

MEMORANDUM

DATE: September 23, 2021

To: Patrick Sauls, AICP, Environmental Project Manager, Krazan & Associates, Inc.

FROM: Amy Fischer, Principal
Ronald Brugger, Senior Air Quality Specialist

SUBJECT: Air Quality and Greenhouse Gas Analysis for the Proposed HP Hood Cold Storage and Packaging Project, Sacramento, California

INTRODUCTION

This Air Quality and Greenhouse Gas Analysis for the proposed HP Hood Cold Storage and Packaging Project (project) in the City of Sacramento (City) has been prepared using methods and assumptions recommended in the Sacramento Metro Air Quality Management District's (SMAQMD) *Guide to Air Quality Assessment in Sacramento County*¹. This analysis includes a description of existing regulatory framework, an assessment of project construction and operation-period air quality emissions, and an assessment of greenhouse gas (GHG) emissions. Measures to reduce or eliminate significant impacts are identified, where appropriate.

PROPERTY LOCATION

The approximate 27.15-acre subject site is currently owned by HP Hood LLC and is located at 8430 Belvedere Avenue in the City of Sacramento, California. The subject site is located at the southwest corner of Belvedere Avenue and Safeway Distribution Driveway. As shown in Figure 1 (all figures are included in Attachment A), it is surrounded by industrial properties to the north, south, east, and west. The nearest sensitive receptors are single family homes approximately 2,800 feet to the west along Merced Avenue.

PROJECT DESCRIPTION

HP Hood LLC is proposing the new construction of a 108,500-square-foot cold storage facility and associated site improvements on their 27.15-acre existing industrial site, as shown in Figure 2. The boundary of the overall property will not be changed. The 100 foot tall proposed expansion building would begin operations in September 2023 and include an automated storage & retrieval system (AS/RS) warehouse, low bay truck dock, additional truck dock expansion offices, employee and

¹ Sacramento Metro Air Quality Management District, 2009. Revised April 2021. *Guide to Air Quality Assessment in Sacramento County*. December. Website: www.airquality.org/businesses/ceqa-land-use-planning/ceqa-guidance-tools (accessed August 2021).

utility areas, blow molding expansion, and wastewater treatment. Proposed site improvements include an additional 41 covered car parking spaces, landscaping, and a new on-site access road between the parking lot expansion and Safeway Distribution Driveway to the north. Existing on-site fire pump, storage tank and trash compactors would be relocated to alternative on-site locations to accommodate the new construction. The new cold storage building would require a deviation from current zoning building height requirements. The site is currently zoned Light Industrial Solid Waste Restricted Overlay (M-1S-SWR).

ENVIRONMENTAL SETTING

Air Quality Background

Both State and Federal governments have established health-based Ambient Air Quality Standards for six criteria air pollutants:² carbon monoxide (CO), ozone (O₃), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), lead (Pb), and suspended particulate matter (PM). In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Long-term exposure to elevated levels of criteria pollutants may result in adverse health effects. However, emission thresholds established by an air district are used to manage total regional emissions within an air basin based on the air basin's attainment status for criteria pollutants. These emission thresholds were established for individual projects that would contribute to regional emissions and pollutant concentrations and could adversely affect or delay the projected attainment target year for certain criteria pollutants.

Because of the conservative nature of the thresholds and the basin-wide context of individual project emissions, there is no direct correlation between a single project and localized air quality-related health effects. One individual project that generates emissions exceeding a threshold does not necessarily result in adverse health effects for residents in the project vicinity. This condition is especially true when the criteria pollutants exceeding thresholds are those with regional effects, such as ozone precursors like nitrogen oxides (NO_x) and reactive organic compounds (ROC).

Occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals, and nursing and convalescent homes are considered to be more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease. Persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality. Residential areas are considered more sensitive to air quality conditions, compared to commercial and industrial areas, because people generally spend longer periods of time at their residences, with greater associated exposure to ambient air quality conditions. Recreational uses are also considered sensitive compared to commercial and industrial uses due to greater exposure to ambient air quality conditions associated with exercise.

² United States Environmental Protection Agency (USEPA), 2014. Criteria pollutants are defined as those pollutants for which the Federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations in order to protect public health.

Air quality monitoring stations are located throughout the nation and maintained by the local air districts and State air quality regulating agencies. Data collected at permanent monitoring stations are used by the USEPA to identify regions as “attainment” or “nonattainment” depending on whether the regions meet the requirements stated in the applicable National Air Quality Standards (NAAQS). Nonattainment areas are imposed with additional restrictions as required by the USEPA. In addition, different classifications of attainment, such as marginal, moderate, serious, severe, and extreme, are used to classify each air basin in the State on a pollutant-by-pollutant basis. The classifications are used as a foundation to create air quality management strategies to improve air quality and comply with the NAAQS.

The California Air Resources Board (CARB) has divided California into 15 regional air basins according to topographic drainage features, geographic features, and meteorological features for the purpose of managing the air resources of the State on a regional basis. Each air district establishes significance thresholds, which are used to manage total regional and local emissions within an air basin. Significance thresholds are based on whether or not the air basin has met State and federal ambient air quality standards (AAQS) for criteria pollutants. These emission thresholds were established for individual development projects that would contribute to regional and local emissions and could adversely affect or delay the Air Basin’s projected attainment target goals for nonattainment criteria pollutants.

Sacramento County is within the Sacramento Valley Air Basin (SVAB), which includes all of Butte, Colusa, Glenn, Placer, Sacramento, Shasta, Solano, Sutter, Tehama, Yolo, and Yuba counties. The SVAB is comprised of nine air pollution control districts (APCDs) or Air Quality Management Districts (AQMDs) which are county governing authorities that have primary responsibility for controlling air pollution from stationary sources within their jurisdiction. The nine air districts within the SVAB include the Butte County AQMD, the Colusa County APCD, the Feather River County AQMD, the Glenn County APCD, the Placer County APCD, the Sacramento Metropolitan AQMD, the Shasta County AQMD, the Tehama County APCD, and the Yolo-Solano AQMD.

The attainment statuses for each of the criteria pollutants for the SMAQMD are listed in Table A.

Table A: Sacramento Metropolitan AQMD Attainment/Nonattainment Classification Summary

Pollutant	Averaging Time	California Standards		National Standards	
		Concentration	Attainment Status	Concentration	Attainment Status
Ozone	8 hour	0.070 ppm	Nonattainment	0.070 ppm	Nonattainment
	1 hour	0.09 ppm (180 µg/m ³)	Nonattainment	-	-
Carbon Monoxide	8 hour	9.0 ppm (10 mg/m ³)	Attainment	9.0 ppm (10 m/m ³)	Attainment
	1 hour	20.0 ppm (23 mg/m ³)	Attainment	35.0 ppm (40 µg/m ³)	Attainment
Nitrogen Dioxide	annual average	0.030 ppm (56 µg/m ³)	Attainment	53 ppb	Unclassifiable/ Attainment
	1 hour	0.18 ppm	Attainment	100 ppb	Unclassifiable/

Table A: Sacramento Metropolitan AQMD Attainment/Nonattainment Classification Summary

Pollutant	Averaging Time	California Standards		National Standards	
		Concentration	Attainment Status	Concentration	Attainment Status
		(338 µg/m ³)			Attainment
Sulfur Dioxide	24 hour	0.04 ppm (105 µg/m ³)	Attainment	Revoked	-
	1 hour	0.25 ppm (655 µg/m ³)	Attainment	75 ppb	Attainment/ Unclassifiable
Particulate Matter (PM ₁₀)	annual arithmetic mean	20 µg/m ³	Nonattainment	Revoked	Attainment
	24 hour	50 µg/m ³	Nonattainment	150 µg/m ³	Attainment
Particulate Matter (PM _{2.5})	annual arithmetic mean	12 µg/m ³	Attainment	12 µg/m ³	Attainment
	24 hour	-	-	35 µg/m ³	Nonattainment
Sulfates	24 hour	25 µg/m ³	Attainment	-	-
Lead	30 day average	1.5 µg/m ³	Attainment	-	-
	rolling 3-month average	-	-	0.15 µg/m ³	Attainment
Hydrogen Sulfide	1 hour	30 ppb	Unclassified	-	-
Vinyl Chloride	24 hour	10 ppb	Unclassified	-	-
Visibility Reducing Particles	8 hour (1000 to 1800 PST)	0.23 per kilometer	Unclassified	-	-

Source: SMAQMD (2021). Website: airquality.org/Air-Quality-Health/Air-Quality-Pollutants-and-Standards/

The primary pollutants of concern in the SMAQMD are O₃, PM₁₀, and PM_{2.5} as the SMAQMD area is designated as nonattainment under State or federal AAQS standards for these pollutants. The SMAQMD is either in attainment or unclassified for all other State and federal standards.³

Pollutant monitoring results for the years 2018 to 2020 at the Sacramento-1309 T Street and Sacramento-Bercut Drive ambient air quality monitoring stations (the two closest monitoring stations to the project site) indicate that air quality in the project area has generally been good, with the exception of PM₁₀. The monitoring results indicated PM₁₀ levels exceeded the State standard 22 days in 2018, 24 days in 2019, and 42 days in 2020; the federal PM₁₀ standards were exceeded 6 days in 2018, one day in 2019, and none in 2020. PM_{2.5} levels exceeded the federal standard three days in 2018, none in 2019, and 8 days in 2020. The State 1-hour ozone standard was exceeded one or two days each year between 2018 and 2020, and the federal 8-hour ozone standard was exceeded one or three days each year between 2018 and 2020. The CO, SO₂, and NO₂ standards were also not exceeded in this area between 2018 and 2020.

³ A region is determined to be unclassified when the data collected from the air quality monitoring stations do not support a designation of attainment or nonattainment, due to lack of information, or a conclusion cannot be made with the available data.

Greenhouse Gas and Global Climate Change Background

Greenhouse gases (GHGs) are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO₂);
- Methane (CH₄);
- Nitrous oxide (N₂O);
- Hydrofluorocarbons (HFCs);
- Perfluorocarbons (PFCs); and
- Sulfur Hexafluoride (SF₆).

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, which is believed to be causing global warming. While manmade GHGs include naturally-occurring GHGs such as CO₂, CH₄, and N₂O, some gases, like HFCs, PFCs, and SF₆ are completely new to the atmosphere.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of Global Warming Potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere (“atmospheric lifetime”). The GWP of each gas is measured relative to CO₂, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO₂ over a specified time period. GHG emissions are typically measured in terms of pounds or metric tons of “CO₂ equivalent” (CO₂e), which is the sum of all GHGs.

Regulatory Framework

Air quality and GHG standards and the regulatory framework are discussed below.

Federal Regulations

At the federal level, the USEPA has been charged with implementing national air quality programs. USEPA air quality mandates are drawn primarily from the Federal Clean Air Act (FCAA), which was enacted in 1963. The FCAA was amended in 1970, 1977, and 1990.

The United States has historically had a voluntary approach to reducing GHG emissions. However, on April 2, 2007, the United States Supreme Court ruled that the USEPA has the authority to regulate CO₂ emissions under the federal Clean Air Act. While there currently are no adopted federal regulations for the control or reduction of GHG emissions, the USEPA commenced several actions in 2009 to implement a regulatory approach to global climate change. This includes the 2009 USEPA final rule for mandatory reporting of GHGs from large GHG emission sources in the United States. Additionally, the USEPA Administrator signed an endangerment finding action in 2009 under the Clean Air Act, finding that six GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, SF₆) constitute a threat to public health and welfare, and that the combined emissions from motor vehicles cause and contribute to global climate change, leading to national GHG emission standards.

California Air Resources Board

The CARB is the State's "clean air agency." The CARB's goals are to attain and maintain healthy air quality, protect the public from exposure to toxic air contaminants, and oversee compliance with air pollution rules and regulations. CARB is also the lead agency for implementing climate change regulations in the State. Since its formation, the CARB has worked with the public, the business sector, and local governments to find solutions to California's air pollution problems. Key efforts by the State are described below.

Assembly Bill 2588 Air Toxics "Hot Spots" Information and Assessment Act. Under Assembly Bill (AB) 2588, stationary sources of air pollutants are required to report the types and quantities of certain substances their facilities routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, identify facilities having localized impacts, determine health risks, and notify nearby residents of significant risks.

The California Air Resources Board Handbook. The CARB has developed an Air Quality and Land Use Handbook⁴, which is intended to serve as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. According to the CARB Handbook, recent air pollution studies have shown an association between respiratory and other non-cancer health effects and proximity to high traffic roadways. Other studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California. The CARB Handbook recommends that county and city planning agencies strongly consider proximity to these sources when finding new locations for "sensitive" land uses such as homes, medical facilities, daycare centers, schools, and playgrounds.

⁴ CARB. 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. April.

Land use designations with air pollution sources of concern include freeways, rail yards, ports, refineries, distribution centers, chrome plating facilities, dry cleaners, and large gasoline service stations. Key recommendations in the CARB Handbook include taking steps to avoid siting new, sensitive land uses:

- Within 500 feet of a freeway, urban roads with 100,000 vehicles/day or rural roads with 50,000 vehicles/day;
- Within 1,000 feet of a major service and maintenance rail yard;
- Immediately downwind of ports (in the most heavily impacted zones) and petroleum refineries;
- Within 300 feet of any dry cleaning operation (for operations with two or more machines, provide 500 feet); and
- Within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater).

The CARB Handbook specifically states that its recommendations are advisory and acknowledges land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues.

The recommendations are generalized and do not consider site-specific meteorology, freeway truck percentages, or other factors that influence risk for a particular project site. The purpose of this guidance is to further examine project sites for actual health risk associated with the location of new sensitive land uses.

Assembly Bill 32 (2006), California Global Warming Solutions Act. California's major initiative for reducing GHG emissions is Assembly Bill (AB) 32, passed by the State legislature on August 31, 2006. This effort aimed at reducing GHG emissions to 1990 levels by 2020. In 2019, statewide GHG emissions were 418.2 million metric tons (MMT) CO₂e, almost 13 MMT CO₂e below the 2020 GHG Limit of 431 MMT CO₂e. AB 32 requires the CARB to prepare a Scoping Plan that outlines the main State strategies for meeting the 2020 deadline and to reduce GHGs that contribute to global climate change. The Scoping Plan was approved by CARB on December 11, 2008, and contains the main strategies California will implement to achieve the reduction of approximately 169 MMT of CO₂e, or approximately 30 percent, from the State's projected 2020 emission level of 596 MMT of CO₂e under a business-as-usual scenario (this is a reduction of 42 MMT CO₂e, or almost 10 percent from 2002-2004 average emissions). The Scoping Plan also includes CARB-recommended GHG reductions for each emissions sector of the State's GHG inventory. The Scoping Plan calls for the largest reductions in GHG emissions to be achieved by implementing the following measures and standards:

- Improved emissions standards for light-duty vehicles (estimated reductions of 31.7 MMT CO₂e);
- The Low-Carbon Fuel Standard (15.0 MMT CO₂e);

- Energy efficiency measures in buildings and appliances and the widespread development of combined heat and power systems (26.3 MMT CO₂e); and
- A renewable portfolio standard for electricity production (21.3 MMT CO₂e).

The Scoping Plan identifies 18 emission reduction measures that address cap-and-trade programs, vehicle gas standards, energy efficiency, low carbon fuel standards, renewable energy, regional transportation-related GHG targets, vehicle efficiency measures, goods movement, solar roof programs, industrial emissions, high-speed rail, green building strategies, recycling, sustainable forests, water, and air. The measures would result in a total reduction of 174 MMT CO₂e by 2020.

On August 24, 2011, the CARB unanimously approved both the new supplemental assessment and reapproved its Scoping Plan, which provides the overall roadmap and rule measures to carry out AB 32. The CARB also approved a more robust CEQA equivalent document supporting the supplemental analysis of the cap-and-trade program. The cap-and-trade took effect on January 1, 2012, with an enforceable compliance obligation that began January 1, 2013.

The CARB approved the First Update to the Climate Change Scoping Plan on May 22, 2014. The First Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. The First Update defines CARB climate change priorities until 2020, and sets the groundwork to reach long-term goals set forth in Executive Orders S-3-05 and B-16-2012. The Update highlights California's progress toward meeting the "near-term" 2020 GHG emission reduction goals as defined in the initial Scoping Plan. It also evaluates how to align the State's "longer-term" GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan,⁵ to reflect the 2030 target set by Executive Order B-30-15 and codified by Senate Bill (SB) 32.

Senate Bill 375 (2008). Signed into law on October 1, 2008, SB 375 supplements GHG reductions from new vehicle technology and fuel standards with reductions from more efficient land use patterns and improved transportation. Under the law, the CARB approved GHG reduction targets in February 2011 for California's 18 federally designated regional planning bodies, known as Metropolitan Planning Organizations (MPOs). The CARB may update the targets every 4 years and must update them every 8 years. MPOs in turn must demonstrate how their plans, policies and transportation investments meet the targets set by the CARB through Sustainable Community Strategies (SCS). The SCS are included with the Regional Transportation Plan (RTP), a report required by State law. However, if an MPO finds that their SCS will not meet the GHG reduction target, they may prepare an Alternative Planning Strategy (APS). The APS identifies the impediments to achieving the targets.

Executive Order B-30-15 (2015). Governor Jerry Brown signed Executive Order B-30-15 on April 29, 2015, which added the immediate target of:

⁵ California Air Resources Board. 2017. *California's 2017 Climate Change Scoping Plan*. November.

- GHG emissions should be reduced to 40 percent below 1990 levels by 2030.

All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the AB 32 Scoping Plan to reflect the 2030 target, and therefore, is moving forward with the update process. The mid-term target is critical to help frame the suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure needed to continue reducing emissions.

Senate Bill 350 (2015) Clean Energy and Pollution Reduction Act. Senate Bill 350 (SB 350) signed by Governor Jerry Brown on October 7, 2015, updates and enhances AB 32 by introducing the following set of objectives in clean energy, clean air, and pollution reduction for 2030:

- Raise California's renewable portfolio standard from 33 percent to 50 percent; and
- Increasing energy efficiency in buildings by 50 percent by the year 2030.

The 50 percent renewable energy standard will be implemented by the California Public Utilities Commission for the private utilities and by the California Energy Commission for municipal utilities. Each utility must submit a procurement plan showing it will purchase clean energy to displace other non-renewable resources. The 50 percent increase in energy efficiency in buildings must be achieved through the use of existing energy efficiency retrofit funding and regulatory tools already available to State energy agencies under existing law. The addition made by this legislation requires State energy agencies to plan for, and implement those programs in a manner that achieves the energy efficiency target.

Senate Bill 32, California Global Warming Solutions Act of 2016, and Assembly Bill 197. In summer 2016 the Legislature passed, and the Governor signed, SB 32 and AB 197. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Governor Brown's April 2015 Executive Order B-30-15. SB 32 builds on AB 32 and keeps us on the path toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels, consistent with an Intergovernmental Panel on Climate Change (IPCC) analysis of the emissions trajectory that would stabilize atmospheric GHG concentrations at 450 parts per million CO₂e and reduce the likelihood of catastrophic impacts from climate change.

The companion bill to SB 32, AB 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 meant to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

Senate Bill 100. On September 10, 2018, Governor Brown signed SB 100, which raises California's renewable portfolio standard requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045.

Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Executive Order B-55-18. Executive Order B-55-18, signed September 10, 2018, sets a goal “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.” Executive Order B-55-18 directs CARB to work with relevant State agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other Statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO₂e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

In-Use Off-Road Diesel-Fueled Fleets Regulation. The In-Use Off-Road Diesel-Fueled Fleets Regulation (Off-Road Regulation) applies to all self-propelled off-road diesel vehicles 25 horsepower or greater used in California and most two-engine vehicles (except on-road two-engine sweepers). The goal of the Off-Road Regulation is to reduce PM and NO_x from in-use (existing) off-road heavy-duty vehicles in California. The Off-Road Regulation:

- Imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles;
- Requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System, [DOORS]) and labeled;
- Restricts the adding of older vehicles into fleets starting on January 1, 2014; and
- Requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing Verified Diesel Emission Control Strategies (VDECS) (i.e., exhaust retrofits).

Sacramento Metropolitan Air Quality Management District

Under the California Clean Air Act (CCAA), the SMAQMD is required to prepare a plan for air quality improvement for pollutants for which the District is nonattainment. The SMAQMD updates the plan every three years. Each SMAQMD Air Quality Attainment Plan (AQAP) is an update of the previous plan and has a 20-year horizon. The Sacramento region is classified as a severe-15 nonattainment area for the 2008 NAAQS. The SMAQMD along with the other air districts which comprise the Sacramento Federal Ozone Nonattainment Area (SFNA), developed a plan to demonstrate attainment of the 2008 8-hour NAAQS of 75 ppb by an attainment year of 2024. This plan was approved by the SMAQMD Board on August 24, 2017, and the four other air districts that comprise the SFNA (Yolo-Solano AQMD, Feather River AQMD, Placer County APCD, and El Dorado County AQMD). CARB approved the Plan on November 16, 2017.

In addition, SMAQMD provides guidance for assessing and reducing the impacts of project-specific air quality emissions in the Guide to Air Quality Assessment in Sacramento County (CEQA Guide).⁶ The CEQA Guide also developed a GHG threshold of 1,100 metric tons of CO₂e per year for project construction and a screening table for operational emissions.

Sacramento Climate Action Plan

The City adopted the City of Sacramento Climate Action Plan (CAP) on February 14, 2012 to comply with AB 32. The CAP identified how the City and the broader community could reduce Sacramento's GHG emissions and included reduction targets, strategies, and specific actions. In 2015, the City of Sacramento adopted the 2035 General Plan Update. The update incorporated measures and actions from the CAP into Appendix B, General Plan CAP Policies and Programs, of the General Plan Update. Appendix B includes all citywide policies and programs that are supportive of reducing GHG emissions. Relevant policies from the General Plan include:

LU 2.6.1 - Sustainable Development Patterns. The City shall promote compact development patterns, mixed use, and higher-development intensities that use land efficiently; reduce pollution and automobile dependence and the expenditure of energy and other resources; and facilitate walking, bicycling, and transit use.

LU 4.1.1 - Mixed-Use Neighborhoods. The City shall require neighborhood design that incorporates a compatible and complementary mix of residential and nonresidential (e.g., retail, parks, schools) uses that address the basic daily needs of residents and employees.

Additionally, Policy U 6.1.5, states that energy consumption per capita should be reduced as compared to the year 2005 and Policy ER 6.1.2 directs the City to review proposed development and incorporate feasible measures that reduce construction emissions for ROG, NO_x, and other pollutants.

THRESHOLDS OF SIGNIFICANCE

The State CEQA Guidelines indicate that a project would normally have a significant adverse air quality impact if project-generated pollutant emissions would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project is nonattainment under an applicable federal or state ambient air quality standard;
- Expose sensitive receptors to substantial pollutant concentrations; or
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

⁶ Sacramento Metropolitan Air Quality Management District, 2021. *Guide to Air Quality Assessment in Sacramento County*. December. Website: www.airquality.org/businesses/ceqa-land-use-planning/ceqa-guidance-tools (accessed August 2021).

According to the SMAQMD CEQA Guide⁷, air quality impacts may be considered significant if construction and/or implementation of the proposed project would result in the following impacts that remain significant after implementation of 2035 General Plan policies:

- Construction emissions of NO_x above 85 pounds per day;
- Operational emissions of NO_x or ROG above 65 pounds per day;
- Violation of any air quality standard or contribute substantially to an existing or projected air quality violation;
- Any increase in PM₁₀ concentrations, unless all feasible Best Available Control Technology (BACT) and Best Management Practices (BMPs) have been applied, then increases above 80 pounds per day or 14.6 tons per year;
- Any increase in PM_{2.5} concentrations, unless all feasible Best Available Control Technology (BACT) and Best Management Practices (BMPs) have been applied, then increases above 82 pounds per day or 15 tons per year;
- CO concentrations that exceed the 1-hour State ambient air quality standard (i.e., 20.0 ppm) or the 8-hour State ambient standard (i.e., 9.0 ppm); or
- Exposure of sensitive receptors to substantial pollutant concentrations.

The State *CEQA Guidelines* indicate that a project would normally have a significant adverse greenhouse gas emission impact if the project would:

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

A project is considered to have a significant effect relating to GHG emissions if the project fails to satisfy the requirements of the City's CAP.

IMPACTS AND MITIGATION MEASURES

The proposed project would release emissions over the short term as a result of construction activities, and over the long term from traffic generation and operation of the project. Emissions would include criteria air pollutants and GHG emissions. The sections below describe the proposed project's consistency with applicable air quality plans, estimated project emissions, and the significance of impacts with respect to SMAQMD thresholds.

⁷ Ibid., 2.

Air Quality Impacts

Consistency with Applicable Air Quality Plans

CEQA requires that proposed projects be analyzed for consistency with the applicable air quality plan. An air quality plan describes air pollution control strategies to be implemented by a city, county, or region classified as a non-attainment area. The main purpose of the air quality plan is to bring the area into compliance with the requirements of the federal and State ambient air quality standards. As discussed above, to bring the Sacramento Federal Ozone Nonattainment Area (SFNA) into attainment for O₃, the SMAQMD developed a plan to demonstrate attainment of the 2008 8-hour NAAQS of 75 ppb by an attainment year of 2024.

For a project to be consistent with the SMAQMD 2017 Ozone Plan, a project's direct and indirect emissions must be consistent with the policies in the 2017 Ozone Plan. Emissions are related to vehicle use, which are directly related to population because additional residents result in more vehicular use. Populations accounted for in the 2017 Ozone Plan are also accounted for in the SMAQMD emissions inventories. The proposed project would provide a new cold storage/processing facility. The proposed project does not include residential units and would not increase population projections within the County and, therefore, would be within growth forecast assumptions used in the 2017 Ozone Plan. Therefore, the project would be consistent with the 2017 Ozone Plan, would not conflict with or obstruct the implementation of the applicable air quality plan.

Criteria Pollutant Analysis

The primary pollutants of concern in the SMAQMD are O₃, PM₁₀, and PM_{2.5} as the SMAQMD area is designated as nonattainment under State or federal AAQS standards for these pollutants. The SMAQMD is either in attainment or unclassified for all other State and federal standards. The SMAQMD's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the SMAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is unnecessary. The following analysis assesses the potential project-level construction- and operation-related air quality impacts.

Short-Term Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by site preparation, grading, hauling, and building activities. Emissions from construction equipment are also anticipated and would include CO, NO_x, ROC, directly emitted particulate matter (PM_{2.5} and PM₁₀), and toxic air contaminants (TACs) such as diesel exhaust particulate matter.

Site preparation and project construction would involve grading, paving, and building activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM₁₀ emissions would vary from day to day, depending on the nature and magnitude of construction activity, local weather conditions, soil moisture, silt content of soil, and wind speed. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

The aforementioned construction activities would involve the use of diesel- and gasoline-powered equipment that would generate emissions of criteria pollutants. Because construction equipment emits relatively low levels of ROG and because ROG emissions from other construction processes (e.g., asphalt paving, architectural coatings) are typically regulated by SMAQMD, SMAQMD has not adopted a construction emissions threshold for ROG. The SMAQMD has, however, adopted a construction emissions threshold for NO_x, as discussed above.

The California Emissions Estimator Model (CalEEMod), Version 2020.4.0, was used to estimate construction emissions for the proposed project. Construction is expected to end September 2023 and using default CalEEMod construction scheduling, would start in September 2022. The proposed construction would not require any demolition and would use onsite soil for all fill. Other construction details are not yet known; therefore, default assumptions (e.g., construction fleet activities) from CalEEMod were used. CalEEMod output worksheets are included in Attachment B. Results are summarized in Table B below.

Table B: Maximum Unmitigated Project Construction Emissions

Pollutant	NO _x	PM ₁₀	PM _{2.5}
Project Emissions (lbs/day)	17	8	4
SMAQMD Threshold of Significance (lbs/day)	85	80	82
Project Emissions (tons/year)	N/A	0.1	0.1
SMAQMD Threshold of Significance (tons/year)	N/A	14.6	15

Source: CalEEMod, August 2021 (see Attachment B).

As shown in Table B, construction emissions associated with the proposed project would not exceed any of the SMAQMD’s significance thresholds.

Dust emissions during demolition and construction would create the potential to exceed locally ambient air quality standards and possibly result in nuisance complaints. Appendix B of SMAQMD’s Guide to Air Quality Assessment in Sacramento County provides recommended dust control measures that would be required as follows:

- Control of fugitive dust is required by District Rule 403 and enforced by District staff.

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.
- Provide current certificate(s) of compliance for CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [California Code of Regulations, Title 13, sections 2449 and 2449.1].

Long-Term Operational Emissions. Long-term air pollutant emission impacts are those associated with mobile sources (e.g., vehicle trips), energy sources (e.g., electricity and natural gas), area sources (e.g., architectural coatings and the use of landscape maintenance equipment), and off-road sources (e.g., forklifts) related to the proposed project.

Long-term operation emissions associated with the proposed project were calculated using CalEEMod. For purposes of evaluating the proposed project, the location in CalEEMod was specified as Sacramento Valley Air Basin and the climate zone of six was selected. Based on this climate zone, CalEEMod assumed a wind speed of 3.5 meters per second and precipitation frequency of 65 days per year. The operational year was specified to be 2023. The utility company for the region was selected as Pacific Gas & Electric Company (PG&E) and the CalEEMod default CO₂ intensity factor was 203.98 pounds per megawatt hour.

The CalEEMod analysis assumed that the overall 108,500 square feet (sf) of new buildings would be comprised of 84,500 sf of refrigerated warehouse-no rail, 8,300 sf of office space, and 15,700 sf of light industrial, with an associated 41-space parking lot. In addition, the estimated potential

increased electricity demand associated with operation of the proposed project is approximately 2,044,708 kWh per year, based on CalEEMod defaults. The proposed project’s estimated potential increased water demand is approximately 25.55 Mgal per year, based on CalEEMod defaults. Most of the equipment used for operation of the proposed project would be electric driven. Where project-specific data were not available, default assumptions from CalEEMod were used to estimate project emissions. The proposed project would not use generators.

Using the default trip rates, the proposed project would generate approximately 179 average daily trips, a mix of employee and truck trips. Mobile source emissions were evaluated using CARB’s 2017 EMFAC2017 data built into CalEEMod with the EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicles to account for the SAFE Vehicle Rule applied. Model details are shown in Attachment B.

Model results are shown in Table C below. CalEEMod output worksheets are included in Attachment B.

Table C: Project Operation Emissions (Pounds Per Day)

	ROG	NO_x	CO	SO_x	PM₁₀	PM_{2.5}
Area Sources	3	<1	<1	0	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	1	2	15	<1	3	<1
Warehouse Sources	0	0	0	0	0	0
Total Project Operation Emissions	4	3	15	<1	3	<1
SMAQMD Significance Thresholds	65	65	N/A	N/A	80	82
Exceed Threshold?	No	No	N/A	N/A	No	No

Source: LSA (August 2021)
 Note: N/A = not applicable

As shown in Table C, the proposed project would not result in operational emissions above the SMAQMD daily thresholds of significance. Additionally, the annual emissions of PM₁₀ and PM_{2.5} would be 0.5 and 0.1 tons per year, respectively. These are both well under the SMAQMD annual thresholds of significance of 14.6 and 15 tons per year, respectively.

In addition, the Project Applicant would be required to comply with CARB’s air pollution emission reduction measures for warehouses and distribution centers, including providing infrastructure for zero-emission trucks and transportation refrigeration units (TRU’s).

Energy source emissions typically result from activities in buildings for which electricity and natural gas are used. The quantity of emissions is the product of usage intensity (i.e., the amount of electricity or natural gas) and the emission factor of the fuel source. Major sources of energy demand would include the freezer/processor facility and building mechanical systems, such as heating and air conditioning and lighting. As indicated in Table C above, the proposed project would generate minimal energy source emissions and would not exceed SMAQMD’s significance thresholds.

Typically, area source emissions consist of direct sources of air emissions located at the project site, including architectural coatings and the use of landscape maintenance equipment. Area source emissions associated with the project would include emissions from the use of landscaping equipment and the use of consumer products. As shown in Table C above, the proposed project would generate minimal area source emissions and would not exceed SMAQMD's significance thresholds.

ROG and NO_x emissions associated with the project would be regional in nature, meaning that the air pollutants are rapidly dispersed on release or, in the case of vehicle emissions associated with the project; emissions are released in other areas of the SVAB (i.e., vehicles traveling to the project site would release emissions along roadways throughout the SVAB and not specifically on the project site). The results shown in Table C indicate the project would not exceed the significance criteria for daily ROG, NO_x, PM₁₀, or PM_{2.5} emissions. The Project Applicant would be required to comply with CARB's air pollution emission reduction measures for warehouses and distribution centers, including providing infrastructure for zero-emission trucks and TRU's. SMAQMD does not have significance thresholds for CO or SO_x, however as indicated in Table C, the proposed project is not expected to generate substantial CO or SO_x emissions.

Sensitive Receptors

Sensitive receptors are defined as people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling units. The closest sensitive receptors are located more than 2,800 feet from the project site.

Construction activities associated with the proposed project would generate airborne particulates and fugitive dust, as well as a small quantity of pollutants associated with the use of construction equipment (e.g., diesel-fueled vehicles and equipment) on a short-term basis. However, construction contractors would be required to implement measures to reduce or eliminate emissions by implementing SMAQMD Standard Measures. Once the project is constructed, the project would include diesel truck traffic associated with loading and unloading of products at the warehouse. However idling of trucks would be limited by the CARB's In-Use Off-Road Diesel Vehicles regulation, which limits idling to 5 minutes or less. The CARB provides analysis of distribution centers, including cold storage facilities, in the document *Air Quality and Land Use Handbook: A Community Health Perspective*.⁸ The document includes the recommendation that distribution centers should be located more than 1,000 feet from sensitive land uses. The closest sensitive receptors to the project site are located more than 2,800 feet away. The siting of the project building is within the CARB's recommended distance, and long-term operational emissions would not be expected to impact sensitive receptors. Therefore, the project would not result in the exposure of sensitive receptors to substantial pollutant concentrations.

The proposed project would result in increased concentrations of carbon monoxide (CO). New vehicle trips would add to carbon monoxide concentrations near streets providing access to the

⁸ California Air Resources Board, 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. April.

project site. Carbon monoxide is an odorless, colorless, poisonous gas whose primary source in the Sacramento Area is automobiles. Concentrations of this gas are highest near intersection of major roads. According to the SMAQMD, in general, land use development projects do not typically have the potential to result in localized concentrations of CO that expose sensitive receptors to substantial pollutant concentrations. This is because CO is predominantly generated in the form of mobile-source exhaust from vehicle trips associated with the land use development project. These vehicle trips occur throughout a paved network of roads, and, therefore, associated exhaust emissions of CO is not generated in a single location where high concentrations could be formed. The proposed project is not expected to result in a significant increase in delay at intersections in the project vicinity. Therefore, the proposed project is not expected to result in CO hot-spots that would exceed the 1-hour State ambient standard or the 8-hour State ambient standard.

Objectionable Odors

According to the SMAQMD, common types of facilities that are known producers of odors include fast food restaurants, bakeries, and coffee roasting facilities. The proposed project would not include any of these types of land uses. The proposed project would generate localized emissions of diesel exhaust during construction equipment operation and truck activity. These emissions may be noticeable from time to time near the project site; however, they would be localized and are not likely to adversely affect people off-site by resulting in confirmed odor complaints. In addition, all operational refuse would be stored in a trash enclosure. The nearest sensitive receptors are located more than 2,800 feet from the project site; therefore, the proposed project would not include any sources of significant odors that could cause complaints from surrounding uses. As such, the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Greenhouse Gas Impacts

Generate Greenhouse Gas Emissions

The following section describes the proposed project's construction and operational related GHG emissions and contribution to global climate change.

Construction GHG Emissions. Construction activities, such as site preparation, site grading, on-site heavy-duty construction vehicles, equipment hauling materials to and from the project site, and motor vehicles transporting the construction crew would produce combustion emissions from various sources. During construction of the proposed project, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO₂, CH₄, and N₂O. Furthermore, CH₄ is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

Construction GHG emissions associated with the proposed project were estimated using CalEEMod. CalEEMod output worksheets are included in Attachment B. Based on the CalEEMod results, construction of the proposed project would generate approximately 336 metric tons of CO₂e. The

SMAQMD threshold of significance for construction GHG emissions is 1,100 metric tons per year, thus the project construction emissions of GHG would be less than significant.

Operational GHG Emissions. Long-term operation of the project would generate GHG emissions from mobile, area, off-road, waste, and water sources and indirect emissions from sources associated with energy consumption. Mobile-source GHG emissions would include project-generated vehicle trips to and from the project. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site. Energy source emissions would be generated at off-site utility providers as a result of increased electricity demand generated by the project. Off-road sources include the use of forklifts and hostlers, however, these are all planned to be electric. Waste source emissions generated by the proposed project include energy generated by land filling and other methods of disposal related to transporting and managing project generated waste. In addition, water source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

Operational emissions associated with area, energy, offroad, waste, and water sources were estimated using CalEEMod and the results are presented in Table D. CalEEMod output worksheets are included in Attachment B.

Table D: Greenhouse Gas Operational Emissions

Emission Source	Operational GHG Emissions (metric tons/year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Area Sources	<1	<1	0	<1
Energy Sources	200	<1	<1	201
Mobile Sources	506	<1	<1	514
Warehouse Sources (all electric)	0	0	0	0
Waste Sources	22	1	0	54
Water Sources	20	<1	<1	46
Total Operational CO₂e Emissions				826

Source: LSA (August 2021).

Notes:

CH₄ = methane

CO₂ = carbon dioxide

CO₂e = gross climate change emissions

GHG = greenhouse gas

MT = metric tons

The proposed project would generate approximately 826 metric tons of CO₂e per year of emissions, as shown in Table D. The majority of the proposed project’s GHG emissions are associated with energy and mobile sources. Emissions estimates would be below the SMAQMD’s 1,100 MT CO₂e threshold.

Projects within Sacramento City limits would be required to adhere to reduction targets, strategies, and specific actions for reducing GHG Emissions set forth by the adopted Climate Action Plan (CAP). Consequently, the City of Sacramento does not assess potential impacts related to GHG emissions on the basis of total emissions of GHGs. Rather, the City of Sacramento has integrated a CAP into the City’s General Plan, and, thus, potential impacts related to climate change from development within the City are assessed based on the project’s compliance with the City’s adopted General Plan CAP

Policies and Programs set forth in Appendix B of the General Plan Update. The majority of the policies and programs set forth in Appendix B are citywide efforts in support of reducing overall citywide emissions of GHG. However, various policies related to new development within the City would directly apply to the proposed project. The project's general consistency with City policies that would reduce GHG emissions from buildout of the City's General Plan is discussed below.

Goal LU 2.5, Policy LU 2.5.1, and Policy LU 2.7.6 require that new urban developments should be well-connected, minimize barriers between uses, and create pedestrian-scaled, walkable areas. The project site is surrounded by existing urban development and would be considered infill development. Policy LU 1.1.4 and LU 1.1.5 seek to support infill development within the City; thus, the project would comply with both policies. In compliance with Policy LU 2.6.1 and LU 4.1.1, the project would expand an existing industrial development within the existing City's industrial areas within proximity to existing residential developments, which could allow for shorter commute trip lengths as current and future employees could continue to reside in close proximity to the project site.

The proposed project would be constructed in compliance with the California Building Standards Code (CBSC), which includes the California Building Energy Efficiency Standards and the California Green Building Code. The CBSC, and the foregoing standards and codes, increase the sustainability of new development through requiring energy efficiency and sustainable design practices (Policy ER 6.1.7). Such sustainable design would support the City's Policy U 6.1.5, which states that energy consumption per capita should be reduced as compared to the year 2005.

Policy ER 6.1.2 directs the City to review proposed development and incorporate feasible measures that reduce construction emissions for ROG, NO_x, and other pollutants. As discussed above, the proposed project would produce emissions of ROG and NO_x at a less-than-significant level. Thus, emissions related to construction of the proposed project would be in compliance with SMAQMD's thresholds of significance and Policy ER 6.1.2.

The proposed project would be consistent with the City's General Plan land use designation for the site as well as the policies discussed above that are intended to reduce GHG emissions from buildout of the City's General Plan. Thus, considering the project's consistency with the City's General Plan and the general consistency with the City's General Plan policies intended to reduce GHG emissions, the proposed project would not conflict with the City's CAP. Consequently, the proposed project would result in a less-than significant GHG emissions impact.

In addition, the State's CEQA Guidelines leaves the determination of the significance of GHG emissions up to the lead agency and authorizes the lead agency to consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence (State CEQA Guidelines Sections 15064.4(a) and 15064.7(c)). The State CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and

thresholds of significance consistent with the manner in which other impact areas are handled in CEQA.⁹

The Governor's Office of Planning and Research's Technical Advisory titled "CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act Review" states that "public agencies are encouraged but not required to adopt thresholds of significance for environmental impacts. Even in the absence of clearly defined thresholds for GHG emissions, the law requires that such emissions from CEQA projects must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact".¹⁰ Furthermore, the advisory document indicates that "in the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a 'significant impact,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice."

CONCLUSION

Based on the analysis presented above, construction of the proposed project would not result in the generation of criteria air pollutants that would exceed SMAQMD's thresholds of significance. As discussed above, the proposed project's construction emissions of criteria pollutants are estimated to be well below the emissions threshold established for the region. Operational emissions associated with the proposed project would not exceed SMAQMD's established significance thresholds for daily ROC, PM₁₀, or PM_{2.5} emissions. SMAQMD does not have significance thresholds for CO or SO_x, however as indicated above, the proposed project is not expected to generate substantial CO or SO_x emissions. The proposed project is not expected to produce significant emissions that would affect nearby sensitive receptors. The proposed project would also not result in objectionable odors affecting a substantial number of people. The proposed project would be consistent with the City's General Plan and the City's CAP, thus, would result in a less-than significant GHG emissions impact.

Attachments: A: Figures
B: CalEEMod Output Sheets

⁹ California Natural Resources Agency. 2009. California Environmental Quality Act (CEQA) Guidelines Update.

¹⁰ California Governor's Office of Planning and Research. 2008. Technical Advisory CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act Review.

ATTACHMENT A

FIGURES

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ATTACHMENT B

CALEEMOD OUTPUT SHEETS

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