEEMod version 2016.3.2. Refer to <b>Appendix G</b> for model outputs.		

As shown in **Table 3.7-3**, the majority of the Project's GHG emissions (9,076.78 MTCO<sub>2</sub>e or 66 percent) are associated with non-construction related mobile sources (i.e., 8,631.96 MTCO<sub>2</sub>e from trucks, 68.79 MTCO<sub>2</sub>e from transport refrigeration units, and 376.03 MTCO<sub>2</sub>e from off-road equipment utilizing the warehouse).

Mitigation Measures (MM) AQ-1 through AQ-6 are identified in the Project's Air Quality Assessment to reduce mobile source emissions. MM AQ-1 requires the implementation of a Transportation Demand Management (TDM) program to reduce single-occupant vehicle trips and encourage transit. MM AQ-2 requires electrical hookups at all loading bays and MMAQ-3 prohibits idling when engines are not in use. Additionally, MM AQ-4 promotes the use of alternative fuels and clean fleets. MMs AQ-5 and AQ-6 require the use of model year 2010 trucks or newer and require electric vehicle charging stations and infrastructure be provided. These mitigation measures are incorporated in the GHG emissions shown in **Table 3.7-3** under the "Mitigated" column and would reduce GHG emissions by reducing the number of employee vehicles on-site, reducing the amount of time trucks spend idling, and replacing older trucks with newer models. While implementation of these mitigation measures would reduce mobile emissions to 8,427.66 MTCO<sub>2</sub>e per year (and total GHG emissions to 13,259.79 MTCO<sub>2</sub>e per year), the Project's emissions would still exceed the 3,000 MTCO<sub>2</sub>e per year threshold. Additional mitigation to further reduce these emissions is not feasible.

Additional mitigation to reduce the Project's mobile emissions is not feasible due to the limited ability of the City of Beaumont to address emissions resulting from trucks, cars, and/or emissions generated by these trucks outside of the City's limits. As with all land use projects, the Project's mobile and transportation-related GHG emissions are a function of two parameters: emissions control technology and vehicle miles traveled (VMT).

CARB is directly responsible for regulating mobile and transportation source emissions in the State. Regarding the first parameter, California addresses emissions control technology through a variety of legislation and regulatory schemes, including the state's Low Carbon Fuel Standard (Executive Order S-01-07) ("LCFS"), a regulatory program designed to encourage the use of cleaner low-carbon transportation fuels in California, encourage the production of those fuels, and therefore, reduce GHG emissions and decrease petroleum dependence in the transportation sector. The regulatory standards are expressed in terms of the "carbon intensity" of gasoline and diesel fuel and their substitutes. Different types of fuels are evaluated to determine their "life cycle emissions" which include the emissions associated with producing, transporting, and using the fuels. Each fuel is then given a carbon intensity score, and compared against a declining carbon intensity benchmark for each year. Providers of transportation fuels must demonstrate that the mix of fuels they supply for use in California meets these declining benchmarks for each annual compliance period. In 2018, CARB approved amendments to the LCFS, which strengthened the carbon intensity benchmarks through 2030 to ensure they are in-line with California's 2030 GHG emission reduction target enacted through SB 32. This ensures that the transportation sector is meeting its obligations to achieve California's GHG reduction targets. The state is also implementing legislation and regulations to address the second parameter affecting transportation-related GHG emissions by controlling for VMT. Examples of this include SB 375, which links land use and transportation funding and provides one incentive for regions to achieve reductions in VMT, and SB 743, which discourages VMT increases for passenger cartrips above a region-specific benchmark. However, the state

has determined that VMT regulations are not applicable to heavy trucks, such as those that would utilize the proposed Project and generate the majority of the Project's GHG emissions.

As such, the City of Beaumont has no regulatory control over emissions control technology and therefore limited ability to control or mitigate emissions associated with truck emissions associated with this Project.

Additional mitigation to further reduce the Project's non-mobile emissions is also not feasible. The Project's PDFs already address non-mobile emissions to the extent possible, by designing buildings to provide environmental design features, incorporate energy and water conservation measures, and provide electrical, heating, ventilation, lighting, and power systems that meet CALGreen Standards with LEED. Further, they require landscaping to reduce health island effect, tree planting, non-diesel fueled cargo handling equipment, etc.

The reliance on carbon offsets to reduce either the Project's mobile or non-mobile emissions is also not feasible, as no local programs are available that would meet CEQA's criteria for a valid mitigation measure. To reduce emissions, purchased offset credits must be genuine, quantifiable, additional and verifiable. Even offset credits purchased from CARB-approved offset project registries have been determined to not adequately assure that purchased offset credits accurately and reliably represent actual emissions reductions, or cannot guarantee that such reductions are additional to any reduction that would occur under business-as-usual operations and reductions required by law. Such offsets have been determined to not comply with CEQA's definition of a valid mitigation measure. See *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467.

The City of Beaumont, the lead agency for the Project and the entity responsible for enforcing any mitigation measures incorporated into the Project and relied upon to reduce impacts to a less than significant level, has no enforcement authority over offset credits that fund carbon reduction projects outside of the City. Many offset credits "sell" reductions in emissions generated outside of California, which may not be genuine or verifiable. International offsets are even more difficult to verify, guarantee and enforce. Even CARB does not have enforcement authority over such reductions, let alone the City of Beaumont. Thus, the purchase of offset credits is not a feasible mitigation measure to reduce the emissions impact of the proposed Project.

Thus, despite the incorporation of all feasible mitigation measures, GHG emissions generated by the Project would be significant.

#### **Standard Conditions and Requirements**

**SC GHG-1** Require construction equipment to turn off when not in use per Title 13 of the California Code of Regulations, § 2449.

**SC GHG-2** In accordance with California Title 24 Standards, buildings will be designed to have 15 percent of the roof area "solar ready" that will structurally accommodate later installation of rooftop solar panels. If future building operators pursue providing rooftop solar panels, they will submit plans for solar panels prior to occupancy.

- SC GHG-3** Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls and sensors for landscaping according to the City's Water Efficient Landscape Requirements (§ 17.06.030 of the City's Municipal Code).
- SC GHG-4** Design buildings to be water-efficient. Install water-efficient fixtures in accordance with § 5.303 of the California Green Building Standards Code Part 11.
- SC GHG-5** Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with § 5.408.1 of the California Green Building Standards Code Part 11.
- SC GHG-6** Provide storage areas for recyclables and green waste and adequate recycling containers located in readily accessible areas in accordance with § 5.410.1 of the California Green Building Standards Code Part 11.
- SC GHG-7** Provide designated parking for any combination of low-emitting, fuel efficient and carpool/van pool vehicles. At least eight percent of the total parking spaces are required to be designated in accordance with § 5.106.5.2, Designated Parking for Clean Air Vehicles, of the California Green Building Standards Code Part 11.
- SC GHG-8** Provide at least six percent of the total parking spaces to facilitate future installation of electric vehicle supply equipment in accordance with § 5.106.5.3.2, Multiple Charging Space Requirements, of the California Green Building Standards Code Part 11.
- SC GHG-9** Limit idling time for commercial vehicles to no more than five minutes per Title 13 of the California Code of Regulations, Section 2485.

### **Mitigation Measures**

Refer to MMs AQ-1 through AQ-6 in **Section 3.2: Air Quality**.

**Level of Significance: Significant and Unavoidable Impact.** No additional feasible mitigation measures are available that can reduce impacts to less than significant. As explained above, the Project incorporates all feasible mitigation measures that could be implemented to further reduce the Project's GHG emissions below the 3,000 MTCO<sub>2</sub>e threshold. There are no additional measures available that would further reduce emissions because the majority of the Project's emissions come from mobile sources which are regulated by the State and not the City of Beaumont. Further, for the reasons discussed above, the purchase of offset credits is not feasible, as no local programs exist, and those offset registries that are available would not meet CEQA's definition of a verifiable, enforceable, and therefore, valid, mitigation measure. Impacts would remain significant and unavoidable.

**Impact 3.7-2: *Would the Project conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions?***

***Level of Significance: Significant and Unavoidable Impact***

## SUSTAINABLE BEAUMONT: THE CITY’S ROADMAP TO GREENHOUSE GAS REDUCTIONS (CLIMATE ACTION PLAN)

The City approved Sustainable Beaumont (Climate Action Plan) in 2015, which serves as a long-term plan for achieving sustainability by utilizing resources effectively and reducing GHG emissions. By using energy more efficiently, harnessing renewable energy to power buildings, recycling waste, and enhancing access to sustainable transportation modes, the City can keep dollars in the local economy, create new green jobs, and improve community quality of life. The goals outlined in the Climate Action Plan are shown in **Table 3.7-4: City of Beaumont, Sustainable Beaumont Plan (Climate Action Plan) Consistency**. As shown in **Table 3.7-4**, the Project would not conflict with the goals in the Climate Action Plan.

**Table 3.7-4: City of Beaumont, Sustainable Beaumont Plan (Climate Action Plan) Consistency**

SBCOG Goals	Compliance
GOAL 1: Increase energy efficiency in existing residential units.	N/A: This is not a residential project therefore this goal is not applicable.
GOAL 2: Increase energy efficiency in new residential development.	N/A: This is not a residential project therefore this goal is not applicable.
GOAL 3: Increase energy efficiency in existing commercial units.	N/A: The Project Site is undeveloped; therefore, this goal is not applicable.
GOAL 4: Increase energy efficiency in new commercial development.	Consistent: Project is required to comply with the provisions of the California Building Energy Efficiency Standards and the Green Building Standards Code (CALGreen) and would incorporate solar or other renewable energy sources.
GOAL 5: Increase energy efficiency through water efficiency.	Consistent: The Project would incorporate low flow appliances and water-efficient landscaping.
GOAL 6: Decrease energy demand through reducing urban heat island effect.	Consistent: The Project would incorporate light-colored materials to reduce heat absorption.
GOAL 7: Decrease GHG emissions through reducing vehicle miles traveled.	Consistent: The Project would incorporate a Transportation Design Management program.
GOAL 8: Decrease GHG emissions through reducing solid waste generation.	Consistent: The Project would comply with AB 939 and will divert at least 50 percent of solid waste from landfills.
GOAL 9: Decrease GHG emissions through increasing clean energy use.	Consistent: Project is required to comply with the provisions of the California Building Energy Efficiency Standards and the Green Building Standards Code (CALGreen) and would incorporate solar or other renewable energy sources.
GOAL 10: Decrease GHG emissions from new development through performance standards	N/A: The City has not implemented the GHG Screening Table.
Source: City of Beaumont, Sustainable Beaumont: The City’s Roadmap to Greenhouse Gas Reductions, October 2015.	

## SCAG RTP/SCS CONSISTENCY

On September 3, 2020, SCAG’s Regional Council adopted Connect SoCal (2020 RTP/SCS). The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS embodies a collective vision for the region’s future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. SCAG’s RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15.

The RTP/SCS contains over 4,000 transportation projects, ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs and replacement bridges. These future investments were included in county plans developed by the six county transportation commissions and seek to reduce traffic bottlenecks, improve the efficiency of the region’s network, and expand mobility choices for everyone. The RTP/SCS is an important planning document for the region, allowing project sponsors to qualify for federal funding.

The plan accounts for operations and maintenance costs to ensure reliability, longevity, and cost-effectiveness. The RTP/SCS is also supported by a combination of transportation and land use strategies that help the region achieve state GHG emissions reduction goals and FCAA requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry, and utilize resources more efficiently. GHG emissions resulting from development-related mobile sources are the most potent source of emissions, and therefore Project comparison to the RTP/SCS is an appropriate indicator of whether the Project would inhibit the post-2020 GHG reduction goals promulgated by the state. The Project’s consistency with the RTP/SCS goals is analyzed in detail in **Table 3.7-5: Regional Transportation Plan/Sustainable Communities Strategy Consistency**.

**Table 3.7-5: Regional Transportation Plan/Sustainable Communities Strategy Consistency.**

SCAG Goals	Compliance
GOAL 1: Encourage regional economic prosperity and global competitiveness.	N/A: This is not a project-specific policy and is therefore not applicable. However, the Project is located on a vacant site and development of the site would contribute to regional economic prosperity.
GOAL 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	Consistent: Although this Project is not a transportation improvement project, the Project is located near existing transit routes on SR-60.
GOAL 3: Enhance the preservation, security, and resilience of the regional transportation system.	N/A: This is not a transportation improvement project and is therefore not applicable.
GOAL 4: Increase person and goods movement and travel choices within the transportation system.	N/A: This is not a transportation improvement project and is therefore not applicable. However, the Project includes a warehouse use that would support goods movement.

SCAG Goals	Compliance
GOAL 5: Reduce greenhouse gas emissions and improve air quality.	Consistent: The Project is located within an urban area in proximity to existing truck routes and freeways. Location of the project within a developed area would reduce trip lengths, which would reduce GHG and air quality emissions.
GOAL 6: Support healthy and equitable communities	Consistent: Although the Project exceeds regional thresholds for NO <sub>x</sub> , the Project does not exceed localized thresholds. Based on the Friant Ranch decision, projects that do not exceed the SCAQMD's LSTs would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and result in no criteria pollutant health impacts.
GOAL 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.	N/A: This is not a project-specific policy and is therefore not applicable.
GOAL 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	N/A: This is not a project-specific policy and is therefore not applicable.
GOAL 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	N/A: The Project involves development of a warehouse and does not include housing.
GOAL 10: Promote conservation of natural and agricultural lands and restoration of habitats.	N/A: This Project is located on previously disturbed land and is not located on agricultural lands.
Source: Southern California Association of Governments, <i>Regional Transportation Plan/Sustainable Communities Strategy</i> , 2020.	

The goals stated in the RTP/SCS were used to determine consistency with the planning efforts previously stated. As shown in **Table 3.7-5**, the Project would be consistent with the stated goals of the RTP/SCS and the CARB Scoping Plan. Therefore, the Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's post-2020 mobile source GHG reduction targets.

### Consistency with the CARB Scoping Plan

The California State Legislature adopted AB 32 in 2006. AB 32 focuses on reducing GHGs (CO<sub>2</sub>, CH<sub>4</sub>, NO<sub>x</sub>, HFCs, PFCs, and SF<sub>6</sub>) to 1990 levels by the year 2020. Pursuant to the requirements in AB 32, CARB adopted the *Climate Change Scoping Plan* (CCSP) in 2008, which outlines actions recommended to obtain that goal. The CCSP provides a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as the cap-and-trade program, and an AB 32 implementation fee to fund the program. As shown in **Table 3.7-6: Project Consistency with Applicable CARB Scoping Plan Measures**, the Project is consistent with most of the strategies, while others are not applicable to the Project.

The 2017 CCSP Update identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the first update to the CCSP in 2013. Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these actions to reduce GHG emissions will be

adopted as required to achieve statewide GHG emissions targets. As such, impacts related to consistency with the Scoping Plan would be less than significant.

**Table 3.7-6: Project Consistency with Applicable CARB Scoping Plan Measures**

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
Transportation	California Cap-and-Trade Program Linked to Western Climate Initiative	Regulation for the California Cap on GHG Emissions and Market-Based Compliance Mechanism October 20, 2015 (CCR 95800)	<b>Consistent.</b> The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers. However, the regulation indirectly affects people who use the products and services produced by these industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.
	California Light-Duty Vehicle GHG Standards	Pavley I 2005 Regulations to Control GHG Emissions from Motor Vehicles Pavley I 2005 Regulations to Control GHG Emissions from Motor Vehicles	<b>Consistent.</b> This measure applies to all new vehicles starting with model year 2012. The Project would not conflict with its implementation as it would apply to all new passenger vehicles purchased in California. Passenger vehicles, model year 2012 and later, associated with construction and operation of the Project would be required to comply with the Pavley emissions standards.
		2012 LEV III California GHG and Criteria Pollutant Exhaust and Evaporative Emission Standards	<b>Consistent.</b> The LEV III amendments provide reductions from new vehicles sold in California between 2017 and 2025. Passenger vehicles associated with the site would comply with LEV III standards.
	Low Carbon Fuel Standard	2009 readopted in 2015. Regulations to Achieve GHG Emission Reductions Subarticle 7. Low Carbon Fuel Standard CCR 95480	<b>Consistent.</b> This measure applies to transportation fuels utilized by vehicles in California. The Project would not conflict with implementation of this measure. Motor vehicles associated with construction and operation of the Project would utilize low carbon transportation fuels as required under this measure.
	Regional Transportation-Related GHG Targets.	SB 375. Cal. Public Resources Code §§ 21155, 21155.1, 21155.2, 21159.28	<b>Consistent.</b> The Project would provide development in the region that is consistent with the growth projections in the RTP/SCS.
	Goods Movement	Goods Movement Action Plan January 2007	<b>Not applicable.</b> The Project does not propose any changes to maritime, rail, or intermodal facilities or forms of transportation.
	Medium/Heavy-Duty Vehicle	2010 Amendments to the Truck and Bus Regulation, the Drayage Truck Regulation and	<b>Consistent.</b> This measure applies to medium and heavy-duty vehicles that operate in the state. The Project would not conflict with implementation of this measure. Medium and heavy-duty vehicles associated with construction and operation of the



Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
		the Tractor-Trailer GHG Regulation	Project would be required to comply with the requirements of this regulation.
	High-Speed Rail	Funded under SB 862	<b>Not applicable.</b> This is a statewide measure that cannot be implemented by a project applicant or Lead Agency.
Electricity and Natural Gas	Energy Efficiency	Title 20 Appliance Efficiency Regulation	<b>Consistent.</b> The Project would not conflict with implementation of this measure. The Project would comply with the latest energy efficiency standards.
		Title 24 Part 6 Energy Efficiency Standards for Residential and Non-Residential Building	
		Title 24 Part 11 California Green Building Code Standards	
	Renewable Portfolio Standard/Renewable Electricity Standard.	2010 Regulation to Implement the Renewable Electricity Standard (33% 2020)	<b>Consistent.</b> The Project would obtain electricity from the electric utility, Southern California Edison (SCE). In 2020 SCE obtained 42.6 percent of its power supply from renewable sources, including large hydroelectric projects. Therefore, the utility would provide power when needed on site that is composed of a greater percentage of renewable sources.
	Million Solar Roofs Program	SB 350 Clean Energy and Pollution Reduction Act of 2015 (50% 2030)	
Million Solar Roofs Program	Tax Incentive Program	<b>Consistent.</b> This measure is to increase solar throughout California, which is being done by various electricity providers and existing solar programs. The program provides incentives that are in place at the time of construction.	
Water	Water	Title 24 Part 11 California Green Building Code Standards	<b>Consistent.</b> The Project would comply with the CalGreen standards, which requires a 20 percent reduction in indoor water use. The Project would also comply with the City's Water-Efficient Landscaping Regulations (Chapter 28, Article IV of the Fontana Municipal Code).
		SBX 7-7—The Water Conservation Act of 2009	
		Model Water Efficient Landscape Ordinance	
Green Buildings	Green Building Strategy	Title 24 Part 11 California Green Building Code Standards	<b>Consistent.</b> The State is to increase the use of green building practices. The Project would implement required green building strategies through existing regulation that requires the Project to comply with various CalGreen requirements. The Project includes sustainability design features that support the Green Building Strategy.
Industry	Industrial Emissions	2010 CARB Mandatory Reporting Regulation	<b>Not applicable.</b> The Mandatory Reporting Regulation requires facilities and entities with more than 10,000 MTCO <sub>2</sub> e of combustion and process emissions, all facilities belonging to certain industries, and all electric power entities to submit an annual GHG emissions data report directly to CARB. As shown above, although total Project GHG emissions would exceed 10,000 MTCO <sub>2</sub> e, the majority of these emissions are from mobile sources. Therefore, this regulation would not apply.

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
Recycling and Waste Management	Recycling and Waste	Title 24 Part 11 California Green Building Code Standards	<b>Consistent.</b> The Project would not conflict with implementation of these measures. The Project is required to achieve the recycling mandates via compliance with the CALGreen code. The City has consistently achieved its state recycling mandates.
		AB 341 Statewide 75 Percent Diversion Goal	
Forests	Sustainable Forests	Cap and Trade Offset Projects	<b>Not applicable.</b> The Project is in an area designated for urban uses. No forested lands exist on-site.
High Global Warming Potential	High Global Warming Potential Gases	CARB Refrigerant Management Program CCR 95380	<b>Consistent.</b> The regulations are applicable to refrigerants used by large air conditioning systems and large commercial and industrial refrigerators and cold storage system. The Project would not conflict with the refrigerant management regulations adopted by CARB.
Agriculture	Agriculture	Cap and Trade Offset Projects for Livestock and Rice Cultivation	<b>Not applicable.</b> The Project Site is designated for urban development. No grazing, feedlot, or other agricultural activities that generate manure occur currently exist on-site or are proposed to be implemented by the Project.
Source: California Air Resources Board, <i>California's 2017 Climate Change Scoping Plan</i> , November 2017 and CARB, <i>Climate Change Scoping Plan</i> , December 2008.			

As seen in **Tables 3.7-5, 3.7-6, and 3.7-7**, the Project would be consistent with all applicable plan goals. In addition, the Project would include several sustainable design features that would help reduce GHG emissions and are discussed below. As shown in **Table 3.7-3**, with mitigation, and the PDFs, the Project is estimated to emit approximately 13,259.79 MTCO<sub>2</sub>e per year directly from on-site activities and indirectly from off-site motor vehicles.

As discussed above, the Project includes PDFs that would help to reduce GHG emissions. Some of the PDFs included to reduce energy consumption also would reduce GHG production. PDFs that would directly result in a reduction of GHG production include the following:

- Buildings would be designed to provide CALGreen Standards with LEED features for potential certification and would employ energy and water conservation measures in accordance with such standards. This includes design considerations related to the building envelope; heating, ventilating, and air conditioning; lighting; and power systems;
- Surface parking lots would be well landscaped to reduce heat island effect. Parking lot landscaping would be planted with 15-gallon trees, at a rate of one per every four parking stalls. The trees may be clustered, but a minimum of one cluster will be provided for each 100 feet of parking row. Trees would be selected and placed to provide canopy and shade for the parking lots;
- Electrical outlets would be provided in loading dock areas to provide power for trucks; and
- All outdoor cargo handling equipment (including yard trucks, hostlers, yard goats, pallet jacks, and forklifts) would be powered by non-diesel fueled engines and all indoor forklifts would be powered by electricity.

Regarding goals for 2050 under Executive Order S-3-05, at this time it is not possible to quantify the emissions savings from future regulatory measures, as they have not yet been developed; nevertheless, it can be anticipated that operation of the proposed Project would benefit from the implementation of

current and potential future regulations (e.g., improvements in vehicle emissions, SB 100/renewable electricity portfolio improvements, etc.) enacted to meet an 80 percent reduction below 1990 levels by 2050.

The majority of the GHG reductions from the Scoping Plan would result from continuation of the Cap-and-Trade regulation. AB 398 (2017) extends the State's Cap-and-Trade program through 2030 and the Scoping Plan provide a comprehensive plan for the state to achieve its GHG targets through a variety of regulations enacted at the state level. Additional reductions are achieved from electricity sector standards (i.e., utility providers to supply 60 percent renewable electricity by 2030 and 100 percent renewable by 2045), doubling the energy efficiency savings at end uses, additional reductions from the LCFS, implementing the short-lived GHG strategy (e.g., hydrofluorocarbons), and implementing the Mobile Source Strategy and Sustainable Freight Action Plan.

Several of the State's plans and policies would contribute to a reduction in mobile source emissions from the Project. These include the CARB's Advanced Clean Truck Regulation, Executive Order N-79-20, CARB's Mobile Source Strategy, CARB's Sustainable Freight Action Plan, and CARB's Emissions Reduction Plan for Ports and Goods Movement. CARB's Advanced Clean Truck Regulation in June 2020 requiring truck manufacturers to transition from diesel trucks and vans to electric zero-emission trucks beginning in 2024. By 2045, every new truck sold in California is required to be zero-emission. The Advanced Clean Truck Regulation accelerates the transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8. Therefore, the Project would also benefit from implementation of CARB's Advanced Clean Truck Regulation, which would reduce future GHG emissions from trucks.

Executive Order N-79-20 establishes the goal for all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, will be zero-emission by 2035 and all medium and heavy-duty vehicles will be zero-emission by 2045. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment "requiring increasing volumes" of new zero emission vehicles (ZEVs) "towards the target of 100 percent."

CARB's Mobile Source Strategy which includes increasing ZEV buses and trucks and their Sustainable Freight Action Plan which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks. This Plan applies to all trucks accessing the Project site and may include existing trucks or new trucks that are part of the statewide goods movement sector. CARB's Emissions Reduction Plan for Ports and Goods Movement identifies measures to improve goods movement efficiencies such as advanced combustion strategies, friction reduction, waste heat recovery, and electrification of accessories. While these measures are not directly applicable to the Project, any commercial activity associated with goods movement would be required to comply with these measures as adopted. As such, the Project would not interfere with their implementation.

The Project would not obstruct or interfere with efforts to increase ZEVs or state efforts to improve system efficiency. As discussed above, MMs AQ-1 through AQ-6 as identified in the Project's Air Quality Assessment would reduce mobile source emissions and would support the State's transition to ZEVs by requiring electrical hookups at all loading bays, promoting the use of alternative fuels and clean fleets,

requiring the use of 2010 model year trucks or newer, requiring electric vehicle charging stations and/or infrastructure to support the future installation of truck charging stations. The Project would also benefit from implementation of the State programs for ZEVs and goods movement efficiencies that reduce future GHG emissions from trucks.

In conclusion, the Project does not conflict with the applicable plans that are discussed above and therefore with respect to this particular threshold, the Project does not have a significant impact. However, despite plan consistency, the Project's GHG emissions would exceed the significance threshold of 3,000 MTCO<sub>2</sub>e per year despite the implementation of MMs AQ-1 through AQ-6, and thus could impede California's statewide GHG reduction goals for 2030 and 2050. Thus, this impact would be significant.

### **Mitigation Measures**

Refer to MMs AQ-1 through AQ-6 in the Air Quality Assessment.

**Level of Significance: Significant and Unavoidable Impact.** No additional feasible mitigation measures are available that can reduce impacts to less than significant. As discussed in Impact 3.7-1, above, the Project includes all feasible mitigation that could be implemented to reduce emissions to below the 3,000 MTCO<sub>2</sub>e threshold. Impacts would remain significant and unavoidable.

## **3.7.5 SIGNIFICANT UNAVOIDABLE IMPACTS**

With implementation of the Project, significant unavoidable impacts would occur in the following areas despite the implementation of the Mitigation Program:

- The Project would generate significant impacts from GHG emissions and would exceed SCAQMD's threshold of 3,000 MTCO<sub>2</sub>e per year despite the implementation of MMs AQ-1 to AQ-6; and
- The Project would conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions.

## **3.7.6 CUMULATIVE IMPACTS**

### **CUMULATIVE SETTING**

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

### **CUMULATIVE IMPACTS**

It is generally the case that an individual project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. As discussed above, the Project-related GHG emissions would exceed the 3,000 MTCO<sub>2</sub>e threshold of significance, despite implementation of MMs AQ-1 through AQ-6 and could impede statewide 2030 and 2050 GHG

emission reduction targets. As such, the Project would result in a potentially significant cumulative GHG impact.

### **Mitigation Measures**

Refer to MMs AQ-1 through AQ-6 in the Air Quality Assessment.

**Level of Significance: Significant and Unavoidable Impact.** No additional feasible mitigation measures are available that can reduce impacts to less than significant.

### **3.7.7 REFERENCES**

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